River Rock Development Project
Vesting Tentative Tract Map No. 5928

Final Initial Study/Mitigated Negative Declaration and Responses to Comments

(Final IS/MND)

Lead Agency:
City of Santa Paula
Planning Department
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Santa Paula, CA 93061
Contact: Chris Williamson, AICP, Contract Planner
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Applicant:

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Prepared by:

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ENVIRONMENTAL CONSULTANTS

April 13, 2016

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Appendix A: Air Quality Worksheets

Appendix B: Biological Constraints and Jurisdictional Delineation Report, Williams Homes Santa Paula River Rock Development Project, Wildscape Restoration, December, 2014.

Appendix C: Hardison House Phase I/II Historic Resource Report, Wallace Libbey Hardison Residence 1226 Ojai Road (Tentative Tract Map 5928) San Buenaventura Research Associates, July 28, 2015.

Appendix D: Geotechnical Investigation, Tentative Tract Number 5928, 1226 Ojai Road, Santa Paula, CA, RMA GeoScience, March 12, 2014.

Appendix E: Greenhouse Gas Emissions Worksheets

Appendix F: Phase I Environmental Site Assessment, EEG Services, November 18, 2013.

Appendix G: Noise Monitoring Worksheets

Appendix H: River Rock Residential Project Traffic Impact Analysis, December 28, 2015.

Appendix I: VTTM 5928 – River Rock (1226 Ojai Road) Post Development Sewer Capacity Analysis, Southland Civil Engineering & Survey, LLP, June 12, 12014

Appendix J: Water System Study for the VTTM No. 5928 – River Rock 1226 Ojai Road, Santa Paula, California, 93060, Southland Civil Engineering & Survey, LLP, July 22, 2014

Appendix K: Architectural Package, "Hardison House, Santa Paula CA," William Hezmalhalch Architects, Inc., dated March 14, 2014.

Appendix L: Supplemental Memorandum Re: Response to Comments, River Rock Development Project Final Initial Study/Mitigated Negative Declaration (Historic Resources) San Buenaventura Research Associates, April 2016.

Appendix M: A. Comment Letters Submitted in Response to the Draft IS/MND.
B. Comment Letters Submitted in Response to the Recirculated Draft IS/MND.

1. INTRODUCTION

Clarification of Previous Circulation: November 12 to December 11, 2015

This Initial Study /Mitigated Negative Declaration (IS/MND) was posted to the City's website and distributed for public review and comment between November 12 and December 11, 2015. However, the required proper notice was not in the local newspaper. The IS/MND was revised and ~~is being~~ recirculated for a 30-day public review period with all required noticing. ~~**Persons or agency representatives who commented on the earlier version should either: 1) submit new comments, or 2) state that their previous comments are to be considered, again, for this public comment process.**~~

This Final IS/MND is printed in double-underline (additions) strikeout (deletions) text to track any substantive changes that have occurred to the document or analysis since the Draft and Recirculated Draft IS/MNDs were published. Written responses to the comment submitted on the Draft IS/MND have been incorporated and are provided in Section 4 of this report. Written responses to the comment submitted on the Recirculated Draft IS/MND are provided in Section 5. Please note these sections have been added in their entirety and are not shown in redline/strikeout text. Copies of the comment letters are provided in Appendix L to this report.

1. Project Title:	River Rock Development Project
2. Lead Agency:	City of Santa Paula 970 Ventura Street Santa Paula, CA 93061
3. Lead Agency Contact:	City of Santa Paula Planning Department Chris Williamson, Contract Planner (805) 933-4214 x 251
4. Project Location:	1226 Ojai Road (Hardison House) Santa Paula, CA 93060 APN: 100-0-040-015
5. Project Applicant:	Williams Homes, Inc. 21080 Centre Pointe Pkwy, Suite 101 Santa Clarita, CA 91350 Contact: Carl Steinberg, Vice President, Community Development (661) 222-9207
6. General Plan Designation:	Hillside Residential
7. Zoning Designation:	HR 2-PD (Hillside Residential 2PD, 0-3 du/ac)

8. Project Summary: The Project Site consists of a 19.28-acre property and is currently improved with four buildings; the "Hardison House" residence constructed in 1884, a stable/barn constructed in 1885, a secondary small residence built circa 1910, and a residence/garage built circa 1920. The Project Applicant is proposing to redevelop the Project Site by retaining the Hardison House in place and relocating the

barn/garage to be its garage; developing 53 new homes, two common area lots, and four streets on the lower half of the site; and retaining the 9.5 acre hillside common area lot in its native vegetation state for a total of 57 lots and 54 homes. The Project requires the demolition of the two other vacant existing structures. The Hardison House main residence and barn/stable are recognized as historic resources and the future owner will be required to maintain the property appropriately. Approximately 52 percent of the overall Project Site will be retained as open space to be maintained by a homeowners association. The Project entitlements are approval of Vesting Tentative Tract Map 5928, a Planned Development Permit, and approval of 53 Growth Management Allocations.

9. Environmental Factors Potentially Affected: The environmental factors checked below are potentially affected by this Project, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

☑	Aesthetics	☑	Greenhouse Gas Emissions	☑	Population and Housing
☐	Agriculture/Forest Resources	☑	Hazards and Hazardous Materials	☑	Public Services
☑	Air Quality	☑	Hydrology/Water Quality	☑	Recreation
☑	Biological Resources	☑	Land Use and Planning	☑	Transportation/Traffic
☑	Cultural Resources	☐	Mineral Resources	☑	Utilities/Service Systems
☑	Geology/Soils	☑	Noise	☑	Mandatory Findings of Significance

10. Environmental Determination: On the basis of this initial evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☑ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the Project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Chris Williamson	CONTRACT PLANNER	805-933-4244 x 251
Signature	**Title**	**Phone**

11. Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the

statement is substantiated

7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9. The explanation of each issue should identify:

   a. The significance criteria or threshold, if any, used to evaluate each question; and

   b. The mitigation measure identified, if any, to reduce the impact to less than significant.

CUMULATIVE IMPACTS

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such*

plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence.

For purposes of this analysis, the cumulative impacts were assessed based on the project's consistency with regional and local planning documents including, but not limited to the City of Santa Paula General Plan, the Santa Paula Municipal Code, the Santa Paula Potable Water System Master Plan, and the Ventura County Air Quality Management Plan and the pending projects that have been identified in these planning documents. In addition to the use of the applicable regional and local adopted planning documents, a list of potential projects located in the surrounding area ("related projects") that might be developed or under construction within the study time frame was obtained from the City of Santa Paula Public Works Department during the scoping process for the traffic impact study. Recently published traffic studies and environmental reports for development projects in the area were also reviewed. Related projects from these sources and within an approximate three‑mile radius of the Project site were included. Refinement of the information resulted in a total of 12 related projects in the surrounding area that could add traffic to the study intersections. The locations of the related projects are shown on Figure 10, Related Projects Location Map, of the Project Traffic Study (see Attachment E of Appendix H to this Recirculated Draft MND).

Table 1-1
Related Project List

Project	Address	Description
1. East Area 1[1]	Hallock Dr. and E. Telegraph Rd.	East Area 1 Specific Plan
2. East Area 2/Gateway[2]	Hallock Dr. and SR-126	30,000 sf Shopping Ctr. Business
3. Ben Park	250 Dove Ct.	20,000 sf General Light Industrial
4. Senior Apartments	125 South Oak Street	8 DU (Senior Adult Housing)
5. Santa Paula Airport	1170 Montebello Stret	37 DU (Condominium)
6. Single Family Homes	Santa Paula St. and Cemetery Rd.	8 DU (Single Family Homes)
7. Single Family Homes	Foothill Rd. and Peck Rd.	70 DU (Single Family Homes)
8. Light Industrial	106 Calavo Street	36,000 sf General Light Industrial
9. Apartments	327 Acacia Rd.	6 DU (Apartments)
10. Santa Maria Street Industrial Park	324 W. Santa Maria Street	571,370 sf (Industrial Park)
11. Vista del Rio Tract	Cornell Dr. and Steckel Drive	86 DU Single Family Homes 103 DU (Apartments)
12. Water Recycling Plant (Phase 2) [3]	957 Calpipe Road	30,000 sf manufacturing

Notes:
du = Dwelling unit; ksf = Thousand square feet of gross floor area.
Trip generation estimates are based on the ITE Trip Generation Manual (9th Edition, 2012) unless noted otherwise.
[1] Source: Draft Transportation Analysis Report East Area 1 Specific Plan (Fehr & Peers, May 2014). The buildout year for the project is 2025 and, based on a discussion with the project's environmental consultant, only a small portion of the first phase of development (approximately 100 residential dwelling units, with ancillary uses) is expected to be constructed and occupied by 2018. Thus, only 10 percent of this total site trip generation was assumed to be added to the City street system by 2018.
[2] Source: Current project trip generation provided in the Draft Transportation Analysis Report East Area 1 Specific Plan (Fehr & Peers, May 2014). The buildout year for the project is 2020 and, based on a discussion with the project's environmental consultant, little to none of the development is expected to be constructed and occupied by 2018. Still, to be conservative, 10 percent of this total site trip generation was assumed to be added to the City street system by 2018.

[3] Source: Calpipe Manufacturing Facility Traffic Impact Study (Hansen Associates, August 2011).
Source: (Table) Crain & Associates, River Rock Residential Project Traffic Analysis December 28, 2015.

2. PROJECT DESCRIPTION

Location

The Project Site is located on a 19.28-acre property at 1226 Ojai Road, in Santa Paula, California, 93060. The Assessor Parcel Number (APN) for the Project Site is 100-0-040-015. The Project Site is bordered by a private road and single-family residential properties to the north, Ojai Road to the east, single-family residential properties to the south, and an undeveloped hillside to the west. A Project Location Map is provided in Figure 2.1 at the end of this Section.

Regionally, the city of Santa Paula (City) is located in Ventura County, California. The foothills of the Los Padres National Forest are to the north and the Pacific Ocean is 14 miles to the west. The Project Site is approximately 1.7 miles north of State Highway 126. Access to the Project Site is directly available from a driveway on the west side of Ojai Road (State Route 150), which is improved as a two-lane north-south trending highway in the vicinity of the Project Site.

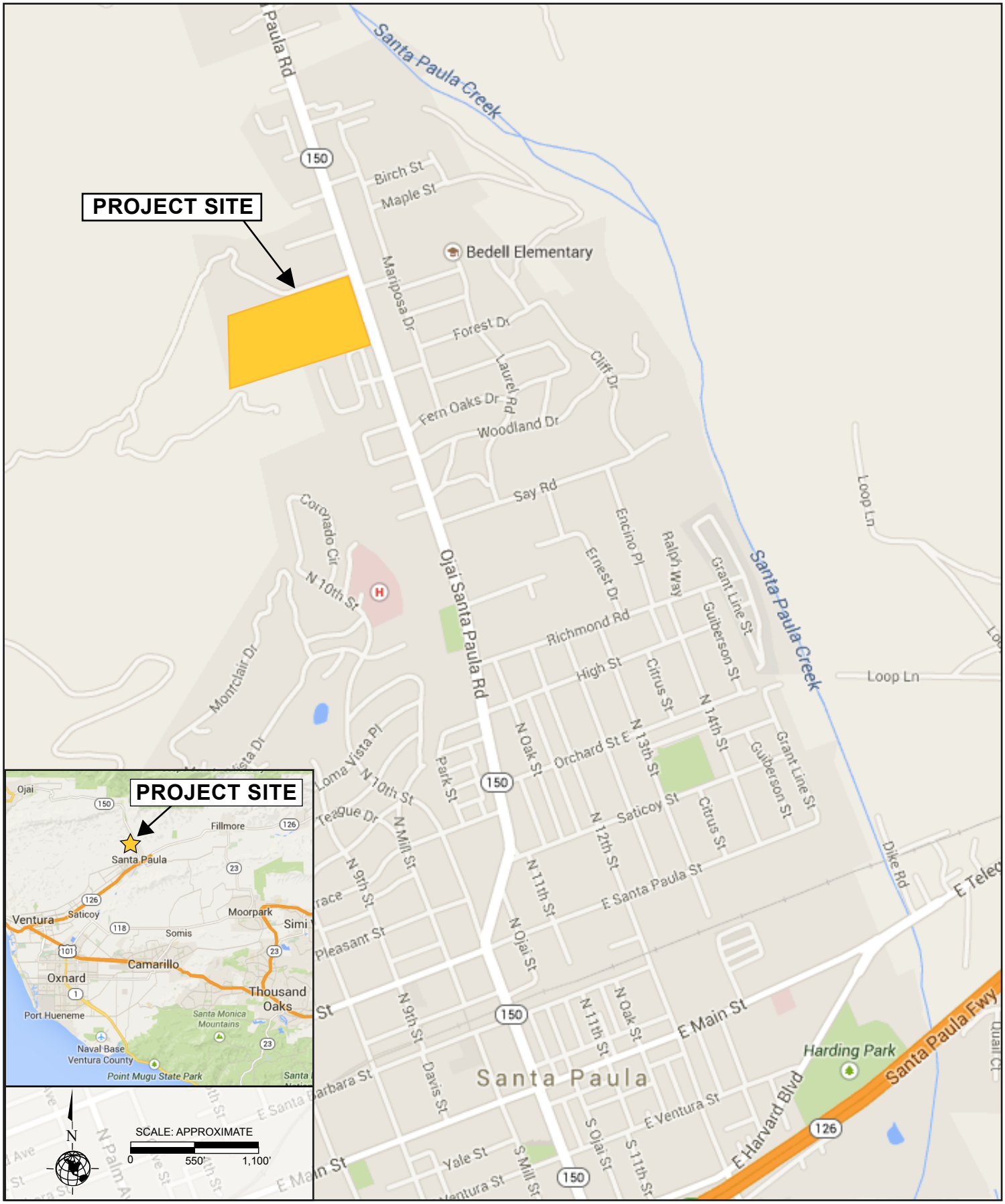
General Plan and Zoning Designation

The existing General Plan land use designation for the Project Site is Hillside Residential. The zoning designation is HR 2-PD (Hillside Residential 2PD, 0-3 du/ac). Based on the allowable density of 0-3 units per acre, the 19.28- acre site would permit 57 single-family dwelling units. A map exhibit showing the existing General Plan and Zoning designations for the Project Site and surrounding areas is shown in Figure 2.2 on page 7.

Existing Conditions

The Project Site consists of a 19.28-acre property that is currently improved with four buildings; the W.L. Hardison House - a residence constructed in 1884 ("Hardison House"), a barn/stable, a secondary small residence, and a residence/garage. The eastern half of the property is relatively level and has been surface graded. As shown in Figure 2.3, Aerial Photograph and Photograph Location Map, the western half of the property is undeveloped and is characterized by a 30–50 percent slope covered with dense coastal sage scrub vegetation. The Project Site and four structures are currently unoccupied.

Representative photographs depicting the current condition on the Project Site are shown in Figure 2.4, Photographs of the Project Site. The Project Site is minimally visible from the residential neighborhood to the south. As shown in Figure 2.4, Photographs of the Project Site, views from Fuschia Lane are blocked by the vegetation at the end of the cul-de-sac and no structures or features on the Project Site are visible. In View 2, taken from Marigold Lane looking north towards the Project Site, the existing barn/stable structure is visible behind existing vegetation. The barn/stable and the main residence are prominently visible from the cul-de-sac of Poppy Lane, looking north. From Ojai Road, the Project Site and structures within the site are clearly visible from the street. The Project Site is bound by a chain link



Source: Google Map, 2014.

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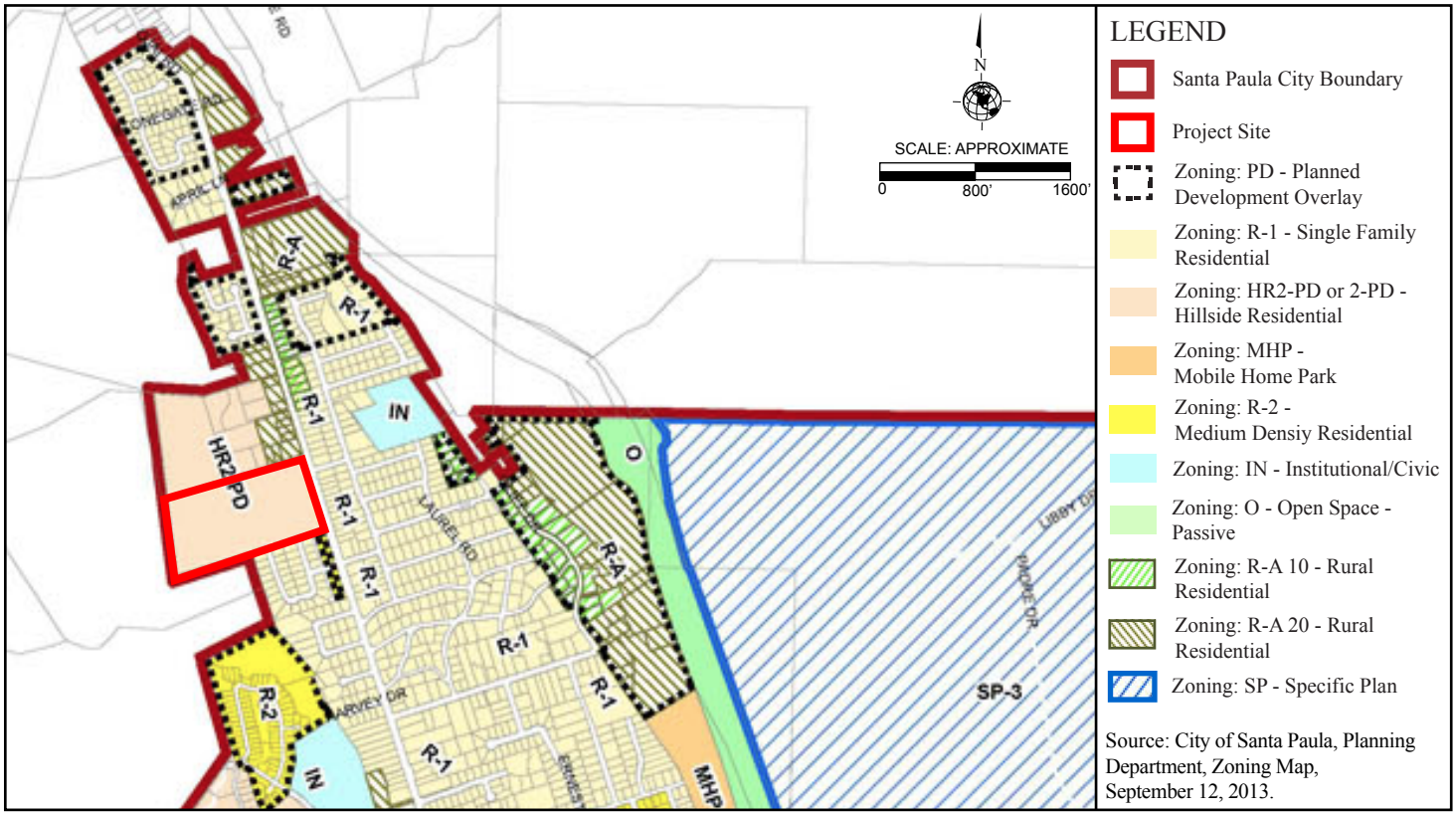
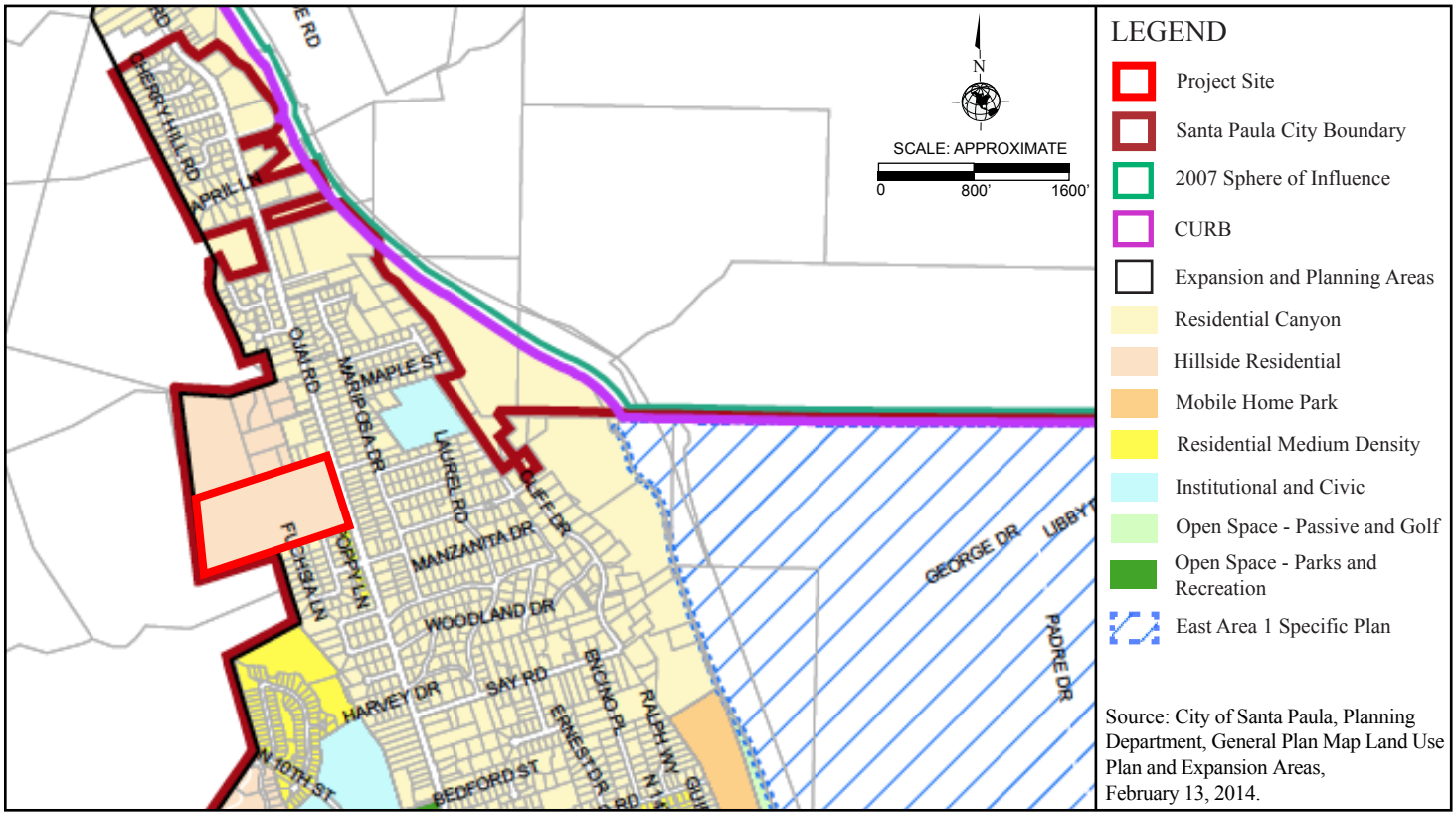
Figure 2.1
Project Location Map

Zoning Designations



General Plan Land Use Designations



Source: Parker Environmental Consultants, 2014.

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Figure 2.2
Existing Zoning and General Plan Land Use Designations

Source: Google Earth Map, December 9, 2013.

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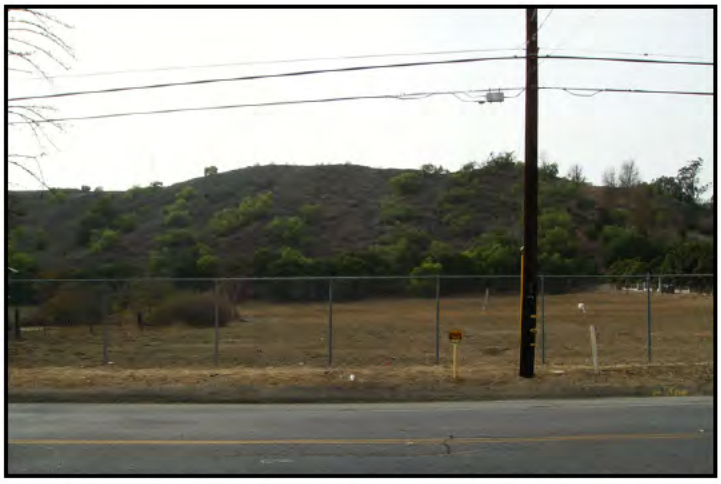
Figure 2.3
Aerial View of the Project Site

View 1: From the north end of Fuchsia Lane, looking north toward the Project Site.

View 2: From the north end of Marigold Lane, looking north toward the Project Site.

View 3: From the north end of Poppy Lane, looking northwest at the Project Site.

View 4: From the east side of Ojai Road (CA SR-150), looking northwest at the Project Site.



View 5: From the east side of Ojai Road (CA SR-150), looking west at the Project Site.

View 6: From the road that borders the Project Site to the north, looking south at the Project Site.

Source: Parker Environmental Consultants, 2014

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Figure 2.4
Photographs of the Project Site
Views 1-6

fence and the landscaping in the front of the structures and across most of the eastern half of the site is minimal (see Views 5 and 6). From the residential areas to the north, the few structures within the Project Site are clearly visible (see View 6). The open space areas of the lower eastern portion of the Project Site, about 7.5 acres) were previously used as an orchard and pasture.

Surrounding Land Uses

The surrounding land uses include agriculture/open space, Fagan Canyon, and rising hillsides to the west and residential properties to the east, south, and north. Representative photographs depicting the current condition of the properties surrounding the Project Site are shown in Figure 2.5, Photographs of the Surrounding Land Uses. Views 7 and 8 depict the residential character of the neighborhood immediately south of the Project Site. Views 9, 10 and 11 depict the character of the residential neighborhood along Ojai Road in the immediate vicinity of the Project Site. View 12 depicts the current easterly views of the private driveway that borders the Project Site to the north.

Proposed Project

The Project Applicant is proposing to redevelop the Project Site to provide a new residential subdivision with approximately 54 residential lots including 53 new homes and the retention of the existing Hardison House and barn/stable. The Proposed Project will require the demolition of two small existing structures on site. The Hardison House, will be retained on site in its current location and the barn/stable relocated and restored for future use as the Hardison House two-car garage. Approximately 9.18 acres of the Project Site will be retained as open space on lots designated as A through D on the proposed Vesting Tentative Tract Map 5928.

The Project will also include the construction of associated access roads, a debris basin, and an unpaved recreational trail on the sloped northwestern side of the property. The proposed Site Plan is depicted in Figure 2.6. Illustrative building cross sections and elevations are shown in Figure 2.7, Building Cross Section and Line-of-Sight Elevations.

Cross Sectional Views

As shown in Figure 2.7, Section A-A depicts the cross sectional view of lots 33 and 34 on the southeast corner of the Project Site with Ojai Road and the adjacent single-family homes on the east side of Ojai Road. Due to the rising elevation of the Project Site, the proposed homes on lots 33 and 34 are elevated above the sidewalk and are screened from public view by a perimeter block wall. The second story of the homes are visible from the pedestrian level of both sides of Ojai Road.

Section B-B depicts the cross sectional view across lot 28 located on the south side of the Project Site abutting the homes on Marigold Lane. As shown in Section B-B, due to the natural difference in grade elevation, the pad level of the proposed home sites is approximately 14 feet higher than the grade level of the existing homes on Marigold Lane. Proposed Lots 24 to 34 are buffered from the adjacent residences by a 2-foot high retaining wall and a five-foot privacy wall with a five-foot wide

View 7: From the south end of Fuchsia Lane, looking north along Fuchsia Lane.

View 8: From the south end of Marigold Lane looking, north along Marigold Lane.

View 9: From the east side of Ojai Road (CA SR-150), looking southwest at the properties south of the Project Site.

View 10: From the west side of Ojai Road (CA SR-150), looking northeast at the properties on the east side of Ojai Road.

View 11: From the west side of Ojai Road (CA SR-150), looking southeast at the properties on the east side of Ojai Road.

View 12: From the west end of the road that borders the Project Site to the north, looking east along the road.

Source: Parker Environmental Consultants, 2014

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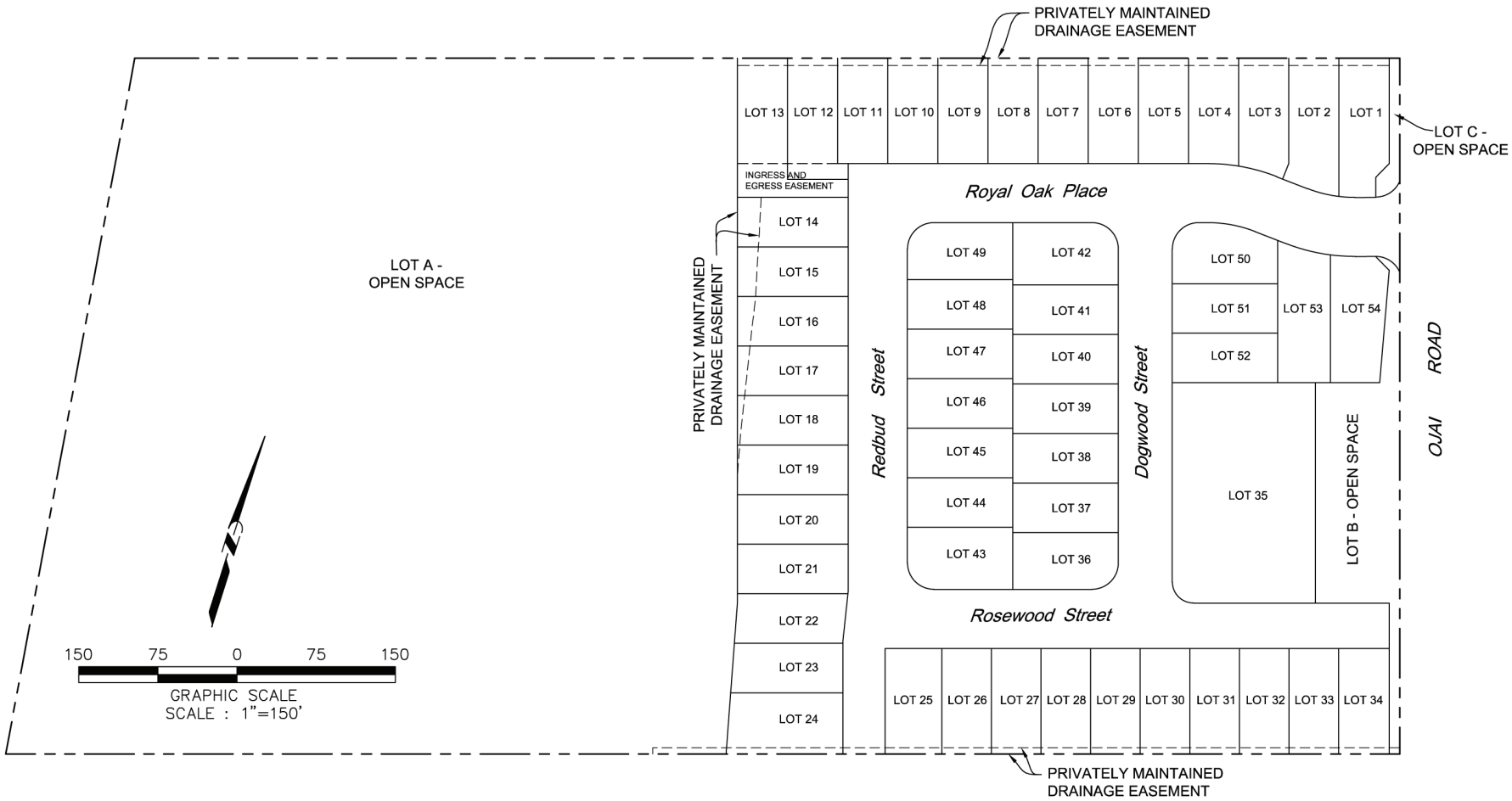
Figure 2.5
Photographs of the Surrounding Land Uses
Views 7-12



Source: Southland Civil Engineering and Survey, LLP, May 2015.

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Figure 2.6a
Proposed Site Plan

Source: Southland Civil Engineering and Survey, LLP, May 2015.

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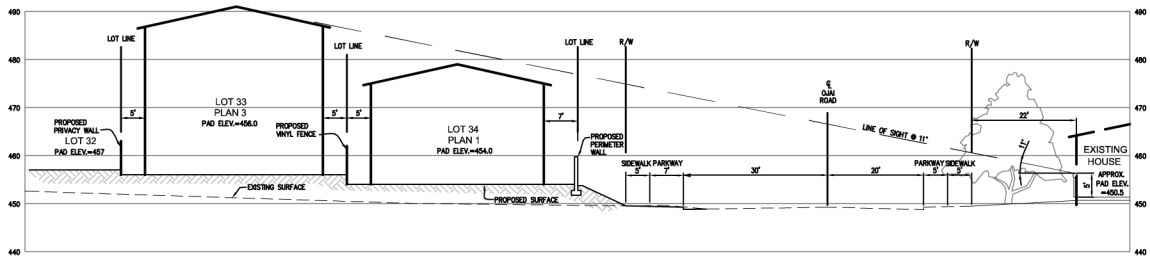
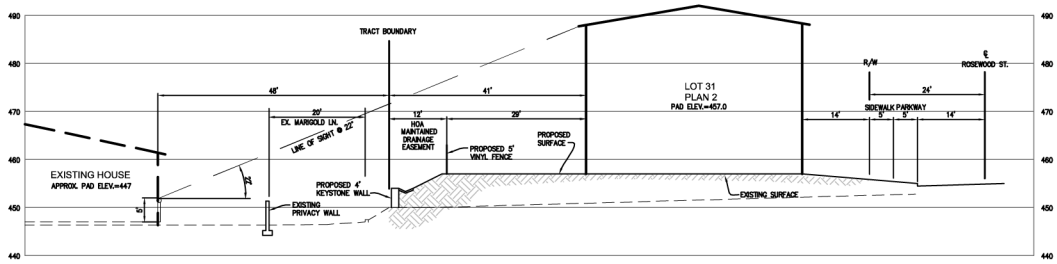
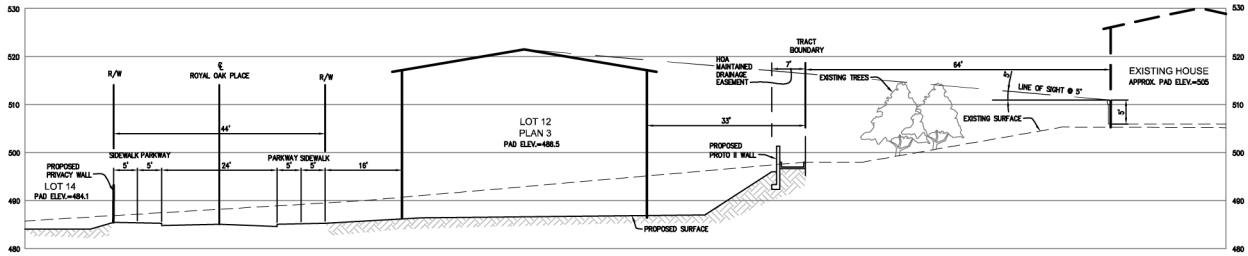
Figure 2.6b
Proposed Illustrative Site Plan



SECTION A-A
NOT TO SCALE



SECTION B-B
NOT TO SCALE



SECTION C-C
NOT TO SCALE

Source: Southland Civil Engineering and Survey, May 2015.

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Figure 2.7
Cross Sections and Line-of Sight Elevations

variable width drainage easement. The proposed homes are set back approximately 41 feet from the property line and are set back proximately 75 feet from the existing residences on Marigold, Poppy, and Fuschia Lanes.

Section C-C depicts the cross sectional view of lot 12 along the north side of the Project Site. As shown in this cross sectional exhibit, the Project Site is lower than the adjacent grade to the north and the pad elevation of the proposed home sites are approximately 19 feet lower than the pad elevation of the nearest residences to the north. Proposed Lots 1 to 13 are buffered from the adjacent properties with a 6- foot wide HOA maintained drainage easement and approximate 5-foot high perimeter wall for privacy. The proposed homes are set back 36 feet from the northern property line, which would provide approximately 100 feet of separation between the proposed homes and the nearest residential home to the north.

Architectural renderings depicting the three design styles are presented in Figures 2.8 (Plan A Front Elevation), 2.9 (Plan B Front Elevation), and 2.10 (Plan C Front Elevation), respectively. As shown in Figures 2.9 through 2.10, the Applicant is proposing three distinct architectural styles to be compatible in style and density with the surrounding residential land uses, and specifically Tract 2128 that is located directly to the south of the Project Site. The architecture also pays homage to the Hardison House as well as the Oaks Community located to the east, across Ojai Road. The proposed Project will provide three unique floor plans ranging from 1,800 square feet to 2,500 square feet, including a single-story residence. The architectural styles include a Craftsman, a Spanish, and a third style denoted the "Hardison House style" which blends elements from American Farmhouse and ltalianate Victorian. Detailed floor plans, cross sectional elevations, color schemes and compatible imagery are provided in Appendix K.

Access and Circulation

Primary vehicular access to the Proposed Project will be provided by way of a full-access residential roadway that will intersect with the west side of Ojai Road (State Route 150) opposite Royal Oaks Place. As noted on the Vesting Tract Map, the internal streets would provide access and circulation through the tract on four proposed residential streets: Royal Oaks Place, ~~Rosebud~~ Redbud Street (Fuschia Lane), Rosewood Street, and Dogwood Street.

Secondary access will be provided via an internal connection between the Project and the residential subdivision located immediately to the south. As shown on Figure 2.6, Proposed Site Plan, Redbud Street will be linked to the existing Fuchsia Lane, which presently terminates in a cul‑de‑sac. This internal connection will provide secondary access for both the Project and the neighboring residential subdivision, thus improving emergency vehicle access for both developments.

Craftsman

Spanish

Hardison

Source: William Hezmalhalch Architects, Inc., March 2014.

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Figure 2.8
Plan A Front Elevations

Craftsman

Spanish

Hardison

Source: William Hezmalhalch Architects, Inc., March 2014.

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Figure 2.9
Plan B Front Elevations

Craftsman

Spanish

© 2014 WILLIAM HEZMALHALCH ARCHITECTS, INC.

Hardison

Source: William Hezmalhalch Architects, Inc., March 2014.

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Figure 2.10
Plan C Front Elevations

Discretionary Requests

The Applicant is seeking the approval of the following discretionary requests from the City of Santa Paula:

1. Approval of Vesting Tract Map No. 5928;
2. Planned Development Project Permit; and
3. Growth Management Allocations.

Subsequent to the approval of the Proposed Project, the Applicant will need to submit detailed architectural renderings to the City Planning Department for design approval and construction drawings for the associated demolition, grading, and building permits. Additionally, as a condition of project approval, it is anticipated that the Applicant will be required to provide either a transfer of water rights or pay in lieu fees in accordance with the requirements set forth in the Santa Paula Municipal Code. The Project will comply with uniformly applied City Code development standards, except as herein granted exceptions, and remit various impact fees including, but not limited to, school impact, in-lieu inclusionary housing, city and county traffic generation, Quimby parks, utility connection, and so on.

Construction Schedule/Phasing

The Project construction schedule is anticipated to occur over an approximate 24-month period with final buildout and occupancy occurring in 2018. Construction activities associated with the Project are undertaken in four main steps: (1) demolition/site clearing, (2) excavation, grading and foundations; (3) building construction, and (4) architectural coatings/finishing.

The demolition/site clearing phase would include the demolition of two of the four structures that are currently located on site and the clearing/grubbing of vegetation within the proposed development area. The demolition/site clearing are completed in approximately one month. In addition, this analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one rubber tired dozer, and three tractors/loaders/backhoes. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment are operated for 8 hours each day.

The grading/earthwork and foundation phase would occur over an approximate 3-month period and would involve the cut and fill of land to ensure the proper base and slope for the lot pads and building foundations. The Proposed Project would require approximately 20,000 cubic yards (cy) of soil to be cut and 20,000 cy of soil of fill with the earthwork quantities balancing on-site. No export or import of soil is anticipated. This analysis assumes daily grading and site preparation activities would require the following equipment: one bore/drill rig, one cement/mortar mixer, one grader, one excavator, and one tractor/loader/backhoe. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment are operated for 8 hours each day.

The building construction phase consists of below grade and above grade structures and is expected to occur for approximately 14 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that architectural coatings would occur over the final 6 months of

the building construction phase, and final paving would occur during the final month of construction. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two cement/mortar mixers, one forklift, one generator set, one tractor/loader/backhoe, two welders, one air compressor, and one piece of paving equipment. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment are operated for 8 hours each day.

Unless stated otherwise, all construction activities are performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in the Santa Paula Municipal Code the permissible hours of construction within the City are 8:00 a.m. to 6:00 p.m. Monday through Saturday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Haul Route

All construction and demolition debris are recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted are hauled to the Chiquita Canyon landfill, which is located approximately 27 miles to the east of the Project Site (approx. 54 miles round trip).

3. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS. Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☑
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway?	☐	☐	☑	☐
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☑	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☑	☐

a. Have a substantial adverse effect on a scenic vista?

No Impact. A significant impact may occur if the proposed Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. The term *scenic vista* generally refers to panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance). No scenic views are provided from or through the Project Site. The Project Site is an infill lot within a developed area of the City of Santa Paula and does provide an in-passing view of the Hardison House, former pasture that is currently a dry field, and rising hillside in the rear. The Project retains and improves views of the Hardison House, the pasture area is converted to housing, and the hillside view is largely retained by the Project. The loss of the small dry pasture area is not considered a substantial impact to a scenic vista in a panoramic context. Therefore, no impact to any recognized or valued scenic view would occur.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway?

Less Than Significant Impact. A significant impact would occur only if scenic resources are damaged and/or removed by development of the Proposed Project. State Route 150 (Ojai Road) is identified as an eligible state scenic highway and a city scenic route in the Conservation Open Space Element of the City's General Plan. The Proposed Project is visible from Ojai Road and would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods. As shown in the representative site photographs in Figures 2.4 and 2.5, the Project Site is a relatively large open lot of 19.28 acres with four structures and is minimally developed. The adjacent properties mostly consist of single-family homes ranging in lot sizes from 5,000 to 10,000 square feet. One adjoining residence to the north consists of an approximate 1.3-

acre property. The proposed subdivision and development of the property would alter local views within the area, but the completed project are consistent with the existing character of the adjoining residentially developed properties along Ojai Road. In addition, the Proposed Project includes the retention of the Hardison House and the relocation and preservation of the barn/stable, which are recognized as historic resources. In its current location, the Hardison House would be prominently visible and located on Lot 35. The barn/stable structure will be relocated from its current location and will be positioned on Lot 35 next to the main residence for future use as a garage. The house and barn/stable are set back behind a drainage easement, which would ensure these structures are prominently visible to passing motorists and pedestrians on Ojai Road. The integration of the existing Hardison House and barn/stable on Lot 35 of the tract map would retain and improve a recognized desirable aesthetic natural feature within a City-designated scenic route. As such, the Proposed Project would result in a less than significant aesthetic impact upon a State-designated scenic highway.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact Unless Mitigated. A significant impact would occur if the Proposed Project were to introduce incompatible visual elements on the Project Site or visual elements that are incompatible with the character of the area surrounding the Project Site. As discussed above, the Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods. If the Project Site is not secured and maintained during the construction process, environmental impacts to the character and aesthetics of the neighborhood may result. Although the construction period are temporary in nature, building equipment, construction debris and rubbish, if visible from off-site properties, would adversely affect the aesthetic character of the surrounding neighborhood. Such impacts could be minimized to an acceptable level with the incorporation of mitigation measure 3.1.1, below. Environmental impacts to the character and aesthetics of the neighborhood from the long-term operation of the Project could occur if the homes and common areas within the Project Site are not attractively landscaped and maintained in an acceptable manner. Implementation of mitigation measure 3.1.2 would ensure any long-term impacts related to landscaping and maintenance are mitigated to less than significant levels. With respect to neighborhood compatibility, the Proposed development is consistent with the scale and massing and density of the surrounding residential properties. As shown in Figures 2.8 through 2.10, the Applicant is proposing three distinctive architectural styles of single-family homes that are compatible with the surrounding residential tracts. See Figures 2.8, 2.9 and 2.10 in Section 2. Project Description. While the proposed project will alter existing views and develop a large, mostly vacant parcel of land with a 54-unit subdivision, the development are compatible with the surrounding single-family residential neighborhoods. As such, the proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings and aesthetic impacts are considered less than significant.

Mitigation Measures:

3.1.1 Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties throughout the duration of the construction process. Such barricades or enclosures shall be maintained in appearance throughout the construction period.

3.1.2 All open areas not used for buildings, driveways, parking areas, or private rear and side yards shall be attractively landscaped and maintained by a homeowners association in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect that complies with applicable local and State drought and water conservations rules and regulations to the satisfaction of the Planning Director.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project introduces new sources of light or glare on or from the Project Site, which are incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether a project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of Proposed Project sources; and (b) the extent to which Proposed Project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

Night lighting for the proposed subdivision would involve illuminating residential roadways (e.g., street lighting), and interior and exterior residential lighting. A moderate degree of illumination already exists in the project vicinity by street and pedestrian lighting along Ojai Road, Marigold Lane, Fuschia Lane and Poppy Lane. The Proposed Project would not generate a substantial increase in ambient lighting as compared to the current conditions on surrounding properties. Project lighting fixtures are directed towards the interior of the Project Site and away from any nearby land uses. The Proposed Project would not introduce any new sources of substantial light that are incompatible with the surrounding areas. A lighting and illumination plan will be required at the time of design review and plan check to verify the location and positioning of the proposed exterior light poles and residential lighting fixtures. Therefore, the Proposed Project's impacts are less than significant.

Cumulative Impacts: Less Than Significant Impact. Development of the Proposed Project would generate aesthetic impacts that are generally localized in nature and limited to the viewshed within the Project Site and immediately surrounding residential neighborhoods. There are no known related projects located within the viewshed of the Project Site that would cause or contribute to a cumulative impact. Therefore, cumulative aesthetic impacts are less than significant.

2. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☑
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☑
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Production (as defined by Government Code section 51104 (g)?	☐	☐	☐	☑
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☑
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☑	☐

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?

No impact. The Project Site is currently occupied by the former Hardison House residence with three associated structures and undeveloped vacant land. Although the Project Site was historically cultivated with a commercial lemon grove, the Project Site is currently located in a residentially developed area of the City of Santa Paula and is not actively used for cultivation or agricultural purposes. No farmland or agricultural activity exists on the Project Site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Ventura County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not

candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no impact to agricultural lands would occur.

b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?

No impact. The Project Site is zoned HR 2-PD and has a land use designation of Hillside Residential. The Project Site is not zoned for agricultural production, and although the site was historically cultivated with a commercial lemon grove, there is no farmland currently in production on the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[1] Therefore, no impact would occur.

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

No impact. The land use designation of the Project Site is Hillside Residential and the zoning designation is HR 2-PD in the City of Santa Paula. The Project Site is not zoned as forest land or timberland, and there is no Timberland Production at the Project Site. Therefore, no impact would occur.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No impact. The Project Site is occupied by the former Hardison House residence and three associated structures and an undeveloped hillside. No forested lands or natural vegetation exist on or in the vicinity of the Project Site. Therefore no impact would occur.

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?

Less Than Significant Impact. Although the Project Site was historically cultivated with a commercial lemon grove, neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. The Project Site is not classified in any "Farmland" category designated by the State of California. The Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). Therefore, no impact would occur.

Cumulative Impacts: Less Than Significant Impact. Development of the Proposed Project would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the cumulative loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and immediately surrounding properties are not included in the Important Farmland

[1] *Williamson Act Program, California Division of Land Resource Protection, website: ftp://ftp.consrv.ca.gov/pub/Dlrp/WA/2012%20Statewide%20Map/WA_2012_11x17.pdf, accessed December 2014.*

category.[2] The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

4. AIR QUALITY.

Where applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable Air Quality Management Plan?	☐	☐	☑	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☑	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☑	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☑	☐

a. Conflict with or obstruct implementation of the applicable Air Quality Management Plan?

Less Than Significant Impact. The City of Santa Paula is located in the Ventura County portion of the South Central Coast Air Basin (Basin). The Ventura County Air Pollution Control District (VCAPCD) is the designated air quality control agency in the Ventura County portion of the Basin. According to the 2007 Air Quality Management Plan (Ventura County Air Pollution Control District, adopted in May 2008), the Ventura County portion of the Basin is in non-attainment for ozone (1-hour) pursuant to the state and federal standards, and in non-attainment area for suspended particulates (PM_{10} & $PM_{2.5}$) pursuant to state standards. Although the Ventura County portion of the Basin is in attainment for the state and federal Carbon Monoxide (CO) standards, CO can potentially be a problem at heavily congested intersections. Ventura County was listed as "moderate nonattainment" for the federal eight-hour ozone standard in 2004, with a required attainment date of June 2010. The 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high pollutant levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It identifies the control measures that will be implemented to reduce major sources of pollutants. These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population and economic growth have occurred within the County.

[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2006, Map, website: ftp://ftp.consrv. ca.gov/ pub/dlrp/FMMP/pdf/2006/los06.pdf, accessed December 2014.*

The future projected air quality levels in the 2007 AQMP are based on several factors including regional population growth and transportation projections identified by Ventura County. A development project would generally conflict with or obstruct implementation of the AQMP if it is not consistent with the regional growth projections as identified in the City's General Plan. The Project Site's current zoning designation is HR 2-PD (Hillside Residential 2PD, 0-3 du/ac), which would accommodate 57 single-family dwelling units under the existing code and planned land use. The Proposed Project includes a Planned Development Permit in the HR-PD Zone to facilitate the development of 53 new single-family homes and the retention of the existing Hardison House and barn/stable structure (i.e., a total of 54 dwelling units). Thus, the Proposed Project's density is consistent with the maximum density allowed under the existing zoning designation, as well as the proposed, and thus are consistent with regional growth projections that were contained within the AQMP. Proposed Project would therefore not conflict with or obstruct implementation of the AQMP and Project impacts are less than significant.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact Unless Mitigated. A project would normally result in a significant adverse air quality impact if it's project-related emissions were to exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. In accordance with CEQA and the CEQA review process, the City of Santa Paula assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits and monitors and enforces implementation of such mitigation. The City does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards. Instead, the City relies upon the expertise of the VCAPCD and utilizes the Ventura County Air Quality Assessment Guidelines as the guidance document for the environmental review of plans and development proposals within its jurisdiction. A detailed discussion of the project's construction and operational emissions is presented below.

Construction Emissions.

The Proposed Project will involve grading approximately 9.7 acres of land and the construction of 53 new single-family dwelling units and the relocation of the barn/stable to proposed Lot 35. Temporary construction activities would generate dust, fumes, equipment exhaust, and other air contaminants. Construction activities involving site excavation, grading and foundation preparation would primarily generate particulate emissions ($PM_{2.5}$ and PM_{10}). Mobile sources, such as diesel-fueled equipment operating onsite and traveling to and from the Project Site, would primarily generate NOx emissions. The application of architectural coatings during the finishing stages would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. Neither the City of Santa Paula nor the VCAPCD have adopted thresholds of significance for temporary construction activities. In accordance with the Ventura County Air Quality Assessment Guidelines, construction-related ROC and NOx emissions are recognized as short-term and temporary impacts and are thus not counted toward the ROC and NOx significance thresholds. Furthermore, rather than quantifying fugitive dust emissions, the

APCD recommends that lead agencies include appropriate mitigation measures to minimize the project's construction related fugitive dust emissions. Therefore, mitigation measures identified below are recommended for implementation to ensure project impacts are mitigated to less than significant levels. With implementation of mitigation measures 3.3.1 through 3.3.8, below, the Project's construction related emissions are considered less than significant.

Mitigation Measures

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

3.3.2 Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.

3.3.3 Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities:

a) All trucks shall be required to cover their loads as required by California Vehicle Code §23114.

b) All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.

3.3.4 Graded and/or excavated inactive areas of the construction site shall be monitored by (indicate by whom) at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.

3.3.5 Signs shall be posted on-site limiting traffic to 15 miles per hour or less.

3.3.6 During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive.

3.3.7 Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

3.3.8 Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

Operation Emissions

Less Than Significant Impact. A project would result in a significant operational air quality impact if it exceeds the regulatory emission standards or significance thresholds adopted by the VCAPCD. Based on guidance provided in the Ventura County Air Quality Assessment Guidelines (October 2003), the VCAPCD recommends the following operational significance thresholds for projects proposed in Ventura County that are outside the Ojai Planning Area: (a) 25 lbs/day of ROC; and (b) 25 lbs/day of NO_X. Thus, if the proposed project generates emissions of 25 pounds per day or more of either ROC or NOx it would have a significant operational air quality impact.

The Proposed Project will generate air quality emissions associated with the use and occupancy of 54 single-family dwelling units. Operational emissions resulting from mobile sources (persons traveling to and from the Project Site), residential energy demands (heating and cooling) and other area sources (residential fireplaces, consumer products, etc.) were estimated using the CalEEMod air emissions software as recommended by the VCAPCD.[3] As shown in Table 3-1, below, the Proposed Project would generate approximately 4.15 lbs./day of ROC and 4.31 lbs./day of NOx in the summer months and approximately 4.27 lbs./day of ROC and 4.62 lbs./day of NOx in the winter months. Thus, as the Proposed Project's emissions are below 25 lbs./day for the respective criteria pollutants, the Proposed Project's operational impacts are less than significant. No operational mitigation measures are required.

Table 3.1
Estimated Daily Project Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Mobile (Vehicle) Sources	1.61	3.87	16.07	0.04	3.23	0.89
Energy (Natural Gas)	0.05	0.39	0.17	< 1	0.03	0.03
Architectural Coatings	0.27	0	0	0	0	0
Consumer Products	2.08	0	0	0	0	0
Landscape Maintenance	0.14	0.05	4.49	< 1	0.02	0.02
Total Project Emissions	**4.15**	**4.31**	**20.73**	**0.04**	**3.28**	**0.94**
VCAPCD Thresholds	**25**	**25**	**--**	**--**	**--**	**--**
Potentially Significant	**No**	**No**	**--**	**--**	**--**	**--**
Wintertime (Non-Smog Season) Emissions						
Mobile (Vehicle) Sources	1.73	4.18	17.46	0.04	3.23	0.89
Energy (Natural Gas)	0.05	0.39	0.16	< 1	0.03	0.03
Architectural Coatings	0.27	0	0	0	0	0
Consumer Products	2.08	0	0	0	0	0
Landscape Maintenance	0.14	0.05	<1	< 1	0.02	0.02
Total Project Emissions	**4.27**	**4.62**	**17.62**	**0.04**	**3.28**	**0.94**
VCAPCD Thresholds	**25**	**25**	**--**	**--**	**--**	**--**
Potentially Significant	**No**	**No**	**--**	**--**	**--**	**--**
Note: Calculation worksheets are provided in Appendix A to this IS/MND.						

[3] *CalEEMod is the successor software program of the URBEMIS program that is recommended for use in the Ventura County Air Quality Assessment Guidelines.*

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. As stated above in response to Checklist Question 3.1, the Ventura County portion of the Basin is in non-attainment for ozone (1-hour) pursuant to the state and federal standards, and in non-attainment area for suspended particulates (PM_{10} & $PM_{2.5}$) pursuant to state standards. The VCAPCD does not suggest any significance thresholds for temporary construction emissions. Rather, the VCAPCD recommends that all development projects within the Basin implement fugitive dust control measures during construction to minimize air emissions to the maximum extent feasible. Thus, with implementation of the construction mitigation measures 3.3.1 through 3.3.8 identified above, the project's construction related air quality emissions are less than significant.

With respect to operational emissions, the Ventura County Air Quality Assessment Guidelines suggests several methods for ascertaining whether a project would exceed operational thresholds for ROC and NO_X. Pursuant to the project screening analysis tables identified in Appendix F of the Ventura County Air Quality Assessment Guidelines, single-family detached housing projects with more than 284 units (for operational year 2020) would have the potential to exceed regional ROC or NO_X thresholds. The Project's proposed 54 dwelling units are well under the screening criteria, and as further assessed in Table 3.1, above, are well under the 25 lbs./day threshold levels for ROC and NO_X emissions. Thus, the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard and impacts are considered less than significant.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A project would result in a significant air quality impact if it exposes sensitive receptors to substantial pollutant concentrations. Sensitive land uses in the vicinity of the Project Site include residential homes and neighborhoods. The Proposed Project would involves the construction of a 54-unit residential subdivision and would not generate any point source emissions that would affect the residents living in close proximity to the Project Site. As noted in the analysis above, construction emissions associated with the development of the Proposed Project would not result in a significant air quality impact after mitigation. Mitigation measures 3.3.1 through 3.3.8 would reduce the project's construction related fugitive dust emissions to less than significant levels. The Project's operational emissions would also be well under the 25 lbs./day threshold levels for ROC and NO_X emissions. Thus the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations and impacts are considered less than significant.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. In accordance with the Ventura County Air Quality Assessment Guidelines (October 2003), the following assesses the potential for the Proposed Project to cause a public

nuisance by subjecting surrounding land uses to objectionable odors. A public nuisance is defined by VCAPCD Rule 51, Nuisance, as "...such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The assessment also should evaluate the potential for a proposed project to be impacted by objectionable odors from nearby existing or proposed land uses. Any project that has the potential to create a public nuisance by subjecting members of the public to objectionable odors should be deemed to have a significant odor impact.

The Proposed Project includes the development of 53 new single-family homes and would not cause odor nuisances to nearby land uses. Moreover, the Project Site is located in a residential area of the City and is not located within the respective distances of any of the potentially odorous land uses identified in Table 6.3, Project Screening Distances For Odorous Land Uses, of the Ventura County Air Quality Assessment Guidelines. Thus, the proposed Project would not create objectionable odors affecting a substantial number of people and impacts are considered less than significant.

Cumulative Impacts

Less Than Significant Impact. The VCAPCD recommends that any operational emissions from individual projects that exceed the project-specific thresholds of significance identified above be considered cumulatively considerable. These thresholds apply to individual development projects only; they do not apply to the emissions generated by a list of related projects. Thus, as the Proposed project would not exceed the significance thresholds identified above, the Proposed Project's emissions are less than cumulatively considerable. The project's cumulative air quality impacts would therefore be less than significant.

4. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☑	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☑	☐	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological	☐	☐	☐	☑

interruption, or other means?				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☑	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☑	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☑

The following analysis is based in part on the findings and conclusions of the William Homes Santa Paula River Rock Project Biological Constraints and Jurisdictional Delineation Report prepared by Wildscape Restoration, in December 2014. Noreen Murano and Allyson Biskner conducted a reconnaissance survey on November 3, 2014. The survey consisted of habitat assessment, vegetation mapping, and an inspection for the necessity of any jurisdictional delineation. Prior to the survey, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2014) was reviewed to identify special status plants, wildlife, and habitats known to occur within a nine USGS 7.5 minute quadrangle of the project site. Aerial photos were also reviewed to determine vegetation communities, which were confirmed during the field survey. A minimum mapping unit of 0.25 acre was used vegetation polygons. The complete report and supporting graphic exhibits are incorporated as Appendix B to this IS/MND.

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact Unless Mitigation Incorporated. A project would have the potential to result in a significant impact on biological resources if results in: (a) the loss or take of individual, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

Wildscape identified six plant communities on the site: ruderal pasture, coast live oak woodland, coastal sage scrub, pepper tree, and ornamental landscape. No ephemeral drainages were observed on the 19.28-acre project site. The acreage of each vegetation type observed on site is listed below in Table 3.2. The locations of the plant communities are shown in Figure 3.1, Vegetation Communities Map. The Project's potential impacts to on-site vegetation communities are shown in Figure 3.2, Approximate Impacts to Vegetation Communities.

Source: Wildscape Restoration, December 2014.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 3.1
Vegetation Communities Map

Source: Wildscape Restoration, December 2014.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 3.2
Approximate Impacts by Vegetation Type

Table 3.2
Summary of Project Area Vegetation and Potential Impacts

Type of Habitat	Acreage Observed Onsite	Proposed Impacts (Acres)
Coastal Sage Scrub	6.95	0.21
Coast live oak woodland	1.41	0.26
Ornamental landscape	1.95	0.01
Ruderal pasture	7.57	0.68
Peruvian Peppertree	1.39	0.05
Total	**19.27**	**1.21**

Source: Wildscape Restoration, 2014.

Vegetation Communities

Coastal Sage Scrub

Coastal sage scrub is the second most abundant native community in the watershed. This vegetation is typically located on the southern facing lower elevation slopes and grows on rocky, well-drained soils. The coastal sage scrub on the project site is dominated by large patches of purple sage (*Salvia leucophylla*) and poison oak (*Toxicodendron diversilobum*) intermixed with smaller amounts of coyote brush (*Baccharis pilularis*), California sagebrush (*Artemisia californica*), and giant wild rye (*Elymus condensatus*). Other native species observed in these areas included: Mexican elderberry (*Sambucus caerulea*), mugwort (*Artemisia douglasiana*), Needlegrass (*Stipa sp.*), and sawtooth goldenbush (*Hazardia squarrosa*).

The coastal sage scrub growing on the southeastern facing slope is dense and approximately 3- 4 feet in height. This vegetation community is normally summer dormant and due to the continuing California drought pattern, vegetation was excessively dry and brittle.

Coast Live Oak Woodland

The coast live oak woodland is dominated by coast live oaks (*Quercus agrifolia*) with some limited understory primarily composed of poison oak, giant wild rye, and an intermix of the adjacent coastal sage scrub. The oak woodland runs primarily in a north west to southeast direction at the toe of the slope meeting the flat agricultural land. Several large individual coast live oaks are also interspersed throughout the property.

The project site formerly supported commercial lemon grove growing operations, primarily terraced along the sloped area on the northwestern side of the property. There are limited nonproductive individual trees still intermixed with the oak woodland.

Ornamental

Ornamental landscaping plants occur around the residential yard footprints of the home and supplemental ranch structures located on the southeast quarter of the property/project site. The species include: sago palm (*Cycad revoluta*), crape myrtle (*Lagerstroemia sp.*), various roses (*Rosa sp.*), Mexican sage (*Salvia leucantha*), spirea (*Spirea ssp.*), and Mexican fan palm (*Washingtonia robusta*). In addition, along the eastern edge of the barn structures is one linear area of remaining lemon (*Citrus limon*) trees.

Ruderal Pasture

Ruderal pasture occurs on the open and fallow farmland surrounding the residential ornamental landscape and located on the bare soil east of the barn and other supplemental ranch structures. It is typically composed of non-native species that opportunistically populate in disturbed soils. Oftentimes, an aggressive non-native single-species may become permanently established such as mustard. Non-native species observed within the fallow bare soil included: Non-native oats (*Avena ssp.*), mustard (*Brassica nigra*), tocalote (*Centaurea melitensis*), red-stemmed filaree (*Erodium cicutarium*), and horehound (*Marrubium vulgare*).

Peruvian Peppertree

Peruvian peppertree (*Schinus molle*) is a non-native, fast growing, and aggressive ornamental tree. The fruit is red with a distinctive pepper odor. Peppertree is prevalent on the eastern facing slope of the property with active new sprouts. It is intermixed between the coast live oak woodland and the coastal sage scrub.

Plants Observed Onsite

Plants observed onsite during the survey, November 3, 2014, are listed below in Table 3.3, Plants Observed On-site, on page 39. Scientific names are from The Jepson Manual; Higher Plants of California, 2nd edition, (Baldwin et al. 2012).

Special Status Plant and Wildlife Species

Based on field surveys, no special status species were determined to be "Present" within the project site. Three (3) special status species "May Occur" within the project area, but were not detected on-site. No species are protected by the federal and/or state Endangered Species Act. The remaining species are designated with California Rare Plant Ranks.

- Robinson's pepper-grass (*Lepidium virginicum var. robinsonii*)
- Santa Barbara Honeysuckle (*Lonicera subspicata var. subspicata*)
- southern curly-leaved monardella (*Monardella sinuata ssp. sinuata*)

Common Wildlife

During the November 3, 2014 reconnaissance site visit, common wildlife observations were limited to birds. There were no fish, amphibians, or reptiles observed on site. The two-striped garter snake, south coast garter snake, and the coast horned lizard could occur on the project site due to their adaptability to soil types and available areas for sunning. A former property employee of the property stated that there is one known rattlesnake inhabiting the sloped area of the site, specifically on the northeastern edge Bird species observed on the project site include turkey vulture (*Cathartes aura*) scrub jay (*Aphelocoma californica*), and acorn woodpecker (*Melanerpes formicivorus*). Evidence of barn owls was found in the barn. Regurgitated pellets were on the upper floor of the structure.

No mammals were observed onsite. Mammals that are common to the area include coyote (*Canis latrans*), bobcat (*Lynx rufus*), and mule deer (*Odocoileus hemionus*).

Table 3.3
Plants Observed On-Site

Native Plants	
Scientific Name	**Common Name**
Ambrosia psilostachya	ragweed
Artemisia californica	California sagebrush
Artemisia douglasiana	mugwort
Asclepias fascicularis	narrow leaved milkweed
Baccharis pilularis	coyote brush
Hazardia squarrosa	goldenbush
Heteromeles arbutifolia	toyon
Leymus condensatus	giant wild rye
Lonicera subspicata var. subspicata	Santa Barbara honeysuckle
Quercus agrifolia	coast live oak
Toxicodendron diversilobum	poison oak
Salvia leucophylla	purple sage
Sambucus caerulea	blue elderberry
Stipa sp.	needlegrass
Non-Native Plants	
Araucaria bidwillii	bunya bunya
Araucaria heterophylla	Norfolk island pine
Brassica nigra	mustard
Cedrus atlantica	atlas cedar
Centaurea melitensis	tocalote
Cereus sp.	cactus
Citrus limon	lemon tree
Cupressus sp.	Arizona cypress
Cycad revolute	sago palm
Diospyros sp.	persimmon tree
Erodium cicutarium	red-stemmed filaree
Lagerstroemia sp.	crape myrtle
Marrubium vulgare	horehound
Olea europa	olive
Quercus robur	English oak
Rosa sp.	rose
Salvia leucantha	Mexican sage
Schinus molle	Peruvian pepper tree
Spirea sp.	spirea
Syzygium paniculatum	brush cherry
Washingtonia sp.	Mexican fan palm
Source: Wilscape Restoration, December 2014	

Special Status Wildlife

No special status species were determined to be "Present" within the project area based on field surveys.

Five (5) special status species "May Occur" within the project area, but were not detected on the Project Site. One (1) species is a federal threatened and state species of special concern; the coastal California gnatcatcher (*Polioptila californica californica*). One (1) species, the white-tailed kite (*Elanus leucurus*) is fully protected by the state. The remaining three species are designated for state species of special

concern: (1) coast horned lizard (*Phrynosoma coronatum*), (2) burrowing owl (*Athene cunicularia*), and (3), American badger (*Taxidea taxus*).

Nesting Migratory Birds

The Migratory Bird Treaty Act (MBTA) protects migratory birds, their nests, and eggs. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (50 Code of Federal Regulations, Section 10.13). Any impact on an active migratory bird nest are considered a violation of the MBTA. In southern California, migratory bird nesting season is typically between March 1 and September 15 each year.

Raptors

If construction occurs during raptor breeding season, usually between February 1 and June 30, the loss of an active nest of any raptor species, including common raptors species are considered a violation of Sections 3503, 3503.5, and 3513 of the California Fish and Game Code. Raptors (birds of prey) have potential to nest within the taller trees such as the oaks on the project site and eucalyptus trees on adjacent properties. Raptors that are likely to nest in the area include Cooper's hawks (*Accipiter cooperii*), red-tailed hawks (*Buteo jamaicensis*), redshouldered hawks (*Buteo lineatus*), American kestrels (*Falco sparverius*), and great horned owls (*Bubo virginianus*).

Conclusion

Based on the findings of the biological impact assessment as summarized above, the Proposed Project has the potential, albeit minimal, to result in significant impact upon species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Proposed Project would result in the removal of 0.21 acres of coastal sage scrub habitat and 0.26 acres of coast live oak woodland. In consideration of the fact that the Proposed Project would provide 9.56 contiguous acres of passive open space in perpetuity on the undeveloped hillside on the western portion of the Project Site to be maintained by the homeowners association, the incremental loss of 0.21 acres of coastal sage scrub habitat and 0.26 acres of coast live oak woodland are considered less than significant. The direct loss of ornamental landscape, ruderal pasture and Peruvian peppertrees are less than significant. Although no threatened, endangered or special of special concern were identified on-site, the Project Site has the potential to support three special status plant species and five special status animals. The Project Site also may also support nesting habitat for raptors and other migratory bird species. With implementation of the mitigation measures recommended below, impacts to biological resources are reduced to less than significant levels.

<u>Mitigation Measures:</u>

The following minimization and avoidance measures shall be utilized to reduce impacts to biological resources.

4.1 Special status species focused surveys should be conducted no more than 3 weeks prior to the start of construction activity. If special status species are present, additional regulatory coordination with

the California Department of Fish and Wildlife and/or the U.S. Fish and Wildlife Service will be required.

4.2 A biological survey for nesting birds, including raptors, is required no more than 5 days prior to construction activity from February 1 to September 15 if in or adjacent to suitable habitat.

4.3 If active bird nests are identified, construction activity within 100-300 feet (500 feet for raptors) must be postponed until after September 15, unless the biologist determines the nest becomes inactive. Size of the buffer will be determined according to the type and level of disturbance and species.

4.4 If it is necessary to conduct the work while sensitive species are present or in proximity to the work areas, a species protection plan shall be developed, approved by relevant agency U.S. Fish & Wildlife Services or California Department of Fish & Wildlife, then implemented.

4.5 An approved biologist shall monitor removal of native vegetation and work within habitat areas for wildlife and relocate species as needed to minimize mortality.

4.6 Minimize sustained construction noise adjacent to sensitive wildlife during the nesting season, as directed by the biological monitor.

4.7 When construction noise is anticipated to affect sensitive wildlife, environmental staff shall consult with regulatory agencies regarding additional mitigation measures.

4.8. In accordance with the standard best management practices recommended by the Ventura County Environmental Health Division, water impoundment(s) and "privately maintained" drainage easements should be maintained in a manner, which will not create mosquito breeding sources. The Applicant shall consult with the Vector Control Section of the Division regarding a mosquito abatement/control plan. The mosquito abatement/control plan shall include the following: (a) proposed physical control measures that will be utilized to promote drainage, (b) proposed chemical and biological control measures to be utilized if mosquito breeding occurs (c) a Mosquito monitoring program, and (d) design details, including cross-sections of all drainage areas.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact Unless Mitigated. Drainages, which may include wetlands and "Waters of the U.S.," are protected by the Clean Water Act (CWA) and are under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and Section 401 of CWA Water Quality Certification from the Regional Water Quality Control Board (RWQCB). In addition, the California Department of Fish and Wildlife (CDFW) requires a Streambed Alteration Agreement (SAA) prior to any modification of the bed, bank, or channel of streambeds on the project site, if the drainage in the project site meets the criteria established by Section 1600 of the California Fish and Game Code.

On November 3, 2014, Wildscape visited the project site to review the site for wetland conditions appropriate for delineation. No wetlands or "waters of the U.S." were observed. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat. As discussed above, the Proposed Project would result in the removal of 0.21 acres of coastal sage scrub habitat and 0.26 acres of coast live oak woodland. Although no threatened, endangered or special of special concern were identified on-site, the Project Site has the potential to support three special status plant species and five special status animals. The Project Site also may also support nesting habitat for raptors and other migratory bird species. With implementation of the avoidance measures recommended above (see mitigation measures 4.1 through 4.7), impacts to biological resources are reduced to less than significant levels.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?

No Impact. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. As discussed above, Wildscape biologists visited the Project Site in November 2014 to review the site for wetland conditions appropriate for delineation. No wetlands or "waters of the U.S." were observed. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (See Section 4(b), above) and no impacts to riparian or wetland habitats would occur.

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?

Less Than Significant Impact. A project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. No wetlands or "waters of the U.S." were observed on site. Thus the Project would not have any impacts upon migratory fish. Although no threatened, endangered or special of special concern were identified on-site, the Project Site has the potential to support five special status animal species. The Project Site also may also support nesting habitat for raptors and other migratory bird species. With implementation of the avoidance measures recommended above (see mitigation measures 4.1 through 4.7), impacts to biological resources are reduced to less than significant levels.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

Potentially Significant Impact Unless Mitigation Incorporated. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Santa Paula Tree Preservation Ordinance (section 156.580 through 156.589 of the Santa Paula Municipal Code). As provided for in Section 156.584 of the

Santa Paula Municipal Code, no native oak and sycamore tree, heritage or historic tree, where that tree is on public or private property, or any other mature tree on public property except as provided for in division (B) of this section, or is associated with a proposal for urban development, shall be removed, cut down or otherwise destroyed, unless a tree removal permit has been issued by the city. The Project Site contains several oak trees within the planned limits of the proposed development. Therefore, consistent with the City's tree preservation policy, an oak tree survey will need to be conducted to determine quantity of trees proposed to be impacted. In accordance with Section 156.584 Subsection F, where tree(s) are proposed for removal that arc 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 site of tree plantings associated with the project. Thus, following compliance with the Santa Paula Tree Preservation Ordinance, the removal of any oak trees are mitigated to less than significant levels.

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?

No Impact. A significant impact would occur if the Proposed Project are inconsistent with mapping or policies in any conservation plans. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources after mitigation. The Project Site is located adjacent to existing developed single-family housing to the north and south and is bordered by Ojai Road to the east. The undeveloped hillside of Fagan Canyon borders the Project Site to the west. The Project Site's western half, which is comprised of approximately 9.5 acres of hillside land, is proposed to remain as open space and will provide a continuous open space and wildlife corridor linkage to the natural open space areas of Adams and Fagan Canyons. Thus, cumulative impacts to biological resources are considered less than significant.

5. CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	☐	☑	☐	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	☐	☑	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☑	☐	☐

d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☑	☐	☐

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

The following section summarizes and incorporates by reference the information and findings provided in the Hardison House Phase I/II Historic Resource Report, Wallace Libbey Hardison Residence 1226 Ojai Road (Tentative Tract Map 5928), prepared by San Buenaventura Research Associates, July 28, 2015. The Historic Resources Report is contained in Appendix C to this IS/MND.

Potentially Significant Impact Unless Mitigation Incorporated. According to the Public Resources Code, "a project that may cause a substantial change in the significance of an historical resource is a project that may have a significant effect on the environment." The Public Resources Code broadly defines a threshold for determining if the impacts of a project on an historic property will be significant and adverse. By definition, a substantial adverse change means, "demolition, destruction, relocation, or alterations," such that the significance of an historical resource are impaired. For purposes of National Register of Historic Places (NRHP) eligibility, reductions in a property's integrity (the ability of the property to convey its significance) should be regarded as potentially adverse impacts. (PRC §21084.1, §5020.1(6)).

Further, according to the CEQA Guidelines, "an historical resource is materially impaired when a project...[d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources [or] that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant."

<u>Administrative Setting</u>

For purposes of understanding the terms, methodology, and findings presented in the Historic Resources Report, the following provides an overview of the regulatory setting as it pertains to determining the eligibility of properties to be considered historic resources pursuant to CEQA. CEQA requires the evaluation of project impacts on historic resources, including properties "listed in, or determined eligible for listing in, the California Register of Historical Resources [or] included in a local register of historical resources." A resource is eligible for listing on the California Register of Historical Resources if it meets any of the criteria for listing, which are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;

2. Associated with the lives of persons important to local, California or national history;

3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

By definition, the California Register of Historical Resources (CRHR) also includes all "properties formally determined eligible for, or listed in, the National Register of Historic Places," and certain specified State Historical Landmarks. The majority of formal determinations of NRHP eligibility occur when properties are evaluated by the Office of Historic Preservation in connection with federal environmental review procedures (Section 106 of the National Historic Preservation Act of 1966). Formal determinations of eligibility also occur when properties are nominated to the National Register of Historic Places (NRHP), but are not listed due to a lack of owner consent.

The criteria for determining eligibility for listing on the NRHP have been developed by the National Park Service. Eligible properties include districts, sites, buildings and structures,

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

C. That embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

According to the NRHP standards, in order for a property that is found to be significant under one or more of the criteria to be considered eligible for listing, the "essential physical features" that define the property's significance must be present. The standard for determining if a property's essential physical features exist is known as integrity, which is defined for the NRHP as "the ability of a property to convey its significance." The CRHR defines integrity as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance." (National Register Bulletin 15; California OHP Technical Assistance Bulletin 6)

For purposes of both the NRHP and CRHR, an integrity evaluation is broken down into seven "aspects." The seven aspects of integrity are: Location (the place where the historic property was constructed or the place where the historic event occurred); Design (the combination of elements that create the form, plan, space, structure, and style of a property); Setting (the physical environment of a historic property); Materials (the physical elements that were combined or deposited during a particular period of time and in

a particular pattern tern or configuration to form a historic property); Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory); Feeling (a property's expression of the aesthetic or historic sense of a particular period of time), and; Association (the direct link between an important historic event or person and a historic property).

It is not required that significant property possess all aspects of integrity to be eligible; depending upon the NRHP and CRHR criteria under which the property derives its significance, some aspects of integrity might be more relevant than others. For example, a property nominated under NRHP Criterion A and CRHR Criterion 1 (events), would be likely to convey its significance primarily through integrity of location, setting and association. A property nominated solely under NRHP Criterion C and CRHR Criterion 3 (design), would usually rely primarily upon integrity of design, materials and workmanship.

While the NRHP guidelines and the CRHR regulations include similar language with respect to the aspects of integrity, the latter guidelines also state "it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register." Further, according to the NRHP guidelines, the integrity of a property must be evaluated at the time the evaluation of eligibility is conducted. Integrity assessments cannot be based on speculation with respect to historic fabric and architectural elements that may exist but are not visible to the evaluator, or on restorations that are theoretically possible but which have not occurred. (National Register Bulletin 15; CCR §4852 (c); California OHP Technical Assistance Bulletin 6)

The minimum age criterion for the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) is 50 years. Properties less than 50 years old may be eligible for listing on the NRHP if they can be regarded as "exceptional," as defined by the NRHP procedures, or in terms of the CRHR, "if it can be demonstrated that sufficient time has passed to understand its historical importance" (Chapter 11, Title 14, §4842(d)(2))

Historic resources as defined by CEQA also includes properties listed in "local registers" of historic properties. A "local register of historic resources" is broadly defined in §5020.1 (k) of the Public Resources Code, as "a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution." Local registers of historic properties come essentially in two forms: (1) surveys of historic resources conducted by a local agency in accordance with Office of Historic Preservation procedures and standards, adopted by the local agency and maintained as current, and (2) landmarks designated under local ordinances or resolutions. These properties are "presumed to be historically or culturally significant... unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant." (PRC §§ 5024.1, 21804.1, 15064.5)

City of Santa Paula Historic Landmark Designation Criteria

City of Santa Paula Ordinance No. 816 adopted on November 19, 1984, provides for the designation of City Landmarks in accordance with the following standards and procedures:

A. Criteria for Designation of Landmark Nomination.

The Design Assistance Committee, shall upon such investigation as it deems necessary, make a determination as to whether a nominated property or structure meets one or more of the following criteria:

(1) Historical & Cultural Significance

(a) The proposed landmark is particularly representative of a distinct historical period, type, style, region, or way of life.

(b) The proposed landmark is an example of a type of building which was once common, but is now rare.

(c) The proposed landmark is of a greater age than most of its kind.

(d) The proposed landmark is connected with a business or use which was once common, but now rare.

(e) The architect or builder was locally or nationally renowned.

(f) The site is the location of a significant local or national event.

(2) Historic Architectural & Engineering Significance

(a) The construction materials or engineering methods used in the proposed landmark are unusual or significant or uniquely effective.

(b) The overall effect of the design of the proposed landmark is beautiful, or its details and materials are beautiful or unusual.

(3) Neighborhood and Geographic Setting

(a) The proposed landmark materially benefits the historic character of the neighborhood.

(b) The proposed landmark in its location represents an established and familiar visual feature of the neighborhood, community or city.

B. Any structure, property or area that meets one or more of the above criteria shall also have sufficient integrity of location, design, materials, construction and workmanship to make it worthy of preservation, restoration or rehabilitation. (City of Santa Paula, Ordinance No. 816, Nomination of Landmarks, Santa Paula City Code Sec. 17.55 et. seq.)

Historical Setting

For a discussion of the general historic context of the western Santa Clara Valley, see the Historic Resources Report in Appendix C to this MND. With respect to the property-specific historical context, the property located at 1226 Ojai Road is the site of four buildings: a residence constructed in 1884, a barn/stable constructed in 1885, a small residence built circa 1910, and a residence/garage built circa 1920; on property purchased in 1883 by oilman, agricultural businessman, gold miner, and newspaper publisher Wallace Libbey Hardison. Born in 1850 in Caribou, Maine, Hardison was the youngest of eight children. His large and notably industrious immediate and extended family would play a prominent role in his entrepreneurial life and rise to fortune. Additional details about the life of Wallace Hardison and his

family are provided in the Historic Resources Report (see Appendix C to this MND).

Potential Historic Resources

The subject property consists of four buildings constructed from 1884 to circa 1920.

Main Residence. The Main Residence was constructed for Wallace Libbey Hardison and his family in 1884. The Main Residence is two stories in height, features a complex plan, and is clad primarily in wide shiplap siding. The architectural style of the Main Residence is an unusually restrained example of the Italianate mode of the Victorian period, which was then giving way to the Stick (sometimes called Eastlake) and Queen Anne Victorian modes that, along with the Colonial Revival, would predominate American domestic architecture until the end of the 19th century. Additional details regarding the style of architecture and notable building alternations of the main residence are provided in the Historic Resources Report.

Barn/stable. This building was constructed for Wallace Libbey Hardison and his family to stable horses and support their ranching operations. The precise date of construction is not documented, but according to family stories, it was completed in 1885, a year after the construction of the Main Residence. This outbuilding is rectangular in plan. The main body of the building is two stories in height and topped with a moderately-steep pitched side-facing clipped gable roof with somewhat shallow eaves. It is clad primarily in wide shiplap siding. The style of this building is essentially Italianate, similar to the Main Residence, but more closely related to the tower house mode, as suggested by the prominent cupola. The shingle treatment under the gable ends is somewhat more characteristic of the Queen Anne mode of the Victorian style, which was emerging during the mid-1880s. This building does not appear to be significantly altered, although it exhibits significant evidence of structural trauma due to foundation settling or failure, particularly at the northeastern corner, and other deterioration issues. Additional details regarding the style of architecture and features of the barn/stable are provided in the Historic Resources Report.

Garage/Residence. This single-story building features an L-plan and a front-facing, low-pitched gable roof with deep, open eaves with exposed rafter tails, and is clad in horizontal lap siding. A double garage opening enclosed with overhead track doors dominates the eastern elevation. An attached residence wing on the southern elevation projects beyond the western elevation of the garage under a separate gable roof. Windows on the northern, southern and western elevations are wood frame sash with plain casings. An entry door is located on the southern elevation above a low concrete stoop. The architectural style is essentially California Bungalow, and it appears to be unaltered. No documented date of construction could be found for this building, but from architectural evidence, it appears to have been constructed circa 1920 as a garage, and an apartment, presumably to be occupied by a ranch employee. This date also corresponds to the time period when James Norris Procter and Hope Hardison Procter began living on the property and apparently began making other alterations. [Photos 7, 8]

Second Residence. This one-story residence features a rectangular plan and a medium-pitched side-facing gable roof with moderately shallow eaves. The single-wall construction is expressed on the exterior as

board-and-batten. Horizontal shiplap siding is located under the gable ends. Windows are moderately narrow wood sash with plain wood casing. The entry is on a small porch located on the eastern elevation covered with a shed roof and supported by a wood post. Two small jigsawed bracket details are located under the porch roofline. This roofline also covers a small wing. A board-and-batten utility porch with a shed roof is attached to the rear (western) elevation. The architectural style of the building is most nearly a modest example of the gable-and-wing configuration of the American Folk House. It appears to be unaltered, but substantially deteriorated. Its date of construction is not documented. Ventura County Assessors records estimate a date of construction of 1910, but the architectural evidence suggests an earlier date, perhaps before 1900. [Photos 9, 10]

Landscape Features. The majority of the property is presently unplanted. However portions of the property, particularly to the north and east of the Main Residence, once featured landscaped gardens, probably designed professionally for the Hardison family. Little of this landscape plan is currently in evidence, with the exception of a number of mature specimen trees, most notably along Ojai Road. Based entirely on their size, a number of these trees appear likely to date from the property's historic period. The age and species of the extant landscape materials was not assessed for this report, as this task would be properly completed by a qualified arborist or landscape historian.

Eligibility of Historic Resources

Previous Listings or Determinations of Eligibility

The W.L. Hardison House was designated Ventura County Landmark No. 35 in 1977, at a time when the historic preservation program in the City of Santa Paula was operated under a joint powers agreement with the County of Ventura. This agreement lapsed in 1984 when the city adopted its own Historic Preservation Ordinance (City Ordinance No. 816). Since that time, the city has re-designated several County Landmarks located within the city as City Landmarks. It appears that the Hardison House has not been re-designated as a City Landmark, leaving its current local listing status unclear.

National and California Registers: Significance, Eligibility and Integrity

This property is closely associated with a significant historical event: the settlement of Santa Paula Canyon, itself an important event within the overall development of the Santa Paula community. Wallace Hardison was one of the first of a handful of settlers to purchase land in Santa Paula Canyon during the 1880s, build homes, and become longterm residents. The settlement of the canyon, the sole source of domestic water for the entirety of Santa Paula for over two decades, in which Hardison took part, is closely linked to the larger theme of community development. The house and outbuildings is one of only a handful of ranches in the canyon from this period to remain today, and the only intact ranch from this period to include both its original property and associated buildings (NRHP Criterion A and CRHR Criterion 1).

The property was owned from 1883 by Wallace Libbey Hardison and was the site of his home beginning in 1884 until circa 1900. Hardison led a distinguished and significant career in the development of the oil industry, culminating in the founding of the Union Oil Company in 1890, an event of at least statewide if

not national significance. Hardison also made significant personal contributions towards the successful development of the Santa Paula community with the establishment of Santa Paula Waterworks, Ltd., the supplier of domestic water to Santa Paula, and the Thermal Belt Water Company. This latter company was key to the founding of the Limoneira Company in 1893, an event in which Hardison was also a major participant. The Limoneira Company would evolve rapidly into one of the state's most prominent agribusiness concerns and a driving force behind the growth and development of Santa Paula for many decades to follow.

Wallace Hardison was a key figure in the establishment of a Universalist congregation in Santa Paula and in the construction of the church building. Hardison's many business ventures led many of his family members to relocate to Santa Paula, several of whom went on to become important figures in their own rights. Most prominent among the individuals who were attracted to Santa Paula by Wallace Hardison were grand-nephew Charles Collins Teague, who became the director of the Limoneira Company for fifty years, and an agriculturist with a national reputation; and nephew A.C. Hardison, who made significant contributions to agriculture both locally and on a statewide level (NRHP Criterion B and CRHR Criterion 2).

The Main Residence and Barn/stable buildings on the property are representative examples of an architectural style, period, and type of construction that is relatively scarce in Santa Paula. While they are not particularly high-style examples of their architectural types, few Italianate-style buildings from the period before the arrival of the Southern Pacific Railroad in 1887 were ever constructed in Santa Paula, and at most only a handful exist today, and none of this scale and architectural quality (NRHP Criterion C and CRHR Criterion 3).

NRHP Criterion D and CRHR Criterion 4 pertain to archeological resources and consequently have not been evaluated in this report.

The most appropriate period of significance for purposes of the NRHP and CRHR appears to be 1884-1900, the time period during which Wallace Hardison lived on this property and achieved the accomplishments that form the basis of his historical importance. The buildings constructed during this time period are the Main Residence, the Barn/stable, and possibly the Second Residence (date of construction not fully determined). The Garage/Residence was constructed after the period of significance and consequently would not contribute to the property's eligibility for the NRHP and CRHR.

Integrity Discussion

The property's integrity of location from the period of significance is intact (none of the buildings appear to have been moved). The integrity of design for the Main Residence appears to be slightly compromised, due to the addition of the sleeping porch on the northern elevation circa 1920 and the addition of the porch balustrade, possibly at the same time, or perhaps earlier. The design integrity for the Barn/stable and Second Residence are intact. The property's integrity of setting is somewhat intact; the undeveloped hillside backdrop that provides the property with its historic rural setting remains, but the setting to the north, south and east are non-historic residential construction dating from the 1920s through the 1970s.

To the extent that the buildings are unaltered, their integrity of materials and workmanship are also intact. The integrity of the property's feeling and association are essentially intact, as the visual connections of the property to its historic use remain. Taken as a whole, the property appears to retain sufficient integrity to be eligible for listing on the NRHP under criteria A, B and C, and the CRHR under criteria 1, 2 and 3.

Local Significance and Eligibility

For purposes of local significance and eligibility, the appropriate period of significance should be expanded to include the lifetime of James Norris Procter (until 1962). In terms of the ordinance for listing landmarks, the property should be regarded as "particularly representative of a distinct historical period, type, style, region, or way of life" (Criterion A-1-a); as the "site is the location of a significant local or national event" (Criterion A-1-f); and, "represents an established and familiar visual feature of the neighborhood, community or city (Criterion A-3-b). The property also appears to meet the requirements of Criterion B, to "have sufficient integrity of location, design, materials, construction and workmanship to make it worthy of preservation, restoration or rehabilitation."

Conclusion

This property appears to be eligible for listing on the NRHP, CRHR, and for City of Santa Paula Landmark designation. Therefore the property should be regarded as a historic resource for the purposes of CEQA. The contributing buildings for purposes of NRHP and CRHR eligibility are the Main Residence and Barn/stable. The Garage/Residence and Second Residence also contribute towards City of Santa Paula Landmark designation.

Project Description and Impacts

The proposed project is to redevelop 9.72 acres of the 19.28 acre project site, to provide a new residential subdivision with approximately 54 residential lots including 53 new homes and the retention of the Hardison House (Main Residence) and the Barn/stable. The proposed project will require the demolition of all of the existing buildings on site with the exception of the Main Residence, which will be retained on site in its current location, and the Barn/stable. The Barn/stable will be restored and relocated adjacent to the Hardison House to be used as the garage. Approximately 9.56 acres of the Project Site will be retained as open space. The Project will also include the construction of associated access roads, and an unpaved recreational trail on the sloped northwestern side of the property.

The project calls for the Barn/stable building to be relocated from its existing position on the property a distance of approximately 160 feet north and east, to a location roughly 44 feet to the south of the Main Residence. The elevation facing will remain as existing. The existing lean-to wing attached to the southern elevation and a small wing on the western elevation will be removed. The relocated building will be placed on a concrete slab foundation in its new location and converted to a garage for the house. (See Figure 2.6, Proposed Site Plan)

General Approach

All relocation and restoration activities will be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation. Where feasible, existing interior and exterior materials will be repaired rather than replaced. Where deterioration requires replacement, the new feature will match the old in design, and wherever feasible, materials. When feasible, the replacement of missing features will be substantiated by documentary or physical evidence. Additional specific callouts and recommendations for the relocation and restoration process for the barn/stable structure are provided in Appendix C, Historic Resources Report. Also contained in the Historic Resources Report is a discussion of the proposed project activities evaluated in terms of their conformance with the Secretary's of the Interior's Standards for Rehabilitation. As concluded by San Buenaventura Research Associates, the Project as proposed partially conforms with the Secretary of the Interior's Standards.

Project Impacts

"It should be understood that the *Secretary of the Interior's Standards* are descriptive, not proscriptive in nature. They are intended to provide for a range of design solutions to any given rehabilitation, not to enforce a specific or uniform approach to any given design problem involving historic resources. The Standards are written purposefully to be interpreted both by architects and decision-makers. Accordingly, multiple design solutions can properly be supported by the application of the *Secretary of the Interior's Standards*. The highly interpretative nature of the Standards provides ample grounds for differences of opinion, between professionals who are familiar with their application, and members of the public. Note also that not every standard necessarily applies to every aspect of a project, nor is it necessary to comply with every standard to achieve conformance." (Appendix C, pgs 19-20)

Without mitigation, the proposed Project would have a significant adverse impact on the integrity of features that contribute to the significance of the property and its eligibility for listing on the NRHP, CRHR and for Local Landmark designation, due to development of the entire property as a single family residential subdivision. This will result in the reduction of the eligible property from its existing 19.28 acres to 0.65 acres, (with an additional adjacent 0.46 acres reserved for public open space), the relocation of the Barn/stable building, the demolition of the Second Residence and Garage/Residence, and the construction of 53 new single family residences surrounding the setting of the Main Residence. These impacts are described in terms of the aspects of integrity as a partial reduction of the property's original integrity of location, design, setting, feeling, and association.

Mitigation Measures

Based on the findings and analysis contained in the Historic Resources Report, San Buenaventura Research Associates recommends including the following mitigation measures in the environmental document for the proposed project that reduce historic impacts to less than significance:

5.1 Interpretive Measures

5.1.1 Interpretive Plan. An historic preservation professional qualified in accordance with the Secretary of the Interior's Standards shall be selected to prepare an interpretative plan that

includes the design of an on-site interpretation exhibit or plaque to be permanently installed on the Lot B public open space area of the Tentative Tract Map. The plan shall be approved by the City of Santa Paula prior to issuance of building permits for the last phase of the new construction, and installed upon the completion of the Lot B public open space area, or no later than three years after the recording of the final tract map.

5.2 Design Measures

5.2.1 Landscape Report Plan. A qualified arborist or landscape architect shall prepare a report and plan to determine the feasibility of retaining and treating the mature landscape materials on the project site. The report shall be completed subject to the approval of the City of Santa Paula prior to the recording of the final tract map, and the recommended treatment measures implemented prior to the issuance of a grading permit for the project.

5.2.2 Fencing and Wall Treatment. To the greatest extent feasible, the wall and fencing treatment surrounding Lot 35 shall be visually compatible with the historic character of the property in terms of scale, details and materials. The fencing between Lot 35 and Lot B shall be visually porous and not unduly obstruct the views of the property from Ojai Road.

5.2.3 Construction Monitoring. Stable A qualified historic preservation professional shall prepare a plan that specifies procedures for protecting historical resources and a monitoring method to be employed by the contractor while working near these resources. At a minimum, the plan shall address the method of bracing and moving of the Barn/Stable building, the operation of construction equipment near adjacent historical resources, storage of construction materials away from adjacent resources, and education/training of construction workers about the significance of the historical resources.

5.2.4 Documentation. A qualified historic preservation professional shall produce a Documentation Report that generally consists of HABS-like archival quality photographs and negatives of exterior and interior views of the historic, a description of the historical significance of the property, and a full set of measured drawings of the historic resources depicting the existing or historic conditions. The printed publication consisting of the documentation report, interpretative information, photographs and negatives, and the Historic Resources Report prepared for this property shall be combined in a reference publication for the public and copies shall be donated to the City of Santa Paula, Museum of Ventura County, Ventura County Cultural Heritage Board and the Santa Paula Historical Society prior to issuance of any permits.

5.2.5 Preservation. A condition of approval of the Tract Map No. 5928, the homeowner association CC&Rs, and deed restrictions applied to the Lot 35 property shall require residential use of the Hardison House, to the extent allowed by State and Federal Law, appropriate and timely maintenance of the Main House and garage and grounds, and that any future exterior alterations to the Main Residence and Barn/Stable be subject to the review and approval of the City of Santa Paula.

Impacts After Mitigation

Based on the findings and recommendations of San Buenaventura Research Associates, as detailed in the Historic Resourced Report, the Main Residence and barn/stable on Parcel 35 will remain eligible for the NRHP, CRHR, and as a City of Santa Paula Historic Landmark. The project as designed, along with the incorporation of the recommended mitigations, will serve to insure future preservation of the eligible property. Consequently, the residual impact of the project on historic resources after mitigation is less than significant.

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources. The Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas. The Proposed Project would involve the grading of the eastern half of the Project Site for construction of the proposed residences and roadways. The area proposed for development has been subject to cultivation and has historically been disked and surface graded without any record of archaeological resource discovery. Thus, there is relatively low potential for the accidental discovery of any unknown archaeological materials to occur. Nevertheless, because the presence or absence of such materials cannot be determined until the site is excavated, as a precautionary measure, the following mitigation measure is recommended to ensure that impacts to archaeological resources, should any such material be encountered, are mitigated to a less than significant level.

Mitigation Measures:

5.3 If any archaeological materials are encountered during the course of project development, all further development activity shall halt in the area of the discovery and the services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.

The archaeologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report to the satisfaction of the Planning Director. The archaeological survey, study or report shall be submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological

resources or geologic features which presently exist within the Proposed Project site. The Proposed Project site has been previously graded and is currently occupied by the former Hardison House residence with three associated structures and an undeveloped hillside. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources. Although no paleontological resources are known to exist on site, there is a possibility that paleontological resources exist at sub-surface levels on the Project Site and may be uncovered during grading activities for the Proposed Project's building foundation. Implementation of the following mitigation measure will ensure that if any such resources are found during construction of the Proposed Project, they are handled according to the proper regulations and any potential impacts are reduced to less than significant levels.

Mitigation Measures:

5.4 If any paleontological materials are encountered during the course of project development, all further development activities shall halt in the area of the discovery and the services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.

The paleontologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report to the satisfaction of the Planning Director. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.

d. Disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Impact with Mitigation Incorporated. A Project-related significant adverse effect could occur if grading or excavation activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Proposed Project site or its vicinity. However, it is possible that unknown human remains could occur on the Proposed Project site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. The following mitigation measure is recommended to reduce potential impacts related to the disturbance of unknown human remains to a less than significant level.

Mitigation Measures:

5.5 In the event that human remains are discovered during excavation activities, the contractors shall stop all activities in the immediate vicinity of the discovery and contact the County Coroner. The coroner has two working days to examine human remains after being notified by the responsible person.

If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. The Native American Heritage Commission will immediately notify the

person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or; if the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Cumulative Impacts: Less Than Significant Impact. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate mitigation. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources are less than significant.

6. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☑	☐
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?	☐	☑	☐	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☑	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☑	☐	☐
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?	☐	☐	☐	☑

The following section summarizes and incorporates by reference information from the *Geotechnical Investigation, Tentative Tract Number 5928, 1226 Ojai Road, Santa Paula, CA,* prepared by RMA GeoScience, March 12, 2014 (Geotechnical Investigation). The Geotechnical Investigation is included as Appendix D to this Initial Study.

a.i Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. A significant impact may occur if a Proposed Project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The subject site is located in Santa Paula in the County of Ventura. According to the USGS 7½-minute topographic map – Santa Paula Quadrangle, the site is located at an elevation of approximately 465 feet (MSL) and has site coordinates 34.3729 (Latitude) and -119.0661 (Longitude). Regional geologic conditions are illustrated on the enclosed Geologic Map, Plate 1 (see Appendix D to this MND).

Based on the findings and conclusions contained in the Geotechnical Investigation, no known active or potentially active faults underlie the Project Site. The site is not located within the boundaries of an Earthquake Fault Zone for fault-rupture hazard as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no active faults are known to pass through the property. The nearest earthquake fault zone is located about 5 miles to the south of the site along the Oak Ridge fault. Therefore, potential impacts associated with surface fault rupture are considered less than significant.

a.ii Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. Based on the information contained in the Geotechnical Investigation, the site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the Proposed Project is considered low. The site, however, is located in the seismically active Southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structure is designed and constructed in conformance with current building codes and

engineering practices and incorporate the recommendations specified in the Geotechnical Investigation. Accordingly, the following mitigation measures are recommended to reduce impacts associated with seismic hazards to a less than significant level.

Mitigation Measures:

6.1 The design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Public Works Department of the City of Santa Paula.

6.2 All grading should be performed in accordance with the General Earthwork and Grading Specifications outlined in Appendix C to the Geotechnical Investigation, unless specifically revised or amended. Recommendations contained in Appendix C are general specifications for typical grading projects and may not be entirely applicable to this project. It is also recommended that all earthwork and grading be performed in accordance with Appendix J of the 2013 California Building Code (CBC) and all applicable governmental agency requirements. In the event of conflicts between the Project Geotechnical Report and CBC Appendix J, the recommendations of the Project Geotechnical Report shall govern.

a.iii Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. According to the Seismic Hazard Zones Map for the Santa Paula Quadrangle (2002), the site is not situated within a Liquefaction Hazard Zone. Additionally, historic high groundwater is anticipated to be greater than 40 feet below existing grade. Therefore, liquefaction and related phenomena (i.e. seismically-induced settlement, lateral spreading, lateral flows, bearing strength loss, sand boils, etc…) are not anticipated to impact the site. Therefore, potential impacts associated with liquefaction are anticipated to be less than significant.

a.iv. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving landslides?

Less Than Significant Impact. According to the Seismic Hazard Zones Map for the Santa Paula Quadrangle (2002), the site is situated within a Landslide Hazard Zone, which indicates the potential for landslides. However, the orientation of the bedding planes on-site is favorable with respect to the gross stability of the slopes. Furthermore, there were no landslides observed during reconnaissance of the site, on regional geologic maps or aerial site photographs. Therefore, potential impacts associated with landslides are anticipated to be less than significant.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact Unless Mitigated. A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and

sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Based on the findings of the Geotechnical Investigation, the orientation of the bedding planes is favorable with respect to the gross stability of the slope. A debris basin is planned to intercept any runoff or shallow debris slides which could occur in the natural slope areas. Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion are reduced by implementation of erosion controls imposed through grading and building permit regulations. Specifically, a Storm Water Pollution Prevention Plan (SWPPP) will be required to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The SWPPP would identify Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for storm water quality. Implementation of the BMPs identified in the SWPPP and compliance with the Ventura County Municipal Separate Storm Sewer System Permit (MS4) discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality during construction. Implementation of mitigation measures 6.3 and 6.4, below would ensure impacts related to erosion and sedimentation are mitigated to less than significant levels.

Mitigation Measures:

6.3. Stormwater Pollution Prevention Plan. In compliance with the Ventura County Municipal Separate Storm Sewer System Permit, before the City issues a grading permit, the developer shall prepare a Stormwater Pollution Prevention Plan for the site for review and approval by the Public Works Director, or designee. The SWPPP must fully comply with RWQCB requirements and contain specific BMPs to be implemented during project construction to reduce erosion and sedimentation to the maximum extent practicable.

6.4 Surface drainage should be directed away from the proposed structures into suitable drainage devices. Neither excess irrigation nor rainwater should be allowed to collect or pond against building foundations or within low-lying or level areas of the property. Surface waters should be diverted away from the tops of slopes and prevented from draining over the top of slopes and down the slope face.

c. Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Potentially Significant Impact Unless Mitigated. Based on specific data and information contained in the Project Geotechnical Report (see Appendix D), it is RMA GeoScience's professional judgment that the proposed development is geologically and geotechnically feasible. This finding is provided that the recommendations presented in their report are fully implemented during design, grading and construction. As required through the implementation of Mitigation Measure 6.1, the design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Public Works Department of the City of Santa Paula. Thus, with the mitigation described above, project impacts associated with expansive soils will be reduced to less than significant levels.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Potentially Significant Impact Unless Mitigated. Based on the findings of the Project Geotechnical Report, it is anticipated that the soils at the site will be re-distributed during re-grading operations. Based on preliminary testing, RMA GeoScience anticipates that the soils which will ultimately support the proposed building foundations will have a medium expansion index. It is anticipated that the primary mechanisms for differential movement of building foundations at the subject site will be shrinkage and swelling of expansive soils. Post-tensioned foundations and slabs can be used to mitigate the effects of expansive soils. It should also be noted that the foundation designs provided herein for expansive soils will be sufficient to mitigate potential settlement associated with the alluvium underlying the fill on the site. Additional expansion index and plasticity index testing will be required at the completion of grading to verify the properties of the near surface soils prior to the final design and construction of the foundation system for the proposed structures. As noted in Mitigation Measure 6.1, the design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Public Works Department of the City of Santa Paula. Thus, compliance with Mitigation Measure 6.1, project impacts associated with expansive soils will be reduced to less than significant levels.

e. Would the Project 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?

No Impact. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. Wastewater collection facilities that serve the City of Santa Paula are owned, operated, and maintained by the City Public Works Department. The development would be served by the City of Santa Paula Public Works Department, which operates over 96 miles of sewer lines and oversees the City's water recycling facility. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

7. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?	☐	☐	☑	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	☑	☐

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

Less Than Significant Impact. Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. However, neither the VCAPCD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a project's GHG emissions. In the absence of any adopted quantitative threshold of significance for a project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines. As required in Section 15604.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Proposed Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Baseline GHG Emissions

The Project Site is currently improved with a single-family residence with a main house and three associated ancillary outbuildings. Approximately 9.18 acres of the Project Site is undeveloped hillside with mixed natural vegetation comprised mostly of coastal sage scrub habitat. The residence is currently unoccupied and does not generate any greenhouse gas emissions.

Proposed Project Emissions

The Proposed Project has the potential to generate GHG emissions as a result of the temporary construction activities and long-term operation of the Proposed Project. To assess the project's contribution of GHG emissions, the construction and operational emissions were quantified using CalEEMod.2013.2.2 as discussed in further detail below.

Construction GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as Project-generated. Emissions of GHGs were calculated for each year of construction of the Proposed Project. The Proposed Project's annual construction-generated GHG emissions are expressed in $CO2_e$ metric tons per year ($CO2_e$ MTY) and are presented in Table 5.2, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 3.4, the Project's total construction-related greenhouse gas emissions are estimated to be 638.8 $CO2_e$ metric tons, with the greatest annual increase in GHG emissions estimated at 349.29 $CO2_e$ MTY in 2016.

Table 3.4
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2015	236.84
2016	349.29
2017	52.67
Total Project Construction GHG Emissions	**638.80**

[a] Construction CO_2 values were derived using CalEEMod.2013.2.2. Calculation data and results are provided in Appendix C to this IS/MND.

Operational GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, and generation of solid waste and wastewater, were calculated under the assumption of compliance with Title 24 building regulations. Emissions of the Proposed Project's operational GHGs are shown in Table 3.5, Proposed Project Operational Greenhouse Gas Emissions. As shown in Table 3.5, the Proposed Project is expected to generate approximately 816.95 $CO2_e$ MTY.

Table 3.5
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)		Percent Reduction
	Unmitigated	Mitigated	
Area	0.67	0.67	0%
Energy	193.72	190.13	2%
Mobile	545.89	545.89	0%
Waste	30.78	15.39	50%
Water	24.60	19.32	21%
Amortized Construction Emissions [a]	21.29	21.29	0%
Project Net Emissions	***816.95***	***792.69***	3%

[a] The total construction GHG emissions were amortized over 30 years and added to the operation of the Project consistent with SCAQMD methodology.
Source: Parker Environmental Consultants, December 2014. Calculation data and results provided in Appendix G to this Draft EIR.

To illustrate the scope of the Project's potential to generate a significant increase in GHG emissions, the Project's operational emissions can be compared to the SCAQMD's proposed interim thresholds that were previously considered for adoption in October 2008. While these thresholds were not formally adopted by the SCAQMD, they are useful in providing a comparative measure of the Project's operational GHG emissions relative to a proposed screening standard as suggested by a SCAQMD District staff. The SCAQMD's draft guidance document regarding interim CEQA GHG significance thresholds proposed a

screening level of 3,000 metric tons of $CO2_e$ per year for residential/commercial land use projects, under which project impacts are considered "less than significant." The 3,000 metric ton screening level was intended "to achieve the same policy objective of capturing 90 percent of the GHG emissions from new mixed-use or all land use development projects in the residential/commercial sectors." Citing the need to for additional analysis to further define the performance standards and to coordinate with CARB staff's interim GHG proposal, no thresholds of significance were ever adopted for residential/commercial sectors. Nevertheless, for comparative purposes, it is worth noting that the Project's total GHG emissions are well below the 3,000 metric tons of $CO2_e$ per year screening threshold proposed by the SCAQMD staff in 2008. The Project's unmitigated GHG emissions would represent only 27 percent of the SCAQMD's proposed screening threshold.

In accordance with City policies and regulations to reduce air pollution, conserve energy, minimize waste, and promote water conservation features into the proposed design of the tentative tract, the Project's GHG emissions were estimated with mitigation measures recommended for other issue areas that would have beneficial impacts with respect to reducing the Project's GHG emissions. The with mitigation scenario represents project design features such as installing energy star rated appliances and using low VOC pints in architectural coatings. Other mitigation measures that are recommended for other issue areas addressed within this MND that would have the beneficial effect of reducing the Project's GHG emissions include, but are not limited to the following: Mitigation Measure 17.1 (requiring water conservation features such as low flow plumbing fixtures within residential dwelling units), Mitigation Measure 17.2 (requiring the use of water conservation landscaping fixtures in common areas), and Mitigation Measure 17.3 (requiring the implementation of a solid waste recycling program). As noted in Table 3.5 above, the Project's total operational GHG emissions with mitigation, is estimated to be 792.69 $CO2_e$ per year, a reduction of 3 percent as compared to the project's unmitigated emissions. As noted previously there are no quantifiable thresholds of significance to determine a project's impact upon greenhouse gases and global warming. However, as noted in response to Checklist Question 1a, the Project is consistent with the AQMP and the ambient growth projections of Ventura County. Additionally, the Proposed Project are consistent with State and regional policies to conserve energy and reduce GHG related emissions. Therefore, since the Proposed Project is substantially consistent with local policies and regulations aimed at increasing energy efficiency and reducing GHG emissions, the Project's GHG emissions are considered less than significant.

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The Proposed Project constitutes an infill development as the Proposed Project would redevelop a property that is currently improved with a single-family residential dwelling unit with three ancillary structures. The Project Site is served by existing infrastructure including wet and dry utilities and is accessible via Ojai Road. As such the Proposed project would not require the extension of utilities or infrastructure and would not be growth inducing. The Project is consistent with regional and statewide goals and policies aimed at reducing the generation of GHGs, including Title 24 building regulations,

SCAG's 2012-2013 RTP/SCS, SB 375, and CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Therefore, the Proposed Project's generation of GHG emissions would not make a cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases. The Proposed Project's impact upon GHG emissions and global warming would be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☑
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☑	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☑
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, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☑
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☑
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑	☐
h. 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?	☐	☐	☑	☐

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No Impact. The Proposed Project involves the construction and operation of a residential subdivision and would not result in the routine transport, use, or disposal of hazardous materials. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site, and use of these substances would comply with State Health Codes and Regulations. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and no impact would occur.

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?

Less Than Significant Impact. A significant impact would occur if a project utilizes quantities of hazardous materials as part of its routine operations that could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions. The Proposed Project would involve the construction and operation of a residential subdivision. Equipment and materials used during the construction period would be securely stored and applied in compliance with all applicable laws and regulations. Therefore, the Proposed Project would result in less than significant impact with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. 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 Impact. The Proposed Project would involve the construction and operation of a residential subdivision with 54 dwelling units. The Project Site is located within 600 feet of Thelma Bedell Elementary School, which is located to the east of the Project Site at 1305 Laurel Road. However, neither construction nor operation of the Proposed Project would result in emissions of hazardous substances or require the handling or storage of hazardous materials. The equipment and materials used during the construction period would be stored and applied in compliance with all applicable laws and regulations. Therefore, project impacts would be less than significant.

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

No Impact. Regulatory agency databases were reviewed by EEG Services in November of 2013 for listed properties located within a one-mile radius of the site. The EDR database search included a review of lists compiled by various federal, state, and local agencies. The County of Ventura Environmental Health Division (EHD) had no listings for the subject site. Geotracker had no listing for the subject property. The Envirostor database had no listing for the subject property. Regulatory agency databases were reviewed by Environmental Data Resources (EDR). These databases include lists of contaminated sites or sites

under assessment for contamination, as well as other compilation lists. The subject site was not listed in any of the databases. The radius map indicates a former underground fuel tank assessment on the subject property, however, the listing is in error and the site is actually in Ojai.[4] The Proposed Project is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. Therefore, no impacts related to the Project Site being listed on a regulatory database would occur.

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, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project is located approximately 1.6 miles north of the Santa Paula Airport. Santa Paula Airport is classified in the *National Plan of Integrated Airport Systems* (NPIAS) as a general aviation airport (FAA 1995, p. A-17). The Ventura County Airports Comprehensive Land Use Plan, a document that governs all aviation facilities in the County, has established inner and outer safety zones applicable to Santa Paula Airport. These zones guide certain land use standards, including use and height of structures. The Project Site is within the Airport Study Zone but is located well outside of the Airport's Noise Exposure Contours, as delineated in Exhibit 4F.[5] As such, the Project would not result in any safety concerns for the people residing or working in the Project area. No impact would occur.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?

No Impact. The Project is not located within the vicinity of a private airstrip. Therefore, the Proposed Project would not result in any safety concerns for the people residing or working in the Project area. No impact would occur.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Proposed Project would result in the development of 54 new residences within an established residential area. As noted on Exhibit S-6 of the Santa Paula Safety Element of the General Plan, Ojai Road (State Route150) is designated as a local emergency evacuation route. The tract map has been reviewed and approved by the Fire Department for conformance with access standards. Furthermore, as noted in response to Checklist Question 3.17, Traffic, under Future Cumulative (2025) With Project conditions, the four non-project driveway intersections would continue to operate at the same LOS as under Future Cumulative (2025) Without Project during both peak hours.

Accordingly, the Proposed Project would not impair or interfere with an adopted emergency response plan or emergency evacuation plan and project impacts would be less than significant.

[4] *See Phase I ESA, EEG Services, November, 2013 at page 9.*
[5] *Airport Comprehensive Land Use Plan for Ventura County Final Report, adopted July 7, 2000.*

h. 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?

Less Than Significant Impact. The Proposed Project is located in a Very High Fire Hazard area as indicated in Figure S-5 of the Safety Element of the Santa Paula General Plan. The Proposed Project includes the development of a residential subdivision that will be designed and built in accordance with all applicable Building Code requirements. The Proposed Tract Map has been reviewed by the Santa Paula Fire Department and the Applicant has incorporated emergency access and fuel modification measures into the Proposed Project. Specifically, the Tract Map has been designed to allow for emergency access from Ojai Road and incorporates additional emergency access points at the terminus of proposed Royal Oaks Road (to access the open space hillside to the west) and at the southerly end of proposed Redbud Street where it aligns with Marigold Lane to the south. As noted in the Water System Study for the proposed Tract Map, the Project Site is adequately served by existing water infrastructure as the combined peak hour water demand and fire flow are 89.73 pounds per square inch (psi) and 62 psi respectively, which is greater than the allowable minimum 20 psi that is required by Code. Thus, the Proposed Project would result in a less than significant impact with respect to exposing people or structures to a significant risk of loss, injury or death involving wildland fires.

Cumulative Impacts:

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Santa Paula. However, the potential impact associated with the Proposed Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with related projects. Therefore, with compliance with local, state and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects is expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

9. HYDROLOGY AND WATER QUALITY. Would the proposal result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	☐	☑	☐	☐
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support	☐	☐	☑	☐

existing land uses or planned land uses for which permits have been granted)?				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☑	☐	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☑	☐	☐
e. 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?	☐	☑	☐	☐
f. Otherwise substantially degrade water quality?	☐	☐	☐	☑
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☑
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☑
i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☑	☐
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☑	☐

a. Violate any water quality standards or waste discharge requirements?

Potentially Significant Impact Unless Mitigation Incorporated. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if the project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction

Construction of the Project would involve the grading of approximately 10.09 acres of the 19.28-acre Project Site. Project-related construction activity would subject the soil surface to erosion and temporary sedimentation. It could also discharge various pollutants into the down gradient watershed and the Santa

Clara River. However, with required implementation of appropriate best management practices (BMPs) on all project development, this impact would be less than significant with mitigation incorporated. As required under the NPDES, the Project Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The primary objectives of the NPDES storm water program requirements are to: 1) effectively prohibit non-storm water discharges; and 2) reduce the discharge of pollutants from storm water conveyance systems to the Maximum Extent Practicable ("MEP" statutory standard). The SWPPP would incorporate the required implementation of Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for storm water quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Implementation of the mitigation measure 6.3 (see response to Checklist Question 6, Geology and Soils) would ensure that the Proposed Project's construction-related water quality impacts are less than significant.

Operation

Operation of the Proposed Project has the potential to alter surface water flows on and around the Project Site. With the exception of the existing building footprints for the four existing structures on-site, the 19.28-acre Project Site is undeveloped and comprised of pervious surfaces that facilitate groundwater infiltration. Surface water runoff currently flows to the east into the curb and storm drain under Ojai Road. Development of the Proposed Project will have the potential to increase stormwater runoff. The Project's stormwater flows will be controlled on site in a series of drainage easements and a proposed LID stormwarer detention basin. The toe of the western slope will be improved with a concrete lined debris basin which will direct surface water flows to the peremeter drainage easements along the Project Site's northerly and southerly borders. A proposed 4-foot wide interceptor drain is proposed along the Project Site's northerly property line. A proposed 5-foot wide privately maintained permanent drainage easement is proposed along the Project Site's southerly property line. Surface water flows within the developed roadways would be directed to a retention basin located at the front of the tract adjacent to Ojai Road. The proposed storm water detention basin would discharge into a proposed 30" reinforced concrete pipe (R.C.P.) under Ojai Road which would connect to an existing 30" R.C.P. located approximately 650 feet south of the property line.

The Project Site is located within the region covered by the Ventura County Municipal Storm Water NPDES Permit No. CAS004002 issued by the RWQCB. The City of Santa Paula as one of the co-permittees under the Permit. The permit requires implementation of a Ventura County Stormwater Quality Urban Impact Mitigation Plan (SQUIMP), which sets forth the basis for planning and design requirements for new development projects. The requirements are intended to reduce impacts of urban runoff and construction on local waterways and the Pacific Ocean. The SQUIMP contains design standards for treatment control BMPs for stormwater runoff for most new construction and redevelopment projects. Various Best Management Practices (BMPs) that use Best Available Control Technology (BACT) are to be implemented to: (1) collect or filter runoff from the first ¾-inch of rainfall

within a 24-hour period; (2) conserve natural areas; (3) protect slopes and channels; (4) provide storm drainage system stenciling and signage; (5) properly design outdoor material storage areas; and (6) properly design trash storage areas (if applicable). Among other measures, permittees may use greenbelts, source reduction methods, active treatment (filtration or other approved method), catch basins, screening devices, or other technology to achieve the desired results. The purpose of these measures is to control the pollutants associated with "first flush" events that occur when the first substantial rainfall of the rainy season washes the pollutants accumulated during the dry season from the developed watershed. With implementation of mitigation measure 9.1, below, post development operational impacts to water quality standards and waste discharge requirements would be less than significant.

Mitigation Measure:

9.1 Prior to issuance of a grading permit, the Project Applicant shall prepare a Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) in accordance with the requirements of the Ventura County Municipal Storm Water NPDES Permit No. CAS004002. The appropriate design and application of Best Management Practices (BMP) devices and facilities shall be determined by the Santa Paula Department of Public Works.

b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?

Less Than Significant Impact. A project would result in a significant impact on groundwater supplies if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity. The site is underlain by the Santa Clara River Valley Basin, Santa Paula Subbasin, whose primary water-bearing units are Quaternary-age alluvium and the San Pedro Formation. Groundwater is generally unconfined in the eastern portion of the basin with localized confinement in the western portion where finer grained sediments are more extensive. The historic high groundwater at the site is shown to be greater than forty feet below ground surface by the California Geological Survey, Seismic Hazard Zone Reports for the Santa Paula and Santa Paula Peak 7.5 Minute Quadrangles, Ventura, California. Based on review of the topographic map, groundwater is expected to migrate in a southerly to southeasterly direction in the immediate vicinity of the site. The Project Site does not contain any groundwater wells and would not directly extract any water from the groundwater table. Therefore the Proposed Project would not have a direct impact on the groundwater table or alter the direction of flow of groundwater. Potable water for the Project would be provided via the Santa Paula Water District. The Proposed Project's water demand would represent fraction of a percent of the total water capacity of the Santa Paula Water District and has already been accounted for as part of the City's ambient growth projections in the 2005 City of Santa Paula Potable Water System Master Plan. Therefore, the Proposed Project would have a less than significant impact upon local groundwater supplies.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact Unless Mitigation Incorporated. A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. Drainage on site occurs as runoff from the east-facing slope on the western 9.15 acres of the Project Site. The eastern 10.09 acres is relatively level and primarily consists of barren tilled soil. Development of the Project Site would alter the immediate flow of surface water runoff but flows would continue to be directed to off site storm drains in Ojai Road. Sedimentation and surface water runoff would be mitigated to a less than significant level with implementation of Mitigation Measure 6.3. Post development surface water flows would be reduced to less than significant levels as the site would be required to retain the first ¾ inch rainfall event (see Mitigation Measure 9.1). Therefore, no substantial changes to the existing drainage pattern of the site or area would occur and project impacts are considered less than significant.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?

Potentially Significant Impact Unless Mitigation Incorporated. As noted in response to Checklist Question 4.b, no watercourses, wetlands or "waters of the U.S." were observed. Therefore, the Proposed Project would not have the potential to alter the course of a stream or river. Post-development surface water flows would be reduced to less than significant levels as the site would be required to retain the first ¾ inch rainfall event (see Mitigation Measure 9.1). Therefore, the proposed project would have a less than significant impact with respect to increasing the rate or amount of surface runoff in a manner which would result in flooding on- or off site. With implementation of Mitigation Measure 9.1, Project impacts are less than significant.

e. 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?

Potentially Significant Impact Unless Mitigation Incorporated. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. The Proposed Project will be subject to the Ventura County Municipal Separate Storm Sewer System Permit (MS4) permit. As discussed above, Mitigation Measures 9.1 requires the Applicant to prepare a SQUIMP prior to construction. The SQUIMP requires design standards for treatment control BMPs for stormwater runoff for most new construction and redevelopment projects. Various BMPs will be implemented to effectively collect or

filter runoff from the first ¾-inch of rainfall within a 24-hour period; conserve natural areas; protect slopes and channels; provide storm drainage system stenciling and signage; properly design outdoor material storage areas; and properly design trash storage areas such that the quality of surface water runoff does not pollute downstream receiving waters. With implementation of Mitigation Measure 9.1, project impacts related to the existing or planned capacity of the storm drain system and quality of surface water runoff are mitigated to a less than significant level.

f. Otherwise substantially degrade water quality?

No Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. The Proposed Project does not include potential sources of contaminants, which could potentially degrade water quality and would comply with all federal, state and local regulations governing stormwater discharge. Therefore, no impact would occur.

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact may occur if the Project was located within a 100-year flood zone. The Project Site is not in an area designated as a 100-year flood hazard area.[6] The Project Site is located outside the designated flood prone areas as delineated on FEMA's flood insurance rate maps. Therefore, the Proposed Project would not have the potential to place housing within a 100-year flood plain. No impact would occur.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Project places structures within a 100-year flood zone that would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area.[7] Therefore, the Proposed Project would not have the potential to impede or redirect flood flows. No impact would occur.

i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. As noted in the City's Safety Element of the General Plan, at least four dams northeast of the Santa Paula area have the hypothetical potential to result in dam inundation to the City or surrounding environs: Lake Pyramid Dam, Lake Castaic Dam, Bouquet Canyon Dam, and Santa Felicia Dam (Lake Piru). Based on a review of the boundary of potential dam inundation within the planning area (See Safety Element, Figure S-4) the Project Site is located outside of the potential inundation area from any of the area dams. Therefore, project impacts related to inundation from the

[6] *FIRM Flood Insurance Rate Map, Ventura County CA and Incorporated Areas., Panel 777 of 1275, Map No. 06111C0777E, Effective January 2010.*

[7] *FIRM Flood Insurance Rate Map, Ventura County CA and Incorporated Areas., Panel 777 of 1275, Map No. 06111C0777E, Effective January 2010.*

result of a failure of a levee or dam are less than significant.

j. Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The City of Santa Paula is located 14 miles inland from the Pacific Ocean. Therefore the potential for the site to be impacted by a tsunami is nil. The site is situated below a prominent north south trending ridge. Natural slopes up to 300 feet in height exist above and to the west of the planned development at gradients of 2:1 or flatter. Due to the planned drainage easements and improvements across the toe of the slope to the west of the planned development, the potential for mudflow to impact the Project Site is low. Therefore, the Proposed Project's impacts associated with potential inundation from mudflow are considered less than significant.

Cumulative Impacts: Less Than Significant Impact. Development of the Proposed Project in combination with the related projects would result in the further infilling of uses throughout the City. As discussed above, the Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. Under the requirements of the SQUIMP, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore mitigate impacts associated with the volume or quality of surface water runoff, and cumulative impacts to the existing stormwater drainage systems are less than significant. Therefore, cumulative water quality impacts are less than significant.

10. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☑
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☑

a. Physically divide an established community?

No Impact. A significant impact may occur if the project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses are disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located within a residentially developed area of the City of Santa Paula and is generally consistent with the existing residentially developed properties within the vicinity of the site. As shown in the representative site photographs in Figures 2.4 and 2.5, the Project Site is a relatively large open lot consisting of 19.28 acres with a single-family residence and three ancillary structures. The adjacent properties to the north and south consist of single-family residences within subdivision tract homes ranging in lot sizes from 5,000 to 10,000 square feet, with one adjoining residence to the north consisting of an approximate 1.3-acre residential property. Single-family homes are also located to the east across Ojai Road. Thus the proposed subdivision of 54 new single-family homes and the retention of the Hardison House and barn/stable are ~~consistent~~ generally compatible with the existing physical arrangement of the properties surrounding the Project Site. The Project Site is currently residential private property and does not provide through access between any adjoining land uses. Thus development of the site would not affect public access and circulation in the project vicinity. The Proposed Project would also be consistent with the General Plan land use designation of Hillside Residential land uses. Thus, the Proposed Project would not physically divide an established community and no impact would occur.

b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region's federally-designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD. At the local level, development of the Project Site is guided by the City of Santa Paula General Plan, and the City of Santa Paula Municipal Code, which are intended to guide local land use decisions and development patterns.

Regional Plans
Southern California Association of Governments
2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Project Site is located within the six-county region that comprises the SCAG planning area. As part of its regional planning efforts, SCAG prepared and has adopted the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Adopted April 2012) to address regional growth and measure progress toward achieving regional planning goals and objectives. The Proposed Project would be consistent with policies set forth in the RTP/SCS, as the Proposed Project is characterized as an infill development, and would increase the residential density of a property that is currently developed with a single family residence. With respect to regional population growth, the growth forecast for the 2012 RTP/SCS is contained in the Growth Management Appendix. The 2012 RTP/SCS growth projections for the City of Santa Paula are summarized below.

Table 3.6
SCAG 2012 RTP/SCS Growth Forecast for the City of Santa Paula

Population			Households			Employment		
2008	**2020**	**2035**	**2008**	**2020**	**2035**	**2008**	**2020**	**2035**
29,000	35,400	38,800	8,300	10,000	11,100	8,800	9,700	10,500
Source: SCAG 2012-2035 RTP/SCS, Growth Management Appendix, at page 37.								

Based on recent Census data published by the U.S. Census Bureau, the most recent population statistic for the City of Santa Paula indicates the City had a population of 30,091 persons in 2013. This reflects a 2.6 percent increase to the 2010 population; which was estimated at 29,321 persons in the 2010 Census. The total number of households estimated for Santa Paula is 8,213 per the Census Bureau's 2013 estimate. As compared to the regional projections contained in SCAG's 2012-2035 RTP/SCS shown in Table 3.6, above, the population of the City is currently 5,309 persons below SCAG's 2020 population forecast and 1,787 households below SGAG's 2020 estimate. Based on an average of 3.5 persons per household, the Proposed Project would increase the City's population by 189 persons bringing the total 2020 population to just under 5,120 persons shy of SCAG's 2020 population estimate and 1,598 dwelling units shy of SCAG's 2020 household forecast. Accordingly, the Proposed Project is consistent with SCAG's 2012-2035 RTP/SCS and land use impacts would be less than significant.

VCAPCD Air Quality Management Plan

The City of Santa Paula is located in the Ventura County portion of the South Central Coast Air Basin (Basin). The Ventura County Air Pollution Control District (VCAPCD) is the designated air quality control agency in the Ventura County portion of the Basin. In conjunction with SCAG, the VCAPCD is responsible for formulating and implementing air pollution control strategies. The Final 2007 AQMP was most recently adopted in 2008 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. As discussed above in response to Checklist Question 3.a (Air Quality), the future projected air quality levels in the 2007 AQMP were based on several factors including regional population growth and transportation

projections identified by Ventura County. A development project would generally conflict with or obstruct implementation of the AQMP if it is not consistent with the regional growth projections as identified in the City's General Plan.

The Project Site's current zoning designation is HR 2-PD (Hillside Residential 2PD, 0-3 du/ac), which would accommodate 57 single-family dwelling units under the existing code and planned land use. The Proposed Project includes a proposed Planned Development Permit in the HR 2-PD Zone. The Proposed Project's density is consistent with the maximum density allowed under the existing zoning designation, as well as the proposed, and thus is consistent with regional growth projections that were contained within the AQMP. The Proposed Project would therefore not conflict with or obstruct implementation of the AQMP and Project impacts would be less than significant.

Local Plans

City of Santa Paula General Plan

The Proposed Project would conform to the objectives outlined in the City of Santa Paula General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan consist of seven elements, including: Land Use; Circulation; Housing; Conservation and Open Space; Safety; and Noise.

Land Use Element

As noted in the City's Land Use Element General Plan Land Use Map, the land use designation for the Project Site is Hillside Residential (see Figure 2.3 in Section 2, Project Description). Pursuant to the Land Use Element, the purpose of the Hillside Residential land use category is to protect those areas of the City's hillside with a slope of 10% or more from haphazard development in an environmentally fragile area. As noted in Table LU-7, General Plan Land use Categories, in the City's Land Use Element, the principal use and development intensity/density for the Hillside Residential designation is single-family residential and accessory uses, with 0-3 units per gross acre. The minimum land area per unit is 14,500 square feet for all new development. Planned development clustering is allowed. Based on the allowable density of 0-3 units per acre (and one dwelling per 14,500 square feet of lot area), the 19.28- acre site would permit a total of 57 single-family dwelling units. Accordingly, the proposed 54-unit tract map is consistent with the standards of the Hillside Residential land use designation Land Use Element for density. However, the proposed tract map focuses the residential development on the eastern half of the site to preserve the hillside and hillside vegetation and includes lot sizes that are under 14,500 sf. Thus the Proposed Project would not be consistent with this standard. As such, the Applicant is seeking a Planned Development Permit in the HR-PD Zone, which would provide site-specific development standards that are consistent with the proposed tract map.

New Development Potential

The Land Use Plan allows for build-out of existing City lands as well as phased annexations. Land Use Element Table LU-6 illustrates the theoretical new development potential of both existing City lands and the expansion and planning areas, and summarizes the potential development upon full buildout of the General Plan. The type and amount of development that actually occurs will depend on market forces and an aggressive marketing plan by the City. The City realizes that total industrial, commercial, and residential build-out may not occur within the 2020 horizon of the General Plan. However, making the land available will eliminate one obstacle and provide an incentive for growth to occur. The Land Use Element's growth projections forecast 10,493 dwelling units by 2020. In 1998, when the General Plan was adopted, the City's growth estimate was based on 8,441 existing dwelling units per 1997 Department of Finance records, and a growth projection of 2,052 new dwelling units including 207 units of assumed ambient growth within the City limits (i.e., build out of vacant and underutilized properties) and 1,845 dwelling units associated with expansion and planning areas. Per the recent (2013) data from the US Census Bureau, the total number of existing households in Santa Paula is 8,213, approximately 228 dwelling units less than estimated in the Land Use Element. Nevertheless, the Project's 54 additional dwelling units would not surpass the City's 2020 growth forecast. Therefore, the Project is consistent with the Land Use Element's housing growth forecast.

City of Santa Paula Municipal Code

The zoning designation for the Project Site is HR 2-PD (Hillside Residential 2PD, 0-3 du/ac). Pursuant to SPMC Section 16.13.100, separate standards for the HR 2-PD zone are established to ensure that residential development in hillside areas is designed and developed to respect and respond to environmental conditions unique to the property. Division 3, Development Standards for HR-PD Zones, establishes performance standards for the design of subdivisions in the HR-PD zone and for development of individual lots within subdivisions. The grading standards set forth in Chapters 16.96 through 16.98 (Grading and Erosion Control) of this Title 16 also apply to development in the HR-PD zone.

The specific development standards for the HR 2-PD zone are summarized below in Table 3.7, below. As shown in Table 5.8, the proposed tract map would not comply with the existing development standards for the HR 2-PD Zone. Accordingly, the Project Applicant is seeking a Planned Development Permit to develop the Project as proposed. The Planned Development ("PD") overlay zone, which is being requested, is established under Section 16.31.010 of the Santa Paula Municipal Code to allow alternative development standards to be applied in limited circumstances where a property or development would benefit from the application of unique and innovative design; to permit greater design flexibility than is feasible under the strict application of conventional zoning and subdivision regulations; and to assist in preservation of areas of natural scenic beauty. The PD Overlay Zone may be approved if any of the following specific circumstances exist:

> (A) Where a property is proximate to public parks, public buildings, areas of public interest such as locations of natural beauty, of exceptional natural resources, and areas of historical significance;

(B) Where a disparity exists between adjacent zones warranting special conditions to protect the more restricted zone; and/or

(C) Where a new residential project or conversion of an existing residential use or uses proposes residential units on smaller lots than permitted in the zone but provides compensating open space and recreational facilities, provided overall density conforms to limits established in the Santa Paula General Plan. (Ord. 1100, passed 7-6-04)

The project would comply with PD standard 'A' above. The Proposed Project would retain the existing Hardison House and barn/stable structure, which is a recognized local historic resource identified in the City's Conservation–Open Space Element of the General Plan. The Hardison House and barn/stable structure are visible to the public viewshed from Ojai Road. In addition, due to the unique topography of the Project Site, the western 9.5 acres of the site is characterized with slopes of 2:1 or greater and will be retained as open space, but not open to the general public and, therefore, cannot be used to satisfy criterion 'C' above. As a result, the development of the Proposed Project is being focused on the eastern one half of the lot. With approval of the requested Planned Development Permit, land use impacts would be less than significant.

Table 3.7
Development Standards - HR-PD Zones

Development Feature	Existing Zoning	
	HR 2-PD Development Standards	**Does Project Comply?**
Density (Maximum)	0-3 du/ac, depending on slope.	Yes
Lot Area (Minimum)	14,500 sf	Yes, with PD
Lot Coverage (Maximum)	60%	Yes
Lot Width - Interior Lot (Minimum)	60 ft	Yes, with PD
Lot Width - Corner Lot (Minimum)	65 ft.	Yes, with PD
Building Height (Maximum)	35 ft. or 2-½ stories	Yes
Dwelling Unit Size (Minimum)	750 sf	Yes
Distance between Primary Residence and Accessory Building (Minimum)	10 ft.	Yes
Distance between Accessory Buildings (Minimum)	6 ft.	Yes
Front Yard Setback (Minimum)	Not less than 20 ft. from ultimate street right-of-way line	Yes, with PD
Side Yard Setback - Interior Lot (Minimum)	10 ft. on both sides	Yes, with PD
Side Yard Setback - Corner Lot (Minimum)	10 ft. on both sides	Yes, with PD
Rear Yard Setback -Second story (Minimum)	20 ft.	Yes, with PD
Source: Santa Paula Municipal Code, Table 13-3.		

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse effect could occur if the Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the Project Site. The Project Site is located in an area developed with single-family residential land uses and the Project Site is planned for residential uses. Therefore, the Proposed Project would not have the potential to conflict with an applicable habitat conservation plan or natural community conservation plan and no impact would occur.

Cumulative Impact

No Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects are compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, the Proposed Project's land use impacts would not be cumulatively considerable since the Proposed Project would not conflict with applicable local or regional plans and the Proposed Project's land use impacts are less than significant.

11. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☑
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☑

a. 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?

No Impact. The Project Site is not zoned for extraction of a regionally-important mineral resource, and development of the Proposed Project would not convert an existing or future mineral extraction use to another use. Therefore, no impacts would occur.

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?

No Impact. The Project Site is not zoned for extraction of a locally-important mineral resource, and development of the Proposed Project would not convert an existing or future locally-important mineral extraction use to another use. Therefore, there are no impacts associated with the loss of availability of a

known mineral resource.

12. NOISE. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☑	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☑	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☑	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☑	☐	☐
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, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑

Noise Fundamentals

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a constant noise level of 60 dBA L_{eq} during a continuous 24-hour period would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather, hard or soft ground surfaces, and physical barriers also help to intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from

stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[8]

Noise Element of the General Plan

The purpose of the Noise Element is to maintain the quality of life for Santa Paula residents through control of excessive or disruptive sources of noise. The goals, objectives, policies, and implementation measures in this element provide guidelines and mandates for community actions to prevent future noise exposure and control of the existing noise environment. For purposes of this analysis, the objectives and policies of the Noise Element that relate to the Proposed Project include roadway noise along Ojai Road and construction activities.

With respect to Roadway Noise, the Noise Element identifies Ojai Road (SR 150) as one of the predominant noise sources in the City. Specifically, the Noise Element describes roadway noise along State Route 150 as follows:

> "SR 150. SR 150 is the primary access between SR 126 and Ojai, with traffic volumes of approximately 12,000 ADT. It is a major north-south corridor linking downtown Santa Paula with the residential areas at the northern end of the City. The 60 dBA noise contour produced by traffic on this roadway is located approximately 80 feet from the roadway centerline. Thus, only residential development directly adjacent to the road would experience noise levels above 60 dBA CNEL. In general, the primary areas of noise concern are north of Saticoy Street, where traffic speeds increase and residential development is more prevalent."

Areas of the Project Site that are within 80 feet of Ojai Road fall within the 60 dBA roadway noise contour. Areas within the Project Site located more than 80 feet from Ojai Road are exposed to roadway noise levels below 60 dBA.

With respect to Construction Noise, the Noise Element identifies the following Objectives and Policies:

Objective 7(a) Minimize the impacts of construction noise on adjacent uses.

Policy 7.a.a. Require that construction activities adjacent to residential units be limited as necessary to prevent adverse noise impacts.

Policy 7.b.b. Require that construction activities employ feasible and practical techniques which minimize the noise impacts on adjacent uses.

[8] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

Noise Ordinance

The City's Noise Ordinance is codified in Chapter 93 of Title IX of the Santa Paula Municipal Code (SPMC). Section 93.21 states that it is unlawful for a source of sound to exceed the sound level limits shown in Table 3.8, below, as measured at the receptor. Section 93.23 states that construction activities between 8:00 a.m. and 6:00 p.m., Monday through Friday, are exempt from these sound level limits. Construction of the project would be subject to these limits.

Table 3.8
City of Santa Paula Sound Level Limits

Land Use	Time Period	Noise Level
Residential	Daytime (7:00 a.m. to 10:00 p.m.)	65 dBA
	Nighttime (10:00 p.m. to 7:00 a.m.)	60 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
Source: City of Santa Paula Municipal Code, Section 93.21.		

Ambient Noise Levels

To assess the current noise levels in the immediate project vicinity, baseline community noise measurements were recorded at four locations in the vicinity of the Project Site. 15-minute noise measurements were conducted on Thursday November 13, 2014 generally between the hours of 11:00 a.m. and 1:30 p.m. Table 3.9, Ambient Noise Levels in the Project Vicinity, provides a summary of the ambient noise levels at these four survey locations. As shown in Table 3.9, the noise levels in the project vicinity are heavily influenced by roadway noise along Ojai Road. Noise levels recorded along Ojai Road were approximately 16 to 22 dBA lower within the residential areas set back from Ojai Road. Figure 3.3, Noise Monitoring and Sensitive Receptor Location Map, depicts the general measurement locations and identifies the surrounding land uses.

Table 3.9
Ambient Noise Levels in the Project Vicinity

Monitoring Location [a]	Time of Day	Average L_{eq}	Minimum L_{min}	Maximum L_{max}
1. Terminus of Marigold Lane, south of the Project Site	11:43 a.m. – 11:58 a.m.	49.6	35.9	60.8
2. Northeast corner of Royal Oaks Place and Ojai Road	12:10 p.m. – 12:25 p.m.	65.6	40.6	78.0
3. Residences on the east side of Ojai Road, directly across from the Project Site	12:27 p.m. – 12:42 p.m.	69.3	35.6	90.4
4. Private Drive north of the Project Site	12:51 p.m. – 1:06 p.m.	46.7	36.8	57.3

[a] *Monitoring locations are identified in Figure 3.3, Noise Measurement Location Map.*
Source: Parker Environmental Consultants, November 2014. See Appendix G for Noise Measurement printouts.

a. Would the project result in exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Santa Paula Noise Element (Noise Element) and the established sound level limits set forth in Chapter 93, Noise of the Santa Paula Municipal Code (Noise Ordinance). Table 3.10, Noise Compatibility Matrix, presents the California Department of Health, Office of Noise Control, noise compatibility guidelines for various land uses as referenced in the City's Noise Element. The compatibility table illustrates the ranges of community noise exposure in terms of what is "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For the most sensitive land uses such as single-family residential uses, 60 dBA CNEL is the maximum normally acceptable level. These guidelines are used to assess whether or not noise poses a conflict with land development.

The Proposed Project has the potential to increase ambient noise levels due to short-term construction activities and long-term operation and occupancy of the residences. Accordingly, a detailed analysis of the construction and operational impacts is provided below.

Construction Impacts

Construction of the Proposed Project would require the use of heavy equipment for demolition/site clearing, grading and site preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table 3.11, Noise Range of Typical Construction Equipment, and Table 3.12, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Pursuant to Section 93 of the Noise Ordinance, construction activities between 8:00 a.m. and 6:00 p.m. Monday through Friday are considered exempt from the established sound level limits set forth in the City's Noise Ordinance. In accordance with the Santa Paula Municipal Code, the general contractor or Applicant will be required to post notice at all entrances to the construction site listing the noise limitations on construction. The posting of a notice will also provide a direct line to the project contractor to register complaints and obtain information on construction activities occurring on-site. Objective 7(a) of the Noise Element of the General Plan also requires that developers minimize the impacts of construction noise on adjacent uses. Accordingly, Mitigation Measures 12.1 through 12.4, below, are recommended to reduce the Project's temporary construction noise impacts upon adjacent properties to acceptable levels. With mitigation, construction noise impacts are less than significant.

Source: Parker Environmental Consultants, November 13, 2014.

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Figure 3.3
Noise Monitoring Locations

Table 3.10
Noise Compatibility Matrix

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Residential Low Density Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 70
Residential Multi-Family	50 - 65	60 - 70	70 - 75	above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 80
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 65
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 70
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*
[b] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*
[c] *Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*
[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*
Sources: Office of Noise Control, California Department of Health Services (DHS), 1976; City of Santa Paula Noise Element, Figure N-1, Noise Compatibility Matrix.

Mitigation Measures

12.1 Construction activity shall be restricted to the hours of 8:00 A.M. to 6:00 P.M. Monday through Saturday. No construction activities shall occur on any Sunday or national holidays.

12.2 The Project Applicant shall post an advisory notice on-site that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by Code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

12.3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from the nearest noise- and vibration-sensitive land uses.

12.4 Construction activities shall be scheduled so as to avoid as feasible operating several pieces of equipment simultaneously, which causes high noise levels.

Table 3.11
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet [a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Table 3.12
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

b. Would the project result in exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact Unless Mitigated. Construction activities for the Proposed Project have the potential to generate low levels of groundborne vibration due to the operation of heavy machinery during earthwork and grading activities. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The City of Santa Paula does not have any adopted thresholds associated with human annoyance for groundborne vibration impacts. Rather, the City's Noise Ordinance focuses on reducing construction noise impacts upon surrounding land uses. Impacts related to groundborne vibration are similar in nature to the effects of noise in that they are temporary and intermittent. Groundborne vibration impacts are mitigated to a less then significant level with the mitigation measures recommended above (see Mitigation Measures 12.1 to 12.5). As such, human annoyance impacts with respect to construction-generated vibration increases are less than significant.

Operation of the Proposed Project would generate typical activities associated with residential uses and would not involve the use of any point sources that would have the potential to generate groundborne vibration levels affecting off site properties. As such, vibration impacts associated with operation of the Proposed Project are less than significant.

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. Operation of the Proposed Project has the potential to permanently increase ambient noise levels through an increase in vehicle trips on nearby roadways. As discussed in greater detail in response to Checklist Question No. 16, the Project's 54 dwelling units are anticipated to generate a total of 514 trips per day, with 41 trips during the AM peak hour and 54 trips during the PM peak hour. The increase of 40 trips during the AM peak hour and 53 trips during the PM peak hour over current conditions would represent a traffic volume increase of 5 percent and 10 percent of the total intersection volume at the Project's driveway at Royal Oaks Place and Ojai Road during the AM and PM peak hours, respectively. In order for an increase to the ambient traffic–related noise to be audible, the traffic volume on any given roadway would need to double (increase by 100%) in order for a 3 dBA increase in ambient noise to occur. As the Proposed Project would result in a maximum 10 percent increase in traffic volume during the PM peak hour, roadway noise impacts are less than significant.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact Unless Mitigated. As stated above, the Project's construction related impacts are less than significant with mitigation. Mitigation Measures 12.1 through 12.5, identified above, focus on minimizing and abating construction noise levels in the project vicinity. As noted in the City's Noise Ordinance, construction noise levels are temporary and intermittent and are exempt from the

acceptable noise limits thresholds set forth for residential land uses. With mitigation the Project's temporary or periodic increase in ambient noise levels are considered less than significant.

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, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is located over 1.6 miles to the north of the Santa Paula Airport. The Project Site is within the Airport Study Zone but is located well outside of the Airport's Noise Exposure Contours, as delineated in Exhibit 4F of the Airport Land Use Plan. As such, the Project would not result in any excessive noise levels related to aviation land uses for the people residing within the proposed development. No impact would occur.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is located over 1.6 miles to the north of the Santa Paula Airport. The Project Site is within the Airport Study Zone but is located well outside of the Airport's Noise Exposure Contours, as delineated in Exhibit 4F of the Airport Land Use Plan. As such, the Project would not result in any excessive noise levels related to aviation land uses for the people residing within the proposed development. No impact would occur.

13. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial 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)?	☐	☐	☑	☐
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑

a. Induce substantial 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)?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the City of Santa Paula that would otherwise not have occurred as rapidly or in as great a

magnitude. The Proposed Project is an infill development project located in an area that is currently developed with a single-family residence and is served by existing public roads, utilities (sewers, water, natural gas, electricity), and services (fire, police, schools, parks). Furthermore, the Proposed Project would not exceed the planned density allowed for the Project Site pursuant to the site's Hillside Residential General Plan Land Use Designation. Therefore, development of the Proposed Project would not induce substantial growth through the extension of public infrastructure. Impacts are less than significant.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

Less Than Significant. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of new housing on a site that is currently the Project Site is currently occupied by a single-family residence that is currently unoccupied. The Proposed Project would result in the construction of 54 new residential units and would retain the existing residence that is currently located on-site. The existing single family residence that currently exists on site is a historic landmark and will be retained in place as part of the Project. This residence is currently unoccupied but will be reoccupied after development of the Project. Therefore, the Proposed Project would not result in any impacts associated with displacement of existing housing units.

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

Less Than Significant. The Proposed Project would consist of the development of 54 new residential units on a site that is currently improved with an unoccupied vacant single-family residential use. The existing Hardison House residence is currently vacant and no residents are displaced during construction. Therefore, the Proposed Project would not result in any impacts associated with displacement of residents requiring replacement housing. No impact would occur.

Cumulative Impacts. Less Than Significant Impact. The related projects would introduce additional development within the City of Santa Paula. While the Proposed Project would generate 54 new residential units within the City, construction of the Proposed Project would not induce substantial growth elsewhere in the City as the Project Site is located on an infill lot that is currently served by public infrastructure and utilities. The Proposed Project would not result in any impacts related to expanding the City's infrastructure that would be capable of inducing substantial cumulative population growth. Therefore, the Proposed Project's contribution to cumulative population and housing growth is less than significant.

14. PUBLIC SERVICES.

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	☐	☐	☑	☐
Police protection?	☐	☐	☑	☐
Schools?	☐	☑	☐	☐
Parks?	☐	☐	☑	☐
Other Public facilities?	☐	☐	☐	☑

Fire Protection

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Based on an average household size of 3.5 persons per unit, the Proposed Project net increase of 54 dwelling units would have the potential to generate approximately 189 new residents within the City. This increase in permanent residents, along with the occupancy of 54 new residential dwelling units could increase the demand for fire services. The Santa Paula Fire Department (SMFD) covers the 4-square mile City of Santa Paula from 2 stations strategically located in the City. The SMFD maintains 2 primary on-duty engine companies at all times and has one additional reserve engine and other apparatus to serve the community. Fire Station 81 is the closest fire station serving the project area and is located approximately 1.5 miles south of the Project Site at 114 S. 10th Street.

The Project Site is located in a Very High Fire Hazard area as indicated in Figure S-5 of the Safety Element of the Santa Paula General Plan. The proposed Tract Map will be designed and built in accordance with all applicable Building and Fire Code requirements. The Proposed Tract Map has been reviewed by the Santa Paula Fire Department and the Applicant has incorporated required emergency access and fuel modification measures. Specifically, the Tract Map has been designed to allow for emergency access from Ojai Road and incorporates additional emergency access points at the terminus of proposed Royal Oaks Road (to access the open space hillside to the west) and at the southerly end of proposed Redbud Street where it aligns with Marigold Lane to the south. As noted in the Water System Study for the proposed Tract Map, the Proposed Project Site is adequately served by existing water infrastructure as the combined peak hour water demand and fire flow are 89.73 pounds per square inch (psi) and 62 psi respectively, which is greater than the allowable minimum 20 psi that is required by Code. Thus, the Proposed Project would result in a less than significant impact with respect to exposing

people or structures to a significant risk of loss, injury or death involving wildland fires. Compliance with the Santa Paula Municipal Code and Fire Code standards is mandatory and would be conditioned upon the project during the approval process. Development of the Proposed Project would not necessitate the construction of a new fire station and impacts related to fire protection are less than significant.

Police

Less Than Significant Impact. A significant impact may occur if the City of Santa Paula Police Department (SPPD) could not adequately serve a project, necessitating a new or physically altered station. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Proposed Project, based on the net increase of residential units; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; and (c) whether the project includes security and/or design features that would reduce the demand for police services. Based on an average household size of 3.5 persons per unit, the Proposed Project would increase the resident population by 189 persons, which could increase demands for local services including public safety. The SPPD operates four patrol teams, two assigned alternating shifts at night (6:00 p.m. to 6:00 a.m.) and two teams alternating during the day. Each Team is lead by a Watch Commander (a Police Sergeant) assisted by an assistant Watch Commander (a Senior Police Officer).[9] Based on a review of the SPPD's annual crime statistics, in 2011 Santa Paula experienced a decrease in its reported Part I crimes (-4.88%) as compared to 2010 statistics. This is the third year where Santa Paula has seen a drop in crime.[10] The SPPD are able to adequately serve the Proposed Project without the need for additional police stations or police substations to be constructed. Thus, impacts to police services are less than significant.

Schools

Potentially Significant Impact Unless Mitigation Incorporated. The Project Site is served by the Santa Paula Unified School District. The schools serving the Project Site include: Bedell Elementary located at 1305 Laurel Road (serving graded K-5), Isbell Middle School, located at 221 S. 4th Street (serving grades 6-8) and Santa Paula and Renaissance High Schools, located at 325 N. Palm and 404 N. Sixth Street respectively. Based on an average household size of 3.5 persons per unit, the Proposed Project's net increase of 54 dwelling units would increase the resident population by 189 persons. Using the State's standard student generation rate of 0.7 students per dwelling unit, the Proposed Projects would generate approximately 38 new students, which would have the potential to increase demands upon school facilities.

Section 17620 of the California Education Code provides for the collection and expenditure of Developer Fees based upon new residential and commercial/industrial construction using criteria that establish a district's justification for a need for such Fees. In January 2014, the State Allocation Board established the current Developer Fees at $3.36 per square foot of residential construction and $0.54 per square foot of commercial/industrial construction. As reported in the SPUSD's Level 1 Developer Fee Justification

[9] *Santa Paula Police website, accessed November 2014, http://ci.santa-paula.ca.us/police/Patrol_Operations.htm*
[10] *Ibid.*

Study (April 2014), between 2008 and 2010 combined enrollment within the District declined from 5,425 to 5,287. Combined enrollment then stabilized and remained the same in 2011, and by 2013 had increased to 5,467. The Project Applicant will be required to pay applicable developer fees to the SPUSD to offset the Proposed Project's demands upon local schools. Pursuant to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."

The Project Site is located over 600 feet from Bedell Elementary. While the Project Site is sufficiently distanced from the school to avoid any localized air quality or noise impacts, off-site construction related activities such as hauling, deliveries, and construction worker traffic would have the potential to impact pedestrian routes and school related traffic. This impact can be reduced to an less than significant level by coordinating with the local school administrators to stagger peak hour deliveries outside of school drop-off and pick-up times and by ensuring a safe pedestrian route around the Project Site is maintained at all times during construction. Thus, with implementation of Mitigation Measure 14.2, the Proposed Project's potential impact upon public school services will be mitigated to a less than significant level.

Mitigation Measures

14.1 Payment of school fees to the Santa Paula Unified School District to offset the impact of additional student enrollment at schools serving the project area shall be completed prior to issuance of the first building permit.

14.2 The developer and contractors shall maintain ongoing contact with the administrator of Bedell Elementary School during the construction process and shall ensure safe pedestrian routes are maintained at all times. The administrative offices should be contacted a minimum of 48 hours in advance of any demolition, grading or construction activity on the project site so that students and their parents will know when such activities are to occur. The developer shall guarantee that safe and convenient pedestrian and bus routes to the school be maintained. Copies of written correspondences shall be submitted to the City Planning Department, Building and Safety Department and Public Works Department.

Parks

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. Based on an average household size of 3.5 persons per unit, the Proposed Project's net increase of 54 dwelling units would increase the resident population by 189 persons. This increase would have the potential to increase demands upon public park and recreation facilities throughout the City. The proposed tract map includes four open space lots totaling 425,578 square feet (9.76 acres) of open space, including approximately 9.56 acres of passive open space that will be provided on the hillside to the west. While this area is largely unutilized, the Applicant is proposing to improve a Homeowner Association (HOA) maintained trail and access easement to access the top of the slope. The Applicant is also proposing three open space lots ranging in

size from 1,553 square feet to 4,708 square feet as common open space lots for use by the residents. These on site recreational amenities, which are intended to serve the resident population of the Project, together with the payment of all applicable fees assessed under the City's Park Fee Impact Ordinance, which are intended to increase the community's parkland resources, will help to offset demands for public parkland and recreational facilities within the City. As such, the Proposed Project's potential impact upon parklands are less than significant.

Cumulative Impacts

For purposes of addressing cumulative impacts upon parkland and recreational space, the City of Santa Paula has adopted a Park Impact Fee Ordinance that requires developers to pay an impact fee on a per unit basis to offset the impacts the development project will have on the City's Park and Recreation system. Santa Paula's ordinance is not a Quimby ordinance, but rather authorized under AB 1600, which allows the City to assess developments for impacts on public safety, libraries, parks, etc.

With respect to assessing the proposed project's cumulative contribution to parkland impacts, the Proposed Project will be consistent with Conservation Element policy 11.b.b, which states "11.b.b. Require new development in the expansion areas to provide parkland at a minimum ratio of 5 acres per 1,000 residents for new residents. (IM 66, 67)" The Proposed Project's 54 new dwelling units will generate approximately 189 additional residents within the City. The Project proposes 9.76 acres of open space, or approximately 0.05 acres per resident. This equates to approximately 51.6 acres per 1,000 residents, which is well above the City's policy of 5 acres per 1,000 residents. As such, the Proposed Project is consistent with policy 11.b.b. As such, the project's cumulative impact are considered less than significant.

15. RECREATION.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☑	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☑

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

Less Than Significant Impact. A significant impact may occur if the project would include substantial employment or population growth, which would 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. The inclusion of common open space and recreation amenities to be provided on-site would serve to reduce or off-set the demand for off-site park services in the local area. Therefore, the Proposed Project would not substantially 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 and impacts are less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As previously discussed in Checklist Questions 15(a) and 14(Parks), above, the Proposed Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site which might have an adverse physical effect on the environment and thus there would be no impact.

Cumulative Impacts. Less Than Significant Impact. As discussed above, the project would have a less than significant impact on recreational resources. Similar to the Proposed Project, future development within the City if Santa Paula is subject to the applicable development standards of the Municipal Code. Each project is evaluated on a case-by-case basis to determine potential demands and impacts upon city facilities. Therefore, cumulative impacts on recreational resources are considered less than significant.

16. TRANSPORTATION/CIRCULATION. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☑	☐	☐
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☑	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☑
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☑	☐

e. Result in inadequate emergency access?	☐	☐	☑	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☑

The following section summarizes and incorporates by reference the information provided in the River Rock Residential Project Traffic Impact Analysis ("Traffic Study") prepared by Crain and Associates, dated December 28, 2015. The Traffic Study is provided as Appendix H to this Draft IS/MND.

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact Unless Mitigation Incorporated. Per the City of Santa Paula (the "City") standards and as included in the City General Plan Circulation Element (adopted in 1998 and updated February 26, 2008), the Intersection Capacity Utilization (ICU) methodology was used to analyze signalized intersection operations. Using the ICU procedures, a determination can be made of the operating characteristics of an intersection in terms of the level of service for different levels of traffic volume and other variables, such as the number and type of traffic lanes. The term "Level of Service" (LOS) describes the quality of traffic flow. LOS A through C are indicative of excellent-to-good traffic flow conditions. LOS D corresponds with fair conditions that may experience substantial delay during portions of the peak hours, but without excessive backups. LOS E represents poor conditions, with volumes at or near the capacity of the intersection and long lines of vehicles that may have to wait through several signal cycles. LOS F is characteristic of failure (i.e., the intersection is overloaded, vehicular movements may be restricted or prevented, and delays and queue lengths become increasingly longer).

A determination of the LOS can be obtained through the calculation of the volume-to-capacity (V/C) ratio at each intersection. Per the 2009 Ventura County Congestion Management Program (adopted by the Ventura County Transportation Commission on July 10, 2009), lane capacities of 1,600 vehicles per hour per lane for left-turn, through, and right-turn lanes were assumed. A description of the different LOS and their corresponding V/C ratio ranges for signalized intersections is included in Table 3.13.

Table 3.13
Signalized Intersection Level of Service (LOS) as a Function of V/C Ratio

LOS	V/C Ratio
A	0.000 – 0.600
B	0.601 – 0.700
C	0.701 – 0.800
D	0.801 – 0.900
E	0.901 – 1.000
F	>/= 1.001

For unsignalized intersections, the Highway Capacity Manual (HCM) operational methodologies were used. The HCM operational analysis has been performed using the Traffix for Windows traffic analysis software (Dowling Associates). Traffix is a standard analysis program for intersection operations and capacity analysis and is widely used in the transportation industry.

Using the HCM operational analysis procedures, a determination of intersection LOS can be made based on controlled vehicle delay. A description of the different LOS and their corresponding average vehicle delay ranges is provided in Table 3.14.

Table 3.14
Unsignalized Intersection Level of Service (LOS)
As a Function of Average Vehicle Delay

LOS	Average Vehicle Delay
A	0.0 – 10.0
B	10.1 – 15.0
C	15.1 – 25.0
D	25.1 – 35.0
E	35.1 – 50.0
F	>/= 50.1

As the lead agency for the Project, the City determines the significant traffic impact criteria for proposed land use projects. The City defines the minimum acceptable LOS for intersections as LOS C during the PM peak hour per the City General Plan Circulation Element (adopted in 1998 and updated on February 26, 2008). Following the example of the East Area 1 Report and previous traffic studies, this minimum LOS was also applied to the AM peak hour. Therefore, any Project traffic volume contribution to an intersection operating at or degrading to LOS D or worse during either peak hour is considered a significant traffic impact. No significant impacts are deemed to occur at intersections operating at LOS A through C following the addition of Project traffic.

This analysis evaluates area traffic conditions under existing and future traffic scenarios. As approved by City staff, the future traffic year was selected to represent the full buildout year of the Project in 2018. Therefore, the Traffic Study presents the results of detailed analyses of Existing (2015), Existing (2015) Plus Project, Future (2018) Without Project, and Future (2018) With Project conditions during both the AM and PM peak hours at the following six intersections:

<u>Study Intersection Locations</u>

1. Ojai Road (State Route 150) & Royal Oaks Place (and future Project driveway);
2. Ojai Road (State Route 150) & Oakdale Place;
3. Ojai Road (State Route 150) & Richmond Road;
4. Ojai Road (State Route 150) & Orchard Street;
5. Ojai Road (State Route 150) & Saticoy Street; and
6. Ojai Road (State Route 150)/ 10th Street & Santa Paula Street.

The location of the Project Site and the six study area intersections are shown on Figure 2 of the Traffic Study, Project Site Vicinity and Study Location Map. The study area includes locations along Ojai Road (State Route 150), within a reasonable radius of the Project Site, through which the vast majority of Project traffic is expected to travel.

Given the modest Project traffic volumes expected for the 53 new single-family homes, these six intersections were selected as the most likely to be impacted by Project traffic. This study area has been reviewed and approved by City staff.

Existing (2015) Traffic Conditions

Traffic volumes for existing conditions at the six study intersections were obtained from manual traffic counts conducted on Thursday, August 13, 2015. The intersection traffic counts for this study were completed on typical weekdays during the morning and afternoon peak commute periods, which range from 7:00 to 9:00 AM and 4:00 to 6:00 PM, respectively. Peak-hour volumes were determined individually for each intersection based on the highest-volume four consecutive 15-minute periods for all vehicular movements. At all six study intersections, the AM peak hour began at 7:15 AM, while the PM peak hour started at 5:00 PM. The Existing (2015) AM and PM peak-hour volumes at the study intersections are illustrated on Figures 3.4 and 3.5, respectively. The intersection count data sheets are provided in Attachment A of the Traffic Study.

Information pertaining to intersection characteristics, such as geometrics, traffic signal operations, and on-street parking restrictions were obtained from the East Area 1 Report and recent available aerial photography. The existing lane configurations and traffic control conditions for the study intersections are illustrated in Attachment B of the Traffic Study.

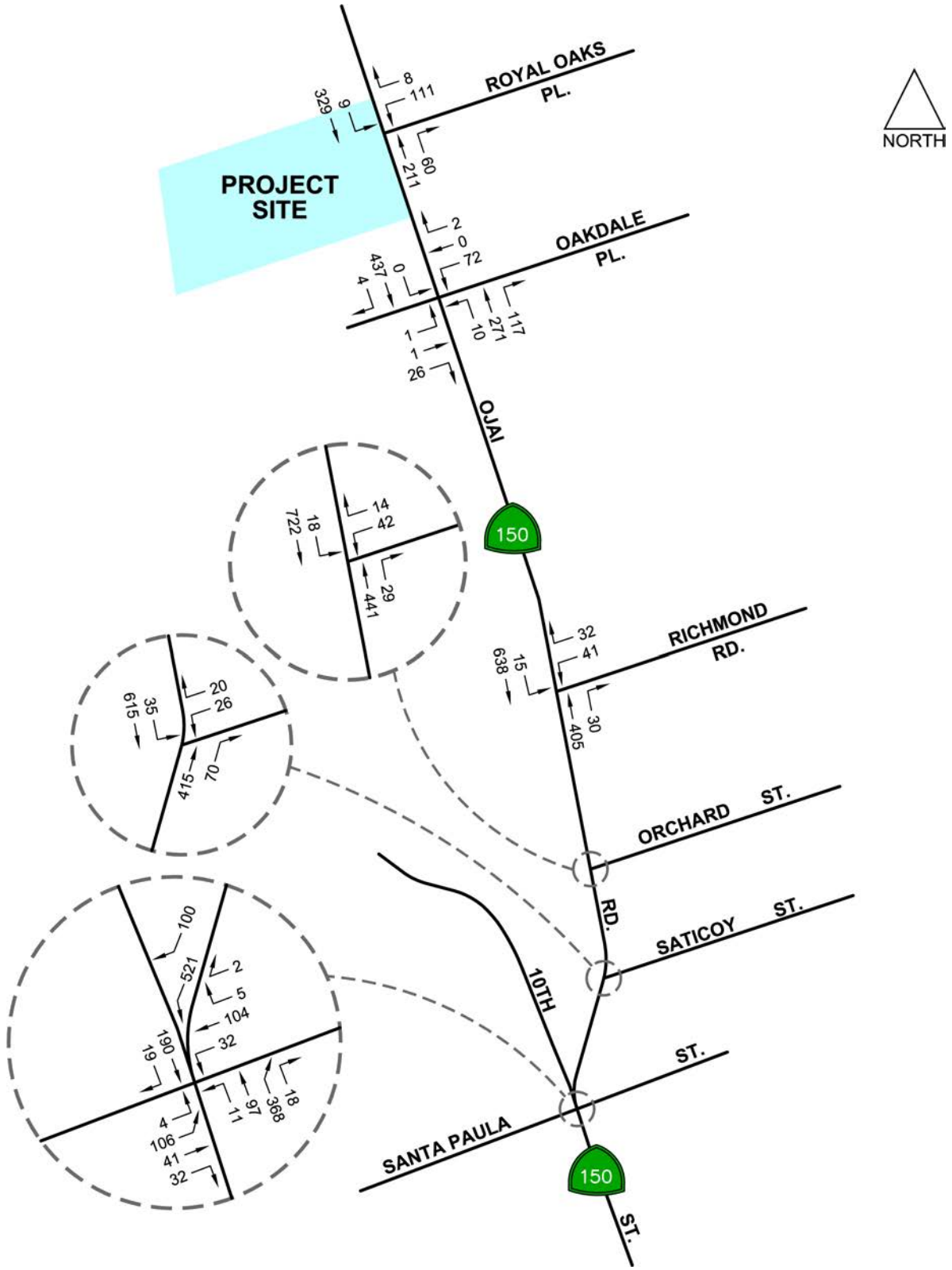
Analysis of Existing (2015) Traffic Conditions

The six study intersections were analyzed for existing traffic conditions. Five of the study intersections are unsignalized, two-way stop-controlled locations (given that Intersections #1, #3, #4, and #5 are three-legged T-intersections, they are all technically one-way stop-controlled locations), while one intersection is signalized. As discussed and per City guidelines, the HCM operational and ICU methodologies were used for the unsignalized and signalized intersections, respectively. The analyses of Existing (2015) AM and PM peak-hour conditions at the study intersections are summarized in Table 3.15, below. As shown in Table 3.15, two study intersections currently operate at LOS B during both peak hours, while the remaining four study intersections operate at LOS C during both peak hours. The LOS calculation worksheets for Existing (2015) traffic conditions are included in Attachment D of the Traffic Study.

Table 3.15
Existing (2015) Traffic Conditions at Study Intersections

Study Intersection		Peak Hour	Existing (2014) Conditions	
			V/C or Delay	LOS
1	Ojai Road (SR-150) & Royal Oaks Place (and Project Driveway) [1,2]	AM	14.8	B
		PM	12.9	B
2.	Ojai Road (SR-150) & Oakdale Place [1]	AM	21.3	C
		PM	15.9	C
3.	Ojai Road (SR-150) & Richmond Road [1]	AM	19.1	C
		PM	19.7	C
4.	Ojai Road (SR-150) & Orchard Street [1,2]	AM	24.5	C
		PM	24.9	C
5.	Ojai Road (SR-150) & Saticoy Street [1]	AM	18.1	C
		PM	18.2	C
6.	Ojai Road (SR-150) / 10th Street & Santa Paula Street [2]	AM	0.684	B
		PM	0.633	B

Notes:
[1] *Unsignalized intersection results presented in terms of average delay to the worse Stop-sign controlled approach.*
[2] *Signalized and four-way stop intersection results presented in terms of average control delay for all vehicles using the intersection during the peak hour.*
Source: Crain & Associates, River Rock Residential Project Traffic Impact Assessment, Attachment C, September 9, 2015.



Source: Crain and Associates, September 9, 2015.

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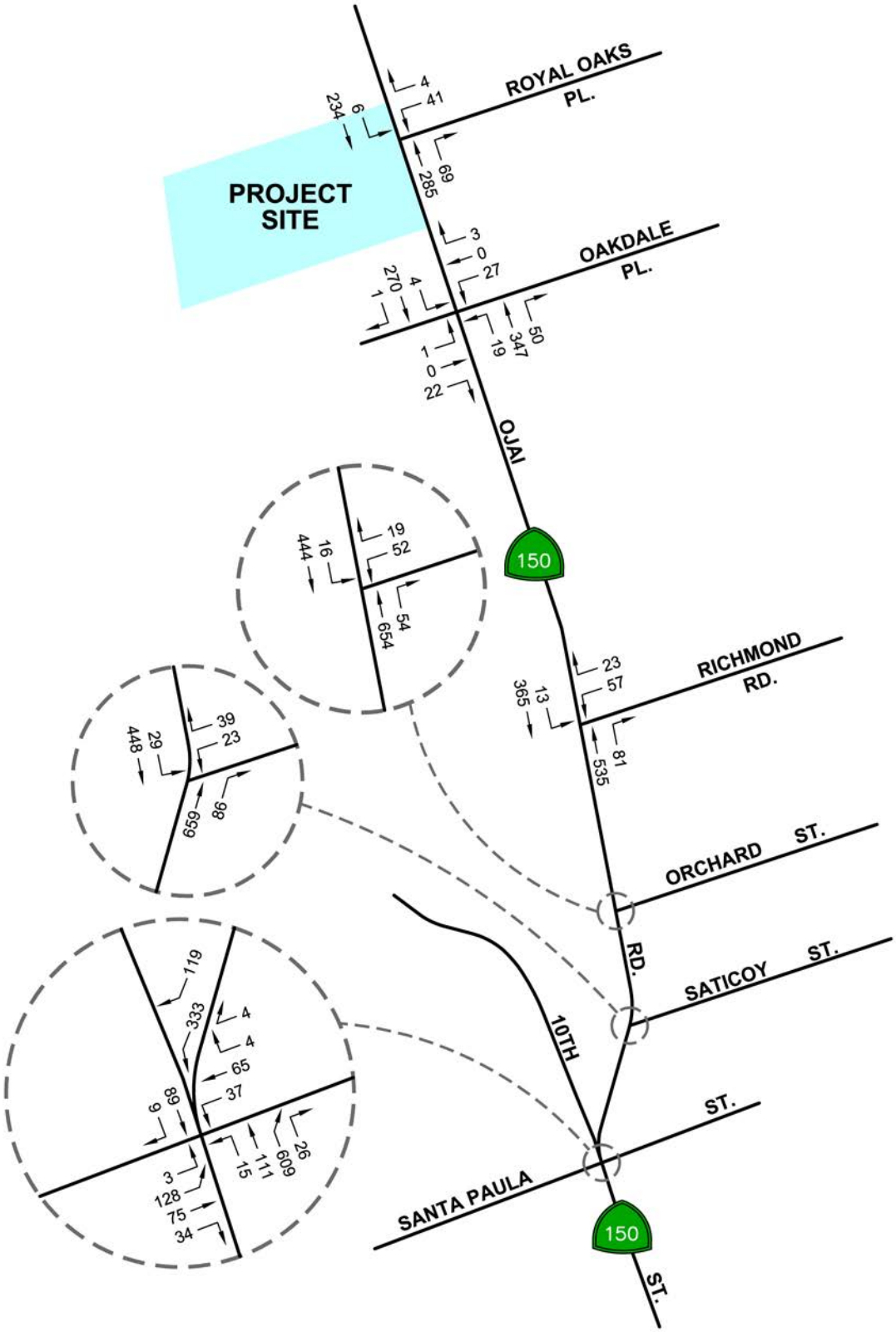
Figure 3.4
Existing (2015) Traffic Volumes - AM Peak Hour



Source: Crain and Associates, September 9, 2015.

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Figure 3.5
Existing (2015) Traffic Volumes - PM Peak Hour

Project Traffic Generation and Distribution

In order to develop the traffic characteristics of the Project, the latest and most up-to-date version of the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) was used. The trip generation rates in the ITE manual are nationally recognized and are used as the basis for most traffic studies conducted in southern California. Table 3.16 presents the trip generation rates and summary for the Project. Due to the planned consolidation of access for the existing single-family home within the Project, traffic associated with all 54 homes will utilize the Project driveway intersection with Ojai Road (State Route 150). However, the Project traffic generation for the remaining five study intersections is based on the net volumes associated with the 53 new homes, given that traffic associated with the existing on-site single-family home is included in the collected traffic counts at these five locations. Based on the trip generation rates for single-family detached housing, projections of the amount of new traffic to be generated by the Project were derived. As shown in Table 3.16, once completed and occupied, the Project's 53 new homes are anticipated to generate a total of 505 trips per day, with 40 trips during the AM peak hour and 53 trips during the PM peak hour.

Table 3.16
River Rock Residential Project Weekday Trip Generation [1]

Land Use	ITE Code	Intensity	Average Weekday	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
SF Detached Housing	210	1 DU	9.52	25%	75%	0.75	63%	37%	1.00
Trip Generation Summary									
Single-Family Detached Housing [2]		53 du	505	10	30	40	33	20	53
Single-Family Detached Housing [3]		54 du	514	10	31	41	34	20	54

Notes:
[1] ITE Trip Generation (9th Edition, 2012) trip generation rates for Land Use Codes 210 (Single-Family Detached Housing) applied.
[2] Trip generation used for analysis of five non-Project driveway intersections.
[3] Trip generation used for analysis of Project driveway intersection.
Source: Crain & Associates, River Rock Residential Project Traffic Analysis, September 9, 2015.

Estimation of the geographic distribution of Project trips was the next step in the analytical process. The primary factors affecting the trip distribution pattern are the nature of the use, existing traffic patterns, characteristics of the surrounding roadway system, geographic location of the Project Site and its proximity to freeways and major travel routes, and employment centers to which residents of the Project would likely be attracted. Additionally, the distribution of vehicle trips into and out of the residential subdivision immediately south of the Project (accessed solely via the west leg of the intersection of Ojai Road [State Route 150] & Oakdale Place) was also examined, given that this subdivision consists of 42 single-family homes and is therefore similar to the proposed Project in type, size, and location. Based on these factors, the overall directional Project trip distribution percentages were determined to be

approximately 7 percent to/from the north, 78 percent to/from the south, 10 percent to/from the west, and 10 percent to/from the east.

These general directional distribution percentages were then disaggregated and assigned to specific routes and intersections that are expected to be used for Project travel. The estimated Project trip distribution percentages at the study locations are presented on Figure 3.6, Project Trip Distribution Percentages. Applying these inbound and outbound percentages to the aforementioned Project trip generation estimates, the traffic volumes for the Proposed Project were determined for the study intersections. These Project only AM and PM peak-hour traffic volumes are depicted on Figures 3.7 and 3.8, respectively.

Existing (2015) Plus Project Traffic Conditions

Project volumes were then added to the Existing (2015) traffic volumes to develop the Existing (2015) Plus Project traffic volumes. The Existing (2015) Plus Project volumes were then used to determine traffic impacts attributed to the Project. The Existing (2015) Plus Project AM and PM peak-hour traffic volumes are shown in Figures 3.9 and 3.10, respectively.

Analysis of Existing (2015) Plus Project Traffic Conditions

The analysis of Existing (2015) Plus Project traffic conditions at the study locations was performed using the same analysis procedures described previously in the Traffic Study. No highway system improvements were assumed for the study intersections, other than the addition of the Project driveway as the west leg of the intersection of Ojai Road (State Route 150) & Royal Oaks Place. Therefore, existing roadway geometric characteristics and traffic control conditions were assumed to prevail at the five remaining intersections.

The results of the analysis of Existing (2015) Plus Project traffic conditions at the study intersections are summarized in Table 3.17. As shown in Table 3.17, under Existing (2015) Plus Project traffic conditions, traffic operations are generally expected to be similar to those under Existing (2015) conditions. Following the addition of Project traffic, one study intersection is projected to operate at LOS B during both peak hours, four study intersections would operate at LOS C during both peak hours, and one study intersection (Ojai Road [State Route 150] & Orchard Street) would operate at LOS D during both peak hours. Therefore, per the City's impact criteria, the Project is expected to have a significant traffic impact at the intersection of Ojai Road (State Route 150) & Orchard Street. Mitigation for this intersection location is discussed following the analysis of Future (2018) traffic conditions. The LOS calculation worksheets for Existing (2015) Plus Project traffic conditions are included in Attachment D of the Traffic Study (See Appendix H to this IS/MND).

Future (2018) Traffic Conditions

As described previously and as approved by City staff, an analysis of future traffic conditions has been conducted for the year the Project is expected to be fully constructed and occupied: 2018. There are a number of other projects either under construction or planned for development in the surrounding area that may contribute future traffic to the study intersection locations by 2018. As shown in Table 1-1, Related Projects there are twelve related project that have been identified that, in conjunction with the

Proposed Project, have the potential to generate cumulative traffic throughout the City. For this reason, the analysis of future traffic conditions was expanded to include potential traffic volume increases expected to be generated by those other projects. In order to evaluate future traffic conditions in the Project area, an analysis of Existing (2015) traffic volumes was first conducted, as described previously. For the analysis of future conditions, an ambient traffic growth factor, compounded annually, was applied to these existing volumes at the six study intersections to develop future year (2018) baseline traffic volumes.

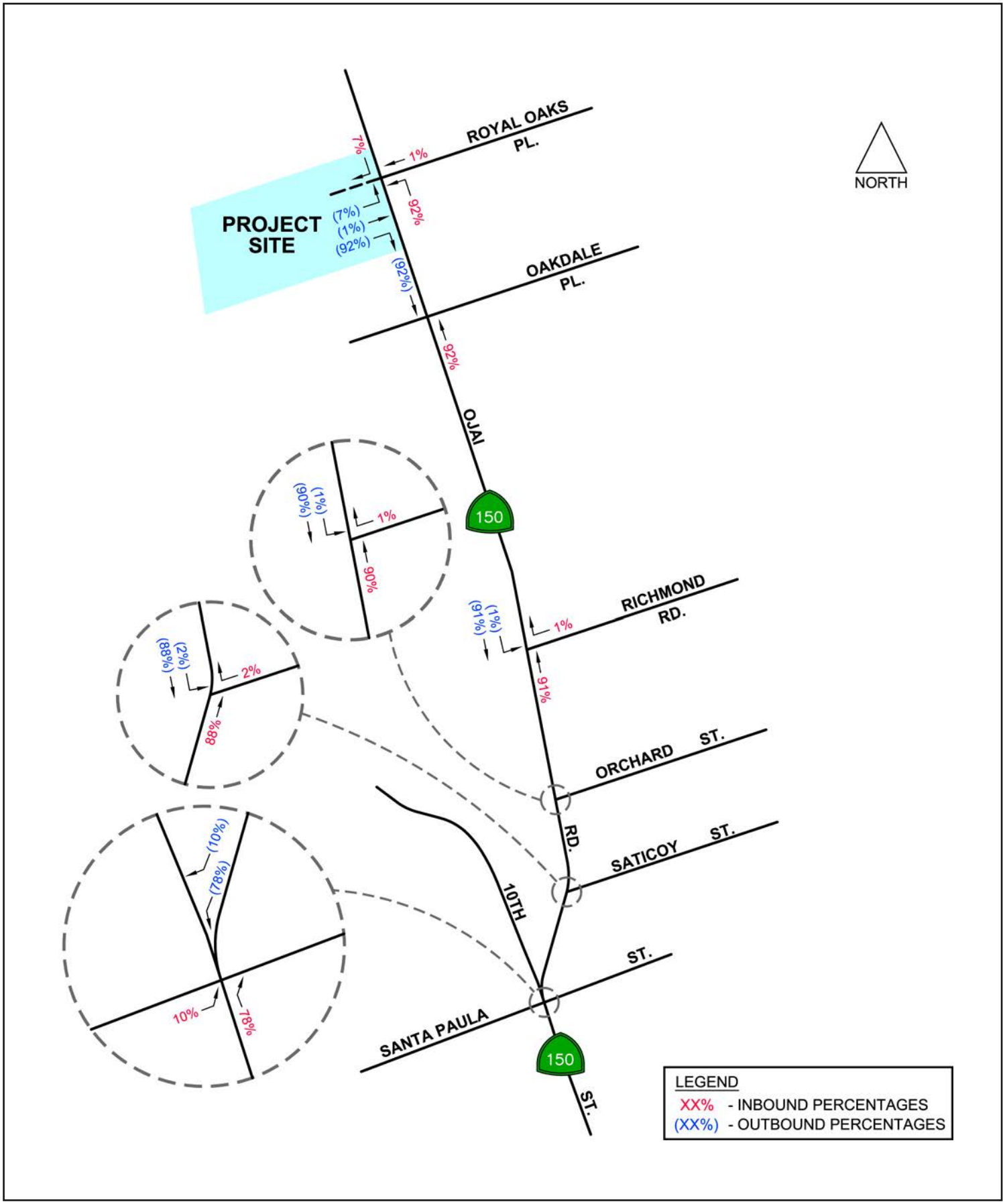
Table 3.17
Existing (2015) Plus Project Traffic Conditions at Study Intersections

Study Intersection		Peak Hour	Existing Baseline		Existing (2015) Plus Project Conditions		
			V/C or Delay	LOS	V/C or Delay	LOS	Significant Impact?
1.	Ojai Road (SR-150) & Royal Oaks Place (and Project Driveway) [1,2]	AM	14.8	B	17.9	C	No
		PM	12.9	B	15.4	C	No
2.	Ojai Road (SR-150) & Oakdale Place [1]	AM	21.3	C	22.7	C	No
		PM	15.9	C	16.8	C	No
3.	Ojai Road (SR-150) & Richmond Road [1]	AM	19.1	C	19.9	C	No
		PM	19.7	C	20.9	C	No
4.	Ojai Road (SR-150) & Orchard Street [1,2]	AM	24.5	C	25.7	D	Yes
		PM	24.9	C	26.7	D	Yes
5.	Ojai Road (SR-150) & Saticoy Street [1]	AM	18.1	C	18.8	C	No
		PM	18.2	C	19.0	C	No
6.	Ojai Road (SR-150) / 10th Street & Santa Paula Street [2]	AM	0.684	B	0.700	B	No
		PM	0.633	B	0.651	B	No

Notes:
[1] *Unsignalized intersection results presented in terms of average delay to the worse Stop-sign controlled approach.*
[2] *Signalized and four-way stop intersection results presented in terms of average control delay for all vehicles using the intersection during the peak hour.*
Source: Crain & Associates, River Rock Residential Project Traffic Impact Analysis, Attachment C, September 9, 2015.

The inclusion of the annual growth factor generally accounts for area‐wide traffic increases. To ensure a conservative estimate of cumulative traffic conditions, the traffic generated by "related projects" in the study area was also added to the future baseline traffic volumes. The total future volumes, including those due to related projects, formed the basis for the Future (2018) Without Project condition. Finally, the traffic expected to be generated by the Project was analyzed as an incremental addition to the Future (2018) Without Project condition, resulting in the Future (2018) With Project condition.

The East Area 1 Report included an analysis of traffic growth expected for the City of Santa Paula between existing and City General Plan Buildout (2025) conditions, using the 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) Travel Demand Model and comparing land use projections with those in the Ventura County Traffic Model (VCTM). That analysis indicated that traffic in the City is expected to grow at a rate of approximately 0.5 percent per year over the next 10 years. This growth factor was used to account for increases in traffic due to potential development projects not yet proposed or outside the study area. Compounded annually, the ambient traffic growth factor was applied to the existing (2015) traffic volumes to develop the estimated baseline volumes for the future study year (2018).



Source: Crain and Associates, September 9, 2015.

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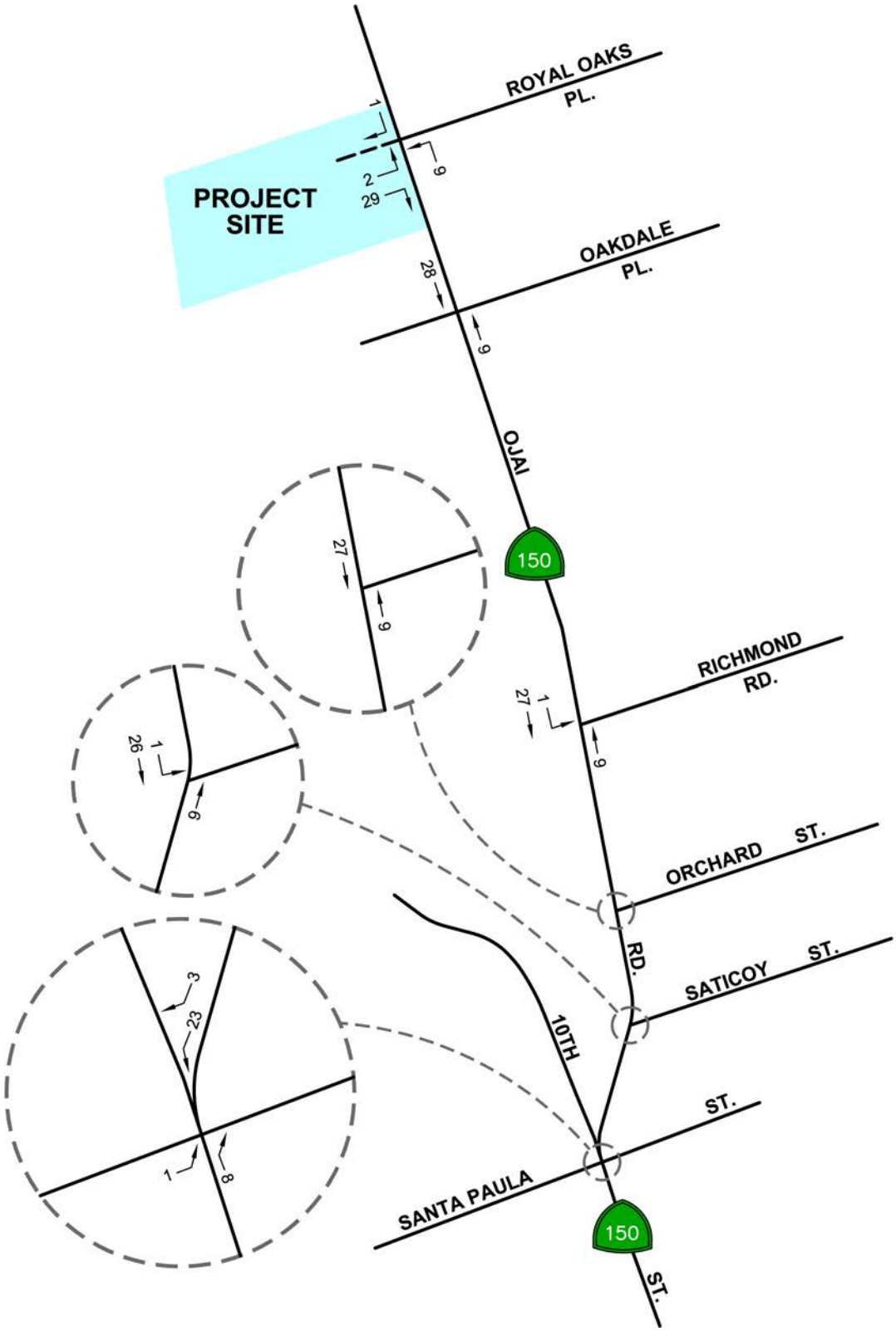
Figure 3.6
Project Trip Distribution Percentages



Source: Crain and Associates, September 9, 2015.

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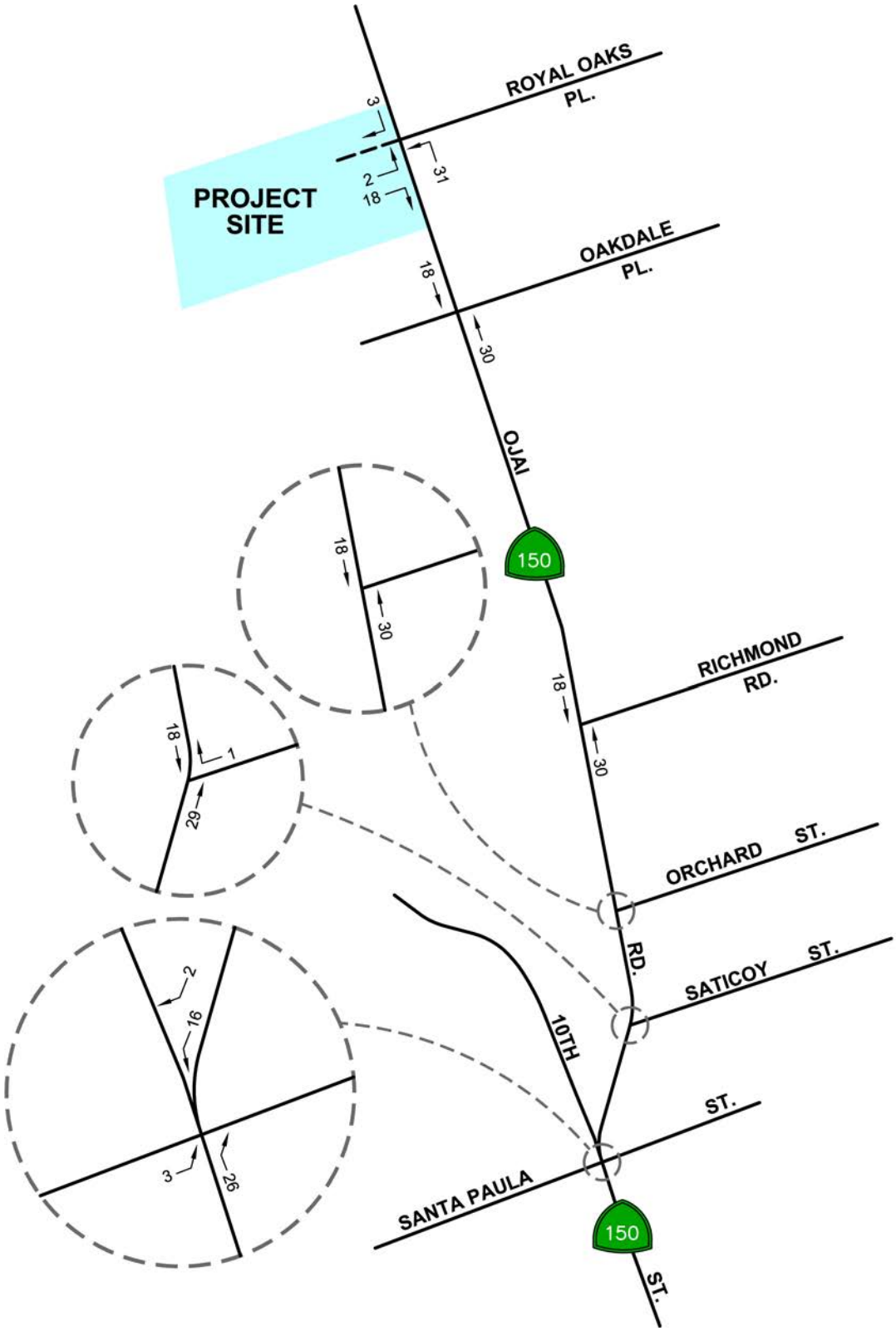
Figure 3.7
Project Only Traffic Volumes - AM Peak Hour



Source: Crain and Associates, September 9, 2015.

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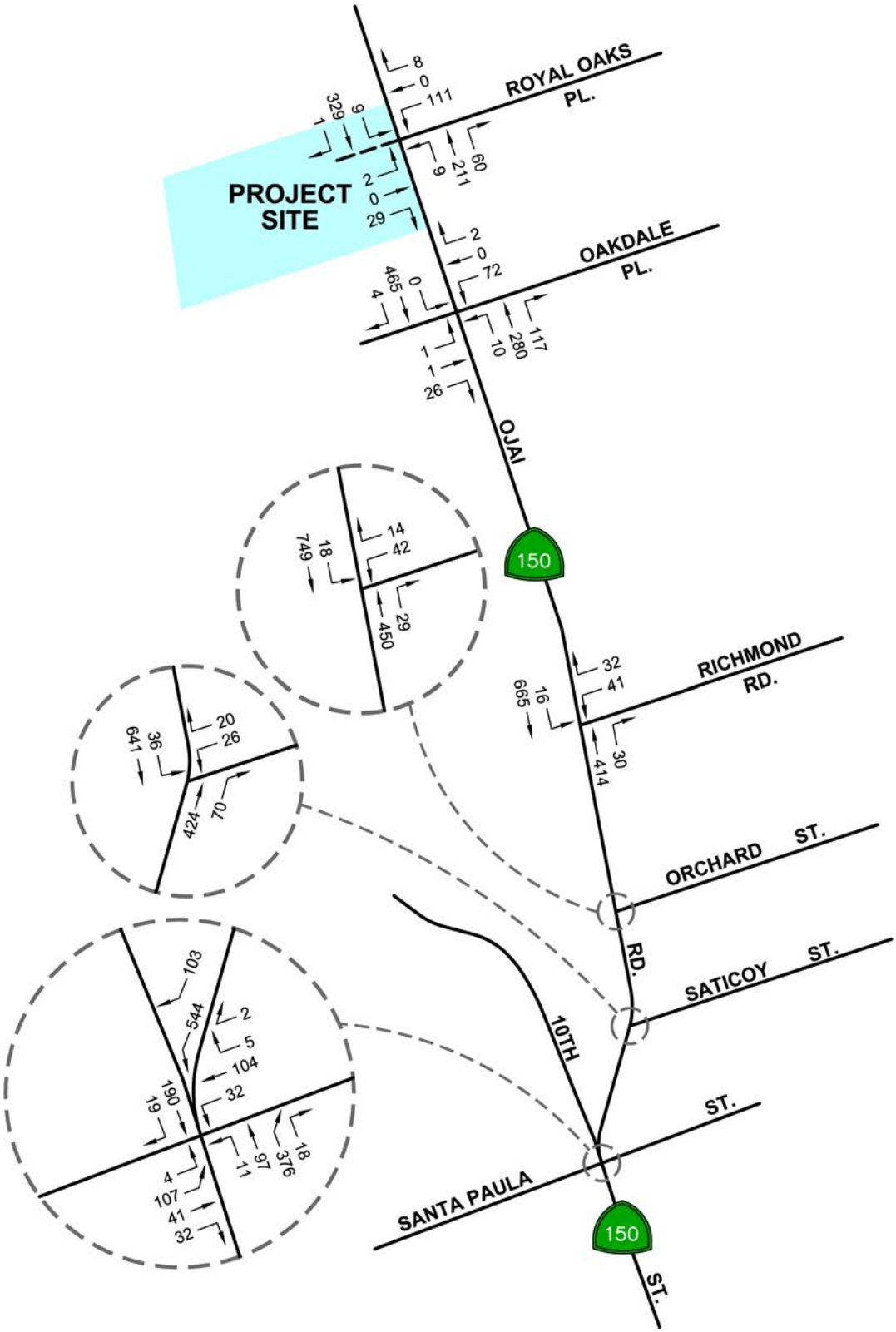
Figure 3.8
Project Only Traffic Volumes - PM Peak Hour



Source: Crain and Associates, September 9, 2015.

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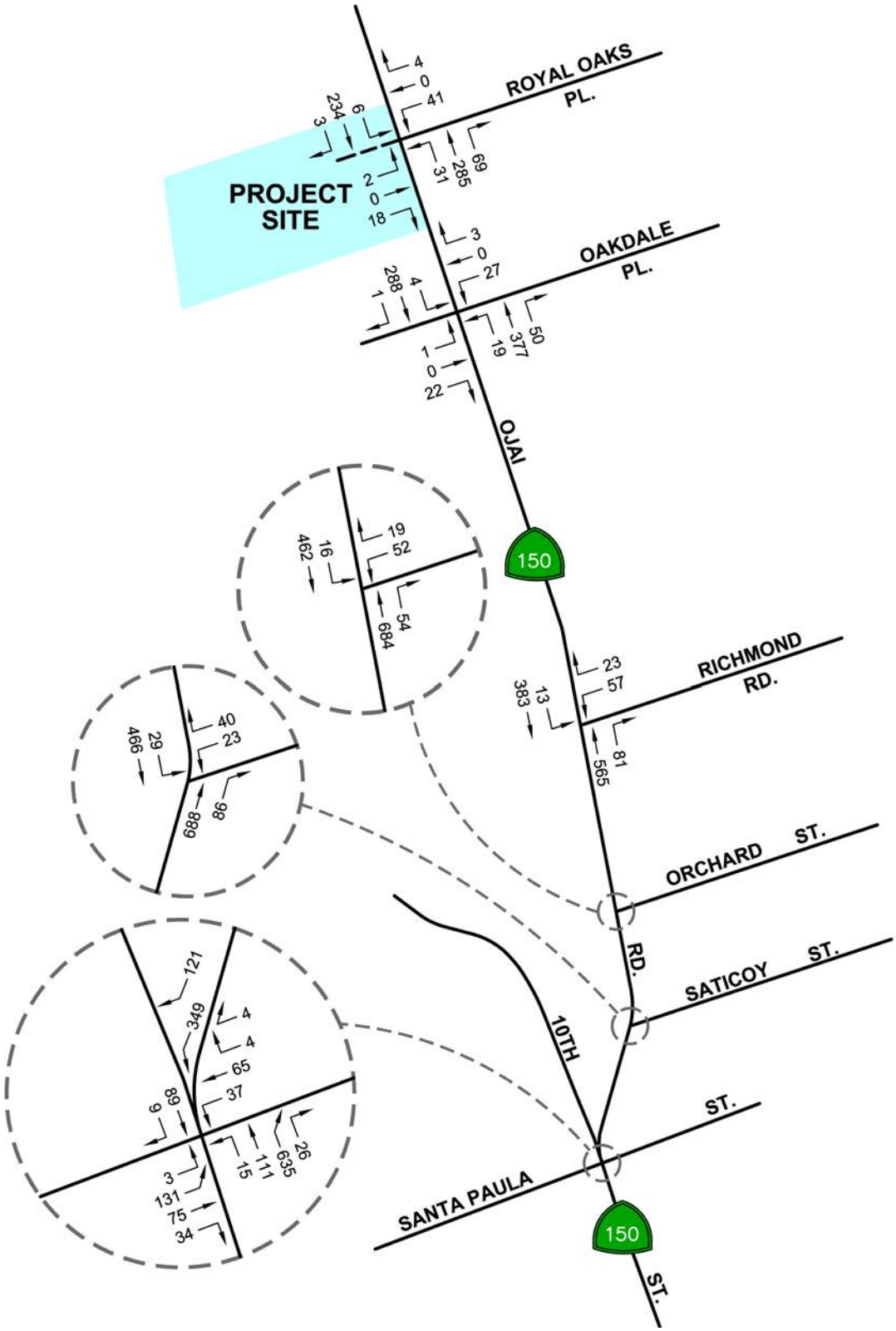
Figure 3.9
Existing (2015) Plus Project Traffic Volumes - AM Peak Hour



Source: Crain and Associates, September 9, 2015.

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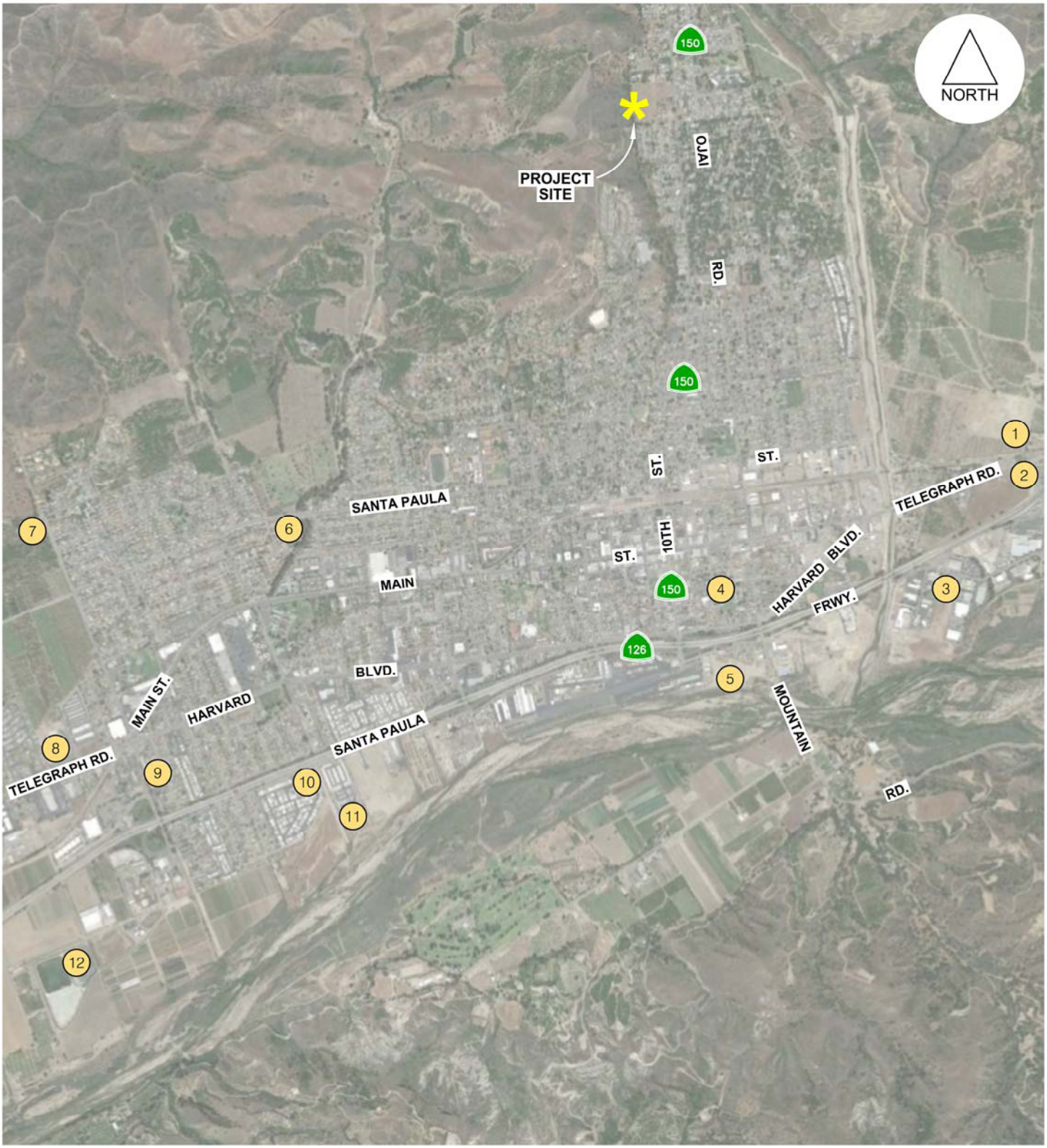
Figure 3.10
Existing (2015) Plus Project Traffic Volumes - PM Peak Hour

In addition to the use of the ambient growth rate, a listing of potential projects located in the surrounding area ("related projects") that might be developed or under construction within the study time frame was obtained from the City of Santa Paula Public Works Department during the scoping process for the traffic impact study. Recently published traffic studies and environmental reports for development projects in the area were also reviewed. Related projects from these sources and within an approximate three-mile radius of the Project site were included. Refinement of the information resulted in a total of 12 related projects in the surrounding area that could add traffic to the study intersections.

The locations of the related projects are shown on Figure 3.11, Related Projects Location Map. The related project locations, descriptions, and trip generation estimates are listed in Attachment E in the Traffic Impact Analysis. This list of related projects accurately reflects the known related project proposals at the time this traffic impact analysis was scoped with City staff. The number of trips expected to be generated by the related projects was obtained from information provided by the City, traffic studies, and environmental reports, to the extent available. For related projects with incomplete trip generation and/or peak‑hour directional (inbound/outbound) distribution information, estimates were determined by applying the appropriate rates and/or directional splits from the ITE Trip Generation Manual (9th Edition, 2012).

For the analysis of Future (2018) Without Project traffic conditions, each related project's trip generation was distributed and assigned to the study area circulation system, using methodologies similar to those previously described for the Project trip distribution and assignment. Summing the individual related project traffic volume assignments, the total related project traffic volumes at the study intersections were calculated. It should be noted that the inclusion of these related projects, as described, results in future (2018) traffic condition forecasts that are conservative for the purposes of impact analysis. As stated previously, the 0.5 percent ambient traffic growth factor, developed from the 2012 SCAG RTP Travel Demand Model and approved by the City, accounts for the traffic growth expected from all sources throughout the study area. The overlay of traffic volumes resulting from the 12 identified related projects, therefore, represents a conservative projection of future traffic volumes. It is likely that some of the identified projects will not be approved or constructed as described. It is also probable that some of these projects will be delayed in their construction beyond the future (buildout) study year of the Project.

In order to better analyze future traffic conditions in the Project area, an investigation regarding relevant future transportation improvements to the roadway system infrastructure in the study area was conducted. The most recent City Capital Improvement Program Master Project Design list was reviewed, and the City plans no improvements that would affect the operations at any of the six study intersections. The nearest street project, the Tenth Street (SR‑150) Bicycle and Pedestrian Improvements Project, does not extend into the Project study area. A review of the most recent State of California Department of Transportation ("Caltrans") District 7 Projects listing indicated that the State agency has no planned



Source: Crain and Associates, September 9, 2015.

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Figure 3.11
Related Project Location Map

improvement projects for State Route 150. Additionally, none of the physical mitigation improvements associated with the 12 aforementioned related projects was incorporated under future traffic conditions (in order to provide a conservative representation of infrastructure capacity).

Analysis of Future (2018) Traffic Conditions

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described previously in this letter. As described earlier, for the analysis of future Project traffic impacts, no potential highway system improvements were incorporated. Thus, at all six study locations, existing roadway geometric characteristics and signal operations were assumed to prevail.

As described earlier, future (2018) baseline traffic volumes for the Without Project condition were determined by superimposing area‐wide ambient traffic growth and the total related projects traffic volumes onto the existing (2015) traffic volumes. The Future (2018) Without Project traffic volumes are depicted on Figures 3.12 and 3.13 for the AM and PM peak hours, respectively.

Project volumes (Figures 3.7 and 3.8, above), as determined earlier, were then added to the Future (2018) Without Project traffic volumes to develop the Future (2018) With Project volumes. The Future (2018) With Project volumes were then used to determine traffic impacts directly attributable to the Project. The Future (2018) With Project AM and PM peak‐hour traffic volumes are shown on Figures 3.14 and 3.15, respectively. The future lane configurations and traffic control conditions for the study intersections are illustrated in Attachment F of the Traffic Study.

In order to analyze properly these future traffic conditions, with traffic volume contributions from the 20 related projects, highway system improvements associated with these related projects were also incorporated at the study intersections. Information related to these highway system improvements was culled from the East Area 1 Report, and the future lane configurations and traffic control conditions for the study intersections are illustrated in Attachment E of the Traffic Study.

Under Future (2018) With Project conditions, five intersections would continue to operate at LOS C or better during both peak hours. However, operations at the intersection of Ojai Road (State Route 150) & Orchard Street would worsen slightly at LOS D (increases in minor-street delay of 1.4 seconds and 2.2 seconds during the AM and PM peak hours, respectively). Therefore, per the City's impact criteria, the Project is expected to have a significant traffic impact at the intersection of Ojai Road (State Route 150) & Orchard Street. Mitigation for this intersection is discussed in the following section. The intersection of Ojai Road (State Route 150) & the Project driveway/Royal Oaks Place is projected to operate at LOS C during both peak hours under Future (2018) With Project conditions. The same is true for the Project's secondary access point at the intersection of Ojai Road (State Route 150) & Oakdale Place. The LOS calculation worksheets for Future (2018) With Project traffic conditions are included in Attachment D of the Traffic Study.

Project Mitigation

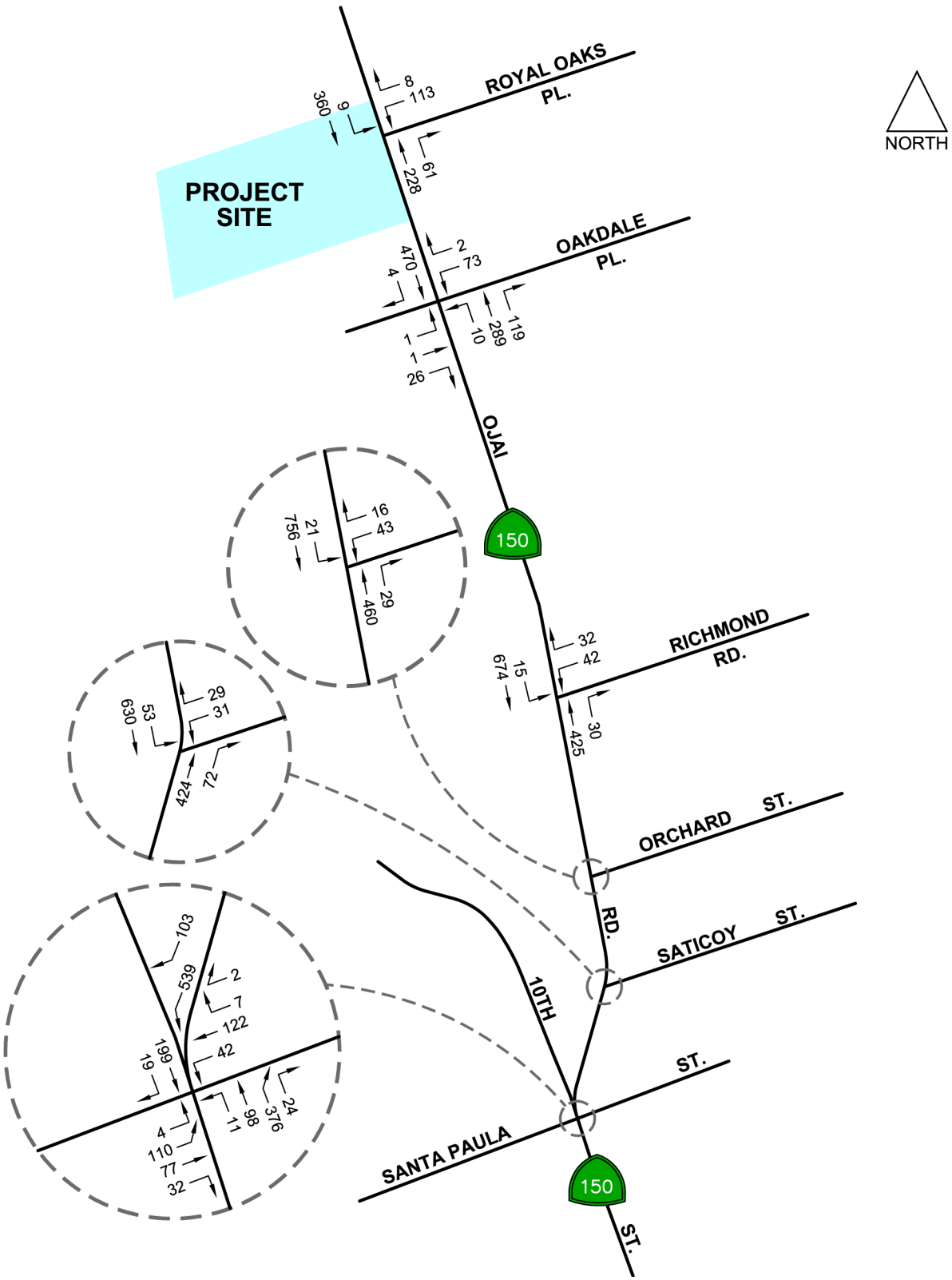
As indicated in the preceding traffic analysis, the Proposed Project is expected to significantly impact traffic conditions at the following study intersection under future (2018) conditions, prior to mitigation:

4. Ojai Road (SR - 150) & Orchard Street

This location is expected to be significantly impacted by non - Project cumulative traffic growth in 2018, with operations projected to be LOS D during both peak hours under pre - Project conditions. The Project would then contribute to a significant cumulative impact by adding traffic and increasing minor - street delays.

Per the East Area 1 Report, this intersection has already been identified for improvements. That specific plan project proposed to mitigate the cumulative impact at the intersection by providing parking restrictions on Ojai Road (SR - 150) to allow for one additional southbound through travel lane in the AM peak period and one additional northbound through travel lane in the PM peak period. The intersection would also be placed under traffic signal control. Given that this location is on a State highway, the engineering design of these improvements would be completed in conjunction with Caltrans.

The intersection of Ojai Road (SR - 150) & Orchard Street was then analyzed under Future (2018) With Project conditions assuming the implementation of the abovementioned physical improvements. It was also assumed that all westbound left - turns at the intersection of Ojai Road (SR - 150) & Richmond Road would shift to the Orchard Street intersection as a result of a new turn restriction. The left - turn restriction at the Richmond Road intersection is included as part of the physical mitigation package for the East Area 1 Project and the subsequent traffic volume shifts were assumed in the traffic signal warrants analysis for the Orchard Street intersection. Even though the Richmond Road intersection was not significantly impacted by the Project, the shift in westbound left - turn volumes from Richmond Road to Orchard Street results in a more conservative estimate of Future (2018) With Project Plus Mitigation traffic conditions at the impacted location. The results of the ICU analysis are shown in Table 3.18. Following the implementation of physical improvements and shift in traffic volumes, the intersection is projected to operate at LOS A during both peak hours. Thus, the cumulative traffic impact will be reduced below the threshold of significance.



Source: Crain and Associates, September 9, 2015.

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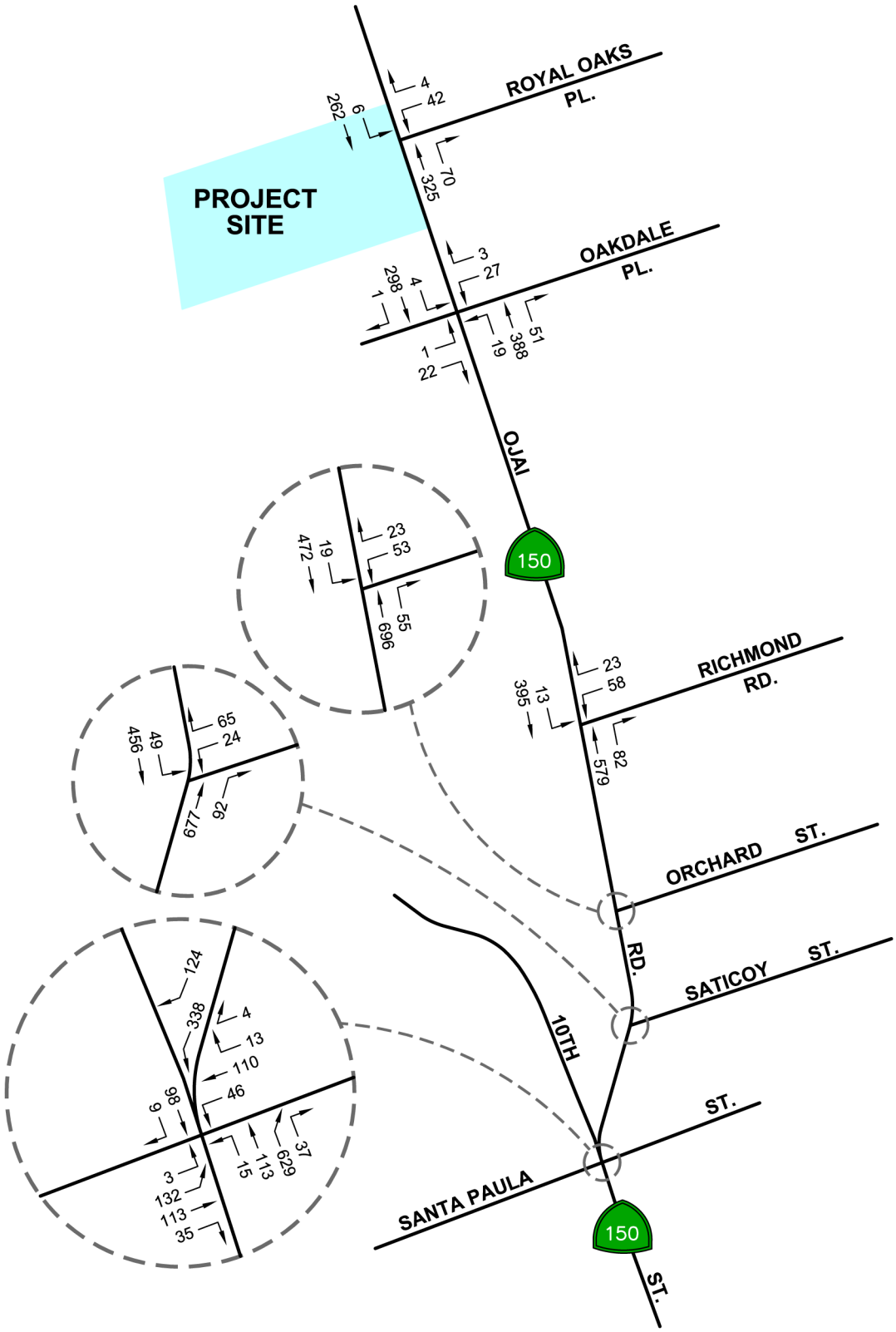
Figure 3.12
Future (2018) Without Project
Traffic Volumes - AM Peak Hour



Source: Crain and Associates, September 9, 2015.

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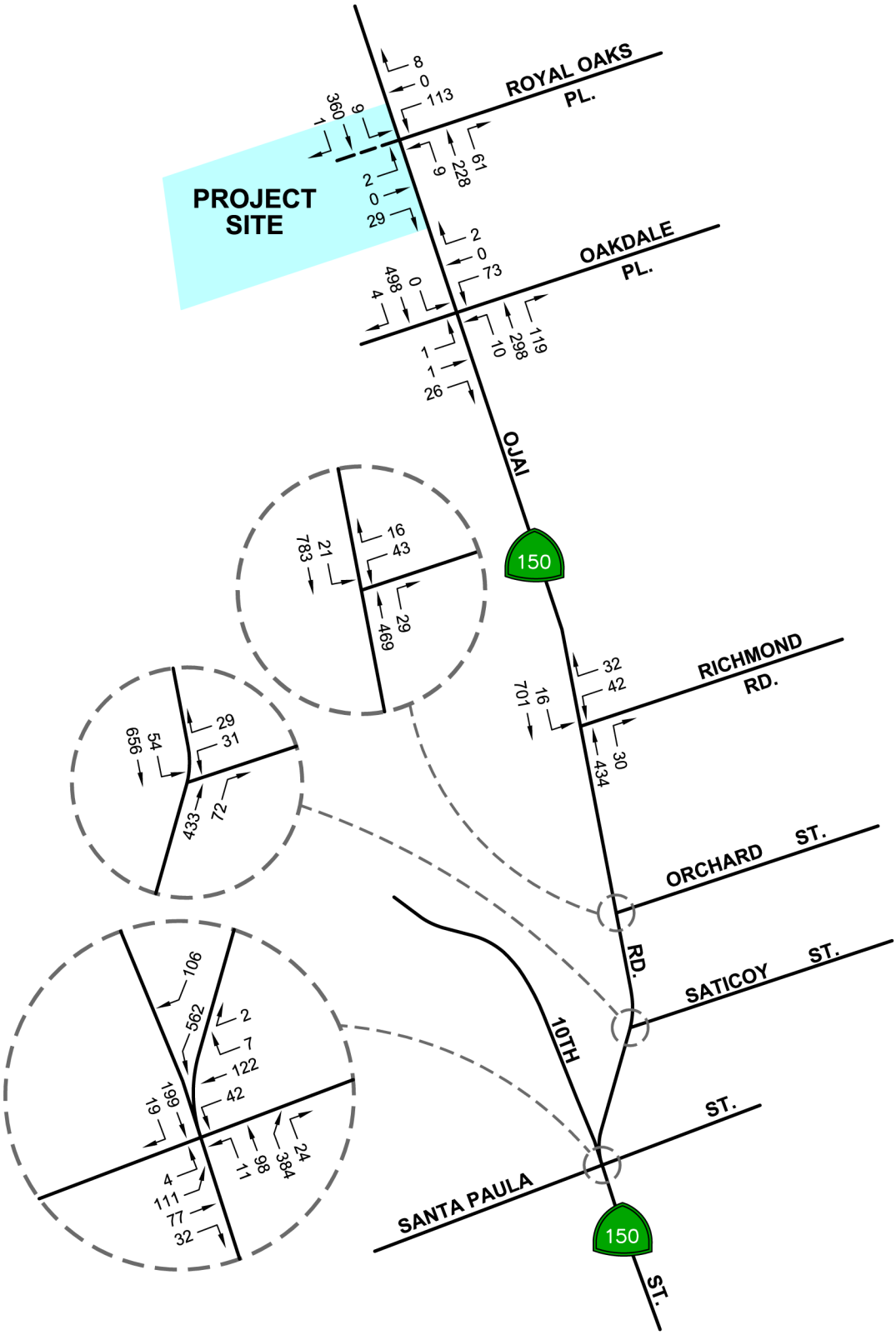
Figure 3.13
Future (2018) Without Project
Traffic Volumes - PM Peak Hour



Source: Crain and Associates, September 9, 2015.

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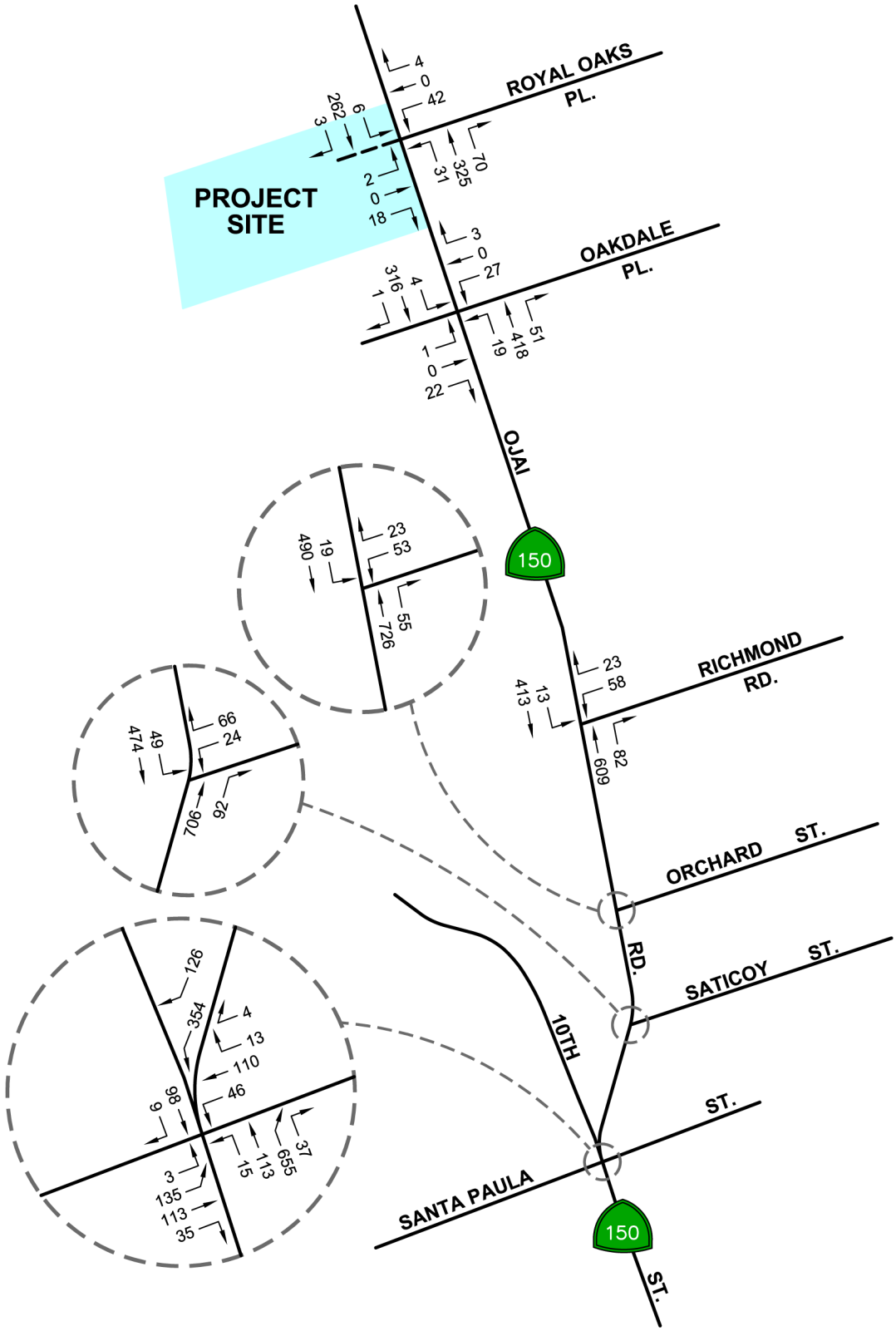
Figure 3.14
Future (2018) With Project
Traffic Volumes - AM Peak Hour



Source: Crain and Associates, September 9, 2015.

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Figure 3.15
Future (2018) With Project
Traffic Volumes - PM Peak Hour

Table 3.18
Determination of Project Impacts – Future (2018) Conditions

Study Intersection		Peak Hour	Existing (2015) Conditions		Future (2018)							
					Without Project		With Project			With Project Plus Mitigation		
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Significant Impact ?	V/C or Delay	LOS	Significant Impact ?
1	Ojai Road (SR-150) & Royal Oaks Place (and Project Driveway) [1,2]	AM	14.8	B	15.7	C	19.5	C	No	--	--	--
		PM	12.9	B	13.7	B	16.7	C	No	--	--	--
2	Ojai Road (SR-150) & Oakdale Place [1]	AM	21.3	C	23.3	C	24.9	C	No	--	--	--
		PM	15.9	C	17.3	C	18.3	C	No	--	--	--
3	Ojai Road (SR-150) & Richmond Road [1]	AM	19.1	C	20.5	C	21.4	C	No	--	--	--
		PM	19.7	C	21.8	C	23.3	C	No	--	--	--
4	Ojai Road (SR-150) & Orchard Street [1,2]	AM	24.5	C	26.4	D	27.8	D	Yes	0.387	A	No
		PM	24.9	C	27.9	D	30.1	D	Yes	0.390	A	No
5	Ojai Road (SR-150) & Saticoy Street [1]	AM	18.1	C	19.0	C	19.8	C	No	--	--	--
		PM	18.2	C	18.5	C	19.3	C	No	--	--	--
6	Ojai Road (SR-150) / 10th Street & Santa Paula Street [2]	AM	0.684	B	0.723	C	0.740	C	No	--	--	--
		PM	0.633	B	0.679	B	0.696	B	No	--	--	--

Notes:
[1] *Unsignalized intersection results presented in terms of average delay to the worse Stop-sign controlled approach.*
[2] *Signalized and four-way stop intersection results presented in terms of average control delay for all vehicles using the intersection during the peak hour.*
Source: Crain & Associates, River Rock Residential Project Traffic Impact Analysis, Attachment C, September 9, 2015.

Project Fair Share Calculation

A fair share calculation was performed to determine the proportional responsibility of the Project Applicant for the improvements required to mitigate the significant impact at the intersection of Ojai Road (State Route 150) & Orchard Street. The formula for determining this percentage is as follows:

$$\text{Project Fair Share} = \frac{\text{Project Peak-Hour Traffic Volume Contribution}}{\text{Future Peak-Hour Traffic Volume Growth (Existing-to-General Plan Buildout Conditions)}}$$

While the present analysis did not evaluate General Plan buildout conditions, the East Area 1 Report analyzed traffic conditions at this intersection under Future (2025) General Plan traffic conditions (the City General Plan buildout year is 2025). Future (2025) General Plan traffic volumes in the East Area 1 report were developed based on two sources of future traffic growth: ambient traffic growth and related projects. Because the Proposed Project was not listed in the related projects included in the East Area 1 Report, the Proposed Project volumes were added to the Future (2025) General Plan with East Area 1 project volumes in order to represent the Future (2025) General Plan With Project traffic volumes in the present analysis. The relevant fair share calculation page of the East Area 1 Report is included in Attachment G of the Traffic Study. The Project fair share calculation is depicted in Table 3.19 below.

Table 3.19
Proposed Project Mitigation Fair Share Calculation

			Traffic Volumes[1]				Project
	Intersection	Peak Hour	Exist	Gen Plan[2]	Growth	Project	Fair Share
4.	Ojai Road (State Route 150) & Orchard Street	AM	1,266	1,579	313	36	11.5%
		PM	1,239	1,525	286	48	16.8%

Notes:
[1] Exist = Existing (2015) Conditions; Gen Plan = Future (2025) General Plan Buildout With Project Conditions; Growth = Future Traffic Growth [GP - Ex]; Project = Project Contribution.
[2] Future (2025) General Plan Buildout With Project traffic volumes based on East Area 1 Report future traffic volumes plus Project traffic volumes.

As indicated above, the Project's maximum Project fair share percentage is 16.8 percent, based on the Project's traffic volume contributions during the PM peak hour.

Project Access Improvements

As described earlier, the Project Site is proposed to have two access/egress connections to the surface street system. The Project's main driveway is planned for construction opposite Royal Oaks Place. The driveway would provide a single eastbound approach lane and a single departure lane and would form the fourth leg of the intersection with Ojai Road (State Route 150). Secondary access is proposed via an internal connection between the Project and the residential subdivision located immediately to the south. As shown on Figure 2.6, Redbud Street would be linked to the existing Fuchsia Lane, which presently

terminates in a cul-de-sac. This internal connection will provide secondary access for both the Project and the residential subdivision to the south, thus improving emergency vehicle access for both developments.

Although the Project is not expected to significantly impact the intersection of Ojai Road (State Route 150) & the Project driveway/Royal Oaks Place, an investigation was performed to determine the appropriate level of traffic control at this location following the construction of the Project. To that end, a traffic signal warrants analysis was performed to explore the potential signalization of this location. The traffic signal warrants analysis was conducted according to the procedures outlined in the Caltrans California Edition of the Manual on Uniform Traffic Control Devices (CA MUTCD), updated in 2014. The traffic signal warrants were evaluated based on 14 hours of traffic volume data collected on a typical weekday (August 13, 2015).

The major street, Ojai Road (SR - 150), has a posted speed limit of 40 miles per hour (MPH) at the Project driveway location. The driveway is located along a segment of the highway that has uncontrolled traffic flow (no traffic signals or STOP signs) for a span extending from over one mile south of the driveway to several miles north of the driveway. Given the relative lack of traffic controls and in order to be conservative, it has been assumed that the critical 85th percentile speed on this roadway likely exceeds 40 MPH at the driveway location and the study intersection should be classified as a rural facility. As described above, the Project driveway would provide a single eastbound approach lane for exiting vehicles, as shown on the Proposed Site Plan in Section 2.0, Project Description. Section 4C.01.05 of the CA MUTCD states:

> *A traffic signal should not be installed unless one or more of the factors described in this Chapter are met.*

However, Sections 4C.01.03 and 4C.01.06 of the CA MUTCD also state:

> *The satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal… A traffic control signal should not be installed unless an engineering study indicates that installing a traffic control signal will improve the overall safety and/or operation of the intersection.*

For the subject intersection, most of the traffic warrants were evaluated based on the Existing (2015) traffic volume data collected at this intersection in August 2015. However, existing and future peak-hour traffic volumes/analysis results were used to evaluate Warrant 3. The nine major traffic signal warrants were evaluated on a preliminary basis, and their analysis are described in more detail below.

Warrant 1, the Eight-Hour Vehicular Volume warrant, is intended for application at intersections where a large volume of intersecting traffic is the primary reason to consider providing a traffic control signal. The major and minor street approaches at this intersection do not carry adequate traffic volumes for eight hours of the day to satisfy this warrant.

Warrant 2, the Four-Hour Vehicular Volume warrant, is also intended for locations where the volume of intersecting traffic is the primary reason for considering the installation of a traffic control signal. Again,

the major and minor street approaches at this intersection do not experience sufficient traffic volumes during four hours of the day to satisfy this warrant.

Warrant 3, the Peak Hour warrant, is meant for intersections at which, for at least one hour of an average day, minor street traffic suffers lengthy delays entering or crossing the major street. The warrant requires that either Part A or Part B be satisfied. Part A of the warrant is satisfied only if three conditions exist, for one hour of an average day, related to: 1. total stopped time delay on one minor-street approach controlled by a STOP sign; 2. volume on the same minor-street approach; and 3. total entering volume for the intersection. Under Existing (2015), Existing (2015) Plus Project, Future (2018) Without Project, and Future (2018) With Project traffic conditions, not all of these conditions are satisfied. Thus, Part A of this warrant would not be satisfied under existing or future conditions. Part B of this warrant would not be satisfied under existing or future conditions, either.

Warrant 4, the Pedestrian Volume warrant, is intended for application at locations where major street traffic volumes are so high that pedestrians suffer undue delays in crossing the major street. Observations in the field indicated that there are very few pedestrian crossing maneuvers at this location; therefore, Warrant 4 would not be satisfied under existing conditions. In order to estimate the additional pedestrian volumes that the Project could contribute to the subject intersection, pedestrian volumes at the adjacent intersection of Ojai Road (SR‐150) & Oakdale Place were reviewed. Oakdale Place provides direct access/egress for the aforementioned 42‐unit single‐family home subdivision on the west side of the highway. The pedestrian volumes observed at the subdivision's roadway intersection with Ojai Road (SR‐150) can be used to model the Project's potential pedestrian volumes. As shown in Attachment A, the maximum hourly pedestrian volume at the intersection of Ojai Road (SR‐150) & Oakdale Place, including adults and schoolchildren, was 10 pedestrians crossing between 4:15 and 5:15 PM. Factoring this volume upward for the Project's 53 single-family homes, it is reasonable to expect approximately 13 additional pedestrian crossings at the subject intersection during the pedestrian peak hour. The subject intersection's current pedestrian peak‐hour volume is 5 pedestrians. Thus, following construction of the Project, the intersection is likely to experience approximately 18 pedestrians during the peak hour. In order to meet the Pedestrian Volume warrant, the total of all pedestrian crossing of the major street (Ojai Road) must meet or exceed 93 pedestrians for one hour of the day or 75 pedestrians for four hours of the day. Therefore, Warrant 4 is not expected to be satisfied under Future conditions.

Warrant 5, the School Crossing warrant, is intended for application at locations where the presence of schoolchildren (defined as elementary through high school students) crossing the major street is the primary reason for providing a traffic control signal. This warrant is not applicable to the subject intersection; therefore, Warrant 5 would not be satisfied. Similar to Warrant 4, the adjacent intersection of Ojai Road (SR‐150) & Oakdale Place serves as a model for future school‐age pedestrian volumes at the subject intersection. The Oakdale Place intersection experienced a school‐age pedestrian peak‐hour volume of 3 school‐age pedestrians (see Attachment A) between 4:15 and 5:15 PM. Factored upward for the Project's 53 single‐family homes, the Project would contribute approximately 4 school‐age pedestrians to the subject intersection. The subject intersection currently experiences zero school‐age pedestrians. Therefore, following construction of the Project, the intersection is likely to experience

approximately 4 school‐age pedestrians during the peak hour. In order to meet the School Crossing warrant, there must be a minimum of 20 school‐age children crossing during the peak hour. Therefore, Warrant 5 is not expected to be satisfied under Future conditions.

Warrant 6, the Coordinated Signal System warrant, is intended for application at intersections where the installation of a traffic control signal would allow for better progressive traffic flow and proper platooning of vehicles. Based on the location of the subject intersection on Ojai Road (State Route 150), it is not anticipated that a traffic signal would be required to assist with vehicle platooning. Therefore, this warrant would not be satisfied.

Warrant 7, the Crash Experience warrant, is meant for intersections where the frequency and severity of motor vehicle collisions are the main reasons for providing traffic signal control. In order to be satisfied, this warrant requires among its criteria that an intersection has experienced five or more reported crashes, of types susceptible to correction through the installation of a traffic signal, within a 12-month period. The most recent available five years of collision records for the subject intersection were obtained from Caltrans and the City Police Department. Based on a review of these records, this intersection has not experienced five or more crashes during any recent 12-month period. Thus, this warrant would not be satisfied.

Warrant 8, the Roadway Network warrant, is intended for application at locations in order to promote concentration and organization of traffic flow on a roadway network. In order for this warrant to be satisfied, both the major and minor streets must meet certain "major route" characteristics. The Proposed Project driveway and Royal Oaks Place would not meet any of the "major route" criteria; therefore, Warrant 8 would not be satisfied.

Warrant 9, the Intersection Near A Grade Crossing warrant, is intended for application at intersections where the proximity of a grade crossing is the primary reason for considering a traffic control signal. Given that the study intersection is not located near a grade crossing, Warrant 9 would not be satisfied.

In summary, under its existing three-legged configuration or the proposed future four-legged configuration with the Project, the intersection of Ojai Road (State Route 150) and the Project driveway/Royal Oaks Place does not appear to meet any of the abovementioned traffic signal warrants under Existing (2015) or Future (2018) traffic conditions. Still, given that the intersection involves a State highway, the appropriate level of traffic control will be coordinated with Caltrans as part of the encroachment permit process. Caltrans maintains the same desired LOS standard as the City (threshold between LOS C and LOS D), so it is expected that the ultimate design of the intersection will satisfy City requirements.

Conclusion

Based on the above analysis, the Proposed Project was shown to contribute to a significant traffic impact at the intersection of Ojai Road (State Route 150) & Orchard Street under future traffic conditions. Mitigation Measure 16.1 is recommended to mitigate the Project's significant traffic impact at this location. With this improvement, the Project's impact at this location would be mitigated to a less-than-

significant level. Operations at the Project's primary and secondary access/egress points are expected to be LOS C or better during both peak hours, assuming the intersection of Ojai Road (State Route 150) & the Project driveway/Royal Oaks Place is placed under two-way stop control (the intersection does not appear to meet warrants for traffic signal control). Therefore, the Project is expected to have zero significant traffic impacts following mitigation. As noted previously, for all planned physical improvements that involve Ojai Road (State Route 150), coordination and agreement with Caltrans will be required.

Mitigation Measure:

To mitigate the potentially significant impact at the intersection of Ojai Road (State Route 150) and Orchard Street, the following mitigation measure is recommended:

16.1 The Project Applicant shall contribute the Project's fair share contribution (16.8 percent) toward physical improvements consisting of the provision of parking restrictions on Ojai Road (State Route 150) to allow for one additional southbound through travel lane in the AM peak period and one additional northbound through travel lane in the PM peak period to be implemented in a manner and time as directed by the Director of Public Works, and the implementation of traffic signal control, at the intersection of Ojai Road (State Route 150) and Orchard Street. Proof of payment or bond shall be provided to the Planning Director prior to the issuance of the first certificate of occupancy.

b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. The Project Site is located within the County of Ventura and is subject to the goals and policies contained in the 2009 Ventura County Congestion Management Program (adopted July 10, 2009). The CMP Project-Level Impact Analysis guidelines state that proposed developments which meet the following criteria are evaluated by VCTC as part of the Project-Level Impacts analysis:

- The proposed land use is not included in the Ventura County Traffic Model because the project was not anticipated in the jurisdiction's general plan and the project will generate 200 or more peak hour trips in either peak hour; or
- The proposed land use is included in the VCTM as provided by the local agency, but because of an increase in project size or density the project will generate an additional 100 or more peak hour trips.

The Proposed Project was not included in the VCTM, thus, a CMP analysis would be required if the Proposed Project generates 200 or more peak hour trips in either peak hour. Based on the information presented in the Traffic Impact Study, the Proposed Project will generate 40 a.m. peak hour trips and 53 p.m. peak hour trips. Thus, the project would not meet the criteria for further review and no analysis is required. The Proposed Project's impacts upon the CMP system would be less than significant.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No impact. This question would apply to the Proposed Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Project Site is located approximately 1.6 miles north of the Santa Paula Airport. The Proposed Project would not interfere with air traffic pattern or create any safety risks and therefore no impact would occur.

d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project will include a new vehicular access driveway to the Project Site from Ojai Road (State Route 150), which, if not properly designed and constructed, could potentially conflict with vehicle and pedestrian circulation in the Project area. As noted in response to Checklist Question 16(a), above, the Proposed Project will install a two-way stop control as a physical improvement to the intersection of Ojai Road (State Route-150) and the Project driveway/Royal Oaks Place. The configuration of the Project's driveway at this location is subject to the review and approval of the City of Santa Paula General Plan Circulation Element. Based on the Traffic Study, no significant Project impacts are foreseen to occur at this location under the post-project conditions. As such, the Project's potential impacts are considered less than significant.

e. Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design would not provide emergency access meeting the requirements of the Santa Paula Fire Department, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. Ojai Road (State Route 150) is a locally designated Emergency Evacuation Route by the City of Santa Paula General Plan.[11] As described above, the Proposed Project driveway will be located on Ojai Road, and the Project will install a two-way stop control as a physical improvement to the intersection of Ojai Road (State Route -150) and the Project driveway/Royal Oaks Place. The Proposed Project has been designed in a manner that satisfies the highway design criteria of the City of Santa Paula General Plan Circulation Element and the emergency response requirements of the Santa Paula Fire Department. The Proposed Tract Map has been reviewed by the Santa Paula Fire Department and the Applicant has incorporated emergency access and fuel modification measures as requested. Specifically, the Tract Map has been designed to allow for emergency access from Ojai Road and incorporates additional emergency access points at the terminus of proposed Royal Oaks Road (to access the open space hillside to the west) and at the southerly end of proposed Redbud Street where it aligns with Fuchsia Lane to the south. As such, the Proposed Project's vehicle access plan will facilitate emergency access and would not create any

[11] *City of Santa Paula General Plan, Safety Element.*

hazardous design features that could impede emergency access. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and a less than significant impact would occur.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. A significant impact may occur if the Proposed Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site. The operation of the Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes. The all-way stop control improvement to the intersection of Ojai Road (State Route 150) and the Project driveway/Royal Oaks Place will ensure that the intersection operates at an acceptable level. Any lane closures during the construction of the Proposed Project will be temporary in nature and may cause a temporary inconvenience; although, they would not be expected to substantially interfere with public transportation services or alter public transportation routes. Furthermore, the Proposed Project would not interfere with any bikeway systems. Since the Proposed Project would not modify or conflict with any alternative transportation policies, plans or programs, it would have no impact on such programs.

Cumulative Impacts: Less Than Significant Impact. Development of the Proposed Project in conjunction with other related development within the City of Santa Paula would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Project vicinity. The Project's traffic impacts were evaluated under Future Year (2018) With Project and Future Year (2018) Without Project conditions. As noted above, with the incorporation of Mitigation Measure 16.1, it does not appear that the Project will result in adverse impacts to the intersections of Ojai Road (State Route 150) & Royal Oaks Place (and future Project driveway); Ojai Road (State Route 150) & Oakdale Place; Ojai Road (State Route 150) & Richmond Road; Ojai Road (State Route 150) & Orchard Street; Ojai Road (State Route 150) & Saticoy Street; and Ojai Road (State Route 150) / 10th Street & Santa Paula Street. Therefore, the Proposed Project's cumulative impact is considered less than significant.

17. UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☑	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☑	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☑	☐

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☑	☐
e. 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?	☐	☐	☑	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☑	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☑	☐

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

The City of Santa Paula provides wastewater collection and treatment for local residents. Operations of the City wastewater treatment plant is conducted by Santa Paula Water LLC, under a design, build, operate and finance contract. The City's wastewater is conveyed through a network of sewers to the Santa Paula Water Recycling Facility, which utilizes a membrane bioreactor (MBR) process to treat wastewater to a tertiary level, meeting CA Title 22 requirements and the present requirements of the Regional Board for all constituents amenable to biologic treatment. As the Proposed Project's wastewater flows will be conveyed to and treated at the Santa Paula Water Recycling Facility, the Project would not exceed the treatment requirements of the Water Quality Control Board and impacts are less than significant.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water demand or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site are exceeded. The determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into

account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water System

A site-specific Water System Study was prepared for the proposed Venting Tentative Tract Map 5928 by Southland Civil Engineering and Survey, LLP, and is included in Appendix J to this MND. The Water System Study was prepared in support of the development's tentative tract map completeness requirements and determines the existing water pressure for current conditions and analyzes the available pressures for the proposed development during the Peak Hour Demand and Fire Flow conditions. The Water System Study is summarized herein as follows:

Existing Infrastructure

The Project Site is currently served by existing potable water lines that exist beneath Ojai Road. There are two water mains (one 6" main and one 8" main) along Ojai Road. Located to the south of the Project Site, Tract 2128 is served by 6-inch mains on Fuchsia Lane, Marigold Lane and Oakdale Place with connection to the 8-inch main at Ojai Road and Oakdale Place intersection. There are 34 existing homes within the Tract 2128 that are connected to these 6-inch mains. At present, the 6-inch mains are terminated at the end of cul-de-sac on both the Fuchsia Lane and the Marigold Lane.

The existing available water pressure was evaluated and a fire hydrant flow test was conducted at the northwestern corner of Ojai Road and Oakdale Place to verify the existing water flow availability and pressure condition. The flow test indicated a static pressure of 90 psi, a flow residual pressure of 65 psi with a flow rate of 2,697 gallons per minute at 20 psi (See Appendix J to this MND).

Point of Connection

The Water System Study concluded that two points of connections are necessary to serve the Proposed Project. One connection is proposed at the end of 6-inch line on Fuchsia Lane with another connection to the 8-inch main at intersection of Ojai Road and Royal Oak Place. This will provide a loop for the proposed development and Tract 2128 off the 8-inch main on Ojai Road.

Water Usage Demand Per Capita

Throughout the years, the city has update reports on the water usage demand. Based on the Final Urban Water Management Plan (UWMP), 2010 Update, there is the 132 gpcd based on actual measurement of residential uses and the 166 gpcd based on the average city consumption. With the current UWMP, the city has the 152 gpcd as the interim 2015 per capita Base Line water use target and this is the design average daily demand (ADD) used for the proposed water system of this project.

Fire Flow Requirement

The city has required a fire flow rate of 1,500 gpm to be used for the proposed water system. Scenario #2 (Fire flow condition) is the worst cast scenario that accounts for the PHD flow and the fire flow

concurrently. The modeling of the proposed water system shows that the existing residual pressures and flow rate available for connection can support the additional water demand as proposed. The existing 6-inch main at Tract 2128 and the proposed new 8-inch main at TTM 5928 are well below the allowable pipe velocity for the Peak Hour Demand flow rate while having good residual pressures over 68 psi. As for the combined PHD and fire flow, the residual pressures at the highest junction and fire hydrant are at 29 psi which are greater than the allowable minimum 20 psi. Therefore, based on this information the Proposed Project could be accommodated by connection to the existing system and no expansion of the existing water system are required. Impacts associated with potable water infrastructure and fire flow would therefore be considered less than significant.

Wastewater

The City's wastewater is conveyed through a network of sewers to the Santa Paula Water Recycling Facility. The facility has the capacity to treat 4.2 million gallons per day (MGD) average dry weather flow (ADWF) and is currently equipped with the membranes needed to treat 3.4 MGD. When it becomes necessary to expand the capacity of the facility in order to accommodate a larger population, additional membranes will be installed into the facility, increasing the rated capacity to 4.2 MGD. The Project's increase flows would not significantly impact the treatment capacity of the Santa Paula Water Recycling Facility such that new or expanded facilities are required.

The sewer network serving the Project Area was evaluated in June 2014, by Southland Civil Engineering & Survey LLP. The Post-Development Sewer Capacity Analysis is provided in Appendix I to this MND. As concluded in the Post-Development Sewer Capacity Analysis, the wastewater flow from the Proposed Project is proposed to discharge to the existing 8-inch sewer main along Ojai Road. The sewer flows southerly to Harvard Boulevard and then westerly to the treatment plant. The existing 8-inch main in Ojai Road splits into 6-inch and 8-inch parallel lines just south of Say Road. The second of the two parallel lines was constructed for capacity relief of the first.

Flow depth analyses were performed for these sections of parallel pipes from Say Road to Richmond Road. Both the existing and proposed flow rates of the Peak Dry Weather Flow (PDWF) and Peak Wet Weather Flow (PWWF) were calculated and are presented in Appendix I. For PDWF design, the maximum allowable flow depth is 50% full and for PWWF design, the maximum allowable flow depth is 75% full. The allowable flow rates at the 50% full and 75% full were also tabulated for comparison. As confirmed in the Post-Development Sewer Capacity Analysis, the design flows in the section of pipes that would serve the Proposed Project are below the allowable flow depth and therefore, enough capacity is available for the proposed flow from the proposed development of the Proposed Project. Impacts related to wastewater would therefore be less than significant.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of storm water runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new storm water drainage facilities. As described in response to Checklist Question

9(c), earlier in this MND, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project will be required to demonstrate compliance with the City's requirements and retain or treat the first ¾ inch of rainfall in a 24-hour period. The Project Site has both impervious surfaces and undeveloped land. As such, a portion of surface water runoff from the Project Site is directed to adjacent storm drains while some percolates into the groundwater table beneath the Site. With the City's requirements for stormwater quality treatment and not allowing an increase in runoff with development, it can be assumed the existing City storm drain system will have sufficient capacity to carry the proposed development runoff. Additionally, the Project Site is not in a flood hazard zone. Therefore, Proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and impacts are less than significant.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if the project increases water demand to such a degree that new water sources would need to be identified. The City of Santa Paula's existing and planned water demands through the year 2035 are addressed in the City of Santa Paula Potable Water System Master Plan (Oct 2005). Based on well production data, the City's highest annual water usage was 5,400 acre-feet (AF)/year and occurred in 2002. With an estimated population of 29,500 (at the time the study was completed), this equates to a per capita demand of 166 gallons per day per person.

The City of Santa Paula currently has limited rights to ground water and surface water. As shown in Table 3.20, City of Santa Paula Existing Water Allocations, the City's water supply is derived from pumping rights for the Santa Paula Basin and the Santa Paula Creek Surface Water Exchange for Additional

Table 3.20
City of Santa Paula Existing Water Allocations

Source	Water Rights (AF/yr)
Pumping Rights Santa Paula Basin Groundwater	5,412 AF/yr
Santa Paula Creek Surface Water Exchanged for Additional Groundwater Pumping Rights	500 AF/yr
TOTAL	**5,912 AF/yr**
Source: Santa Paula Water System Master Plan, Table 5-9 at page 82, October 2005.	

Groundwater Pumping Rights. The City's total existing water allocation from these two sources is 5,912 AF/year. In accounting for future growth, the Water System Master Plan factors an allowance for 5 percent increase in existing usage across the City through the year 2035 to accommodate infill development and higher intensity water usage. The Water System Master Plan acknowledges that it is impossible to reliably predict whether per capita consumption in Santa Paula will increase or decrease

over the next few decades. New homes, on average, generally contain more bathrooms and water-consuming appliances such as washing machines and dishwashers as compared to the existing housing stock. However, newer homes are equipped with water-conservation devices such as low-flow/flush toilets, low-flow showerheads, front-loading washing machines, and self-adjusting irrigation controllers, which would reduce water demand on a per capita basis. Water demand is also influenced by outdoor irrigation demands, which is affected by the size of the residential lots. Given the overall uncertainty of demand trends and considering consumption figures from other new developments in the area, the City's Water System Master Plan does not expect per capita consumption to be significantly lower in the future, without the imposition of mandatory water conservation limits. Thus, for the analysis performed in the Master Plan, an overal1 per capita consumption equivalent to 163 gallons per day was used.

The City's projected total future (year 2035) water demand, which includes potable and recycled water, is estimated to be 8,000 AF/yr. A summary of the City's projected water demand by source is provided in Table 3.21, below.

Table 3.21
Total Future Water Demands – Potable and Recycled Water

	Annual (Acre ft/year)	Peak Day (mgd)
Existing System, Plus 5 percent allowance for infill	5,570	7.58
Fagan Canyon	1,836	2.98
Adams Canyon	217	0.47
East Areas 1 and 2	1,023	1.64
South Mountain	33	0.04
West Area 2	122	0.16
Totals	**8,800**	**12.9**

Source: Santa Paula Water System Master Plan, Table 5-8 at page 81.

The water demand for the Proposed Project is included within the future projections of the City's Water System Master Plan as the Project is an infill development that would not exceed the planned growth demand for the existing land use. In projecting water demands for infill development, the Water System Master Plan bases future infill development on the maximum allowable density permitted under the City's Zoning Map. For the Project Site, the existing zoning is HR2-PD, which has an allowable density of 1 dwelling unit per 14,500 square feet of lot area. Accordingly, the maximum allowable density for the 19.28- acre Project Site is 57 single-family dwelling units. The Proposed Project includes 54 total dwelling units and would thus be consistent with the water demand forecast for infill development within the existing zone. The Proposed Project is seeking a Planned Development Overlay Zone to allow for lot sizes that are under 14,500 sf. This feature would further reduce anticipated water demands as the outdoor water use of the project are reduced compared to single family lots of 6,000 sf or larger that were developed in previous decades. Approximately 9.56 acres of the site is proposed as an open space lot with natural vegetation and would not be irrigated. The Proposed Project would also incorporate a number of

other water conservation strategies that would effectively reduce the project's anticipated water demand. The Proposed Project's sustainable design features include the following:

- High-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, will be provided in all restrooms as appropriate.
- Restroom faucets will have a maximum flow rate of 1.5 gallons per minute.
- Separate water meters (or submeters), flow sensors, and/or master valve shutoff valves will be provided for all landscape irrigation uses.
- Shower stalls will be designed with no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Energy Starr rated appliances will be used for all appliances installed by the developer (i.e., water heaters, dishwashers, front loaded clothes washers (water factor of 6.0 or less). If such appliances are to be furnished by the homeowners, this requirement shall be incorporated into the HOA agreement contract.

Based on the above, the Proposed Project's anticipated net water demand is within the planned growth rate of the Water System Master Plan. Using the conservative per capita water rate used for the City's 2035 water demands (i.e., 163 gpd per capita), and the citywide average household size of 3.5 persons per dwelling units) the Project would result in a total water demand increase of 30,807 gpd, or approximately 34.5 AF/yr.[12] This estimate is conservative, as it does not factor in the water conservation design measures identified above, recent State-mandated drought-related conservations regulations, and does not deduct any existing or historic water use from the existing unoccupied residential property on the Project Site. With these considerations taken into account, the Public Works Department has determined that the Project's net water demand is 21.2 AF/yr. Of the approximate 512 AF/year of water supply that is currently available within the System, the Proposed Project's demand would represent approximately 0.4 percent. Based on the information presented above and the future water demand study presented in the City's Water System Master Plan, the City should have sufficient water supplies available to serve the Proposed Project from existing entitlements and resource, absent unforeseen water supply interruption or other reductions in supply.

However, over the past four years, nearly the entire State has been experiencing unprecedented drought conditions that have impacted water local resources. On January 17, 2014, Governor Brown proclaimed a State of Emergency and directed state officials to take all necessary actions to make water immediately available. Although the City of Santa Paula has met and exceeded all state-mandated water conservation goals set in place, water resources for the City and the State are currently being reassessed and an updated Water System Master Plan is expected to be published later this year. For at least the past five years, the City has required water rights over payment of in lieu fees for the majority of development projects that the City has reviewed and recommended for approval. As discussed in Section II, Project Description, the Proposed Project will be conditioned to provide either in lieu fees or a transfer of water rights in the amount of 21.2 AFY to the City to secure water supply resources in the event the City's existing supplies are further reduced due to restrictions on groundwater pumping from an extended drought, either in 2016

[12] *54 net new dwelling units X 3.5 persons per units = 189 persons. 189 persons X 163 gpd = 30,807 gpd, or 34.5 AF/yr.*

or in a future extended drought that is increasingly more likely with climate change. With the transfer of water rights or payment of in lieu fees, Project impacts are less than significant and no mitigation measures are required.

Cumulative Impact: Less Than Significant Impact. Development of the Proposed Project, in conjunction with cumulative growth throughout the City of Santa Paula, would further increase the demand for potable water within the City. The City's future water demand forecast (year 2035) is based on a 5 percent increase in existing water use (to account for infill development) and takes into account the related developments for Fagan Canyon, Adams Canyon, East Areas 1 and 2, South Mountain, and West Area 2. In total the future water demand is estimated to be 8,800 AF/year. As concluded in the Water System Master Plan, the difference between future demand and current supply is 2,888 AF/year (8,800 – 5,912 = 2,888).

In June 2012, the Water System Master Plan was amended to reflect updated East Area 1 and East Area 2 water system improvements. Through that update, it was determined that the water supply for East Area 1 and East Area 2 would be derived from private wells located on East Area 1, which would be integrated into the City's Water Supply System. Currently, water supplies for the agricultural water uses of East Area 1 are derived from three or more on-site wells. These wells draw from the Santa Paula and Fillmore Groundwater Basins. The property owners have a combined on-site groundwater allocation of 1,283 AF/year from the Santa Paula Basin and have historically withdrawn AF/year from the Fillmore Groundwater Basin. Therefore, combined groundwater sources available on-site for the East Area 1 development is approximately 1,612 AF/year. Based on this potential new allocation, the revised difference between future demand and future supply is 1,276 AF/year (8,800 – (5,912 + 1,612) = 1,276 AF/yr).

Among the sources of new supply identified for consideration in the Water Supply Master Plan are: Groundwater allocation transfers (land areas planned for future development often have associated water rights that can be transferred to the City); Groundwater allocations owned by others, but not currently used; State water project allocation; Increased yields in the Santa Paula Basin; Groundwater pumping in higher yield areas on the east side of the City; The use of recycled water from the City's proposed wastewater treatment facility. Buildout of the cumulative developments identified in the City's Water Supply Master Plan is dependent upon the City's ability to meet the anticipated demands of each project based on the available supply of water at the time such developments are approved. As indicated above, the Proposed Project's water demand can be accommodated within the existing available water supply, the Project is conditioned to provide 21.2 AF/yr of water rights or in lieu fees, and the Project's contribution to cumulative impacts upon water supplies are less than significant.

e. 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?

Less Than Significant Impact. A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

(b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements. As stated in Checklist Question 17(b), above, the sewage flow will ultimately be conveyed to the Santa Paula Water Recycling Facility, which has a treatment capacity of 4.2 MGD. With the installation of additional membranes, its treatment capacity could be expanded to 4.2 MGD to accommodate a larger population. Therefore, impacts are less than significant.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity is insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the Project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the Project conflicts with solid waste policies and objectives in the City's Source Reduction and Recycling Element (SRRE).

The local landfills serving the Project Site include the Toland Landfill, the Simi Valley Landfill, and the Chiquita Canyon Landfill. All waste and refuse collected in the City of Santa Paula is managed by Crown Disposal under a municipal contract with the City. State law, AB 939, requires the City to divert 50% of all solid waste generated from the landfill through the use of waste prevention, recycling and re-use. To meet this law, City of 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; re-use, recycle or salvage; and, least preferred, landfilling. The City Ordinance requires a minimum of 50 percent 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.

Construction Waste

Based on the calculations provided in Table 3-22, below, it is estimated that the proposed construction activities would generate approximately 490 tons of debris during the construction process before compliance with the City's Construction and Demolition Ordinance (Municipal Code Section 50.140). With compliance, the Projects construction and demolition debris would be reduced by more than 50 percent, or by more than 245 tons. Therefore, the Proposed Project's construction impacts on solid waste are less than significant.

Table 3.22
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a] (lbs./sf)	Generated Waste (tons)
Demolition			
Residential (3 Ancillary Structures)	3,500 sf	111	194
Construction			
Residential (53 DU)	135,000 sf	4.38	296
		Total C& D Debris	**490**
		Less 50% Recycling/Diversion	**-245**
		Total C& D Debris Entering the Landfill	**245**

Notes: sf= square feet
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
Source: Parker Environmental Consultants, 2014.

Operational Solid Waste

As shown in Table 3.23, Proposed Project Solid Waste Generation, the Proposed Project's net generation during operation of the Proposed Project would be 294 pounds per day. The amount of waster being disposed of at area landfills is approximately 50% of this estimate, or approximate 144 lbs. per day, as the City implements curbside recycling. Crown Disposal, the City's contract waste hauler is a member of the U.S. Green Building Council (USGBC), and uses a state-of-the-art processing facility in Sun Valley, Community Recycling. The destination for refuse garbage collected by the City's private waste hauler include the Toland Road Landfill, the Simi Valley Landfill and Recycling Facility, and the Chiquita Canyon Landfill. The Toland Road landfill has a maximum permitted capacity of 1,500 tons of solid waste per day, and has a remaining capacity of 21,983,000 cubic yards with an estimated closure date of May 2027. The Chiquita Canyon landfill has a maximum permitted capacity of 6,000 tons of solid waste per day, and has a remaining capacity of 22,400,000 cubic yards with an estimated closure date of November 2019. The Simi Valley Landfill and Recycling Facility has a maximum permitted capacity of 9,250 tons of solid waste per day, and has an estimated closure date of 2052. The amount of solid waste generated by the Proposed Project is within the available capacities of the landfills serving the City of Santa Paula. Therefore, solid waste impacts are less than significant.

Table 3.23
Expected Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Proposed Project			
Multi-Family Residential	54 du	5.32 lbs/du/day	287
		Less 50% Recycled	**-144**
		Total Proposed Project Solid Waste	**144**

Notes:
du = dwelling units, sf = square feet
Source: Parker Environmental Consultants, 2014

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact would occur if the Proposed Project does not comply with federal, state, and local statutes and regulations related to solid waste. The Proposed Project would generate construction and demolition debris during the construction process and household operational solid waste associated with the typical household operations of 54 residential units. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Therefore, solid waste impacts are less than significant.

18. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☑	☐	☐
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☑	☐	☐
c. Does the project have environmental effects, which cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☑	☐

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a developed residential area and would have no unmitigated significant impacts with respect to biological resources or California's history or pre-history. As noted in the analysis above, the project would avoid significant impacts to historic resources as the Project will retain the Hardison House in place. No direct impacts upon this local historic landmark will occur. Impacts upon the loss of existing trees would also be mitigated to a less than significant level by a replacement tree program. Potential impacts to migratory bird species would also be mitigated to a less than significant level. Therefore, with mitigation, the Proposed Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but are significant when viewed together. As concluded in this analysis, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, green house gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities are less than significant, or are reduced to less than significant levels with the incorporation of mitigation measures. As such, the Proposed Project's contribution to cumulative impacts are less than significant.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts are reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified herein.

4. RESPONSES TO COMMENTS RECEIVED ON THE DRAFT IS/MND

~~This~~ The IS/MND was published on November 12, 2015 and circulated for a 30-day public review period ending on December 11, 2015. In accordance with the procedures set forth in the State CEQA Guidelines, the Draft IS/MND was submitted to the State Clearinghouse and filed with the Ventura County Clerk. The State Clearinghouse number is 2015111040. However, as a newspaper ad was not published, the circulation period cannot be used to satisfy CEQA. As a result, the Draft IS/MND ~~is being~~ was recirculated for another 30-day public review period between February 8 and March 8, 2016 (see page 167 for comments on the Recirculated MND).

The following 11 comment letters or e-mails were submitted to the lead agency in response to the initial November 2015 Draft IS/MND 30-day public comment circulation:

State Agencies

1. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
   December 14, 2015
2. California Department of Transportation, District 7 – Office of Regional Planning
   December 11, 2015

Local Agencies

3. County of Ventura, Resource Management Agency, Planning Division
   December 10, 2015
4. County of Ventura, Resource Management Agency Planning Division, Ventura County Cultural Heritage Board
   December 10, 2015
5. County of Ventura, Resource Management Agency Environmental Health Division
   December 7, 2015
6. County of Ventura, Public Works Agency, Transportation Department
   November 24, 2015

Individuals

7. Nicole Dryden, December 11, 2015
8. S. Hamlin, December 4, 2015
9. Patricia Kennedy, December 11, 2015
10. Amber Mickelson, December 11, 2015
11. Alberto Perez, December 9, 2015

~~**Changes were made throughout the IS/MND and previous commenters should review the IS/MND again and either; 1) provide a new comment letter and note that the new letter replaces their previous letter, or 2) state by letter or e-mail that their previous letter, listed below, is to be considered a comment letter of this updated IS/MND.**~~

For purposes of full disclosure, copies of the comment letters to the first circulated IS/MND are provided ~~on the following pages~~ in the Appendix.

COMMENT LETTER 4.1

State of California
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Director
1400 10th Street
Sacramento, CA 95812-3044
December 14, 2015

COMMENT 4.1.1

Subject: Williams Homes I River Rock Project (City Project No. 2014-CDP-02)

SCH#: 2015111040

Dear Stratis Perros:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on December 11, 2015, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

RESPONSE TO COMMENT 4.1.1

This comment acknowledges the State Clearinghouse received and transmitted the Mitigated Negative Declaration to the respective state agencies, in compliance with CEQA and the State Clearinghouse review requirements for environmental documents. It is noted that Caltrans, a state agency, submitted comments directly to the lead agency. Caltrans comments are provided in Comment Letter 4.2, below. No further response is warranted.

COMMENT LETTER 4.2

California Department of Transportation
District 7 – Office of Regional Planning
Dianna Watson, IGR/CEQA Branch Chief
100 S. Main Street, MS 16
Los Angeles, CA 90012
December 11, 2015

COMMENT 4.2.1

The California Department of Transportation (Caltrans) has reviewed the Mitigated Negative Declaration (MND) for the proposed William Homes / River Rock Project.

The project will be located at 1226 Ojai Road in the city of Santa Paula. The applicant proposes to redevelop the project site to provide a new residential subdivision with approximately 54 residential lots including 53 new homes and the retention/rehabilitation of the Hardison House main residence and barn/stables. A total of 54 single-family homes will be located on the future Project Site.

To assist in evaluating the impacts of this project to State Transportation Facilities, please consider the following comments:

1. Please clarify the future improvements at the Ojai Road intersection, SR-150 and Orchard Street. The document stated these improvements could be found in the East Area 1 Report, unfortunately the report was not included with this submittal.

RESPONSE TO COMMENT 4.2.1

This comment provides an introduction that describes the Proposed Project. The introduction does not require analysis.

In response to Caltrans' first comment, the intersection of Ojai Road (State Route 150) and Orchard Street was analyzed in the Proposed Project's Traffic Study and Recirculated Draft MND and is identified as study intersection No. 4. As discussed in the MND, the intersection of Ojai Road and Orchard Street currently operates at a level of service (LOS) C during both peak hours. The intersection of Ojai Road and Orchard Street is expected to operate at LOS D during both peak hours under the existing (2015) plus Project condition. Additionally, the intersection of Ojai Road and Orchard Street is expected to operate at a LOS D during both peak hours under both the future (2016) without Project and future (2018) plus Project traffic conditions. As such, this intersection is expected to be significantly impacted by non-Project cumulative traffic growth in 2018; the Project would then contribute to a significant cumulative impact by adding traffic and increasing minor street delays.

To reduce impacts to this intersection to a less than significant level, the Project includes a fair-share contribution to fund a previously approved East Area 1 EIR (SCH2006071134) mitigation measure to

enhance the intersection Ojai Road and Orchard Street in coordination with the East Area 1 project, which has previously identified improvements at this intersection. As discussed in the Recirculated MND (page 114), the East Area I project proposed to mitigate the future cumulative impact at the intersection by providing parking restrictions on Ojai Road (SR-150) to allow for one additional southbound through travel lane in the AM peak period and one additional northbound through travel lane in the PM peak period. The intersection would also be placed under traffic signal control. Given that this location is on a State highway, the engineering design of these improvements would be completed in conjunction with Caltrans. A fair share calculation was performed to determine the proportional responsibility of the Project Applicant for the improvements required to mitigate the significant impact at the intersection of Ojai Road and Orchard Street (discussed on page 120 of the Recirculated MND). The Project's maximum Project fair share percentage is 16.8 percent, based on the Project's traffic volume contributions during the PM peak hour.

With the implementation of Mitigation Measure 16.1, the intersection of Ojai Road and Orchard Street would be expected to operate at a LOS A under future (2018) with Project condition and a less than significant impact would occur. No further analysis is warranted.

COMMENT 4.2.2

2. Clarify the complete funding sources for the traffic control signal and if this proposed mitigation will be completed by project completion, or certificate of occupancy.

RESPONSE TO COMMENT 4.2.2

The East Area 1 Project EIR addresses the traffic impacts at the intersection of Ojai Road and Orchard Street and includes Mitigation Measure T-4 (refer to the Appendix A of the East Area 1 Specific Plan Amendment Final SEIR). As discussed in the East Area 1 Specific Plan Mitigation Monitoring and Reporting Program (MMRP) (Appendix A of the Final SEIR), the Applicant of the East Area 1 project would pay pro-rata costs per residential dwelling unit and per square foot of non-residential development for the improvements at the Ojai Road and Orchard Street intersection. The River Rock Development Project would contribute a fair share contribution for the physical improvements of the Ojai Road and Orchard Street intersection, which was determined to be approximately 16.8 percent. As discussed in the East Area 1 Specific Plan MMRP:

> *"Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Final Map imposed as a condition on every Final Map, payable before the City issues a certificate of occupancy." (page 6 of the East Area 1 Project MMRP included in Appendix A of the Final SEIR).*

The Proposed Project (River Rock) would contribute the determined fair share contribution. The timeline for implementation would be dependent on the East Area 1 Project timeline, since the East Area 1 is the main contributor to the physical improvements of Ojai Road and Orchard Street intersection. No further analysis is warranted.

The East Area 1 Specific Plan Amendment Mitigation Monitoring and Reporting Program (MMRP), dated January 15, 2015, includes Transportation and Traffic Mitigation Measure T-1 for the Ojai Road/Orchard Road intersection. The mitigation measure requires East Area 1 developers to determine with the City Public Works Department the pro-rata costs for improvements to the Ojai Road/Orchard Road intersection per housing unit and/or per square foot of non-residential development prior to approval of tract maps for each East Area 1 project phase. The fees would be payable before the City issuances a certificate of occupancy for each completed housing unit or non-residential structure. East Area 1 Condition of Approval No. 51 requires the developer to provide signal warrant analyses as the project develops that determine when various traffic improvements are required. As traffic mitigation funds are being received concurrently with development of East Area 1, the Public Works Department will be able to decide when the Ojai Road/Orchard Road improvement are actually needed and funds will be available. Given the development status of the East Area 1 project relative to the River Rock project, it is possible the River Rock project will be completed and occupied before the Ojai Rd /Orchard Road traffic signal is installed. However, River Rock Project generated traffic does not, by itself, require the Ojai Road/Orchard Road improvements. When enough East Area 1 traffic is also generated to collectively warrant the new signal, the new signal would be installed.

COMMENT 4.2.3

3. Future conditions, which include both, project and project plus cumulative traffic generated up to General Plan build out year.

Please keep in mind, any project work proposed in the vicinity of the Caltrans Right of Way, would require an encroachment permit and all environmental concerns must be adequately addressed.

If you have any questions regarding these comments, please contact project coordinator Miya Edmonson, at (213) 897-6536 and refer to IGR/CEQA No. 151130ME.

RESPONSE TO COMMENT 4.2.3

The Draft MND published in November 2015 (page 115) and the Recirculated Draft MND published in February 2016 (Page 120), discussed future General Plan buildout year conditions (2025), as recommended. As shown in Table 3.19 (on page 115 and page 120 of the Draft MND and Recirculated Draft MND, respectively), the Project would add 36 trips during the AM peak hour and 48 trips during PM peak hour to the intersection of Ojai Road and Orchard Street. Cumulatively, the future (2025) General Plan Buildout with Project traffic would generate 1,579 trips during the AM peak hour and 1,525 trips during the PM peak hour, which represents a growth of 313 trips to the existing AM peak hour and 286 trips to the existing PM peak hour. The Proposed Project's traffic represents approximately 11.5 percent of the AM peak hour traffic growth and 16.8 percent of the PM peak hour traffic growth. Refer to Table 3.19, Proposed Project Mitigation Fair Share Calculation. Given that this location is on a State highway, the engineering design of these improvements would be completed in conjunction with Caltrans. No further analysis is warranted.

The last sentence of this comment letter provides contact information to reach Caltrans staff. This information is noted for the record, and no further discussion is warranted.

COMMENT LETTER 4.3

County of Ventura, Resource Management Agency
Planning Division
Tricia Maier, Manager Planning Programs Section
800 S. Victoria Avenue, L# 1740
Ventura, CA 93009
December 10, 2015

COMMENT 4.3.1

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

lf you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

RESPONSE TO COMMENT 4.3.1

This comment acknowledges the County of Ventura Planning Division received and transmitted the Mitigated Negative Declaration to the respective county agencies and attached the resulting comments from the intra-county review. These comments are provided in Comment Letter 4.4 through Comment Letter 4.6, below. No further response is warranted.

COMMENT LETTER 4.4

County of Ventura, Resource Management Agency
Planning Division, Ventura County Cultural Heritage Board
Nicole Doner, Cultural Heritage Board Staff
800 S. Victoria Avenue
Ventura, CA 93009-1740
December 10, 2015

COMMENT 4.4.1

Below are the CHB staff's suggested changes (additions are shown in *italics* and deletions are crossed out) to the mitigation measures identified in the Draft Initial Study/MND Section 5 Cultural Resources for

the above project. The following suggested changes will ensure protection of Ventura County Landmark No. 35 (W.L. Hardison House):

5.1 Interpretive Measures

5.1.1 Interpretive Plan. ~~The applicant~~ An historic preservation professional qualified in accordance with the Secretary of the Interior's Standards shall be selected to ~~shall~~ prepare an interpretative plan ~~for the property~~ that includes the design of an on-site interpretation exhibit or plaque to be permanently installed on Lot B public open space area of the Tentative Tract Map. The plan shall be ~~designed in consultation with a qualified historic preservation professional and~~ approved by the City of Santa Paula prior to issuance of building permits for the last phase of the new construction, and installed upon the completion of the Lot B public open space area, or no later than three years after the recording of the final tract map.

5.2 Design Measures

5.2.1. Landscape Report Plan

(No changes proposed)

5.2.2. Fencing and Wall Treatment

(No changes proposed)

5.2.3. Construction Monitoring

A qualified historic preservation professional ~~shall be on call during the bracing and moving operation for the Barn/Stables building and be available to assure that the project is carried out in accordance with the approved plans and project description~~ will prepare a plan that specifies procedures for protecting historical resources and a monitoring method to be employed by the contractor while working near these resources. At a minimum, the plan will address the method of bracing and moving of the Barn/Stables building, the operation of construction equipment near adjacent historical resources, storage of construction materials away from adjacent resources, and education/training of construction workers about the significance of the historical resources.

5.2.4 Documentation

~~In consultation with~~ A qualified historic preservation professional, ~~the applicant~~ shall produce a Documentation Report ~~consisting~~ that generally consists of HABS-like archival quality photographs and negatives of exterior and interior views of the historic, a description of the historical significance of the property, and a full set of measured drawings of the historic resources depicting the existing or historic conditions. The printed publication consisting of the documentation report, interpretative information, photographs and negatives, and the Historic Resources Report prepared for this property shall be combined in a reference publication for the public and copies shall be donated to the City of Santa Paula, Museum of Ventura County, Ventura County Cultural Heritage Board and the Santa Paula Historical Society prior to issuance of any permits.

5.2.5 Preservation

(No changes proposed)

Please contact Nicole Doner at 805-654-5042 or nicole.doner@ventura.org if you have any questions.

RESPONSE TO COMMENT 4.4.1

This comment letter was received in response to the original Draft MND published in November 2015. The Recirculated Draft MND implemented the Ventura County Cultural Heritage Board's recommendations to the language of the mitigation measures pertaining to Cultural Resources. These changes can be seen in Section 5, Cultural Resources, pages 52-53 of this Final IS/MND.

The last sentence of the comment letter provides contact information to reach Ventura County staff.

No further analysis is required.

COMMENT LETTER 4.5

County of Ventura, Resource Management Agency
Environmental Health Division
Sean Debley, Registered Environmental Health Specialist
800 S. Victoria Avenue
Ventura, CA 93009-1730
December 7, 2015

COMMENT 4.5.1

Environmental Health Division (Division) staff reviewed the information submitted for the subject project and provides the following comments:

1. Water impoundment(s) and "privately maintained" drainage easements should be maintained in a manner, which will not create mosquito breeding sources.
2. The Division recommends consultation with the Vector Control Section of the Division regarding a mosquito abatement/control plan. The following items are recommended to be included in the plan:
    - Proposed physical control measures that will be utilized to promote drainage.
    - Proposed chemical and biological control measures to be utilized if mosquito breeding occurs.
    - Mosquito monitoring program.
    - Design details, including cross-sections of all drainage areas.

For more information on vector control measures please contact Cary Svoboda at 805/677-8716 or cary.svoboda@ventura.org. If you have any questions, please call me at 805/654-2433.

RESPONSE TO COMMENT 4.5.1

This comment was letter was received in response to the original Draft MND published in November 2015. To address this comment, the Recirculated Draft MND proposed Mitigation Measure 4.8, which states:

> *In accordance with the standard best management practices recommended by the Ventura County Environmental Health Division, water impoundment(s) and "privately maintained" drainage easements should be maintained in a manner, which will not create mosquito breeding sources. The Applicant shall consult with the Vector Control Section of the Division regarding a mosquito abatement/control plan. The mosquito abatement/control plan shall include the following: (a) proposed physical control measures that will be utilized to promote drainage, (b) proposed chemical and biological control measures to be utilized if mosquito breeding occurs (c) a Mosquito monitoring program, and (d) design details, including crosssections of all drainage areas. (Page 41).*

As such, the Recirculated Draft MND addressed this comment, and no further analysis is required.

COMMENT LETTER 4.6

County of Ventura, Public Works Agency
Transportation Department
950 County Square Drive, Suite 207
Ventura, CA 93003
November 24, 2015

COMMENT 4.6.1

Pursuant to your request, the Public Works Agency Transportation Department has reviewed the MND/IS for the Williams Homes/River Rock Project.

The proposed project is a subdivision of a parcel west of Ojai Road (State Route 150) and Royal Oaks Place in the City of Santa Paula for the construction of 54 single-family dwelling units on 10.09 acres of a 19.27-acre parcel.

We offer the following comment:

The cumulative impacts of the development of this project, when considered with the cumulative impact of all other approved (or anticipated) development projects in the County, will be potentially significant. To address the cumulative adverse impacts of traffic on the County Regional Road Network, the appropriate Traffic Impact Mitigation Fee (TIMF) should be paid to the County when development occurs. Based on the information provided in the MND/IS for the Williams Homes River Rock Project, and the reciprocal agreement between the City of Santa Paula and the County of Ventura, the fee due to the County would be:

$28,974.18 = 514 ADT x $ 56.37 per ADT

Notes

a. County Reciprocal TIMF Rate for Santa Paula Traffic District #2

The above-estimated fee may be subject to adjustment at the time of deposit, due to provisions in the TIMF Ordinance allowing the fee to be adjusted for inflation based on the Engineering News Record Construction Cost Index. The above is an estimate only, based on information provided in the MND/IS.

Our review is limited to the impacts this project may have on the County's Regional Road Network.

RESPONSE TO COMMENT 4.6.1

The comment addresses the payment of Traffic Impact Mitigation Fees to address cumulative adverse impacts of traffic on the County Regional Road Network. The Proposed Project would be required to pay any required development fees as part of regulatory compliance measures. No further analysis is required.

COMMENT LETTER 4.7

Nicole Dryden
411 E. Santa Barbara Street
Santa Paula, CA 93060
December 11, 2015

COMMENT 4.7.1

I strongly oppose the proposed plan for the development of 35 homes in the Ojai rd. area. Each household, at two cars per house, will significantly impact traffic beyond it's (sic) capacity.

The lack of information regarding potential solutions to negative impacts is also alarming. My thoughts include; will a traffic light be installed?

RESPONSE TO COMMENT 4.7.1

The Proposed Project includes the development of a residential subdivision with approximately 54 residential lots including 53 new homes and the retention of the existing Hardison House and barn/stable. As discussed on page 103 of the Recirculated Draft MND, the Proposed Project's 53 new homes are anticipated to generate a total of 505 trips per day, with 40 trips during the AM peak hour and 53 trips during the PM peak hour. The Traffic Study analyzes traffic at six study intersections. The Traffic Study found that all intersections would operate at a LOS C or better and would not create a significant impact with the addition of Project traffic, with the exception of the intersection of Ojai Road and Orchard Street. The intersection of Ojai Road and Orchard Street is expected to operate at LOS D during both peak hours under the existing (2015) plus Project condition. Additionally, the intersection of Ojai Road and Orchard Street is expected to operate at a LOS D during both peak hours under both the future (2016) without Project condition and future (2018) plus Project traffic condition. As such, the Project proposes physical improvements to Ojai Road (Mitigation Measure 16.1, identified on page 124 of the Recirculated Draft MND). With implementation of Mitigation Measure 16.1, the intersection of Ojai Road and Orchard Street would operate at an LOS A.

Further, Mitigation Measure 16.1 includes the installation of a traffic signal at the intersection of Ojai Road and Orchard Street. No other intersections were found to warrant traffic signal controls. As such, the Proposed Project would not significantly impact traffic beyond the roadway capacities with the incorporation of Mitigation Measure 16.1.

COMMENT 4.7.2

Is this tract going to be visible from the road, or blemish the view of neighbors?

RESPONSE TO COMMENT 4.7.2

The Proposed Project is visible from Ojai Road and would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods and the Santa Paul General Plan. As discussed in Section 1, Aesthetics, the Proposed Project would not impact any identified scenic vistas and would result in a less than significant aesthetic impact upon a State-designated scenic highway. The ridge and hillside vegetation would remain visible. The proposed subdivision and development of the property would alter local views within the area and of the Project Site, but the completed project would be compatible with the existing character of the adjoining residentially developed properties along Ojai Road. The Proposed Project would not degrade the existing visual character of the site or its surroundings. The Proposed Project would not significantly alter views of neighbors. No further analysis is required.

COMMENT 4.7.3

What is the proposed design of the architecture, and does it suit the neighborhood? Are sub-par building materials going to contribute to the degradation of property values?

Please keep the public informed; you have one of the most important jobs in the city! Thank you.

RESPONSE TO COMMENT 4.7.3

This comment is in response to the Draft MND published in November 2015; the Recirculated Draft MND provides architectural renderings that address this comment. The Proposed Project includes three architectural styles, which include: Craftsman, Spanish, and Hardison. Figures 2.8 through 2.10 within the Recirculated Draft MND illustrate these architectural styles within the three available plans (A-C). The architectural styles were designed to be consistent with the surrounding neighborhood. The Proposed Project's design and materials would comply with code and be reviewed by the Planning Department prior to issuing building permits for approval.

COMMENT LETTER 4.8

S. Hamlin
December 4, 2015

COMMENT 4.8.1

The following comments refer to the River Rock IS - MND dated 11 - 4 - 2015.

1. On page 9, the following statement is made:

   The existing General Plan land use designation for the Project Site is Hillside Residential. The zoning designation is HR-2-PD (Hillside Residential 2PD, 0-3 du/ac). Based on the allowable density of 0-3 units per acre, the 19.27-acre site would permit 57 single-family dwelling units.

   The site plan on page 16 shows Lot A Open Space which appears to reduce the total site by 50%. Would this then reduce the total housing allowed by 50%? The calculation should be 30 homes minus the one existing or 29 new homes. A 2:1 up-zoning in unacceptable. As described on page 76, the PD (Planned Development) request is unacceptable. The PD as described on page 78 is unacceptably tight and will result in tenement style living unassociated with the country look and feel of the 19th century ranch property. The development of the upper part of the property is not possible due to slope considerations and the buyer was aware of this at time of purchase.

RESPONSE TO COMMENT 4.8.1

The project is consistent with the Santa Paula General Plan and zoning which anticipated eventual development. Allowable density is calculated by the square footage of the entire Project Site. Santa Paula Municipal Code Section 16.13.110, outlines the maximum density allowed within HR2-PD zones. Under allowed density, the zoning on-site allows for the development of a maximum of 57 homes. The Proposed Project would include a total of 54 homes. The Proposed Project includes single-family homes and is designed to be visually compatible with the surrounding neighborhood.

COMMENT 4.8.2

2. On page 16, Redbud Street appears to extend into the existing subdivision. The integration of these two subdivisions should be shown on a drawing. There appears to be no such drawing in the document. If Redbud Street is a dead-end, then there is only one way of ingress-egress. Page 18 later clarifies this as an emergency exit. If so, what type of gate would be present and what would trigger ingress/egress? Why is Rosewood Street not opening to Ojai Road?

RESPONSE TO COMMENT 4.8.2

As described in the Recirculated MND (page 16) Primary vehicular access to the Proposed Project would be provided by way of a full-access residential roadway that would intersect with the west side of Ojai Road (State Route 150) opposite Royal Oaks Place. As noted on the Vesting Tract Map, the internal streets would provide access and circulation through the tract on four proposed residential streets: Royal Oaks Place, Redbud Street (Fuschia Lane), Rosewood Street, and Dogwood Street.

Secondary access would be provided via an internal connection between the Project and the residential subdivision located immediately to the south. As shown on Figure 2.6, Proposed Site Plan, Redbud Street would be linked to the existing Fuchsia Lane, which presently terminates in a cul-de-sac. This internal connection will provide secondary access for both the Project and the neighboring residential subdivision, thus improving emergency vehicle access for both developments.

At the present time, the proposal includes full through access from Redbud Street to Fuschia Lane. However, the option remains to terminate Redbud Street at Fuschia with an emergency only access gate to allow for limited through access for emergency vehicles without changing traffic impacts elsewhere. This comment will be forwarded to the decision makers for their consideration.

COMMENT 4.8.3

3. On page 16, lot 35 appears to be the existing historic home and potentially the site of the relocated historic barn. There should be a drawing to show the placement of these buildings on the lot and their relationships to the rest of the subdivision. Is there a physical separation between the open space and the Hardison house?

RESPONSE TO COMMENT 4.8.3

An illustrative site plan was incorporated in the Traffic Study (refer to Appendix H, Figure 1) and will be incorporated as Figure 6b, Illustrative Site Plan, in the Final MND. This graphic shows the location of the Hardison House and barn/stable and the separation between the Hardison House and the proposed open space.

COMMENT 4.8.4

4. On page 14, the following statement is made:

   Approximately 9.18 acres of the Project Site will be retained as open space on lots designated as A through D on the proposed Vesting Tentative Tract Map 5928.

   The words “in perpetuity” should be added.

RESPONSE TO COMMENT 4.8.4

This comment is in response to the original Draft MND published in November 2015. The Recirculated Draft MND added the words "in perpetuity" to the discussion of maintaining passive open space under the Section 4(a), Biological Resources. Refer to page 40 of the Recirculated Draft MND. Under "Conclusion," the sentence states, "In consideration of the fact that the Proposed Project would provide 9.56 contiguous acres of passive open space *in perpetuity* on the undeveloped hillside on the western portion of the Project Site to be maintained by the homeowners association…" As such, the Commenter's concern has been addressed, and no further action is required.

COMMENT 4.8.5

5. On page 23, the Hardison house is discussed as a featured property; however, there is no description of the upgrades to be made to this property which appears to be in need of repair.

   Upgrades to the interior or exterior should be period relevant. There should be a section on planned upgrades and renovation to this house.

RESPONSE TO COMMENT 4.8.5

The discussion referred to on page 23 (page 19 of the Recirculated MND) discloses the retention of the Hardison House and the relocation and preservation of the barn/stables, which are recognized as historic resources. For a detailed discussion of the interior and exterior renovations, the reader is referred to the Historic Resources report contained in Appendix C to the Recirculated MND. As disclosed on page 47 of the Recirculated MND, all relocation and restoration activities will be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation. Where feasible, existing interior and exterior materials will be repaired rather than replaced. Where deterioration requires replacement, the new feature will match the old in design, and wherever feasible, materials. When feasible, the replacement of missing features will be substantiated by documentary or physical evidence. Additional specific callouts and recommendations for the relocation and restoration process for the barn/stables structure is provided in Appendix C., Historic Resources Report.

COMMENT 4.8.6

6. Page 17 describes the hillside elevations of the homes. With only two 5 feet setbacks between each home as shown in Section A-A (five feet per home), there is no privacy. Window to window views are possible and lighting from each property will be visible by the other property. Ten feet is too tight between the homes.

7. Page 17 shows the use of vinyl fencing. Vinyl should not be permissible. A complete list of project materials should be made available in this document and shortcuts like vinyl fencing should be disallowed.

8. Page 17 shows no earthquake stress patterns which might affect the homes and how the houses are

reinforced to adjust for the earthquakes.

RESPONSE TO COMMENT 4.8.6

The Santa Paula Municipal Code (SPMC) provides standards for development within each zone. SPMC Section 16.13.030, Table 13-2, indicates that the minimum distance between dwelling unit buildings shall be 10 feet for HR2-PD zones. The Proposed Project is consistent with this requirement. The Commenter's concerns about setbacks and privacy are noted for the record and will be forwarded to the decision maker. Also, the Commenter's concerns about vinyl fencing are noted for the record and will be forwarded to the decision maker. No further analysis is required.

Page 17, as reference by the Commenter, refers to Figure 2.7, Building Cross Section and Line-of-Sight Elevations. The purpose of Figure 2.7 is to contextualize the buildings' relationship to each other and existing surroundings, the buildings' elevations, and line of sight from existing houses. A discussion of Figure 2.17 is provided on page 12 of the Recirculated Draft MND. Geological hazards, including surface rupture, ground shaking, liquefaction, landslides, and additional soil instability are discussed in Section 6, Geology and Soils. The Proposed Project would be designed and constructed in conformance with current uniformly applied building codes and engineering best practices and would incorporate the recommendations specified in the Geotechnical Investigation. As such, the proposed houses would be adequately reinforced to adjust for earthquakes. No further analysis is required.

COMMENT 4.8.7

9. Page 19 Construction Schedule Phasing. No worker parking allowed on the east side of Ojai Road opposite of the site. No worker parking in existing residential neighborhoods.

10. Visitor Parking: there is no designated visitor parking. Existing street parking has been reduced due to the reduced setbacks between the homes. In the event of a 3 to 4 car household, several cars will always be on the street causing a dangerous situation in the event of an emergency and will leave no guest parking.

RESPONSE TO COMMENT 4.8.7

Construction workers typically park on-site or park at a designated off-site location and are shuttled to the Project Site. Construction workers are not expected to park on Ojai Road or in existing residential neighborhoods.

In relation to parking during the operation of the Proposed Project, each proposed home would include two-car garage with a 20-foot driveway. Visitors and households with multiple vehicles would be able to park on the driveway or on streets within the residential subdivision, as is typical of residential subdivisions. Parking for the Proposed Project would be subject to the parking regulations for the City of Santa Paula (outlined in the Santa Paula Municipal Code).

COMMENT 4.8.8

11. Façade elevations: not provided. This project was started over a year ago. Applicant should have provided elevations. Are all homes multi-story?

RESPONSE TO COMMENT 4.8.8

This comment is in response to the Draft MND that was published in November 2015. The Recirculated Draft MND that was published in February 2016 incorporates façade elevations in Figures 2.8 through 2.10. There are three architectural plans (A-C). Architectural plan A includes a single-story design; architectural plans B and C include a two-story design.

COMMENT 4.8.9

12. Loss of pastoral street view. The current street view looking west is pastoral with the large house and the view of the mountains. The new street view will be partially walls and partially open space which is potentially walled. There is no grandeur to the proposal from the street view. See point 13 below.

13. Page 22 discusses Loss of Scenic Vista:

    a. Have a substantial adverse effect on a scenic vista?

    No Impact. A significant impact may occur if the proposed Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. The term scenic vista generally refers to panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance). No scenic views are provided from or through the Project Site. The Project Site is an infill lot within a developed area of the City of Santa Paula and does not possess any unique scenic vistas. Therefore, no impact to any recognized or valued scenic view would occur.

    No unique scenic vistas? This is highly subjective and most people would disagree particularly those living in the adjacent areas.

RESPONSE TO COMMENT 4.8.9

This comment is in response to the Draft MND that was published in November 2015. The Recirculated Draft MND published in February 2016 expands on the topic of scenic vistas and is discussed in Question 1(a) of the Recirculated Draft MND. Question 1(a) finds that the Project Site is an infill lot within a developed area of the City of Santa Paula and does provide an in-passing view of the Hardison House, open pasture, and rising hillside in the rear. The Project retains public views of the Hardison House, the pasture area is converted to housing, and the hillside view is largely unaltered. The loss of the pasture area is not considered a substantial impact to a scenic vista in a panoramic context. Therefore, no significant impact to a recognized or valued scenic view would occur. Refer to pages 23-24 of this Final IS/MND MND.

COMMENT 4.8.10

14. Hillside Residential. The property is zoned Hillside Residential but the proposal does not appear to include any hillside homes. Rather the elevation shows townhouse style homes which are built on a level pad. THIS IS NOT A HILLSIDE HOME. A hillside home takes advantage of the hill.

RESPONSE TO COMMENT 4.8.10

The Project Site includes 19.28 acres and is zoned HR 2-PD. In order to preserve the natural hillside portion of the Project Site (the western side of the Project Site), the Applicant seeks to create a residential subdivision on the eastern side of the Project Site, which is allowed with concurrent approval of a Planned Development Project Permit. The proposed subdivision includes 54 detached single-family homes. No townhomes or hillside homes are proposed.

COMMENT LETTER 4.9

Patricia Kennedy
December 11, 2015

COMMENT 4.9.1

1. Why has nothing been posted at the site itself regarding this development to notify neighbors and other interests parties?

2. Why has the Historic Board not met to discuss this property? Did the Planning Director, in fact, tell the Council that it has not met because there is nothing to do? If so that would indicate negligence on his part! This property is one of the most historically significant properties in Santa Paula as well as Ventura County!

RESPONSE TO COMMENT 4.9.1

The State CEQA Guidelines Section 21092(b)(3) states:

> *(3) The notice required by this sect ion shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:*
>
> *(A) Publication, no fewer times than required by Section 6061 of the Government Code, by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area will be affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.*
>
> *(B) Posting of notice by the lead agency on- and off-site in the area where the project is to be located.*

(C) Direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll.

The Draft IS/MND was originally published on November 12, 2015 and was circulated for a 30-day public review period ending on December 11, 2015. However, as a newspaper ad was not prepared, the circulation period cannot be used to satisfy CEQA. As a result, the Draft MND was republished on February 2016 and was recirculated for another 30-day public review period. As such, the Project complied with State CEQA Guidelines for public noticing.

COMMENT 4.9.2

3. It is unthinkable that anyone would think that moving the barn next to the house and converting it to a garage in any way preserves the historical value of the barn or the property as a whole. The relationship, distance and relative size, of homes to barns is historically significant. People did not build large barns and stables next to their homes. The size of the barn, relative to the size of the house, will detract from the architectural significance of the house, if it is moved next to the home, and remove all historical significance of the barn.

4. A part of the historical significance of the barn is the way it was constructed, including the existing foundation and drainage system. Moving it to a concrete pad means losing this view to the past.

RESPONSE TO COMMENT 4.9.2

The commentor's opinion that relocating the barn next to the main house is noted for the record and will be forwarded to the decision makers for their consideration. However, as concluded in the Historic Resources Report, the preservation in place of the main Hardison residence and the relocation of the barn structure mitigates potential impacts to less than a significant level which is defined as the ability to be listed as an historic landmark. That is not to say there are not more extensive preservation schemes that have merit. The purpose of CEQA and this MND is to evaluate and disclose the impacts of the Proposed Project, not to identify and evaluate one or more arguably better preservation schemes.

With respect to the relocation of the barn and placing it on a concrete pad foundation, the preservation and relocation of the barn structure would avoid the demolition of a potentially significant historic resource pursuant to CEQA. As noted in the recommended mitigation measures, a qualified historic preservation professional shall be on-call during the bracing and moving operation for the Barn/Stables building and be available to assure that the Project is carried out in accordance with the approved plans and project description. Although the barn's original and failing foundation will be improved, the Historic Resources Report concludes that relocating the Barn/Stables on Parcel 35 will retain its eligibility for the NRHP and CRHR. The Project, with the incorporation of the recommended mitigation, preserves the two eligible buildings compared to no plans or requirement for preservation absent this project at this time. Consequently, the residual impact of the project on historic resources after mitigation should be regarded as adverse, but less than significant.

COMMENT 4.9.3

5. Why is their (sic) no EIR in place? This property is not just significant because of the structures, but is important as one of the last open spaces for wildlife in the city. Their (sic) will be a definite impact on the environment both during construction and after.

RESPONSE TO COMMENT 4.9.3

After review of the Proposed Project and the Project Site, the Lead Agency determined that a Mitigation Negative Declaration was appropriate to analyze the Proposed Project's environmental effects. A Mitigated Negative Declaration (MND) is prepared when a project could have a significant impact on the environment, with all significant impacts reduced to a less than significant level with the incorporation of mitigation measures and revisions to the Proposed Project that are agreed to by the project proponents. Following the direction of the Lead Agency, this MND was prepared.

The Proposed Project's effects on biological resources are discussed in Section 4, Biological Resources (starting on page 33 of the Recirculated Draft MND). Wildscape Restoration prepared the *William Homes Santa Paula River Rock Project Biological Constraints and Jurisdictional Delineation* Report in December 2014 to document biological resources on-site and provide recommendations. Wildscape Restoration conducted a reconnaissance survey of the Project Site on November 3, 2014. The survey consisted of habitat assessment, vegetation mapping, and an inspection for the necessity of any jurisdictional delineation. Prior to the survey, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2014) was reviewed to identify special status plants, wildlife, and habitats known to occur within a nine USGS 7.5 minute quadrangle of the Project Site. Aerial photos were also reviewed to determine vegetation communities, which were confirmed during the field survey. A minimum mapping unit of 0.25 acre was used vegetation polygons.

Based on the findings of the biological impact assessment, the Proposed Project has the potential, albeit minimal, to result in significant impact upon species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Proposed Project would result in the removal of 0.21 acres of coastal sage scrub habitat and 0.26 acres of coast live oak woodland. In consideration of the fact that the Proposed Project would provide 9.56 contiguous acres of passive open space in perpetuity on the undeveloped hillside on the western portion of the Project Site to be maintained by the homeowners association, the incremental loss of 0.21 acres of coastal sage scrub habitat and 0.26 acres of coast live oak woodland are considered less than significant. The direct loss of ornamental landscape, ruderal pasture and Peruvian peppertrees are less than significant. Although no threatened, endangered or special of special concern were identified on-site, the Project Site has the potential to support three special status plant species and five special status animals. The Project Site may also support nesting habitat for raptors and other migratory bird species. As such, the Proposed Project shall incorporate Mitigation Measures 4.1 through 4.8, described on page 40 of this Final IS/MND, to ensure that impacts relating to biological resources would be less than significant.

COMMENT 4.9.4

6. Is this to be a development controlled by a HOA? For how long will Williams Homes control the property and at what point will control be transferred to an elected Board of Directors? Is the entire property included, or will the open spaces, including the trail, be for public use? Where is the access point for the trail? Will access to it impact the homes at it's (sic) base?

7. What is the breakdown of responsibilities between the city and the HOA if this is a HOA controlled development - for roads, trail maintenance, potential mud slides, etc.?

8. Will this be, or can it in the future become, a gated community?

RESPONSE TO COMMENT 4.9.4

Questions 6 through 8 generally pertain to the operation and administration of the subdivision and recreational trail after the Project is constructed. A required Homeowners Association (HOA) for the proposed subdivision will maintain the 3 common area lots and two internal streets. Two proposed streets would be public streets and two owned and maintained by the HOA. The Proposed Project is not a gated community and the design of the entrance would not allow for future gating. Future alterations to subdivision administration and infrastructure (such as putting a gate) would be reviewed at that time and is not within the scope of this MND.

COMMENT 4.9.5

9. What provisions are being made for the increased traffic turning onto Ojai Road? Any left turn off of existing streets is already difficult at high traffic volume times. Will there be a traffic light?

RESPONSE TO COMMENT 4.9.5

As discussed in the Section 16, Transportation / Circulation (refer to page 95 of this Final IS/MND), all analyzed study intersections would continue operating at a LOS C or better under future conditions and with the addition of Project traffic, with the exception of the intersection of Ojai Road and Orchard Street. As discussed in the Transportation / Circulation Section, the intersection of Ojai Road and Orchard Street is expected to operate at LOS D during both peak hours under the existing (2015) plus Project condition. Additionally, the intersection of Ojai Road and Orchard Street is expected to operate at a LOS D during both peak hours under both the future (2016) without Project and future (2018) plus Project traffic conditions. As such, this intersection is expected to be significantly impacted by non-Project cumulative traffic growth in 2018, and the Project would then contribute to a significant cumulative impact by adding traffic and increasing minor street delays.

To reduce impacts to this intersection to a less than significant level, the Project includes a mitigation measure to enhance the intersection Ojai Road and Orchard Street in coordination with the East Area 1 project, which has previously identified improvements at this intersection. As discussed in the Recirculated MND (page 114), the East Area 1 project proposed to mitigate the cumulative impact at the

intersection by providing parking restrictions on Ojai Road (SR-150) to allow for one additional southbound through travel lane in the AM peak period and one additional northbound through travel lane in the PM peak period. The intersection would also be placed under traffic signal control. Given that this location is on a State highway, the engineering design of these improvements would be completed in conjunction with Caltrans. Mitigation Measure 16-1 details the improvements made to Ojai Road and the intersection of Ojai Road and Orchard Street. With the implementation of Mitigation Measure 16-1, the intersection of Ojai Road and Orchard Street would be expected to operate at a LOS A under future (2018) with Project condition. As such, traffic flow on Ojai Road is expected to operate at acceptable levels and a less than significant impact would occur. No other road modifications are warranted to manage traffic flow.

COMMENT 4.9.6

10. The Geotechnical Investigation states that "All non-engineered fills and loose, porous, compressible soils will need to be removed down to competent ground." "The average depth of removal of these soils is expected to be 6 feet with some local areas extending to 8 feet below the existing ground surface." Where will this soil be moved to? How will traffic issues be mitigated during this process? What is the source of water for watering the site during this process to protect surrounding residents and their property? What other safeguards will be taken on the site and at the site to which this dirt is sent concerning the potential for Valley Fever when the soil is disturbed. Valley Fever is known to be an issue in this area!

RESPONSE TO COMMENT 4.9.6

To ensure proper base and slope for the lot pads and building foundations, earthwork activities may include soil removals and over-excavations (as discussed in on Page 4 and 5 of the Geotechnical Study, dated March 12, 2014). Removed or over-excavated soils may be moisture-conditioned and re-compacted as engineered fill. The Proposed Project would require approximately 20,000 cubic yards of soil to be cut and 20,000 cubic yards of soil for fill with the earthwork quantities balancing on-site. As such, the Project is not expected to have any soil export or import.

The addition of construction vehicles onto the local street system would contribute to increased traffic in the Project area. Construction-related impacts to traffic would be temporary in nature. Construction trip traffic is not expected to cause a permanent impact at any of the study intersections. As discussed in Section 16(f), any lane closures that may occur during construction of the Proposed Project would be temporary in nature and may cause temporary inconvenience; although, they would not be expected to substantially interfere with public transportation services or alter public transportation routes.

As disclosed on pages 29-30 in this Final IS/MND, construction activities involving site excavation, grading, and foundation preparation has the potential to generate particulate emissions ($PM_{2.5}$ and PM_{10}). The Ventura County Air Pollution Control District recommends that lead agencies include appropriate mitigation measures to minimize the Project's construction related fugitive dust emissions. As such, the Project would implement Mitigation Measures 3.3.1 through 3.3.8, which are listed on page 30 of this

Final IS/MND. Methods of controlling fugitive dust include period watering, application of environmentally-safe soil stabilization materials, environmentally-safe dust suppressants, and/or roll-compaction. Additionally, the project would stop earthwork activities during periods of high winds. The best method for controlling Valley Fever is minimizing the fugitive dust emissions. With the implementation of these routinely applied mitigation measures, the Proposed Project is not anticipated to create fugitive dust concerns for surrounding residents and their properties.

As stated in Mitigation Measures 3.3.1 through 3.3.8, construction activities will require the use of watering as a method of controlling fugitive dust. Private water truck companies will be utilized to provide the water necessary for watering the construction site. The source of water depends on the water truck company. As specified in the mitigation measures, reclaimed water shall be used whenever possible.

COMMENT 4.9.7

11. Are there provisions to prevent construction workers and their vehicles - personal or construction vehicles - from parking on Ojai Road?

RESPONSE TO COMMENT 4.9.7

Construction workers typically park on-site or park at a designated off-site location and are shuttled to the Project Site. Construction workers are not expected to park on Ojai Road or in existing residential neighborhoods.

COMMENT 4.9.8

12. No elevations are provided in the plan. Are these single story or multi-story homes. Homes on three sides of the property will have their views impacted and have a right to input on how great the impact will be.

RESPONSE TO COMMENT 4.9.8

This comment is in response to the Draft MND that was published in November 2015. The Recirculated Draft MND that was published in February 2016 incorporates façade elevations in Figures 2.8 through 2.10. There are three architectural plans (A-C). Architectural plan A includes a single-story design; architectural plans B and C include a two-story design. Additionally, cross sections are provided in Figure 2.7 that show the proposed buildings' relationship to each other and existing surroundings, the buildings' elevations, and line of sight from existing houses. The Proposed Project is visible from Ojai Road and would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods and anticipated by the General Plan. As discussed in Section 1, Aesthetics, a less than significant impact is expected to occur in relation to aesthetics.

COMMENT 4.9.9

13. "No impact to any recognized or valued scenic view would occur." Has the author of this statement

ever driven up Ojai Road? This property is as familiar as the Faulkner Farm and the Little Red School House to anyone local or visiting the area both as a slice of history, and for the scenic setting.

RESPONSE TO COMMENT 4.9.9

The sentence quoted above can be found in Question 1(a), located on page 23 of the Final IS/MND. The Proposed Project is expected to alter the existing views and character of the Project Site and immediate surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods. As discussed in Question 1(a), which has been updated with the republishing of the Draft MND, the Project Site is an infill lot within a developed area of the City of Santa Paula and provides an passing view of the Hardison House, a pasture, and a rising hillside in the rear. The Project retains views of the Hardison House, the pasture area is converted to housing, and the hillside view is largely unaltered by the Project. The loss of the pasture area is not considered a substantial impact to a scenic vista in a panoramic context. Therefore, no significant impact is expected to occur.

COMMENT 4.9.10

Parking, including street parking, for this development is insufficient.

RESPONSE TO COMMENT 4.9.10

Each proposed home would include a two-car garage with a 20-foot driveway. Residents and visitors would be able to park on the driveway or on streets within the residential subdivision, as is typical of residential subdivisions. Parking for the Proposed Project would be subject to the parking regulations for the City of Santa Paula (outlined in the Santa Paula Municipal Code). As such, there would be sufficient parking for the Proposed Project.

COMMENT LETTER 4.10

Amber Mickelson
December 11, 2015

COMMENT 4.10.1

River Rock Development. Project Summary states that the propesed (sic) project will require the removal of the Garage, Second Residence, Relocation and Preservation of the Barn which are recognized as a historic resources and Landmark 35 for the Ventura County Cultural Heritage Board.

Standard for Eligibility. *The standard for determining if a property's essential physical features exist is known as integrity, which is defined for the NRHP as "the ability of a property to convey its significance." The CRHR defines integrity as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retail enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance." (National Register*

Bulletin 15; California OHP Technical Assistance Bulletin 6)

For purposes of both the NRHP and CRHP, an integrity evaluation is broken down into seven "aspects." The seven aspects of integrity are: Location (the place where the historic property was constructed or the place where the historic event occurred); Design (the combination of elements that create the form, plan, space, structure, and style of a property); Setting (the physical environment of a historic property); Material (the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form a historic property); Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory); Feeling (a property's expression of the aesthetic or historic sense of a particular period of time), and; Association (the direct link between an important historic event or person and historic property).

Relocating the Barn will have an effect on its DESIGN, SETTING, MATERIALS, WORKMANSHIP, and FEELING, Which does not go with the Standards

Relocating the Barn will not only change its (**Design**), it will change its (**Setting**). The removal of the Rock foundation which is the same as the main houses foundation, it will affect the (**Materials**) which will effect part of its distintive (sic) character of **(Workmanship).** Relocating the Barn will remove the Rock Drainage ditch that is still very funtional (sic). That same Rock connects to the rock border along the driveway. It also goes with the Horse Troft and the Rock pathways along the second house. That same Rock style wall runs along the south side of the property and connects to the Rock Terraces that made up the rows for the Citrus Trees along the Hillside There is 3 rows of Rock Wallthat (sic) make up the terraces. That same Rock Style holds the Water tank for the property. The Terraces also have original stock citrus trees that are still producing lemons. Contradicting what the Report states also says nothing about the removal of all this materials that make up the setting and design of the property, Which will affect the overall natural **FEELING** of the property which would affect the landmark status. Preserving and Restoring according to the standards does not mean to remove whichis (sic) not recommended wheather (sic) the property will have a new use or not.

All the buildings should remain where they are, be preserved and restored. The Barn looks worse than it is. Yes it needs a new roof, it needs parts of the sidding (sic) that was removed and not put back restored. The foundation is the issue due to the runoff from the rains. All of things can be done without relocating it. Development is inevitable but that does not have to happen by ruining such an important part of this town. People from all over stop and take pictures even in the state its currently in. Artist have come just to paint the Barn in its natural setting. That feeling will no longer be there if it is relocated. It will be a big house with a giant barn that will be turned into a garage with no yard. The history will be gone.

RESPONSE TO COMMENT 4.10.1

The commentor's opinions regarding the significance of the historic impacts are noted for the record and will be forwarded to the decision makers for their consideration. It should be noted, however that the conclusions in the IS/MND are based on the Historic Resources Report which was prepared by a qualified local architectural historian and historic resources consulting firm. The findings and conclusions in the

Historic Resources report reflect the professional judgment of a qualified expert in the field of architectural history and included a detailed analysis of the project's impacts pursuant to the National Register of Historic Places (NRHP) standards.

As noted in the Historic Resources Report, for purposes of both the NRHP and CRHR, an integrity evaluation is broken down into seven "aspects." The seven aspects of integrity are: 1) Location (the place where the historic property was constructed or the place where the historic event occurred); 2) Design (the combination of elements that create the form, plan, space, structure, and style of a property); 3) Setting (the physical environment of a historic property); 4) Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property); 5) Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory); 6) Feeling (a property's expression of the aesthetic or historic sense of a particular period of time), and; 7) Association (the direct link between an important historic event or person and a historic property). All of these aspects were thoroughly analyzed and discussed in the Historic Resources Report.

It should further be noted that it is not required that a potentially historic significant property possess all seven aspects of integrity to be eligible. Depending upon the NRHP and CRHR criteria under which the property derives its significance, some aspects of integrity might be more relevant than others. For example, a property nominated under NRHP Criterion A and CRHR Criterion 1 (events), would be likely to convey its significance primarily through integrity of location, setting and association. A property nominated solely under NRHP Criterion C and CRHR Criterion 3 (design), would usually rely primarily upon integrity of design, materials and workmanship.

Project impacts were acknowledged in the Historic Resources Report to be significant and adverse due to a reduction of the property's integrity of location, design, setting, feeling, and association. The comments are noted but the preparers observe that they do not alter the Historic Resources Report's conclusions with respect to eligibility or project impacts. The preparers note that different project(s), such as those suggested by the commenter, have not been evaluated in this environmental document. A different project could result in reduced, or greater, impacts on historic resources.

COMMENT 4.10.2

It received its Cultural Status for a reason and if the city would have been more responsible and keeping their historic preservation with the county this would not be an issue. There is no oversite (sic) for landmarks in this town, Which that seriously needs to be addressed, but not at the cost of losing the reason this city is even what it is today.

If you look at lot 35 and the open space in front the Main House and Barn will be the only things on that lot. There is no room for a yard or anything else for that matter. No one would buy that in that setting and if donating it is the plan that would be rediculous (sic).

RESPONSE TO COMMENT 4.10.2

The Hardison House property was analyzed pursuant to CEQA §15064.5, discussed on pages 44-45 of this Final IS/MND. This comment was noted for the record and will be forwarded to decision makers.

COMMENT 4.10.3

The trail on the hillside would wash away with the first rain. The risk of mudslides is always high. The neighbors have mud run off every year. Retaining wall and easement over time will become a problem. With a HOA isnt (sic) the city responsible for the up keep of retaining walls. The second houses foundation is a result of the mud that comes from the hillside.

RESPONSE TO COMMENT 4.10.3

The recreational trail would be maintained and monitored by the Project HOA to ensure that it does not wash away during a rainstorm event. As discussed in Question 9(j), page 73 of this Final IS/MND, the Project Site is situated below a prominent north south trending ridge. Natural slopes up to 300 feet in height exist above and to the west of the planned development at gradients of 2:1 or flatter. Due to the planned drainage easements and improvements across the toe of the slope to the west of the planned development, the potential for mudflow to impact the Project Site is low.

COMMENT 4.10.4

Not to mention, where will people that want to use the trail, from the outside community park. Will parking become a (sic) issue like the highschool (sic).

RESPONSE TO COMMENT 4.10.4

The proposed trail would be on private HOA-owned common area property and the HOA would have to provide liability insurance and maintenance. The trail cannot be ADA-compliant due to the slope. It is possible Project residents may invite non-residents to use the trail, depending on HOA Rules and Regulations adopted by the HOA member residents. The Proposed Project provides sufficient parking for on-site uses. Parking for the Proposed Project would be subject to the parking regulations for the City of Santa Paula (outlined in the Santa Paula Municipal Code). As such, a less significant impact would occur.

COMMENT 4.10.5

Being a HOA community will they decide that the trail is just for their HOA or is there a plan that hasnt (sic) been said to connect the trail to the existing Williams Homes Community by the Hospital which is also HOA.

RESPONSE TO COMMENT 4.10.5

As described under the 'Parks' subheading, on page 95, the Homeowners Association would maintain the recreational trail and access easement to access the top of the slope. As seen in Figure 3.2, the trail would

go up the slope and loop around at the west end of the Project Site. The recreational trail is not currently planned for connection to another community.

COMMENT 4.10.6

How does the Agricultural property that is next to the hillside feel about the trail and how that will work when people wander off to pick illegally. Not to mention the High Risk of trespassers, the higher risk in potential for fires. Is all of this being addressed.

RESPONSE TO COMMENT 4.10.6

As discussed Section 14, Public Services (page 91 of this Final IS/MND), the Project Site is adequately served by the Santa Paula Police Department. The development of the Project is expected to generate approximately 189 persons, which could increase demands for local police services. As discussed on page 92 of this Final IS/MND, the SPPD would be able to adequate serve the Proposed Project and any issues associated with trespassing.

As discussed in Section 14, Public Services, the Project Site is adequately served by the Santa Paula Fire Department. The Project Site is located within a Very High Fire Hazard area. The proposed Tract Map would be designed and built in accordance with all applicable Building and Fire Code requirements. The Proposed Tract Map has been reviewed by the Santa Paula Fire Department, and the Applicant has incorporated required emergency access and fuel modification measures. Specifically, the Tract Map has been designed to allow for emergency access from Ojai Road and incorporates additional emergency access points at the terminus of proposed Royal Oaks Road (to access the open space hillside to the west) and at the southerly end of proposed Redbud Street where it aligns with Fuschia Lane to the south. As noted in the Water System Study for the proposed Tract Map, the Proposed Project Site is adequately served by existing water infrastructure as the combined peak hour water demand and fire flow are 89.73 pounds per square inch (psi) and 62 psi respectively, which is greater than the allowable minimum 20 psi that is required by Code. Thus, the Proposed Project would result in a less than significant impact with respect to exposing people or structures to a significant risk of loss, injury or death involving wildland fires. Compliance with the Santa Paula Municipal Code and Fire Code standards is mandatory and would be conditioned upon the project during the approval process. As such, a less than significant impact would occur in relation to fire risk.

COMMENT 4.10.7

If a development hss (sic) to happen at least leave the Barn and existing buildings in their place Should build around the back by Fushia (sic) and to the North side of the property along the fense (sic) line closest to the house. Lot 35 should be what is already fenced from the pasture. Someone would still purchace (sic) it or if donated could be used for a teaching extension to the mill or a nice open space park where the city could rent it out for special occasions. Qualify for state and federal funding. The Mill did it there would be no reason that this couldnt (sic) happen there. Its too important to loose (sic) a big part in this towns history because we dont (sic) have the write (sic) preservation steps going on.

RESPONSE TO COMMENT 4.10.7

The Commenter describes an alternative development and operation plan for the Project Site and the Hardison House in this comment. The comment was noted for the record and will be transmitted to the decision makers.

COMMENT 4.10.8

The wildlife that are on the property would also be affected. The returning Barn Owls who live in the Barn and in the trees on the hillside. The Red Tailed Hawks that nest in the trees on the hillside. Different Bird Species Quail, The varity (sic) of Birds that eat the nats (sic) in the pasture, I can go on and on. The Deer, Coyote, a fox or bobcat on occasion. All of thid (sic) will be affected.

RESPONSE TO COMMENT 4.10.8

The Proposed Project's effects on biological resources are discussed in Section 4, Biological Resources (starting on page 33 of this Final IS/ MND). Wildscape Restoration prepared the *William Homes Santa Paula River Rock Project Biological Constraints and Jurisdictional Delineation* Report in December 2014 to document biological resources on-site and provide recommendations. The Proposed Project shall incorporate Mitigation Measures 4.1 through 4.8, described on pages 40-41 of this Final IS/MND, to ensure that impacts relating to biological resources would be less than significant.

COMMENT 4.10.9

Please look at everything regarding this project, more time and the right people should be overseeing this project. There was no public notice even given except the website.

Photos are available upon request regarding landdcape (sic) and settings, etc regarding things brought up in this letter.

[Photos included in attached comment letter (See Appendix M)]

RESPONSE TO COMMENT 4.10.9

This comment was in response to the MND published in November 2015 and that was circulated for a 30-day public review period ending on December 11, 2015. However, as a newspaper ad was not prepared, the circulation period cannot be used to satisfy CEQA. As a result, the Draft IS/MND was republished in February 2016 (and incorporates the comments received during the first comment period) and was recirculated for another 30-day public review period. This comment is noted into the record.

COMMENT LETTER 4.11

Alberto Perez
75 Coromar Drive
Goleta, CA 93117
December 9, 2015

COMMENT 4.11.1

Is there a forum to comment on this development?

I played around with powerpoint and came up with this as an alternative.

RESPONSE TO COMMENT 4.11.1

The Draft MND was originally published on November 12, 2015 and was initially circulated for a 30-day public review period ending on December 11, 2015, and the Recirculated Draft MND was circulated for another 30-day public review period that ended on March 8, 2016. Additionally, the Applicant held a community meeting at the Project Site on March 3, 2016 to engage public commentary.

Moving forward, public comment and participation will be possible through the Planning Commission hearing and the City Council hearing on the Proposed Project. The Commentor's name has been added to the project mailing list and will be notified of future hearing dates.

COMMENT 4.11.2

I live in the near vicinity (1301 Mariposa Drive) and believe that opening the development to the two streets on the south side will decrease the impact to the intersection of Ojai and Royal Oaks Place.

RESPONSE TO COMMENT 4.11.2

Currently, primary vehicular access to the Project Site would be provided by way of a full-access residential roadway that would intersect with the west side of Ojai Road (State Route 150) opposite Royal Oaks Place. A secondary access would be provided via an internal connection between the Project Site and the residential subdivision located immediately to the south, where Redbud Street (proposed) would link to the existing Fuchsia Lane. This internal connection would provide secondary access for both the Project Site and the neighboring residential subdivision. The Commenter's suggestion is noted for the record and will be transmitted to the decision makers.

COMMENT 4.11.3

As proposed... looks like they are placing about twice (or more) the density from surrounding areas. Seems to me just because the lot is large the zoning allowance should only be on the percentage of land that is developable and the hill is not countable.

RESPONSE TO COMMENT 4.11.3

The Project Site is a total of 19.28 acres, which includes the developed eastern portion of the Project Site and the natural, undeveloped western portion of the Project Site. Allowable density is calculated by using the area of the entire project site. In order to preserve the natural western portion of the Project Site, the Applicant is seeking approval of a concurrent Planned Development Permit to cluster the proposed homes on the eastern portion of the Project Site. The Planned Development Permit would allow for a reduced lot size

COMMENT 4.11.4

[View attached comment letter for photo]

Here is a more reasonable development.

[View attached comment letter for photo]

I added a walkway on the north side where drainage can be installed and have access to underneath the walkway. (the same can be done on the south side of the development.) This would also provide access for people to walk up to the open space on the hill.

Additionally I added a small park on the north side of the remaining home. This can be dual use if the home turns into an elderly care facility for example, or a museum. Parking also on the left side of the open space. Total 24 homes. (you might be able to add a home in each of the streets to make it ~28 homes and it would still be more reasonable.

Do we as neighbors have any say in what gets approved?

RESPONSE TO COMMENT 4.11.4

In this comment, the Commenter describes an alternative development for the Project Site and includes renderings in his comment letter (attached). The comments pertaining to an alternative development are noted for the record and will be submitted to the decision maker.

Public participation is an essential part of the CEQA process. The City of Santa Paula Planning Department, as Lead Agency, seeks public involvement in order to document public's opinions on environmental issues pertaining to the Proposed Project (pursuant to CEQA §15201). Providing constructive commentary on environmental issues discussed in the Draft MND, is incorporated into the record and submitted to the decision makers, who have final discretion on the Proposed Project.

The public and other governmental agencies will have additional opportunities to comment on the proposed development application and participate in the Planning Commission and City Council hearings. All persons and agencies who commented on the Draft IS/MND and Recirculated Draft IS/MND will be added to the project mailing list and will be provided written notices of future hearings pertaining to the Proposed Project.

5. RESPONSES TO COMMENTS RECEIVED ON THE RECIRCULATED DRAFT IS/MND

The Recirculated IS/MND was published on February 8, 2016 and circulated for a 30-day public review period ending on March 8, 2016. In accordance with the procedures set forth in the State CEQA Guidelines, the Recirculated Draft IS/MND was submitted to the State Clearinghouse and filed with the Ventura County Clerk. The State Clearinghouse number is 2015111040.

Provided below are responses to each of the comments raised in the 44 comment letters. A copy of the original comment letters with annotated brackets corresponding to the labeling of the individual comments and responses as addressed below are included in Appendix M(B). The following 44 comment letters were submitted to the lead agency in response to the February 2016 Recirculated IS/MND:

State Agencies

1. State of California – Governor's Office of Planning and Research
   State Clearinghouse and Planning Unit
   Scott Morgan, Director
   1400 10th Street
   Sacramento, CA 95812
   March 8, 2016

2. State of California –
   California State Transportation Agency
   Department of Transportation
   District 7 – Office of Transportation Planning
   Dianna Watson,
   IGR/CEQA Branch Chief
   100 S. Main Street, MS 16
   Los Angeles CA 90012
   February 22, 2016

3. State of California –
   The Natural Resources Agency
   Department of Parks and Recreation
   Office of Historic Preservation
   Julianne Polanco, State Historic Preservation Officer
   1725 23rd Street, Suite 100
   Sacramento, CA 95816
   March 4, 2016

Local Agencies

4. County of Ventura, Resource Management Agency, Planning Division,
   Ventura County Cultural Heritage Board
   Nicole Doner, Cultural Heritage Board Staff
   800 S. Victoria Avenue
   Ventura, CA 93009-1740
   March 17, 2016

Organizations

5. San Buenaventura Conservancy
   Post Office Box 23263
   Ventura, CA 93002
   March 8, 2016

6. National Barn Alliance
   Danae Peckler, MHP
   SOI-Qualified Architectural Historian and Past President, National Barn Alliance
   March 5, 2016

Individuals

7. Jackie Abel
   February 10, 2016

8. Arnold Acevedo
   1310 Ojai Road
   Santa Paula, CA 93060
   March 2, 2016

9. Amina Bancroft
   March 4, 2016

10. Mary Benigar
    March 5, 2016

11. Kevin Beyer
    1157 Say Rd.
    Santa Paula, CA 93060
    March 7, 2016

12. Steven and Mary T Cain
    1205 Ojai Rd.
    Santa Paula, CA 93060

13. Mary Kate Cain

14. Briena Cooper
    March 5, 2016

15. Rebecca Countryman
    17036 April Lane
    Santa Paula, CA 93060
    February 16, 2016

16. Jack DeJamaer
    1213 Laurel Rd.
    Santa Paula, CA 93060
    February 6, 2016

17. Ellen Evanow
    1214 Mariposa Drive
    Santa Paula, CA 93060
    March 6, 2016

18. Kathryn Gardner
    March 8, 2016

19. Clifford and Phyllis Garmon
    1246 Maple St.
    Santa Paula, CA 93060
    February 27, 2016

20. Ismael Guillen
    1300 Ojai Rd.
    Santa Paula, CA 93060

21. Sheryl Hamlin
    February 19, 2016

22. Silvia Huerta-Wetherbee

23. Patricia Kennedy
    March 8, 2016

24. George Ketterman
    1155 Royal Oaks Place
    Santa Paula, CA 93060
    March 4, 2016

25. Patricia Ketterman
    615 N. Ojai Rd.
    Santa Paula, CA 93060

26. Harald Marschall
    1216 Birch Street
    Santa Paula, CA 93060

27. William L. Martin
    1343 Magnolia Dr.
    Santa Paula CA 93060
    February 26, 2016

28. Eugene E. Marzec
    1347 Magnolia Dr.
    Santa Paula, CA 93060
    February 23, 2016

29. Amber Mickelson (Change.org Petition)
    February 10, 2016 &
    February 26, 2016

30. Michael W. Mobley
    673 Westfield Court
    Ventura, CA 93004
    February 17, 2016

31. Shannon Nelson
    Forest Dr., Santa Paula
    February 7, 2016

32. Elsbeth Nowak
    1302 Ojai Road
    Santa Paula, CA 93060
    February 19, 2016

33. Esidro I. Prado
    1203 Birch St.
    Santa Paula, CA 93060
    February 23, 2016

34. Steve Ramser
    819 Ojai Road
    Santa Paula, CA 93060
    March 5, 2016

35. Debra Renick
    14397 Ojai Rd.
    Santa Paula, CA 93060
    February 11, 2016

36. Janet W. Shephard
    500 W. Santa Maria Street
    Santa Paula, CA 93060
    March 11, 2016

37. Harold and Beverly Shoemate
    1351 Magnolia Drive
    Santa Paula, CA 93060
    February 23, 2016

38. Heather and Patrick Silva
    322 Bradley Street
    Santa Paula, CA 93060
    March 6, 2016

39. John Stone (Residents Petition)
    1006 Fuchsia Lane
    Santa Paula, CA 93060
    March 3, 2016

40. Greg Thayer
    February 11, 2016

41. Mary Vomund
    March 3, 2016

42. Gene Wallace
    1348 Magnolia Drive
    Santa Paula, CA 93060
    February 25, 2016

43. Richard M. and Sue Yamamoto
    1330 Ojai Road
    Santa Paula, CA 93060
    March 3, 2016

44. Anna M. Zalesak
    March 5, 2016

COMMENT LETTER 5.1

State of California – Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Director
1400 10th Street
Sacramento, CA 95812
March 8, 2016

COMMENT 5.1.1

Subject: Williams Homes / River Rock Project (City Project No. 2014-CDP-02)
SCH#: 2015111040

Dear Janna Minsk:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 7, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

RESPONSE TO COMMENT 5.1.1

This comment acknowledges that the State Clearinghouse received and transmitted the recirculated Mitigated Negative Declaration to the respective state agencies, in compliance with CEQA and the State

Clearinghouse review requirements for environmental documents. It is noted that Caltrans and the Office of Historic Preservation (Department of Parks and Recreation), both state agencies, submitted comments directly to the lead agency. Caltrans and the Office of Historic Preservation comments are provided in Comment Letter 5.2 and Comment Letter 5.3, respectively.

COMMENT LETTER 5.2

State of California – California State Transportation Agency
Department of Transportation
District 7 – Office of Transportation Planning
Dianna Watson, IGR/CEQA Branch Chief
100 S. Main Street, MS 16
Los Angeles CA 90012
February 22, 2016

COMMENT 5.2.1

Re: Williams Homes/River Rock Project
(City Project No. 2014-CDP-02)
Vic: VN-150
IGR#160218ME-MND

Dear Ms. Minsk:

The California Department of Transportation (Caltrans) has reviewed the Mitigated Negative Declaration (MND) for the proposed William Homes/River Rock Project.

The project will be located at 1226 Ojai Road in the city of Santa Paula. The applicant proposes to redevelop the project site to provide a new residential subdivision with approximately 54 residential lots including 53 new homes and the retention/rehabilitation of the Hardison House main residence and barn/stables. A total of 54 single-family homes will be located on the future Project Site.

Caltrans' previous comments are to be considered, again, for this public comment process. Attached is a copy of the comment letter that was submitted on December 11, 2015 for your convenience.

If you have any questions regarding these comments, please contact project coordinator Miya Edmonson, at (213) 897-6536 and refer to IGR/CEQA No. 160218ME.

RESPONSE TO COMMENT 5.2.1

A response to Caltrans' comment letter dated December 11, 2015 is provided in Section 4, Responses to Comments on the MND Published November 2015. Please refer to Comment Letter 4.2 in Section 4.

COMMENT LETTER 5.3

State of California – The Natural Resources Agency
Department of Parks and Recreation
Office of Historic Preservation
Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100
Sacramento, CA 95816
March 4, 2016

COMMENT 5.3.1

Dear Ms. Minsk:

RE: River Rock/Hardison House (Project No. 14-CDP-02, VTTM No. 5928)

Thank you for including the California Office of Historic Preservation (OHP) in the environmental review process for the River Rock/Hardison House Project (proposed project) and the City of Santa Paula (Lead Agency) intent to adopt a Mitigated Negative Declaration (MND). The State Historic Preservation Officer and the OHP have a broad responsibility for the implementation of federal and state historic preservation programs in California. Our comments are offered with the intent of preserving historical resources impacted by the proposed project while allowing the Lead Agency to meet its program needs. The following comments are based on the information included in the IS/MND for the proposed project and the San Buenaventura Research Associates report (SanBuena report), included as Appendix C.

The proposed project includes request for approval of a Vesting Tentative Tract Map (5928) to subdivide the 19.28 acre property into 57 individual lots and construct 55 new single-family residences and associated site infrastructure (sewer, roads, gutters, etc.). The project site is partially occupied by the existing Hardison farm complex, which includes a main farmhouse, barn, a second residence, garage, and other associated agricultural site features. The proposed project will relocate the barn, and combine the barn structure with the farmhouse on a single 0.65 acre lot. The north, east, and west of the farmhouse/barn lot will be surrounded by the new single-family homes, streets, and contemporary landscaping. All other buildings and features of the farm complex will be demolished. The Lead Agency evaluated the resources and determined the property is eligible for listing on the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and the City of Santa Paula Historic Landmark Designation, making the Hardison farm complex a historical resource for the purposes of CEQA (See CEQA Guidelines § 15.064.1(a)(1-4)).

RESPONSE TO COMMENT 5.3.1

This comment identifies the State's Office of Historic Resources as a commenting agency responsible for the implementation of federal and state historic preservation programs in California. The comments provided above accurately restate the project description and the lead agency's determination that the property is eligible for listing on the NRHP, CRHR, and as a City of Santa Paula Historic Landmark

Designation. The Hardison House property is identified in the Draft IS/MND as a historical resource for the purposes of CEQA (See CEQA Guidelines § 15.064.1(a)(1-4)).

COMMENT 5.3.2

The IS/MND determines the proposed project will result in a significant adverse change to the Hardison property pursuant to the definition provided in the CEQA Guidelines § 15064.5(b)(1), which states:

> Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired.

The resource, in this instance, is the historic farm property, which will undergo physical demolition, destruction, relocation and alteration of both the built environment resources and their immediate surroundings. It appears the collection of buildings/structures, fences, retaining walls, vegetation, openspace (sic), etc. may need to be evaluated as a historical district. A historical district is defined by the National Parks Service as a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. The elements of the district may be considered collectively significant, even if individual components lack distinction on their own. The impacts to individual resources should be evaluated based on their contribution to the farm complex as a whole, not as merely to the individual building or structure.

The historical farm complex in its current state retains a high degree of historic integrity. The elements of historical integrity that will be impacted by the proposed project include location, design, setting, feeling, and association. More specifically, the IS/MND states that the following design elements of the proposed project will cause significant impacts to the historical resource:

- Development of the property as a single family residential subdivision,
- Reduction of the eligible property from 19.27 acres to 0.65 acres,
- Relocation of the Barn/Stables building,
- Demolition of the Second Residence and Garage/Residence, and
- Construction of new single family residences within the setting of the Main Residence.

The mitigation measures in the IS/MND include both interpretive plan elements and design measures; however, it is unlikely the proposed mitigation measures would reduce the impacts to Hardison farm complex to a level that would be considered insignificant. Even with implementation of mitigation measures provided in the Mitigation Monitoring and Reporting Plan, the proposed subdivision design severs the relationship of the historical resources to the historical people and events that make the farm complex historically significant. While project mitigation measures call for use of the Secretary of the Interior Standards for Rehabilitation to apply to work on the barn (after relocation), this treatment alone does not address the significant impacts resulting from the loss of the farm complex as a whole.

The Lead Agency might consider preparing an Environmental Impact Report (EIR) so decision makers and the public can consider feasible project alternatives that would significantly reduce or eliminate impacts to historical resources. Another option for the Lead Agency is to work with the project applicant to modify the proposed project in such a way that would restore and preserve the Hardison farm complex, thereby avoiding the impacts to historical resources discussed above.

Thank you for considering our comments. If you have questions, please feel free to contact Sean deCourcy, State Historian II of the Local Government and Environmental Compliance Unit, at (916) 445-7042 or at Sean.deCourcy@parks.ca.gov.

RESPONSE TO COMMENT 5.3.2

The State Office of Historic Preservation (OHP) suggests that the collection of buildings/structures, fences, retaining walls, vegetation, and open space features may need to be evaluated as a historical district and opines that even with implementation of mitigation measures provided in the Mitigation Monitoring and Reporting Plan, the proposed subdivision design severs the relationship of the historical resources to the historical people and events that make the farm complex historically significant. While OHP suggests the Lead Agency consider preparing an EIR so decision makers and the public can consider feasible project alternatives that would significantly reduce or eliminate impacts to historical resources, no substantial evidence has been presented by OHP or any other commenting organization or individual to support a fair argument that the Project may result in a significant impact upon a historic resource.

The Historic Resources Report presented in Appendix C to the Draft and Recirculated Draft IS/MNDs included a detailed analysis of the Hardison property and included a substantial discussion on the physical attributes of the entire property, including the size of the property, landscape features, open space, and assemblage of structures. The property's integrity of setting was documents as being somewhat intact; the undeveloped hillside backdrop that provides the property with its historic rural setting remains. However, the setting to the north, south and east are non-historic residential construction dating from the 1920s through the 1970s. Portions of the property, particularly to the north and east of the Main Residence, once featured landscaped gardens, probably designed professionally for the Hardison family. Little of this landscape plan is currently in evidence, with the exception of a number of mature specimen trees, most notably along Ojai Road. The Historic Resources Report evaluated all of the structures located on the property and concluded that even with the demolition of the second residence and garage/residence the property will remain eligible for the NRHP, CRHR, and as a City of Santa Paula Historic Landmark. The project as designed, along with the incorporation of the recommended mitigation, will serve to insure future preservation of the eligible property. Consequently, the residual impact of the project on historic resources after mitigation should be regarded as adverse, but less than significant.

Evaluation as a Historic District and Impacts. With respect to the property being part of a larger district, in the preparer's opinion, evaluating the property as a historic district would not result in any material difference in the determination of eligibility of the property, the features that contribute to its significance or eligibility, or the evaluation of project impacts. The method used in the Historic Resources Report considers the ability of all extant features of the property to contribute to its significance and eligibility within a period of significance defined by associated historic events and individuals. The

commenter speculates that some potentially contributing historic features may not have been documented or considered, but does not supply any evidence of specific features that were not documented or evaluated. In the opinion of the preparers, the California Office of Historic Preservation instructions for recording historic resources supports the approach used:

> *Small, simple groupings of resources such as … a house with an associated garage or barn are most appropriately documented together as an individual historical resource using a single Primary Record to index all of the values present and detailed recording forms, as appropriate, to present more detailed information about each component.*[13]

Consequently the preparers cannot agree that the project impacts would be greater or materially different if the property was evaluated for significance and eligibility as a historic district. The Historic Resources Report identified the entire property as eligible as well as the features that contribute to its eligibility for the NRHP and CRHR listing, and City Landmark designation.

Project impacts were acknowledged in the Historic Resources Report to be significant and adverse due to a reduction of the property's integrity of location, design, setting, feeling, and association. The commenter repeats this conclusion of the report, but does not suggest any expanded conclusions that might have resulted from a district evaluation.

Mitigation Measures and Residual Impacts. The commenter argues that the proposed mitigation measures would not reduce the project impacts to "a level that would be considered insignificant." The preparers agrees, concluding in the Historic Resources Report that the residual impacts after mitigation would be adverse, but less than significant. The preparers note that term "insignificant" does not have a defined meaning in CEQA.

The commenter argues that the project after mitigation "severs the relationship of the historical resources to the historical people and events that make the farm complex historically significant." In so doing the commenter appears to be arguing that the project would result in property that would be ineligible for NRHP and CRHR listing, or City Landmark designation. A finding of ineligibility for the remainder parcel leads to a de facto conclusion under the CEQA Guidelines that the project impacts are adverse, significant and unmitigable.

The preparers do not agree that the retained features, which would include the W.L. Hardison House and barn, in situ, would have this result. The preparers also do not believe that it has ever been the practice of the Office of Historic Preservation to evaluate NRHP and CRHR eligibility on a basis that demands that a property retain all of its original features, as well as the entire parcel on which it was originally constructed, in order for it to be considered eligible. This leads the preparers to conclude that the project impacts are adverse, but less than significant after mitigation.

Preparation of an EIR. The commenter recommends the preparation of an EIR in connection with this project, in order for project alternatives to be considered within the environmental document. The

[13] *Office of Historic Preservation. Instructions for Recording Historic Resources, March 1995, p.3.*

preparers agree as a general matter that an EIR would require the examination of project alternatives. However the commenter does not supply evidence of project alternatives that would result in reduced or avoided impacts on historic resources. As the reduction or avoidance of significant impacts is the primary purpose of the CEQA process, the recommended additional analysis appears to provide an unspecified and speculative benefit.

COMMENT LETTER 5.4

County of Ventura, Resource
Management Agency, Planning Division,
Ventura County Cultural Heritage Board
Nicole Doner, Cultural Heritage Board Staff
800 S. Victoria Avenue
Ventura, CA 93009-1740
March 17, 2016

COMMENT 5.4.1

Re-circulated Draft Initial Study/MND Project No. 14-CDP-02
River Rock Development Project, Vesting Tentative Map 5928,
City of Santa Paula, RMA Project Ref. No. 15-022

Based on our review of the comments we received from the State of California Historic Preservation Office (SHPO), San Buenaventura Conservancy, and the National Barn Alliance regarding this IS/MND and our review of the re-circulated IS/MND, the Cultural Heritage Board staff provides the following new comments to ensure the protection of Ventura County Landmark No. 35 (W.L. Hardison/Proctor House):

- The conclusion of the analysis in the IS/MND is that the property appears to be eligible for listing on the National Register, California Register and the City of Santa Paula Landmark designation. Thus, the entire property should be regarded as a historic resource for CEQA purposes. However, the impacts to the historical farm complex as a potential historic district were never analyzed in the IS/MND. As recommended by SHPO in their March 4, 2016 letter to Ms. Minsk, the Lead Agency should evaluate the farm complex (including the collection of buildings, structures, hardscape and landscape features that originate from the periods of significance that range from 1883 to 1962) for its potential as a historical district using the National Register criteria.

RESPONSE TO COMMENT 5.4.1

The Historic Resources Report includes an evaluation of the entire property including the collection of buildings, structures, hardscape and landscape features that originate from the periods of significance for its potential as a historical resource pursuant to the guidelines provided in the National Register. The Historic Resources Report concluded that the main residence and barn/stables on Parcel 35 will remain eligible for the NRHP, CRHR, and as a City of Santa Paula Historic Landmark. The project as designed, along with the incorporation of the recommended mitigation, will serve to insure future preservation of

the eligible property. Consequently, the residual impact of the project on historic resources after mitigation should be regarded as adverse, but less than significant. See also Response to Comment 5.3. With respect to the suggestion to evaluate the property as a Historic District, see Response to Comment 5.3.2. With respect to the remarks about the need for the preparation of an EIR, see Response to Comment 5.3.2. And with respect to the evaluation of project impacts, see Response to Comment 5.3.2.

COMMENT 5.4.2

- The Lead Agency proposed mitigation would: 1) relocate the barn closer to the farmhouse determined to be eligible for both the National Register and California Register, 2) document the smaller residence and garage buildings proposed for demolition through Historic American Building Survey-like (HABS-like) documentation, and 3) demolish all other elements of the farm complex. Even with the mitigation measures, this treatment does not address the significant impacts resulting from the loss of the farm complex as a whole, and clearly results in a significant impact to historical resources for the purposes of CEQA. Thus, an EIR should be prepared to evaluate alternatives and explore more effective mitigation.

Please contact Nicole Doner at 805-654-5042 or nicole.doner@ventura.org if you have any questions.

RESPONSE TO COMMENT 5.4.2

See Response to Comment 5.3.

COMMENT LETTER 5.5

San Buenaventura Conservancy
Post Office Box 23263
Ventura, CA 93002
March 8, 2016

COMMENT 5.5.1

The San Buenaventura Conservancy works through advocacy and outreach to preserve the irreplaceable historic, architectural and cultural resources of Ventura and surrounding areas. We have been asked by residents of Santa Paula to comment on the recirculated **River Rock/Rosewood/W.L. Hardison House (Project No. 14-CDP- 02;VTTM No. 5928)**

The City of Santa Paula intends to adopt a Mitigated Negative Declaration (MND) based on the IS/MND for the proposed project to subdivide the property locally known as Ventura County Landmark #35 – the Hardison/Proctor farm. The proposed project adds 50+ new single family homes and will result in significant adverse impacts to the historic property but the IS/MND finds that they are less than significant after mitigation. The proposed project destroys critical features of the historic Hardison farmstead and impairs the aesthetic qualities of the site. These types of adverse impacts be mitigated to a less than significant level.

[See attached comment letter in Appendix M for picture]

RESPONSE TO COMMENT 5.5.1

This comment serves as an introduction to the contents of the comment letter. This comment is noted for the record, and the comment letter is further discussed below.

COMMENT 5.5.2

The proposed project alters the extraordinarily significant W. L. Hardison property: farmhouse, barn, 2nd residence, garage, outbuildings and landscape. Based on Lead Agency findings, the Hardison property is a historical resource for the purposes of CEQA. However, the collection of house, barn, and other buildings/structures as well as the landscape, heritage trees and plants, fences, walls, drainage ditches, roads, pathways and their spacial (sic) relationships and circulation patterns should actually be defined as a historical district. The project as currently proposed will destroy important features of that district and relocate the barn far too close to the south side of the farmhouse on less than an acre, creating an "artificial" historic context to facilitate maximum development of the site. The south, east, and north of the newly created farmhouse/barn lot will be surrounded by the new single-family homes. Access to the house, formerly from the main road to the east, is reconfigured to the south. A public park will adoptively reuse the pasture in front of the house presumably to fulfill open space requirements. All other buildings and features of the district will be demolished, and the view of the house from scenic Highway 150 will be partially impaired to the north and south by new homes and the relocated barn itself.

RESPONSE TO COMMENT 5.5.2

The preparers disagree with the commenter that the retention of the house in situ and barn on its historically associated property would result in an "artificial historic context" for the property. The context for the property, which is the historic themes and associations that supply its significance, will not be altered by the project. The change will be to the property's integrity, which is acknowledged in the Historic Resources Report as a significant and adverse impact before mitigation. (See also response to comment 5.3.2)

The proposed project specifies that the primary historic feature of the property, the W.L. Hardison House, will remain in its existing location. The barn, a secondary feature, is proposed to be moved 160 feet to a position closer to the house and rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation, for use as a garage, and will retain the majority of its character-defining features and compatibility in orientation.

A longstanding principle of historic preservation is that the disuse of historic buildings presents one of the most immediate and significant threats to their continued existence. Abandoned buildings are subject to decline, a process that often results in their destruction as the consequence of fire, vandalism, and exposure to the elements. Accordingly, contemporary historic preservation practice recognizes the importance of providing new uses for historic buildings that no longer serve their original use or purpose.

This concept, known as adaptive reuse, is a process that necessarily involves changes to aspects of the property's historic features. The accepted method for managing change to historic properties is the application of the Secretary of the Interior's Standards for Rehabilitation. The Historic Resources Report includes a detailed analysis of the project in accordance with these standards.

The commenter further opines that the project will result in the relocation of the barn "far too close to the south side" of the house, but otherwise appears to reject relocation as a preservation strategy. The preparers respond that the relocation of historic buildings is an accepted preservation technique with an established purpose and standards of performance. Relocation is specifically recognized in the NRHP Special Criteria for Consideration, which states that a relocated resource will remain eligible when it is "moved from one location on its original site to another location on the property, during or after its Period of Significance." [14]

The preparers also note that proposed treatment is consistent with and supported by the California Code and the guidelines promulgated by the Office of Historic Preservation, which state,

… it is recognized that moving an historic building, structure, or object is sometimes necessary to prevent its destruction. Therefore, a moved building, structure, or object that is otherwise eligible may be listed in the California Register if it was moved to prevent its demolition at its former location and if the new location is compatible with the original character and use of the historical resource. A historical resource should retain its historic features and compatibility in orientation, setting, and general environment.[15]

See also Response to Comment 5.3.

COMMENT 5.5.3

This project will cause unmitigable adverse impacts to the historic farmstead district and also it's individual features, which will undergo demolition, relocation and alteration. The proposed project results in a fictional relationship between the remaining historical resources and the association to W.L. Hardison co-founder of Union Oil and Limoneira Ranch. The buildings and structures and the agricultural landscape and site plan currently retain a remarkably high degree of historic integrity-virtually unchanged from a century ago, and the historic analysis emphasizes the rarity of this type of historic resource. The applicant's historic report finds the property eligible for both the National Register of Historic Places and the California Register of Historic Resources as well as locally in all three applicable criteria: Events, Persons and Architectural significance, making this property one of the most unique and historically important in the city of Santa Paula.

Resources eligible for the National and California Registers must retain some of "Seven Aspects of Integrity." The aspects are: Materials, Design, Feeling, Location, Association, Workmanship and Setting. This property retains a remarkably high degree of all seven. The proposed project will adversely impact

[14] *U.S. Department of the Interior. National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation. National Park Service, 1990; revised 1991, 1995, 1997. p. 29.*

[15] *14 CCR § 4852 (d) (1); OHP Technical Assistance Series #6.*

five: location integrity, design integrity, setting integrity, and integrity of feeling and association. The IS/MND finds that the proposed project will cause significant impacts to the historical resource through relocation of the barn, demolition of structures, and reduction of the Hardison house property to just 0.6 acre from its historic 19+ acres with the addition of 50+ homes surrounding the house and barn.

[See attached comment letter in Appendix M for picture]

RESPONSE TO COMMENT 5.5.3

The preparers disagree with the commenter that the retention of the house in situ and the barn on its historically associated property will result in a "fictional relationship between the remaining historical resources and the association to W.L. Hardison." The correct method for evaluating the significance and eligibility of historic resources is their association with historic events and individuals. For a property to be eligible, associations must be documented as significant, as they are for this property in the Historic Resources Report. Consequently the preparers do not agree with the commenter's assertion that the project can be said to result in imaginary associations. Under no conventional interpretation of the standards of evaluation will the proposed project result in the property's loss of its historic associations.

The preparers agree with the commenter that project impacts were acknowledged in the Historic Resources Report to be significant and adverse due to a reduction of the property's integrity of location, design, setting, feeling, and association.

COMMENT 5.5.4

The mitigation measures currently proposed in the IS/ MND (documentation, interpretive elements and design measures) do not mitigate the impacts to the historic farmhouse and barn and related resources to the level of insignificance CEQA requires. In addition, all feasible mitigations must be undertaken until adverse impacts have been mitigated. There are further mitigations that are feasible but not included in the IS/MND. The following mitigations should be included/added to this project MND/EIR.

- All work shall be supervised by a licensed architect meeting the Secretary of the Interior's Qualifications for Historic Architecture.
- Adjacent grading, site preparation and construction supervision by a qualified preservation architect.
- Creation of construction buffers for house/barn while homes are built and shoring/stabilization plan for barn if moved.
- Retention and rehabilitation of barn to Secretary of the Interior's Standards in situ.
- Nomination mitigation: NRHP nomination of the property to the National Register of Historic Places.
- Standards compliant protection plan and materials conservation report listing possible salvage and reuse of historic materials.
- Design mitigation: increasing setbacks between the historic buildings and new construction.
- Design mitigation: California Historical Building Code Compliance.

- Design mitigation: Compatible new landscape with historic or appropriate vegetation and protection of scenic view corridor.
- Protect and maintain historic trees, cactus and landscape elements with a landscape protection plan and construction buffers.
- View easement to maintain sight-lines across any parcel or park between the Hardison house and the Eligible Scenic Highway 150.
- Commemorative sign age, interpretive educational program or public art component.
- Publishing of photos, historic report, and research about the Hardison/Proctor families in a publication for local distribution.
- HABS II compliant photos/measured drawings donated to the National Park Service/Library of Congress and local libraries.
- Archeological assessment of the site before any construction activities, exploration of unique features found before construction.
- Mitigation measure for inadvertent discovery of archeological/paleontological resources. (Enforcement: No Certificate of Occupancy for project until all mitigations have been completed.)

RESPONSE TO COMMENT 5.5.4

Mitigation Measures. Several of the commenter's recommended mitigation measures would result in a substantially different project from the proposed project, and consequently cannot be properly evaluated as mitigation approaches. While a different project could arguably result in reduced environmental impacts to historic resources, the preparers note that, even within an EIR, only alternatives that meet the basic project objectives need be considered. Consequently the commenter's suggestions for increasing setbacks, creating view easements, a scenic view corridor, and maintenance of sight lines, are noted, but cannot be evaluated within the environmental document prepared for the proposed project.

In the preparer's opinion, other measures suggested by the commenter provide doubtful mitigation value and arguably greater impacts to historic resources. Retention of the barn in its current location on a separate parcel, with no defined future use for the building, fails to address reasonably foreseeable longterm preservation and adaptive reuse issues. The commenter's recommendation also positions the barn between new single family homes in a manner that does not improve it visual relationship to the W.L. Hardison House nor does it address important preservation questions, such as a new use for the building, or the degree to which alteration would be required to adapt it to a new use.

Some of the proposed measures appear to be unrelated to project impacts. A National Register of Historic Places listing for the property would not in itself confer any protections for the property. The mitigation measures included in the Historic Resources Report, requiring that the City of Santa Paula review all future changes to the property as a condition of the land use entitlements, affirmatively accomplishes this preservation objective. The preparers note that the property is not currently listed as a City of Santa Paula landmark and is consequently not protected from alteration or demolition by operation of local ordinance.

Several of the commenter's suggested mitigation measures, such as the treatment and protection of the barn during relocation and construction, reuse of salvage materials, interpretative measures, and documentation, are incorporated into the project description. The commenter's recommendations do not appear to further this objective.

The commenter's suggestion that the federal HABS/HAER standards be employed for documentation of the property would not expand upon or improve on the outcome of the documentation effort, as the Historic Resources Report requires documentation of the property to an archival standard by a qualified professional. The preparers also note that the commenter's suggested requirement for the documentation to be filed with the Library of Congress is essentially infeasible, as the Library alone determines the materials it accepts for the collection.

As above, CEQA does not require that project impacts be mitigated "to the level of insignificance." The preparers note that term "insignificance" does not have a defined meaning in CEQA.
See also Response to Comment 5.3.

COMMENT 5.5.5

Even with the addition and implementation of all the above feasible mitigation measures, the project as proposed would still have significant impacts on the environment. Therefore an MND is not appropriate and an EIR is necessary to further explore feasible project alternatives to avoid the destruction of the district. **Only addition of a mitigation measure that requires wholistic project compliance with the Secretary of the Interior's Standards (the Standards) would allow the project to proceed under a MND because there is no impact to historic resources when the Standards are followed.** (Stated another way, projects that follow the Standards are exempt.) The Standards allow for flexibility in alterations and additions to resources and might even allow for sensitive repositioning of structures on the site allowing contextual infill development to occur while maintaining valuable cultural resources.

RESPONSE TO COMMENT 5.5.5

The preparers do not agree with the commenter's assertion that "[o]nly addition of a mitigation measure that requires wholistic [holistic] project compliance with the Secretary of the Interior's Standards (the Standards) would allow the project to proceed under a MND because there is no impact to historic resources when the Standards are followed." In the preparer's opinion, this statement represents a misinterpretation of the CEQA Guidelines. According to the Guidelines, a finding of compliance with the Secretary's Standards is the only method of presumptively finding that a project will not result in a significant adverse impact. The Guidelines do not state and cannot be reasonably interpreted to imply that no other mitigation techniques are available to reduce adverse impacts on historic resources to a less than significant level. See also Response to Comment 5.3.

COMMENT 5.5.6

Additionally, the Environmental Impact Analysis (EIA) of the IS/MND does not make the required findings of no significant impacts to Aesthetics. The EIA states in **Aesthetics a.** "...the Project retains or

improves views of the Hardison House." This is not the case since new single-family homes will obscure sight-lines to the house and district. The EIA states in **Aesthetics b.** "The integration of the existing Hardison House and barn /stable on Lot 35 of the tract map would retain and improve a recognized desirable aesthetic natural feature... would result in a less than significant aesthetic impact..." The original district layout is historic and therefore aesthetically preferred, any alteration, or in this case substantial demolition, cannot be categorized as an "improvement." The EIA in **Aesthetics c.** mentions temporary construction debris impacts and compatibility with the form of the adjacent tracts but ignores the demolition of historic features on the property that cannot be mitigated. The historic and scenic character of the property is what needs to be protected, not the form and design of the adjacent neighborhoods. The EIA does not make the required findings that a project adding 50+ new houses on the property would not adversely impact the aesthetics of the historic resource that is seen by millions of travelers on Scenic Highway 150. This is also an unmitigable impact unless the Standards are used.

RESPONSE TO COMMENT 5.5.6

Comment noted. Aesthetics are typically evaluated separately from historic resources impact issues. See also Response to Comment 5.3.

COMMENT 5.5.7

The Hardison farmstead is a property that deserves a compatible, contextual and sensitive approach to any development on the site, not just one that maximizes buildable lots to the detriment of our heritage. If variances/exceptions are granted to maximize the project's density and reduce set backs and lot sizes, then one of Santa Paula's most significant remaining properties should be preserved in return. With sensitive design of the new subdivision and adherence to the Secretary of the Interior's Standards, the majority of the district can be preserved while the majority of the development proceeds with minimal redesign.

If the project is not modified to protect the historic district, the Lead Agency is required to prepare an Environmental Impact Report so the public can consider feasible project alternatives that would significantly reduce or eliminate Aesthetic and Cultural Resource impacts. The Conservancy would like to propose a feasible "Preservation Alternative" if an EIR is undertaken. However, the project can still be modified to preserve most of the important historic resources and allow for a profitable and compatible new development under an MND. The Conservancy is available and willing to discuss pro-preservation approaches that facilitate sensitive development in a win-win.

RESPONSE TO COMMENT 5.5.7

This comment is noted for the record and will be forwarded to the decision makers for their consideration. The preparers observe that, within an EIR, only alternatives that meet basic project objectives need be considered. Therefore it is unclear in what respects the commenter's unspecified "preservation alternative" would differ from the proposed project in terms of its impacts on historic resources. See also Response to Comment 5.3.

COMMENT LETTER 5.6

National Barn Alliance
Danae Peckler, MHP
SOI-Qualified Architectural Historian
and Past President, National Barn Alliance
March 5, 2016

COMMENT 5.6.1

Dear Chris Williamson and who it may concern at the Santa Paula Planning Department:

My name is Danae Peckler and I am writing you to submit comments on the above-reference project on behalf of the National Barn Alliance (NBA), a non-profit organization that has been working to protect and promote the preservation our America's rural heritage since 1995. Attached you will find a copy of our letter in support of a more thoughtful and historically sensitive plan for the preservation of the W. L. Hardison farmstead. As proposed, the current project does substantial and irreparable harm to this historic property.

Please respond at your earliest convenience to assure me that you successfully received our submission.

Thank you for your time and consideration of this material!

RESPONSE TO COMMENT 5.6.1

This comment serves as an introduction to the contents of the comment letter. The comment is noted for the record, and the comment letter is further discussed below.

COMMENT 5.6.2

Re: River Rock Development Project & the Wallace L. Hardison Farmstead

Dear Mr. Williamson,

Today, I am writing on behalf of the National Barn Alliance (NBA)- the only national organization focused on the preservation of historic barns and farmsteads. Since 1995, the NBA has worked to raise awareness of the cultural value embodied in our historic farm properties. These tangible links to our agrarian past continue to reflect our nation's history and are vital components of our American experience.

The NBA became aware of the River Rock Development Project late last year and we are pleased to have the opportunity to now provide comment on the proposed plans. Studies conducted in association with this project indicate that the Wallace L. Hardison farmstead is a National-Register and California-Register-eligible property that is historically significant for its associations with regional agricultural

history (Criterion A/1), historically important individuals in your community's past (Criterion B/2), and for its architectural expression as an outstanding farm property in your area (Criterion C/3). Although a historic property need meet only one of the criteria to merit listing on these registers, this resource meets three of the four professional requirements for historic significance. Further, the historic architectural investigation and report prepared for Williams Homes, Inc. (28 July 2015) finds that this resource is eligible for local landmark listing with two periods of significance, so that the importance of this property extends from 1883 until 1900 and also from 1900 to 1962. We would also like to point out that the July 2015 report noted a construction date of circa 1900 for the secondary dwelling identified on the property.

RESPONSE TO COMMENT 5.6.2

The commenter is incorrect in stating that the Historic Resources Report identified a date of construction of 1900 for the Second Residence. As stated in the report, the date of construction of this building is undocumented, a date of 1910 was found in Ventura County Assessor Records, but architectural evidence suggests an earlier date, perhaps before 1900. Consequently the ability of this building to contribute to the NRHP and CRHR period of significance for the property was judged by the preparers to be uncertain. See also Response to Comment 5.3.

COMMENT 5.6.3

As currently proposed, the plan to demolish two contributing historic structures and relocate the historic barn substantially alter the property's historic integrity of location, design, setting, workmanship, feeling, and association. Furthermore, the complete lack of information on existing historic landscape features is an unfortunate oversight. All farm properties contain landscape features, detailing the spatial organization and design of the relationship between the built environment and the land that supports its function. The relocation of the barn, regrading of the land, and creation of more than 50 new residential lots will adversely affect the historic integrity of location, design, setting, feeling and association of the entire farm property and, more specifically, for the barn and its relation to the agricultural fields, pasture, and orchard lots that once marked it. The historic integrity of this property should not be piecemealed in an attempt to mitigate the negative impacts of the proposed plans to one building or another. Collectively, the buildings and the land comprise the historic Wallace L. Hardison farmstead.

RESPONSE TO COMMENT 5.6.3

The reduction in the property's integrity resulting from the project is acknowledged in the Historic Resources Report. The loss of spatial relationships is addressed as a reduction in design integrity.

Landscape features are addressed in the Historic Resources Report. The report recommends that the extant landscape features be evaluated by a qualified arborist or landscape architect, and for the development of a plan for treatment and retention of these features. These measures are incorporated into the environmental document as mitigation measures.

The barn is not presently related to agriculture. As stated in the report, the property was planted in citrus at least as early as the 1920s, but these trees were removed decades ago, possibly by the 1950s. No agricultural activities have taken place on the property since that time.

The preparers agree with the commenters that the entire property is historically associated with W.L. Hardison and is significant and eligible on this and the other bases discussed and stated in the conclusions section of the report. See also Response to Comment 5.3.

COMMENT 5.6.4

In conclusion, it is the opinion of the Board Members of the NBA that this project will have an adverse effect on the historic Wallace L. Hardison farmstead and that the proposed mitigation measures do not sufficiently offset these significant impacts. On page 50 of the recirculated report for the River Rock Development project, this property was noted as one of the last remaining ranches from this era in Santa Paula's history: "The house and outbuildings is one of only a handful of ranches in the canyon from this period to remain today, and the only intact ranch from this period to include both its original property and associated buildings" (8 February 2016). Therefore, it is further unsettling to read that this report and the proposed mitigation measures contained within it discuss methods for making this historic ranch look more like the abundant number of non-historic residential subdivisions around it.

The proposed River Rock Development project and these plans appear to miss the mark. The NBA does not believe that the community will benefit from the destruction of its last few surviving ranches, but will instead be made poorer for it.

RESPONSE TO COMMENT 5.6.4

The commenter suggests that the mitigation measures are insufficient to offset project impacts, but does not suggest the adoption of any additional mitigations measures. The commenter's opposition to the project is noted.

COMMENT LETTER 5.7

Jackie Abel
February 10, 2016

COMMENT 5.7.1

To Whom it may concern:

"Completed in 1884, this was the home of Wallace L. Hardison and his family. Mr. Hardison is remembered primarily for being a co-founder of both the Union Oil and the **Limoneira** Companies. However, when he built this house neither of these accomplishments had occurred! A businessman of many interests, he was, among other things, breeder of fine racehorses and registered cattle, the **President of the Santa Paula Horse and Cattle Company**, a part owner of a profitable gold mine in Peru and the

one-time owner of the Los Angeles Herald. The town's **first telephone line** was installed here to connect him with Union Oil's wells in nearby **Adams Canyon**. In 1894 the structure was lifted by pulley's to permit a basement to be built. The style is **Victorian Era Farmhouse**." What a history!!!!

There are few towns that still boast such a slice of history where everyone can drive by and view it!

How could Santa Paula even consider for one moment building around this wonderful heritage? And look at how lovingly the house has been restored! This is such a pastoral setting, and should remain so.

RESPONSE TO COMMENT 5.7.1

The property is historically associated with W.L. Hardison and his significant accomplishments during the period of time he lived on the property (1884-1900).

COMMENT 5.7.2

The highway here cannot tolerate more traffic, and this would devalue homes existing in the area as well.

RESPONSE TO COMMENT 5.7.2

The Proposed Project's Traffic Study (dated December 28, 2015) analyzed six Study Intersections, which include:

1. Ojai Road (SR-150) and Royal Oaks Place (and future Project driveway);
2. Ojai Road (SR-150) and Oakdale Place;
3. Ojai Road (SR-150) and Richmond Road;
4. Ojai Road (SR-150) and Orchard Street;
5. Ojai Road (SR-150) and Saticoy Street; and
6. Ojai Road (SR-150)/ 10th Street and Santa Paula Street

The Traffic Study determined that the six study intersections operate at a level of service (LOS) C or better under existing conditions during both AM and PM peak hours. The Traffic Study determines that the six intersections would continue operating at a LOS C or better under future without Project condition at both peak hours, with the exception of the intersection of Ojai Road and Orchard Street that would operate at a LOS D at both peak hours. The Traffic Study determines that the six intersections would continue operating at an LOS C or better with the additional of Project traffic during both peak hours under existing and future conditions, with the exception of the intersection of Ojai Road and Orchard Street that would operate at a LOS D during both peak hours. The intersection of Ojai Road and Orchard Street is expected to be significantly impacted by cumulative traffic growth in 2018. The Project would then contribute to a significant cumulative impact by adding traffic and increasing minor street delays. For this reason, the Project would implement Mitigation Measure 16.1 (discussed on page 124), which includes physical improvements to Ojai Road and the Ojai Road and Orchard Street intersection. With the implementation of Mitigation Measure 16.1, the intersection of Ojai Road and Orchard Street is expected to operate at a LOS A. Section 16, Transportation / Circulation, Question (a), determines that Project

impacts would be less than significant following mitigation. With Mitigation Measure 16.1, the Project would not significantly impact traffic.

Property values are not an issue analyzed under CEQA. The Commenter's concerns with property values are noted for the record and will be forwarded to the decision makers.

COMMENT 5.7.3

My son lives directly next to the barn and horses, at the end of a quiet cul-de-sac. He bought here for the very location of the house, and has greatly improved his yard for the purpose of enjoying the view of the ranch. The history and surroundings are extremely important to the neighborhoods around it as well.

RESPONSE TO COMMENT 5.7.3

As discussed in Section 1, Aesthetics, the Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods and anticipated by the Santa Paula General Plan. The Proposed Project would preserve the Hardison House and barn. With approval of the concurrent Planned Development Permit, the Project is consistent with the existing zoning on the Project Site. The City has ultimate discretion on approval of discretionary requests.

COMMENT 5.7.4

Please consider those that live on both sides of this ranch, as well as those living in The Oaks neighborhood. The traffic is already very busy through Ojai Road/Highway 150.

RESPONSE TO COMMENT 5.7.4

The Project would be compatible with the residential development in the surrounding neighborhood. As discussed under Response to Comment 5.7.2, the Project would create a less than significant impact to traffic / circulation with the implementation of Mitigation Measure 16.1.

COMMENT 5.7.5

Last, but not least, when I visit my son and his family in Santa Paula we talk about the history in Santa Paula and how it has been preserved through the Agricultural Museum, the Train Depot, The Oil Museum, the Downtown area, and W.L. Hardison Home and Barn. When I take my grandchildren for walks through the lovely setting how will I explain to them that Santa Paula decided they want more cookie-cutter homes, rather than save the beautiful home and barn and land right next to them?

RESPONSE TO COMMENT 5.7.5

The Proposed Project would keep the Hardison House and barn on lot 35 and would develop the Project in a manner that would preserve the historical significance of the Hardison House through HOA CC&R's.

As discussed in Section 5, Cultural Resources, Question 5(a), development of the Proposed Project would preserve the historical significance of the Hardison House and the Barn/Stables structure so they remain individually eligible for the NRHP and CRHP. The remaining portion of the comment is outside the scope of CEQA. The comment is noted for the record, and will be submitted to the decision makers.

COMMENT LETTER 5.8

Arnold Acevedo
1310 Ojai Road
Santa Paula, CA 93060
March 2, 2016

COMMENT 5.8.1

RE: River Rock/Hardison House Project #2014-CDP-02

Dear Mr. Williamson:

I have lived along the easement road north of the Proctor (Hardison) House property for many years. I have serious problems with several of the developer's proposals since they could cause great harm to my family's lifestyle and my home's value.

RESPONSE TO COMMENT 5.8.1

This comment serves as an introduction to the comment letter. This comment lays out the Commenter's concerns about his family's lifestyle and home value. Property values are not issues analyzed under CEQA. The Commenter's concern with property values is noted for the record and will be forwarded to the decision makers.

COMMENT 5.8.2

First, 53 homes is a bad idea in such a confined area. Traffic is bad enough as it is. This will only make it worse and more dangerous.

RESPONSE TO COMMENT 5.8.2

The Proposed Project proposes to develop 53 new single-family homes and retain the existing Hardison House and barn for a total of 54 dwelling units. The Project includes a concurrent request for a planned development project permit.

As discussed in Section 16(a), the Proposed Project would result in a less than significant impact to traffic with the implementation of Mitigation Measure 16.1 (on page 124). With the incorporation of Mitigation Measure 16.1, the six study intersections would operate at LOS C or better. Refer to Response to Comment 5.7.2, above.

COMMENT 5.8.3

Second, two-storey homes should not be allowed along our easement road. They will stand much too tall and will obliterate any view toward the south. They will also create a closed-in feeling that is dark, depressing, and totally opposite to the pleasant and open view we have now.

RESPONSE TO COMMENT 5.8.3

The development of two-story homes on the Project Site is allowed under the existing zoning (HR2-PD). Pursuant to Santa Paula Municipal Code Section 16.13.120, the HR2-PD allows for the development of dwelling units to have a maximum of 2.5 stories above finished grade. The proposed homes would comply with this requirement. The Proposed Project would alter the existing southerly views and character from the commentor's residence from open space to a residential neighborhood in a manner anticipated by the General Plan.. The Commenter's concerns are noted for the record and will be forwarded to the decision makers.

COMMENT 5.8.4

Third, it is important that emergency vehicles can reach our homes with little or no difficulty. The easement road is very narrow and large vehicles already have trouble getting in and out. Turnouts or extra space by moving the wall over should be considered.

Anything that will lower my property value or my quality of life is completely unacceptable.

RESPONSE TO COMMENT 5.8.4

The Proposed Project would not change access to the private easement road to the north of the Project Site. An approximately five-foot wall would be set back approximately four feet from the property line along the north side of the property bordering the private easement road.

The Commenter's concerns about property values and quality of life are noted for the record and will be forwarded to the decision makers.

COMMENT LETTER 5.9

Amina Bancroft
March 4, 2016

COMMENT 5.9.1

I am writing to let you know I oppose the River Rock/ Hardison House development project. Most of my friends and neighbors feel the same way.

Building fifty-three (53) homes in an already traffic-congested area is a bad idea. It is my understanding that the land is zoned for only thirty (30) homes. Even that amount seems questionable. It's already dangerous accessing Ojai Rd. So many new homes will only make it worse, and the already overcrowded school district will be largely affected.

RESPONSE TO COMMENT 5.9.1

As discussed on page 77, under current zoning and land use designations, the Project Site is allowed a maximum density of 57 dwelling units. The Proposed Project proposes to develop 53 new single-family homes and retain the existing Hardison House and barn for a total of 54 dwelling units. As such, the Project Site is consistent with allowed density on-site.

As discussed in Section 16(a), the Proposed Project would result in a less than significant impact to traffic with the implementation of Mitigation Measure 16.1 (on page 124). With the incorporation of Mitigation Measure 16.1, all six study intersections would operate at LOS C or better.

The Project is located in the Santa Paula Unified School District (SPUSD). As discussed on page 94, under the Schools subheading, the Proposed Project is anticipated to generate approximately 38 new students. The Project Applicant would be required to pay applicable developer fees to the SPUSD to offset the Proposed Project's demand on local schools. Pursuant to Government Code Section 65995, development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." By State law, the Proposed Project would result in a less than significant impact to SPUSD facilities with the implementation of Mitigation Measure 14.1 (on page 94). The Commenter's concerns are noted for the record and will be forwarded to decision makers.

COMMENT 5.9.2

In addition, the noise, dust, and traffic congestion that will certainly be caused during the two-year construction phase will cause even more problems, create a nightmare on Ojai Rd, and significantly lower our quality of life both then and afterward.

RESPONSE TO COMMENT 5.9.2

Various construction impacts would be temporary for the duration of construction. The Proposed Project's construction noise impacts are discussed in Section 12(a) starting on page 85. Construction activities must comply with the City of Santa Paula's Noise Ordinance, Title IX, Chapter 93: Noise. Code section 92.23 "Sound Level Limits – Exceptions," subsection (A) "Construction activities" states:

> *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 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.*

MND Mitigation Measure 12.1 through 12.4 would further reduce the Project's temporary construction noise impacts upon adjacent properties to acceptable levels. With mitigation, construction noise impacts are less than significant.

The Ventura County Air Pollution Control District recommends that lead agencies include appropriate mitigation measures to minimize a project's construction related fugitive dust emissions. As such, the Proposed Project would implement Mitigation Measures 3.3.1 through 3.3.8 (identified on pages 29-30) to ensure that fugitive dust emissions during the construction phase would be minimized.

Lastly, the addition of construction vehicles onto the local street system would contribute to increased traffic in the Project area; although, construction-related impacts to traffic would be temporary in nature. Construction trip traffic is not expected to cause a permanent significant impact at any of the study intersections. As discussed in Section 16(f), any lane closures that may occur during construction of the Proposed Project would be temporary in nature and may cause temporary inconvenience; although, they would not be expected to substantially interfere with public transportation services, alter public transportation routes, or interfere with emergency response.

COMMENT 5.9.3

I urge you to deny Williams Homes' request for a waiver to increase density and ask that you protect the small town lifestyle of Santa Paula and its historical sites. The residents of this wonderful community deserve better. There have to be better options out there.

RESPONSE TO COMMENT 5.9.3

This comment is noted for the record and will be forwarded to the decision makers.

COMMENT 5.9.4

My family and my neighbors are opposed to anything that will lower our property values, decrease our safety, or otherwise damage our quality of life. This project threatens all three.

RESPONSE TO COMMENT 5.9.4

As discussed in Section 14, Public Services, the Project Site and surrounding neighborhood would continue to be adequately serviced by the Santa Paula Fire Department and Police Department during and after construction of the Proposed Project. Property taxes from the 54 taxable parcels that are directed to the City's General Fund may allow for enhancement to Police and Fire Departments services. The Commenter's concerns about property values and quality of life are noted for the record and will be forwarded to decision makers. The Commenter's concerns are noted for the record and will be forwarded to decision makers.

COMMENT LETTER 5.10

Mary C. Benigar
March 5, 2016

COMMENT 5.10.1

Dear Sir:

I am writing to let you know I oppose the River Rock/ Hardison House development project.

Building fifty-three (53) homes in an already traffic-congested area is a bad idea. It is my understanding that the land is zoned for only thirty (30) homes. I urge you to deny Williams Homes' request for a waiver to increase density and ask that you protect the small town lifestyle of Santa Paula. The residents of this wonderful community deserve better. There have to be better options out there.

My family and my neighbors are opposed to anything that will lower our property values, decrease our safety, or otherwise damage our quality of life.

This project threatens all three.

RESPONSE TO COMMENT 5.10.1

As discussed on page 77, under current zoning and land use designations, the Project Site is allowed a maximum density of 57 dwelling units. The Proposed Project proposes to develop 53 new single-family homes and retain the existing Hardison House and barn for a total of 54 dwelling units. As such, the Proposed Project's density is consistent with the maximum density allowed under the existing zoning designation. The Applicant is seeking a concurrent Planned Development Permit in the HR-PD Zone that permits reduced lot sizes and setbacks. Refer to the density discussion on Page 77, under the Land Use Element subtitle. This comment is noted for the record and will be forwarded to decision makers.

Property values are not an issue analyzed under CEQA. The Commenter's concerns with property values are noted for the record and will be forwarded to the decision makers.

COMMENT LETTER 5.11

Kevin Beyer
1157 Say Rd.
Santa Paula, CA 93060
March 7, 2016

COMMENT 5.11.1

Dear Members of the Planning Department,

While we are not anti-development in any way, my family and I are opposed to the River Rock / Hardison House project for a number of reasons and ask you not to approve this development.

We have been informed the property is currently zoned for a maximum of 30 homes. We also understand that the developer, Williams Homes, is asking to place 53 homes on this property. We strongly urge you not to grant the density waiver that the developer, Williams Homes, is requesting. This would be a mistake as it would serve to help the developer, not the citizens of Santa Paula.

RESPONSE TO COMMENT 5.11.1

The Project Site is consistent with the allowable General Plan density. As discussed on page 77, under current zoning and land use designations, the Project Site is allowed a maximum of 57 dwelling units. The Proposed Project proposes to develop 53 new single-family homes and retain the existing Hardison House and barn for a total of 54 dwelling units. As such, the Project is consistent with the allowed density. Please refer to Response to Comment 5.10.1, above.

COMMENT 5.11.2

Please consider the following.

- The traffic impact on SR 150 (Ojai Road) would add significantly to the existing impacted traffic at peak hours at 30 homes.
- The requested density level of 53 homes would make it much worse.
- Placing lights on SR 150 to mitigate the impact would enable traffic inflow to SR 150 from connecting streets, but the additional vehicles would greatly increase travel time to SR 126, the downtown area or anywhere south of Santa Paula Street.
- To avoid traffic, cars would travel through neighbor hoods on the east and possible west sides of SR 150 (through The Oaks neighborhood and others). As you know, additional traffic is a negative and will reduce the quality of life for members of these neighborhoods.
- It would also negatively impact safety in these quiet neighborhoods.
- The main street through The Oaks, for example, is Laurel. This is also the main route to Thelma Bedell School and is already impacted with both vehicle and pedestrian traffic during peak traffic hours.
    - Please consider the pedestrian traffic usually consists of children walking to and from school along Laurel Rd.
    - Please consider further that Laurel Rd. is a narrow street and is designed for a low quantity of low speed traffic. There are no designated lanes on Laurel Rd. as it is a meandering neighborhood lane.

- Please also consider that there is an existing traffic problem on Laurel Rd. caused by vehicles travelling at excessive speeds, running stop signs and driving in the center of the road.
- Beyond the traffic caused by the school, there are many families bicycling and walking dogs through these neighborhoods. Additional traffic, especially those 'cutting through' to avoid traffic signals, puts these citizens at greater risk.

- From a personal point of view, I expect to experience additional wait times to turn from Say Rd. onto SR 150 in the morning.
  - Along with a few neighbors, I expect not to be able to back out of my driveway in the mornings (when we take our children to school) due to cars waiting on Say Rd. at the light.
- While somewhat hard to define, additional vehicle traffic and traffic controls directly affect the 'feel' of a city and increase the negative impact.

Considering all the above, we ask that you do not grant a density waiver to Williams Homes for this project. However, we would fully support a development of fewer homes (significantly fewer than 30) on larger parcels with a lower traffic impact. Since this type of development may not be within Williams Homes capabilities, it means that they are the wrong developer for this parcel from Santa Paula's perspective.

RESPONSE TO COMMENT 5.11.2

The City defines the minimum acceptable level of service for intersections as LOS C during the AM peak hour and PM peak hour. In consultation with City staff, six study intersections were selected for analysis in the Traffic Study. These intersections, identified on page 99, were selected as the most likely to be impacted by Project traffic. As discussed in Section 16(a), all study intersections are expected to operate at LOS C or better with the implementation of Mitigation Measure 16.1. With the implementation of Mitigation Measure 16.1, the Proposed Project's impacts to traffic and circulation would be considered less than significant. Since the impacts to the six study intersections, would be less than significant with implementation of mitigations, impacts to other intersections and streets would be considered less than significant.

The Proposed Project would work with the City Public Works Department to identify and provide measures to ensure pedestrian and vehicle safety during construction. Mitigation Measure 14.2 (discussed on page 94) states:

> *14.2 The developer and contractors shall maintain ongoing contact with the administrator of Bedell Elementary School during the construction process and shall ensure safe pedestrian routes are maintained at all times. The administrative offices should be contacted a minimum of 48 hours in advance of any demolition, grading or construction activity on the project site so that students and their parents will know when such activities are to occur. The developer shall guarantee that safe and convenient pedestrian and bus routes to the school be maintained. Copies of written correspondences shall be submitted to the City Planning Department, Building and Safety Department and Public Works Department.*

The Commentor's concerns are noted for the record and will be forwarded to decision makers.

COMMENT 5.11.3

Further, and more importantly, unless it can be shown that any development will add value to Santa Paula at the net level, after all the positive and negative impacts are considered, please do not approve multi-home projects in Santa Paula. It is our belief that the negative impacts are never completely brought to light until the project has been completed. These lower the 'perceived value' of a city.

Also, most projects are approved by a group such as yours, without placing requirements on the developer to add value. A development should improve, not maintain, the economics, safety, and quality of life to the existing community.

The Santa Paula Planning Commission's approval should be reserved for projects that can be shown to add to the look, feel and ease of living in Santa Paula as well as make the city safer and more prosperous than without it.

RESPONSE TO COMMENT 5.11.3

The Project Site is zoned HR2-PD and has a land use designation of Hillside Residential. The Proposed Project is consistent with the zoning and General Plan land use designations. The Project has been designed to be visually compatible with the surrounding neighborhood and Hardison House. The Commenter's concerns are noted for the record and will be forwarded to decision makers.

COMMENT LETTER 5.12

Steven and Mary Cain
1205 Ojai Rd.
Santa Paula, CA 93060

COMMENT 5.12.1

We live on Ojai Rd directly across from the proposed development of the Hardison property. It is our opinion that the development will greatly impact our quality of life and the quality of life of all Santa Paulans. We have read the materials submitted by Williams Homes and we have the following comments.

In the Initial Study/Mitigated Negative Declaration (pg. 28) the subject of Scenic Vista is discussed. Indeed scenic vista might be something rather difficult to determine. The report determines that it is in no way a scenic vista. it (sic) describes the property as a "infill lot within a developed area of the City of Santa Paula and does provide an in-passing view of the Hardison House, former pasture that is currently a dry field, and rising hillside in the rear". Certainly given this description one would never consider it as "scenic". However this description fails to adequately describe the scenic value of the site. One principle characteristic of a scenic vista is that it is singled out as a place that people enjoy looking at. I can attest as one who lives across the street that it is the judgement (sic) of many who pass by that the barn, field, and

home are indeed a scenic vista. Hardly a day goes by without someone either in a car or on foot stopping to admire, photograph or just ponder the beauty and peace of the place that speaks of a time gone by.

RESPONSE TO COMMENT 5.12.1

The Proposed Project is visible from Ojai Road and would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods and anticipated by the General Plan. This comment is noted for the record and will be forwarded to the decision makers.

COMMENT 5.12.2

This brings up another issue with the declaration regarding the Historical Impact of the proposal. It is important to see that the home, the barn and the surrounding open space are indeed one unit. One cannot preserve one while destroying another. It is necessary to preserve the whole unit for the true historical integrity of any part. Moving the barn closer to the home and destroying the open space by allowing a crowded development would destroy the context of the historical relevance of the Proctor Hardison Home. The suggestion that the placement of a commemorative plaque would in some way undo this damage is preposterous. It is just this sort of destruction that is to be safeguarded by listing sites with the NRHP or CRHP. Please do not allow the destruction of our timeless historical treasures for the short lived benefit of increased city revenues.

RESPONSE TO COMMENT 5.12.2

Project impacts were acknowledged in the Historic Resources Report to be significant and adverse due to a reduction of the property's integrity of location, design, setting, feeling, and association.

Mitigation measures are not required or intended to undo environmental impacts, but to provide compensatory environmental benefits where project impacts cannot be feasibly avoided. In the preparer's opinion, the rehabilitation of the barn for a future use and securing the preservation of it and the W.L. Hardison House on a single parcel provides substantial environmental benefits over the baseline conditions. The preparers consider the vacant condition of the W.L. Hardison House and the disused and fragile state of the barn to be substantial, practical ongoing threats to the continued existence of these historic features. (See also, response to comment 5.5.2) The preparers also observe that the property as a whole is not currently designated as a City Landmark, and consequently enjoys no explicit protection from demolition or alteration under operation of City Code. See also Response to Comment 5.3.

COMMENT 5.12.3

Williams homes claims that the proposed lot sizes are very close (within 100 square feet) to the size of those in the surrounding neighborhoods. From their own map one can see that this is clearly not true of the contiguous properties. All the Ojai Rd properties are considerably larger. It should be noted that the yellow lines are indeed not property lines for all the properties- The first two properties on Ojai Rd that the proposed development would border have their properties cut in half by these lines in the map that

Williams homes is circulating. This seems rather deceptive on the part of Williams Homes. Of the lots bordering on Ojai Road, 8 are significantly larger. While 4 are many times larger. Our lot for example, directly across the street is more than 3 times the size of the proposed lots. The same is true about those properties that border on either side of the development. I am not sure how far away they went to get their figures, but the claim is surely misleading.

It also strikes me as misleading to build homes at a density of more than twice the permitted density. Clearly it is cheaper for the developer to cluster the homes on the easily developed level area of the property but I don't see this as good for the city. The quality of life of those residents would be significantly impaired as would that of all of the present homeowners.

RESPONSE TO COMMENT 5.12.3

The adjacent properties mostly consist of single-family homes ranging in lot sizes from 5,000 to 10,000 square feet. One adjoining residence to the north consists of an approximate 1.3-acre property. The proposed subdivision and development of the property would alter local views within the area, but the completed project are compatible with the existing character of the adjoining residentially developed properties along Ojai Road.

For the Project Site, the existing zoning is HR2-PD, which has an allowable density of 1 dwelling unit per 14,500 square feet of lot area. Accordingly, the maximum allowable density for the 19.28- acre Project Site is 57 single-family dwelling units. The Proposed Project includes 54 total dwelling units and would thus be consistent with the water demand forecast for infill development within the existing zone. The Proposed Project is seeking a Planned Development Overlay Zone to allow for lot sizes that are under 14,500 sf. This feature would further reduce anticipated water demands as the outdoor water use of the project are reduced compared to single family lots of 6,000 sf or larger that were developed in previous decades.

COMMENT 5.12.4

The report claims that traffic will be minimally impacted on Ojai Rd. For this they stated some arbitrary threshold of acceptance which they claimed was approved by the city that in their study the projected impact would not reach. It is mind boggling that one could hold this to be an adequate threshold. Anyone trying to access Bedell School knows that there are times when the traffic right now on Ojai Rd. is very heavy. There are now no cars that enter the property on a daily basis while after construction there will be nearly 100 going in and out at various times of the day and night. How could this not have a significant negative effect on the traffic?

The report grants that there will be impacts towards the 126 and that they would be contributing to the cost (with the East Area Development) of updating the structures so that they are more able to carry the increased load. Why would it not be wiser to wait and see what the actual effects of the **voter approved** East Area Development really are before jumping into this development that does not have the approval of the residents.

RESPONSE TO COMMENT 5.12.4

The Intersection Capacity Utilization (ICU) methodology was used to analyze signalized intersection operations. The Highway Capacity Manual (HCM) operational methodologies were used to analyze unsignalized intersections. Please refer to Tables 3.13 and 3.14 on page 98 for Level of Service (LOS) thresholds. These analysis methodology and significant traffic criteria assumptions are required by the City of Santa Paula. As discussed in the Section 16, Transportation / Circulation, six intersections along Ojai Road were identified (with City Public Works staff) for as the most likely to possibly be impacted by Project-generated traffic. Manual traffic counts documenting traffic volumes for existing conditions at the six study intersections were conducted during the academic school year. As discussed in Section 16(a), under existing conditions, all six study intersections operate at LOS C or better under existing conditions during both AM and PM peak hours. The Traffic Study determined that all six intersections would continue operating at a LOS C or better under future without Project condition at both peak hours, with the exception of the intersection of Ojai Road/ Orchard Street that would operate at LOS D at both peak hours. The Traffic Study determined that the six study intersections would continue operating at an LOS C or better with the addition of Project traffic during both peak hours under existing and future conditions, with the exception of the intersection of Ojai Road/Orchard Street which would operate at a LOS D during both peak hours. As such, the intersection of Ojai Road/Orchard Street is expected to be significantly impacted by cumulative traffic growth in 2018, largely – but not entirely - due to the development of the East Area 1 Specific Plan. The Project would, then, contribute to a significant cumulative impact by adding some additional traffic and reducing the LOS to D. To mitigate this cumulative impact, the Project would implement Mitigation Measure 16.1 (discussed on page 124), which includes physical improvements to Ojai Road and the Ojai Road/Orchard Street intersection. With the implementation of Mitigation Measure 16.1, the intersection of Ojai Road and Orchard Street is expected to operate at a LOS A. Section 16(a), determines that Project impacts would be less than significant following mitigation.

The East Area 1 Specific Plan is included as numbers 1 and 2 in the related projects list (refer to Table 1-1). Future traffic conditions take into account related projects traffic and a 0.5 percent annual ambient traffic growth factor. Ambient traffic refers to all traffic, in general, increasing at a modest annual amount. Results in future traffic condition forecasts are conservative (i.e. worse case scenario), because it is likely that some of the identified related projects will not be approved or constructed as described. It is also probable that some of the related projects would be delayed in their construction beyond the future (buildout) study year for the Proposed Project. As such, the Project's contribution to future traffic conditions has been conservatively analyzed. With the incorporation of Mitigation Measure 16.1, which requires the Project contribute a fair share contribution towards a new traffic signal and Ojai Rd/Orchard Rd, the Project's impacts would be considered less than significant under CEQA.

COMMENT 5.12.5

The character of the development is also of concern. The houses to be built are expected to sell for between just under 500K to 600K. These are not homes that will be accessible to many Santa Paulans. Thus the development will draw in homeowners who have no connection to the city, will very likely not work in the city, and (given the projected 2.6 persons/home that Wiliams (sic) Homes projected at the

meeting they recently held) would not even have children that could increase their interest in the good of our community.

RESPONSE TO COMMENT 5.12.5

The Commenter's concerns are noted for the record and will be forwarded to decision makers.

COMMENT 5.12.6

All in all we urge you to reconsider this proposal. Williams Homes proposes to build homes that most Santa Paulans can not afford while destroying an important part of our heritage. They are putting up houses in the way that is easiest and most affordable for themselves without consideration of the impact that it will have on the current residents. There are other uses for the property that would have a positive impact for our community. Some proposals that are circulating that would be good for our city include creating an historical farm or a community garden space. We have a very large housing complex already approved in the East Area development; one should wait to see the impact that those homes will have before adding more variables to the plan. It is important for you as our city planner to make decisions not solely on the generation of fees but rather the good of the community. Please safeguard our historical and cultural treasure that speaks so eloquently to the special farming heritage that is Santa Paula.

RESPONSE TO COMMENT 5.12.6

In this comment, the Commenter discusses their concern about the development of the Project Site and alternative uses for the Project Site. As discussed in the Draft MND, the Project would create a less than significant cumulative impact in all sections with the incorporation of the identified mitigation measures. The Commenter's concerns are noted for the record and will be forwarded to decision makers for their consideration.

COMMENT LETTER 5.13

Mary Kate Cain

COMMENT 5.13.1

This is Mary Kate Cain.

I am 9 years old and I live right across the street from the fields and barn. I am writing to tell you that the barn is beautiful from my window. It is very pretty in itself and peaceful to look out at. It would be less of a landmark if it is not left how it is. I have watched bobcats and foxes with the horses playing in the field. Where would these poor animals go?

I also think that having so many houses so close together would be an attraction to gangs.

Thank you for reading my letter.

RESPONSE TO COMMENT 5.13.1

With the mitigation measures identified in Section 1, Aesthetics and Section 4, Biological Resources, impacts relating to Aesthetics and Biological Resources would be considered less than significant. The mitigation measures for aesthetic resources (identified on page 24) will ensure that the Project would not create a significant impact to aesthetics during the construction phase and the operation phase of the Proposed Project. The Project would include barricades and enclosures to visually screen construction equipment, debris, and stockpiled equipment during the construction period. Further, all open areas not used for buildings, driveways, parking areas, or private rear and side yards shall be attractively landscaped and maintained in accordance with a landscape plan and automatic irrigation plan to ensure an aesthetically pleasing development. The mitigation measures identified for biological resources (identified on page 41) would ensure that construction and operation of the Project would have a less than significant impact to wildlife.

As discussed in Section 14, Public Services, the Proposed Project would be adequately served by the Santa Paula Police Department. Development of the Proposed Project is not expected to substantially increase Santa Paula Police demands. The Santa Paula Police Department are able to adequately service the Project without the need for additional police stations or police substations to be constructed. Please refer to page 93.

COMMENT 5.14.1

Briena Cooper
March 5, 2016

Dear Sir or Madam:

I am writing to let you know I oppose the River Rock/ Hardison House development project. Most of my friends and neighbors feel the same way.

I have several objections.

1) The proposed plan destroys a valuable part of Santa Paula history. Given that we have no lack of new housing (with the EAl development,etc), Santa Paula should preserve our historic buildings in their original settings whenever possible.

RESPONSE TO COMMENT 5.14.1

The Proposed Project would incorporate mitigation measures, which include interpretive measures and design measures to ensure that the Hardison House and barn/stable maintain their eligibility for the NRHP, CRHR, and as a City of Santa Paula Historic Landmark. The Project as designed, along with the incorporation of the identified mitigation measures (on page 53 and 54) and HOA CC&R's will ensure

future preservation of the Hardison House and Barn/Stable as a garage. Please refer to the discussion in Section 5(a).

COMMENT 5.14.2

2) My understanding is that the ranch property is currently zoned for up to 3 homes per acre...but the proposal would have 53 homes built on 9 acres. That is not only not consistent with its zoning but also clearly not consistent with the surrounding neighborhoods.

RESPONSE TO COMMENT 5.14.2

The Project Site includes a total of 19.28 acres, which allows a maximum development of 57 homes under the General Plan and zoning designations. In order to preserve the undeveloped, natural hillside (the western portion of the Project Site), the Project proposes to development 53 homes and the retention of the Hardison House on the eastern portion of the Project Site, for a total of 54 homes. The Project density is within the allowed density for the entire Project Site, which is how the law is applied. The Applicant seeks the approval of a concurrent Planned Development Permit as part of the Proposed Project. See also Response To Comment 5.12.3

COMMENT 5.14.3

3) The city of Santa Paula has a shortage of developed parks as admitted in the city's master plan. The master plan analysis identified city park space as being less than 30% of the standard recommended park space for our population. The master plan recommends 5 acres per 1,000 residents as the standard. In the analysis, they recommended requiring all new developments to make up for that lack. The proposed development does not included any dedicated park space. IF the city decides not to preserve this historic ranch, it should follow the master plan and require any development of this ranch to dedicate 3 acres as a neighborhood park.

Based on these considerations, I strenuously object to the proposed Hardison house development project. I urge you to do whatever you can to protect our history and prevent building such a dense development. If the project cannot/will not be stopped I urge you to follow the recommendation of the master plan and require this new development to dedicate 3 acres as a neighborhood park.

RESPONSE TO COMMENT 5.14.3

The proposed vesting tract map includes four open space lots totaling 425,578 square feet (9.76 acres) of HOA-owned common open space. These on-site open space areas are intended to serve the Project residents and their guests but will somewhat offset the Project's demand for neighborhood public parkland. The Project would be required to pay all applicable "Quimby" park impact fees assessed under the City's Park Fee Impact Ordinance which are intended to increase the community-level park resources. As discussed on page 95 and 96, the Proposed Project would have a less than significant impact to the City's parks and recreation facilities.

In the second paragraph of this comment, the Commenter discusses her opinions and recommendation for the Project Site. This comment is noted for the record and will be forwarded to the decision maker.

COMMENT LETTER 5.15

Rebecca Countryman
17036 April Lane
Santa Paula, CA 93060
February 16, 2016

COMMENT 5.15.1

Dear Mr. Williamson:

This letter is in regards to the W. L. Hardison home, property and the proposal by ***Williams Home Inc.*** to build 53 homes on the property surrounding it.

My initial concern is that the proposed project would involve the building of a 53-unit residential subdivision. As stated in an article in the Ventura County Star: "Our goal is to make the barn and the house viable and preserve their historical futures," project manager Carl Steinberg said. "One of the reasons we want to do 53 homes is it creates enough financial resources to help preserve the two historic structures."

Creation of a preservation or historical society by Williams Home, Inc. would allow the group to apply for local and statewide grant opportunities to offset the expenses of maintaining the home and property surrounding it. In addition, gifting of the property to the preservation or historical society would offer the investors a tax write off as well.

Therefore, the need to build 53 homes to finance this does not seem to me as a viable reason for this many homes to be built. In addition, the W. L. Hardison home and property could be a 'working ranch' where volunteers who are docents and work the farm and garden areas with flowers and vegetables could sell them in a Farmers Market type setting where monies would go to maintaining this area. The home could be used for events such as weddings, teas and other special events that would supply additional funding for the preservation of the home and property.

RESPONSE TO COMMENT 5.15.1

In this comment, the Commenter discusses the creation of a preservation or historical society for the Hardison House and provides an alternative use for the home and property as a 'working ranch.' The CEQA MND process does not include the analysis of alternative uses of the project site. The Commenter's alternative to the Proposed Project has been noted for the record and will be forwarded to decision makers.

COMMENT 5.15.2

An additional concern is the amount of traffic that will be coming onto Highway 150 from this tract that is already heavily traveled by residences and visitors to our city. A reduction in the amount of homes to be built will create less of an impact on the aforementioned road.

Thank you for your time and consideration in this matter.

RESPONSE TO COMMENT 5.15.2

The City of Santa Paula determines the significant traffic impact criteria for proposed land use projects. The City defines the minimum acceptable level of service for intersections as LOS C during the AM peak hour and PM peak hour. In consultation with City staff, six study intersections were selected for analysis in the Traffic Study. These intersections, identified on page 99, were selected as possibly being impacted by Project traffic. As discussed in Section 16(a), all six study intersections are expected to operate at LOS C or better with the implementation of Mitigation Measure 16.1. With the implementation of Mitigation Measure 16.1, the Proposed Project's impacts to traffic and circulation would be considered less than significant.

COMMENT LETTER 5.16

Jack DeJamaer
1213 Laurel Rd.
Santa Paula, CA 93060
February 6, 2016

COMMENT 5.16.1

The purpose of this email is show my concern for the high density of housing requested by the Developer for the Hardison/Procter property. The Developer is asking for a zoning change to allow 53 houses on this small property. The Oaks and adjacent areas have a unique quality that the residents of this area do not want impacted. I recommend that the city reject the zoning change and allow the Developer to only build the number or residences allowed under the current zoning regulations. Limoneira is planning an extensive housing development on the East Side of town that will provide additional housing for Santa Paula residents – we do not need another high density housing track in this area.

RESPONSE TO COMMENT 5.16.1

The Applicant is not requesting a zone change. The Project Site allows for the construction of 57 dwelling units, and the Proposed Project includes a total of 54 dwelling units. As such, the Proposed Project is within the allowable General Plan and zoning density with concurrent approval of the Planned Development Permit that allows for small lots and setbacks on the lower 10 acres so as to retain the open hillside acreage. This comment is noted for the record and will be forwarded to the decision makers.

COMMENT 5.16.2

I am sure that Santa Paula has more than met the California low income housing requirements and we do not need another high density housing track with all of the associated traffic problems on Ojai road. It is almost impossible to enter Ojai road from the various streets that the Oaks and adjacent housing tracks use to go downtown or to work – especially during school and rush hours. Putting in a bunch of street lights would assist with this issue, but would impact the large amount of traffic flowing through Highway 150, which is a major thoroughfare for Mupu, Thomas Aquinas College, Upper Ojai and the other ranches along Ojai road.

RESPONSE TO COMMENT 5.16.2

The proposed development would provide 54 homes at market rate. The Proposed Project does not include low income housing. The City of Santa Paula determines the significant traffic impact criteria for proposed land use projects. The City defines the minimum acceptable level of service for intersections as LOS C during the AM peak hour and PM peak hour. In consultation with City staff, six study intersections were selected for analysis in the Traffic Study. These intersections, identified on page 99, were selected as the most likely to possibly be impacted by Project traffic. As discussed in Section 16(a), all study intersections currently operate at LOS C or better. With the implementation of Mitigation Measure 16.1, all study intersections would continue to operate at a LOS C or better with the development of the Proposed Project.

COMMENT 5.16.3

There is also the matter of preserving the few Historic Landmarks in the Santa Paula area. Mr. Hardison was one of the first settlers in the Santa Paula area and was also one of the Limoneira founders. It would be a (sic) of great benefit to future generations to preserve this Historic Landmark.

RESPONSE TO COMMENT 5.16.3

As discussed under Section 5(a), the incorporation of the Mitigation Measures 5.1, Interpretive Measures, and 5.2, Design Measures, and HOA CC&R's would ensure that the Hardison House and barn/stable would remain eligible for the NRHP, CRHR, and as a City of Santa Paula Historic Landmark. The Project as designed, along with the incorporation of the recommended mitigation measures, will serve to insure future preservation of the eligible property. Please refer to page 53 and 54 for the proposed mitigation measures and conclusion.

COMMENT LETTER 5.17

Ellen Evanow
1214 Mariposa Drive
Santa Paula, CA 93060
March 6, 2016

COMMENT 5.17.1

Re: River Rock Hardison House Project

Dear Sir:

I live near the proposed River Rock Hardison House Project. I feel that adding 53 homes to the area would destroy what is left of the quiet and ambiance of the neighborhood.

RESPONSE TO COMMENT 5.17.1

Short-term construction activities may cause temporary noise impacts. As such, Section 12(a), Noise, would implement Mitigation Measures 12.1 through 12.4 to reduce the Project's temporary construction noise impacts to less than significant levels. Operation of the Project would generate noise that is typical of residential uses. Further, future residents of the Proposed Project would be required to comply with the Santa Paula Noise Ordinance. As such, the quiet ambiance of the neighborhood would be largely maintained after development of the Proposed Project.

COMMENT 5.17.2

Here are reasons for my objection to the proposed project:

1. It is common knowledge that the addition of 100 vehicles to the morning and evening commute along Ojai Road would be a nightmare.
2. Local residents would no doubt use ancillary streets through the Oaks to bypass Ojai Road.
3. Children walking to school as well as those playing in the Oaks would be in danger due to increased traffic.

RESPONSE TO COMMENT 5.17.2

The City of Santa Paula determines the significant traffic impact criteria for proposed land use projects. The City defines the minimum acceptable level of service for intersections as LOS C during the AM peak hour and PM peak hour. In consultation with City staff, six study intersections were selected for analysis in the Traffic Study. These intersections, identified on page 99 (and in Response to Comment 5.7.2, above), were selected as the most likely to possibly be impacted by Project traffic. As discussed in Section 16(a), the Proposed Project would result in a less than significant impact to traffic with the addition of Mitigation Measure 16.1 (on page 124). With the incorporation of Mitigation Measure 16.1, all intersections would operate at LOS C or better. Further, the Proposed Project access is subject to the review and approval by the City of Santa Paula and Caltrans.

Further, the Proposed Project would work with the City Public Works Department to take adequate measures to ensure pedestrian and vehicle safety. For example, the Proposed Project would implement Mitigation Measure 14.2 (discussed on page 94), which states:

14.2 The developer and contractors shall maintain ongoing contact with the administrator of Bedell Elementary School during the construction process and shall ensure safe pedestrian routes are maintained at all times. The administrative offices should be contacted a minimum of 48 hours in advance of any demolition, grading or construction activity on the project site so that students and their parents will know when such activities are to occur. The developer shall guarantee that safe and convenient pedestrian and bus routes to the school be maintained. Copies of written correspondences shall be submitted to the City Planning Department, Building and Safety Department and Public Works Department.

The Commenter's concerns are noted for the record and will be forwarded to decision makers.

COMMENT 5.17.3

4. The already congested schools (as described by parents of children attending these schools) would be overburdened.

RESPONSE TO COMMENT 5.17.3

The Project is located in the Santa Paula Unified School District. As discussed on 94, under the Schools subheading, the Proposed Project is anticipated to generate approximately 38 new students. The Project Applicant would be required to pay applicable developer fees to the SPUSD to offset the Proposed Project's demand upon local schools. Pursuant to Government Code Section 65995, these school impact development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." As such, the Proposed Project would result in a less than significant CEQA impact to schools facilities with the implementation of Mitigation Measure 14.1 (on page 94).

COMMENT 5.17.4

5. There would be more noise and light pollution.

RESPONSE TO COMMENT 5.17.4

The Proposed Project is expected to result in a less than significant impact to noise with the implementation of Mitigation Measures 12.1 through 12.4. Please refer to Response to Comment 5.17.1, above, for a discussion on noise impacts.

In regards to light pollution, the Proposed Project would not generate a substantial increase in ambient lighting as compared to the current conditions on surrounding properties or introduce significant new sources of lighting that are incompatible with the surrounding areas. Night lighting for the proposed subdivision would involve illuminating residential doorways, interior and exterior residential lighting. Project street light fixtures are directed towards the interior of the Project Site and away from nearby land uses. Further, a light and illumination plan would be required at the time of design review and plan check to verify the location and positioning of the proposed exterior light poles and residential lighting fixtures. As such, the Project would result in a less than significant level to light impacts. Refer to page 24.

COMMENT 5.17.5

6. The cost of the homes would be prohibitive for most local citizens.

At the Hardison presentation on March 3, 2016, many people voiced similar concerns.

I urge you to listen to the voices of the citizens living in proximity to the proposed River Rock Hardison House Project.

RESPONSE TO COMMENT 5.17.5

The Commenter's concerns are noted for the record and will be forwarded to decision makers.

COMMENT LETTER 5.18

Kathryn Gardner
March 8, 2016

COMMENT 5.18.1

Re: River Rock/ Hardison House Project

Dear Sir:

I am writing to let you know I oppose the River Rock/ Hardison House development project. Many of my friends and neighbors in Santa Paula are also opposed to this proposed development, particularly due to its negative impact on traffic on the 150 as well as the fact it will destroy an historical landmark in the area.

I am opposed to building fifty-three (53) homes in an already traffic-congested area. I have had problems accessing Ojai Road from that area and with 53 new homes, it will only make traffic problems worse as well as dangerous.

RESPONSE TO COMMENT 5.18.1

The Proposed Project is expected to result in a less than significant impact to traffic and circulation with the implementation of Mitigation Measure 16.1. Please refer to Response to Comment 5.15.2, above, for a discussion on traffic impacts.

The Proposed Project is expected to result in a less than significant impact to the Hardison House and barn/stable structures with the implementation of Mitigation Measure 5.1 and 5.2. Please refer to Response to Comment 5.16.3, above, for a discussion impacts pertaining to the Hardison House and barn/stable.

COMMENT 5.18.2

I am particularly opposed to the destruction of the Hardison House, a beloved landmark here in Santa Paula. The green space is a beautiful place and a wonderful spot that points to our roots in agriculture. Please, let us not loose (sic) our heritage just to build more homes. This will damage our quality of life here in small town Santa Paula.

I urge you to deny Williams Homes' request for a waiver to increase density and ask that you (sic)

I urge you to deny Williams Homes' request for a waiver to increase density and ask that you protect the small town lifestyle of Santa Paula.

RESPONSE TO COMMENT 5.18.2

As part of the Proposed Project, the Hardison House and relocated and renovated Barn/Stable will be maintained on site as a private residential property. As discussed in Section 5(a), with the incorporation of Mitigation Measures 5.1 (Interpretive Measures) and 5.2 (Design Measures), the Hardison House and barn/stable are expected to remain eligible for NRHP, CRHR, and as a City of Santa Paula Historic Landmark.

Further, under General Plan and zoning land use designations, a maximum of 57 homes is allowed on site. The Proposed Project includes 54 homes. As such, the Proposed Project would be consistent with the density allowed for the entire Project Site. The Applicant seeks the approval of a concurrent Planned Development Project Permit as part of the Proposed Project. This comment is noted for the record and will be forwarded to the decision makers.

The Commenter's comment is noted for the record and will be forwarded to the decision makers.

COMMENT LETTER 5.19

Clifford and Phyllis Garmon
1246 Maple St.
Santa Paula, CA 93060
February 27, 2016

COMMENT 5.19.1

RE: River Rock/Hardison House Project

Dear Sir:

I am writing to let you know that I oppose the River Rock/Hardison House development project. Most of my friends and neighbors feel the same way.

RESPONSE TO COMMENT 5.19.1

The Commenter states his/her dislike of the Proposed Project. The comment is noted for the record and will be forwarded to the decision makers.

COMMENT 5.19.2

Building fifty-three (53) homes in an already traffic-congested area is a bad idea. It is my understanding that the land is zoned for only thirty (30) homes. Even that amount seems questionable. It's already dangerous accessing Ojai Road. So many new homes will only make it worse.

RESPONSE TO COMMENT 5.19.2

Under the current General Plan and zoning land use designations on the Project Site, a maximum of 57 homes is allowed. The Proposed Project includes a total of 54 homes. As such, the Proposed Project would be consistent with the density allowed for the entire Project Site. The requested Planned Development Permit allows the 54 units to be place on the lower half of the property so that the hillside is preserved.

Pursuant to City of Santa Paula standards, the minimum acceptable level of service for intersections is LOS C during the AM peak hour and PM peak hour. As discussed in Section 16(a), the Proposed Project would result in a less than significant impact to traffic with the addition of Mitigation Measure 16.1 (on page 124). With the incorporation of Mitigation Measure 16.1, all intersections would operate at LOS C or better.

The Proposed Project will install a two-way stop control as a physical improvement to the intersection of Ojai Road (State Route-150) and the Project driveway/Royal Oaks Place. The configuration of the Project's driveway at this location is subject to the review and approval of the City of Santa Paula Public Work Department. Based on the Traffic Study, no significant Project impacts are foreseen to occur at this location under the post-project conditions.

COMMENT 5.19.3

In addition, the noise, dust, and traffic congestion that will certainly be caused during the two-year construction phase will cause even more problems, create a nightmare on Ojai Road, and significantly lower our quality of life both then and afterward.

RESPONSE TO COMMENT 5.19.3

Construction impacts would be temporary for the duration of construction. The Proposed Project's construction noise impacts are discussed in Section 12(a) starting on page 85. Construction activities would follow the City of Santa Paula's Noise Ordinance. Construction activities between 8:00 a.m. and 6:00 p.m. Monday through Friday are considered exempt from the established sound level limits set forth

in the City's Noise Ordinance. Mitigation Measure 12.1 through 12.4 would further reduce the Project's temporary construction noise impacts upon adjacent properties to CEQA-acceptable levels. With mitigation, construction noise impacts are less than significant.

The Ventura County Air Pollution Control District recommends that lead agencies include appropriate mitigation measures to minimize a project's construction related fugitive dust emissions. As such, the Proposed Project would implement Mitigation Measures 3.3.1 through 3.3.8 (identified on pages 29-30) to ensure that fugitive dust emissions during the construction phase would be minimized.

Lastly, the addition of construction vehicles onto the local street system would contribute to increased traffic in the Project area; although, construction-related impacts to traffic would be temporary in nature. Construction trip traffic would be a fraction of the operational traffic and is not expected to cause a significant impact at any of the study intersections. As discussed in Section 16(f), any lane closures that may occur during construction of the Proposed Project would be temporary in nature and may cause temporary inconvenience; although, they would not be expected to substantially interfere with public transportation services or alter public transportation routes or emergency response.

COMMENT 5.19.4

I urge you to deny Williams Homes' request for a waiver to increase density and ask that you protect the small-town lifestyle of Santa Paula. The residents of this wonderful community deserve better. There have to be better options out there.

My family and my neighbors are opposed to anything that will lower our property values, decrease our safety, or otherwise damage our quality of life. This project threatens all three.

RESPONSE TO COMMENT 5.19.4

Property values are not an issue analyzed under CEQA. The Commenter's concerns with property values are noted for the record and will be forwarded to the decision makers.

COMMENT LETTER 5.20

Ismael Guillen
1300 Ojai Rd.
Santa Paula, CA 93060

COMMENT 5.20.1

This comment letter is the same as COMMENT LETTER 5.8. Please refer to COMMENT LETTER 5.8 for comments and responses.

COMMENT LETTER 5.21

Sheryl Hamlin
February 19, 2016

COMMENT 5.21.1

Comments on Appendix C Hardison House Phase I II Historic Resources Report (S. Hamlin)

1. On page 2 of Appendix C, the following statement is made:

City of Santa Paula Historic Landmark Designation Criteria

City of Santa Paula Ordinance No. 816 adopted on November 19, 1984, provides for the designation of City Landmarks in accordance with the following standards and procedures:

A. Criteria for Designation of Landmark Nomination.

The Design Assistance Committee, shall upon such investigation as it deems necessary, make a determination as to whether a nominated or structure meets one or more of the following criteria:
(1) Historical & Cultural Significance

San Buenaventura Research Associates (Page 2 of 26)

Please include copy of minutes from these meetings and reviewof (sic) the session by appropriate agencies in the final MND for this project.

RESPONSE TO COMMENT 5.21.1

The first part of the comment is a direct quote from the Historic Report, and does not require discussion. When a determination was made by City staff that an MND would be required and it would include an expert historic evaluation that would address historic and/or cultural significance, there was no need for the DAC to address these issues separately. There are no minutes taken at internal DAC meetings, DAC meetings are not Brown Act public meetings.

COMMENT 5.21.2

2. On page 14, the following statement is made:

5. Eligibility of Historic Resources

Previous Listings or Determinations of Eligibility

The W.L. Hardison House was designated Ventura County Landmark No.35 in 1977, at a time when the historic preservation program in the City of Santa Paula was operated under a joint powers agreement with the County of Ventura. This agreement lapsed in 1984 when the city adopted its own Historic Preservation Ordinance (City Ordinance No.816). Since that time, the city has re-designated several County Landmarks located within the city as City Landmarks. It appears that the Hardison House has not been re-designated as a City Landmark, leaving its current local listing status unclear.

San Buenaventura Research Associates (Page 14 of 26)

The city is obviously violating its own Historic Preservation Ordinance (816) by not reviewing this and other buildings in a regular and timely manner. Please provide dates and minutes of all meetings of the Historic Preservation Commission and the Design Assistance Committee since 1984. If not available digitally, please provide access to copies. If none available, please provide City Attorney's opinion as to why this ordinance has been ignored particularly in light of the following conclusion on page 16 of the Historic Resource document.

RESPONSE TO COMMENT 5.21.2

The first part of the comment is a direct quote from the Historic Report, and does not require discussion.

The Commenter asks about the City's implementation of the Historic Preservation Ordinance and requests dates and meeting minutes for all Historic Preservation Commission and the Design Assistance Committee meetings since 1984. This comment is directed towards City practice and is outside the scope of the Proposed Project MND. The Project Site and Hardison House and barn/stable was sufficiently addressed and investigated in the Historic Resources Report (included as Appendix C and discussed in Section 5(a)). The Hardison House and barn/stable are eligible for the NRHP, CRHR, and as a City of Santa Paula Historic Landmark. Development of the Proposed Project would retain the Hardison House and barn/stable eligibility for historic listings. The Project would be designed and incorporate of the recommended mitigation measures. The Commenter's concerns are noted for the record and will be submitted to the decision makers.

COMMENT 5.21.3

Conclusion

This property appears to be eligible for listing on the NRHP, CRHR, and for City of Santa Paula Landmark designation. Therefore the property should be regarded as a historic resource for the purposes of CEQA. The contributing buildings for purposes of NRHP and CRHR eligibility are the Main Residence and Barn/Stables. The Garage/Residence and Second Residence also contribute towards City of Santa Paula Landmark designation.

3. Restoration of home and barn.

There is a lengthy discussion about the design and construction standards necessary to renovate/restore the home and barn. These specifications should be written into the Development Agreement as well as an appropriate monitoring schedule.

RESPONSE TO COMMENT 5.21.3

The first part of the comment is a direct quote from the Historic Report (page 16 of 26), and does not require discussion.

The Proposed Project would include the interpretive measures and design measures discussed in the Historic Report, as amended by the Ventura County Cultural Heritage Board (refer to Comment Letter 4.4). Refer to the proposed Mitigation Measures 5.1 and 5.2 on pages 53 and 54. These mitigation measures will be mandatory with approval of the Proposed Project and will be monitored by the City of Santa Paula Planning Department through the Mitigation Monitoring and Reporting Program (refer to page 176 through 178).

COMMENT 5.21.4

4. Historic Setting

While the Historic Resource document provides an invaluable and fascinating history of the owners and their contribution to the City of Santa Paula, the county and the State of California, there is no reference to the site itself.

The California Office of Historic Preservation says this...*The project in our CEQA case-study proposed to turn a historically significant citrus farm into a residential subdivision. The project included relocation of the farmhouse, removal of all trees, and demolition of the landscape features that occupy the site. The Lead Agency prepared a Mitigated Negative Declaration for the proposed but failed to identify the historic farm as a contributing resource of a larger historic vernacular landscape. When dealing with a historic landscape, the building is only one part of the larger resource. Relocating the building and demolishing all other features associated with the setting would result in a significant impact ...*

http://ohp.parks.ca.gov/paqes/1071/files/ceqa%20significant%20impacts%20cultural%20landscapes%20vi.pdf

The Historic Resource document should be amended to include a section on the site and its significance.

RESPONSE TO COMMENT 5.21.4

In the preparer's opinion, evaluating the property as a historic district would not result in any material difference in the determination of eligibility of the property, the features that contribute to its significance or eligibility, or the evaluation of project impacts. The method used in the Historic Resources Report

considers the ability of all extant features of the property to contribute to its significance and eligibility within a period of significance defined by associated historic events and individuals. The commenter speculates that some potentially contributing historic features may not have been documented or considered, but does not supply any evidence of specific features that were not documented or evaluated. In the opinion of the preparers, the California Office of Historic Preservation instructions for recording historic resources supports the approach used:

> *Small, simple groupings of resources such as … a house with an associated garage or barn are most appropriately documented together as an individual historical resource using a single Primary Record to index all of the values present and detailed recording forms, as appropriate, to present more detailed information about each component.*[16]

Consequently the preparers cannot agree that the project impacts would be greater or materially different if the property was evaluated for significance and eligibility as a historic district. The Historic Resources Report identified the entire property as eligible as well as the features that contribute to its eligibility for the NRHP and CRHR listing, and City Landmark designation. Project impacts were acknowledged in the Historic Resources Report to be significant and adverse due to a reduction of the property's integrity of location, design, setting, feeling, and association. The commenter repeats this conclusion of the report, but does not suggest any expanded conclusions that might have resulted from a district evaluation.

COMMENT 5.21.5

5. Relation of Historic Building to new tract

On page 9 of "The Oaks" written by Mitch Stone, there is a discussion of the Harrison Crumrine home, a family who owned much of the property which became the Oaks. The author says:

"The two-story Crumrine House can still be seen today, on Cadway Street, now on a small parcel ***crammed*** *into the midst of a 1950's subdivision..."*

Clearly the Hardison family and its decendents (sic) are equally significant. Why would the city want to subject this history to a fate as dismal as that of the Harrison Crumrine family? The proposed site plan must be redone to eliminate the gridding of homes and rectilinear street layout. The developer should consider using the entire property with a limited density to create a graceful turn-of-the century community or another adaptive reuse of the entire property.

RESPONSE TO COMMENT 5.21.5

Development of the Project would retain and preserve the Hardison House at its original location and relocate the barn/stable onto lot 35. As discussed in Section 1(a), the Project retains public views of the Hardison House. The Project Site is zoned HR2-PD and has a corresponding General Plan land use designation of Hillside Residential with which the Proposed Project is consistent with concurrent

[16] *Office of Historic Preservation. Instructions for Recording Historical Resources, March 1995, p. 3.*

approval of the Planned Development Permit. The Commenter's concerns are noted for the record and will be forwarded to decision makers.

COMMENT LETTER 5.22

Silvia Huerta-Wetherbee

COMMENT 5.22.1

RE: River Rock/Hardison House Project

Dear Sir:

I am writing to let you know that I oppose the River Rock/Hardison House Development project. Most of my friends and neighbors feel the same way.

Building fifty-three (53) homes in an already traffic-congested area is a **bad** idea. It is my understanding that the land is zoned for only thirty (30) homes. Even that amount seems questionable. It's already dangerous accessing Ojai Road and exiting the congested 10th Street freeway offramp. So many new homes will only make it worse.

RESPONSE TO COMMENT 5.22.1

Please refer to Response to Comments 5.19.1 and 5.19.2.

COMMENT 5.22.2

In addition, the noise, dust, and traffic congestion that will certainly be caused during the two-year construction phase will cause even more problems, create a nightmare on Ojai Road, and significantly lower our quality of life both then and afterward.

RESPONSE TO COMMENT 5.22.2

Please refer to Response to Comments 5.19.3.

COMMENT 5.22.3

I urge you to deny Williams Homes' request for a waiver to increase density and ask that you protect the small-town lifestyle of Santa Paula. The residents of this wonderful community deserve better. There have to be better options out there.

My family and my neighbors are opposed to anything that will lower our property values, decrease our safety, or otherwise damage our quality of life. This project threatens all three.

RESPONSE TO COMMENT 5.22.3

Please refer to Response to Comments 5.19.4.

COMMENT LETTER 5.23

Patricia Kennedy
March 8, 2016

COMMENT 5.23.1

Re: River Rock Development Project – Recirculated Initial Study / Mitigated Negative Declaration

Below are my concerns regarding the River Rock Development Project as outlined in the Recirculated Initial Study / Mitigated Negative Response Declaration

Aesthetics

Two story housing will block the scenic view that now exists. Relocating the barn next to the house will detract from the view of the house. The relative size of the barn and house is consistent with their current locations. Locating the barn next to the house is not.

Two story housing is not consistent with surrounding housing.

The architectural plans do not provide three distinctive architectural styles. There is one cookie cutter style with different architectural coatings.

There is no discussion of the walls around the project that the applicant proposed at the site viewing. These need to be included in the proposal, as they will impact the line of site of the surrounding residents.

RESPONSE TO COMMENT 5.23.1

The Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods. The Project retains public views of the Hardison House, the pasture area is converted to housing, and the hillside view is largely retained by the Project. The Project includes "Plan A" homes (refer to Figure 2.8) along Ojai Road that are single-story and will be visually consistent with the homes that front the east side of Ojai Road. Further, two story homes currently exist along Ojai Road to the south of the Project Site and intermittently along the east side of Ojai Street in the vicinity of the Project Site.

The Project includes three architectural plans (Plan A through Plan C). Each architectural plan includes three styles (Craftsman, Spanish, and Hardison). Refer to Figure 2.8 through Figure 2.10. Additionally, Figure 2.7 provides cross sections and line-of-sight elevations showing the proposed buildings' elevations in relation to existing buildings. This graphic also includes the location and height of the proposed walls.

A discussion of the proposed walls are also provided as part of the Cross Sectional Views discussion (refer to page 12 and page 16). The walls throughout the Project would largely contain privacy walls and perimeter walls. As shown in Figure 2.7, the walls would not significantly hinder views.

COMMENT 5.23.2

Air Quality

There is no indication of a source of reclaimed water. "Where possible" does not guarantee that any water will be reclaimed.

Those on site "should be advised to wear" respiratory protection, but surrounding neighbor's will not realistically have this protection. The construction site can not control dust during periods of high winds. The person monitoring the site is not named. There is a concern when the earth is disturbed that those in the area could be exposed to Valley Fever. There have been reported cases in the Santa Paula area.

RESPONSE TO COMMENT 5.23.2

Preference for reclaimed water is not a CEQA or City requirement. Water used during the construction period would come from a private source and would be limited to the duration of earthwork activities. If reclaimed water is not available, other sources would be identified and subject to the availability of the water purveyor.

The Ventura County Air Pollution Control District recommends that lead agencies include appropriate mitigation measures to minimize the Project's construction related fugitive dust emissions. As such, the Project would implement Mitigation Measures 3.3.1 through 3.3.8 (on page 29 and 30). Methods of controlling fugitive dust include period watering, application of environmentally-safe soil stabilization materials, environmentally-safe dust suppressants, and/or roll-compaction. Further, as discussed in Mitigation Measure 3.3.6, all clearing, grading, earth moving, and excavation operations would be curtailed to the degree necessary to prevent fugitive dust during periods of high winds. The method for controlling Valley Fever is by controlling fugitive dust emissions. With the implementation of these mitigation measures, the Proposed Project would minimize construction-related fugitive dust.

COMMENT 5.23.3

Biological Resources

One reconocence (sic) visit is insufficient to determine which wildlife species would be impacted. Different plants and animals are seen during different seasons. The statement that no mammals were seen proves this. There is documentation of mammals on the property, including the pasture, reptiles have been seen there, and there is clear evidence, as well as documentation, of nesting owls (in the barn, which is to be moved and repurposed, with some parts removed). In addition, the visit was made during a drought. Recent rains are revealing vegetation and wildlife that were potentially not visible during the visit.

There is no guarantee that residents would respect the native species - plant or animal - by limiting use of the hillside to the projected trail.

The proposed development area will abut those areas where wildlife is found. The density of buildings in the project will affect wildlife residing on the adjoining hillside by limiting habitat and increasing human traffic, lighting, and noise. The effects of this cannot be measured in advance.

RESPONSE TO COMMENT 5.23.3

Wildscape Restoration conducted the biological survey and analysis for the Project Site. Wildscape provided their findings and conclusions in the Biological Constraints Report titled "Williams Homes Santa Paula River Rock Project Biological Constraints and Jurisdictional Delineation Report" dated December 2014. The Biological Constraints Report is provided in Appendix B to this Recirculated Draft MND and is discussed in Section 4, Biological Resources. The Biological Constraints Report has adequately addressed the concerns presented in this comment. The Biological Constraints Report discusses the Project Site's vegetation communities and potential impacts and lists the plants observed on-site (refer to Table 3.2 and Table 3.3, respectively).

During Wildscape's site reconnaissance, only bird species were observed, including turkey vulture, scrub jay, and acorn woodpecker. Wildscape also found evidence of barn owns. Although not seen during the site reconnaissance, Wildscape notes that common wildlife that may occur on-site include: two-striped garter snake, south coast garter snake, the coast horned lizard, coyote, bobcat, and mule deer.

As discussed on page 38, the Biological Constrains Report finds that three special status plant species "May Occur" within the project area, even though they were not detected during field surveys. No species are protected by federal and/or state Endangered Species Act. As discussed on page 39 and 40, five special status animal species "May Occur" within the Project area but were not observed during field surveys. One species is a federal threatened and state species of concern (the coastal California gnatcatcher). One species, the white-tailed kite, is fully protected by the state. The remaining three species are designated for state species of special concern (the coast horned lizard, burrowing owl, and American badger). Raptors that are likely to nest in the area include Cooper's hawks, red-shouldered hawks, American kestrels, and great horned owls.

The Proposed Project would be required to comply with the Migratory Bird Treaty Act that protects migratory birds, their nests, and eggs. Additionally, the Project would be required to comply with applicable provisions of the California Fish and Game Code. Although the site reconnaissance did not reveal all species mentioned above, the Biological Constraints Report and the Section 4, Biological Resources, discusses potential animals and plants that may use or inhabit the Project Site. The Biological Constraints Report and the Section 4, Biological Resources, provide mitigation measures (page 41) to ensure that potential Proposed Project impacts would be minimized or avoided for all that species that occur or may occur on-site.

The Project Site includes a developed eastern portion and an undeveloped western portion totaling 19.28 acres, which allows a development density of 57 homes throughout the entire Project Site. However, in an

effort to preserve the undeveloped, natural western portion of the Project Site, the Proposed Project would concentration development on the eastern side of the Proposed Project. As discussed on page 40, the Project would result in the incremental loss of 0.21 acres of coastal sage scrub habitat and 0.26 acres of coast live oak woodland. In consideration of the fact that the Proposed Project would provide 9.56 contiguous acres of passive open space in perpetuity on the undeveloped hillside on the western portion of the Project Site, the incremental loss would be considered less than significant. Further, the direct loss of ornamental landscape, ruderal pasture, and Peruvian peppertrees are less than significant.

The Homeowners Association (HOA) would own and manage and monitor the proposed trail and its use.

As discussed in Response to Comment 5.16.2, the Proposed Project would result in a less than significant impact with respect to transportation and circulation with the implementation of Mitigation Measure 16.1. Lighting and noise generated by the Proposed Project would be directed towards the developed portion of the Project Site. The Project would generate traffic, lighting, and noise that would be consistent with existing sources of traffic, lighting, and noise. Please refer to Response to Comment 5.17.4 for further discussion on lighting and noise.

The Commenter's concerns pertaining to biological resources are noted for the record and will be forwarded to decision makers.

COMMENT 5.23.4

Cultural Resources
Interpretive Measures
An historic preservation professional should be consulting on this project before any decisions are made about the existing buildings or vegetation as well as the impact of the project on all aspects of historical significance, including the relocation or demolition of buildings. A part of the historical significance of the site is the relative location of the existing buildings. The existing foundation and drainage system for the barn is a part of its historical significance, and cannot be duplicated.

The landscape report and plan needs to be completed and considered before the plan is approved, not after.

The plan for educating workers on the project needs to be submitted before the project is approved.

RESPONSE TO COMMENT 5.23.4

San Buenaventura Research Associates were the professional historic consultants hired for the Proposed Project. San Buenaventura Research Associates prepared the Historic Report for the Proposed Project, titled: *Hardison House Phase I/II Historic Resource Report, Wallace Libbey Hardison Residence 1226 Ojai Road (Tentative Tract Map 5928)*. The Historic Report is included as Appendix C to this Recirculated Draft MND and is summarized in Section 5, Cultural Resources.

The Proposed Project will implement a landscape plan and an automatic irrigation plan. Pursuant to Mitigation Measure 3.1.2, all open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the Planning Director. Pursuant to the Mitigation Monitoring and Reporting Program (MMRP), this mitigation measure will be reviewed and approved during the pre-construction/site plan review phase by the Planning Department. Please refer to page 173.

COMMENT 5.23.5

If the house and property are to be sold to private parties, but controlled by a HOA, there is little reason to think that a buyer will be found. If no buyer is found, that puts financial the responsibility for the maintenance of the buildings on the other homeowners. That needs to be clearly explained in the project plan before approval.

RESPONSE TO COMMENT 5.23.5

The Applicant is the owner of the Hardison House and barn/stable. The Applicant is responsible for the maintenance and upkeep of the Hardison House and barn/stable pursuant to the Secretary of the Interior Standards. Sale of the Hardison House and barn/stable will include a covenant and restrictions that will ensure that future owners maintain the property in accordance to the Secretary of the Interior Standards.

COMMENT 5.23.6

Palentological (sic) resources do exist on the property in the form of fossilized mollusks. This would indicate that other fossil evidence of past life also exists.

RESPONSE TO COMMENT 5.23.6

As discussed in Section 5(c), the Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources. Since the presence or absence of paleontological resources cannot be determined until the site is excavated, regulatory compliance and compliance with Mitigation Measure 5.4 (refer to page 55) will ensure that if paleontological resources are encountered such materials will be properly handled.

COMMENT 5.23.7

Land Use and Planning

The project does not comply with 7 of the development standards for HR 2 - PD zones and is not consistent with adjoining and nearby development. No Planned Develop Permits should be allowed. It is entirely possible for the applicant to propose a plan that meets the standards. The developer had access to these standards before beginning plans for the site.

RESPONSE TO COMMENT 5.23.7

The Proposed Project would be consistent with the Santa Paula General Plan and zoning with concurrent approval of the requested Planned Development Permit. The comment is noted and will be forwarded to the decision makers.

COMMENT 5.23.8

Parking, including street parking, for this development is insufficient.

RESPONSE TO COMMENT 5.23.8

Each proposed home would include two-car garage with a 20-foot driveway. Visitors and households with multiple vehicles would be able to park on the driveway or on the four Project streets within the residential subdivision, as is typical of residential subdivisions. Parking for the Proposed Project would be subject to the parking regulations for the City of Santa Paula (outlined in the Santa Paula Municipal Code). As such, parking would be sufficient for the Proposed Project.

COMMENT 5.23.9

Transportation/ Circulation

The project will have a major impact on traffic during the construction phase. Traffic on Ojai Road is already an issue, especially during peak hours. There is no proposal to mitigate this issue.

RESPONSE TO COMMENT 5.23.9

The addition of construction vehicles onto the local street system would contribute to increased traffic in the Project area; although, construction-related impacts to traffic would be temporary in nature. Construction trip traffic is not expected to cause a permanent significant impact. As discussed in Section 16(f), any lane closures that may occur during construction of the Proposed Project would be temporary in nature and may cause temporary inconvenience; although, they would not be expected to substantially interfere with public transportation services or alter public transportation routes or emergency response.

COMMENT 5.23.10

Utilities and Service Systems

The projected availability and use of water does not take into consideration the drought conditions in the state and the fact that future water use restrictions may be put into place. The use of water during the construction period, required to mitigate construction issues, is not addressed sufficiently.

RESPONSE TO COMMENT 5.23.10

The Urban Water Management Plan (2010 Update) specifically addresses multi-dry year conditions. With this in consideration, the City of Santa Paula Public Works Department determined that it can serve the General Plan building of the City, including the planned density of the Project Site, and is requesting the Project provide 21.2 AFY of water rights to the City. Section 17(d) (starting on page 130) analyzes water supplies available to serve the Project. Moreover, the Proposed Project's design and water conservation features (such as high-efficiency toilets and Energy Star appliances) will further reduce the Project's anticipated water demand. As a conservative estimate, the Proposed Project would have a water demand of approximately 21.2AF/year (MND, page 133). As discussed in Section 17(d), the City of Santa Paula's water supply is derived from pumping rights from the Santa Paula Basin and the Santa Paula Creek Surface Water Exchange for Additional Groundwater Pumping Rights. The City's total existing water allocation from these two sources is 5,912 AF/year. The water demand for the Proposed Project is included within the future projections of the City's Water System Master Plan.

COMMENT 5.23.11

Mandatory Findings of Significance

This project will impact resources of historical significance. A part of the historical significance of this property is the relative placement of buildings. The barn, it's placement relative to the house, and the surrounding features, including the foundation and drainage system, as well as the additional two structures are a part of what makes this property historically significant. In addition, moving the barn will both change the structure and its intended use. This plan directly impacts this important example of a period of California history, and specifically local history.

The impacts on existing plant and animal wildlife, including migratory birds cannot be estimated or mitigated. There will be an impact. There needs to be an EIR for this project.

The proposed project's cumulative impact IS significant.

RESPONSE TO COMMENT 5.23.11

The issues discussed in this comment were addressed in Section 5, Cultural Resources. The Recirculated Draft MND evaluates the Project's impacts on cultural resources and determined that the Project would result in a less than significant impact to cultural resources with the implementation of the proposed mitigation measures. Refer to page 44.

Existing plants and wildlife, including migratory birds, are addressed in Section 4(a) under Biological Resources. Biological Consultants, Wildscape Restoration, conducted a biological study and site reconnaissance for the Proposed Project Site. Wildscape Restoration determined that the removal of 0.21 acres of coastal sage scrub habitat and 0.26 acres of coast live oak woodland would be less than significant because the Proposed Project would maintain 9.56 contiguous acres of passive open space on the undeveloped hillside on the western portion of the Project Site. The Project would coordinate with the

California Department of Fish and Wildlife and/or the U.S. Fish and Wildlife Service and comply with applicable provisions of the Migratory Bird Treaty Act and the California Fish and Game Code. Further, the implementation of Mitigation Measures 4.1 through 4.8 (on page 41) would reduce impacts to biological resources to a less than significant impact.

As discussed under the "Cumulative Impacts" subheading at the end of each section and in Section 18, Mandatory Findings of Significance, the Proposed Project would result in a less than significant impact to cumulative impacts with the incorporation of identified mitigation measures. The Commenter does not introduce any substantial evidence into the record to render the existing analysis within the Recirculated MND as inadequate.

COMMENT 5.23.12

This project is described as being an HOA controlled development. The breakdown of responsibilities between the city and the HOA needs to be a part of the plan.

Thank you for your consideration of my comments.

RESPONSE TO COMMENT 5.23.12

As discussed in the Recirculated Draft MND, the Homeowner Association (HOA) would be responsible for establishing CC&R's and Rules and Regulations for the future homeowners. The HOA would own and maintain the trail and access easement to access the top of the slope. The Applicant proposes three HOA common-area open space lots that will serve as open space for use by residents and their guests that will be maintained by the HOA in accordance with an approved landscape plan and an automatic irrigation plan. The HOA will maintain the proposed drainage easements and fencing on-site. The City would be responsible for public infrastructure, services, and utilities and the two public streets.

COMMENT LETTER 5.24

George Ketterman
1155 Royal Oaks Place
Santa Paula, CA 93060
March 4, 2016

COMMENT 5.24.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.25

Patricia Ketterman
615 N. Ojai Rd.

Santa Paula, CA 93060

COMMENT 5.25.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.26

Harald Marschall
1216 Birch Street
Santa Paula, CA 93060

COMMENT 5.26.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.27

William L. Martin
1343 Magnolia Dr.
Santa Paula CA 93060
February 26, 2016

COMMENT 5.27.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.28

Eugene E. Marzec
1347 Magnolia Dr.
Santa Paula, CA 93060
February 23, 2016

COMMENT 5.28.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.29

Amber Mickelson (Change.org Petition)
February 10, 2016
February 26, 2016

COMMENT 5.29.1

Hi there,

I have a question in regards to the Ranch. I see somethings (sic) have been added to the MND report from the last. It says in the beginning that whoever purchases the property will have to maintain it. My question is Wiliams (sic) Homes are tge (sic) owners currently and shouldn't they also be maintaining it. At least according to the local historic ordinance.

RESPONSE TO COMMENT 5.29.1

The Applicant shall retain and rehabilitate the Hardison House and retain, relocate, and rehabilitate the barn/stable in accordance with the Secretary of the Interior Standards as discussed in Section 5(a).

COMMENT 5.29.2

(change.org)
Letter to the city

amber mickelson
Santa Paula, CA

Feb 26, 2016 - The purpose of this petition is to show that preserving Santa Paula's history, farmland heritage, and its cultural resources are valued by our citizens. The W.L. Hardison Home, Landmark #35, is closely associated with a significant historical event; the settlement of Santa Paula Canyon. Wallace Hardison was one of the first settlers to purchase land in Santa Paula Canyon during the 1880s. Hardison was also one of the founders of Limoneira Company. The house and out buildings are one of only a handful of ranches in the canyon from this period that remain today. The surrounding landscape features are associated with a farm setting and its cultural resources associated with the citrus industry will be lost forever. This is not the right plan for this Project. As citizens we demand a better plan for this site. As a community we are asking that you protect this historical landmark and preserve the W.L. Hardison Ranch.

RESPONSE TO COMMENT 5.29.2

This comment is associated with a change.org petition that was submitted into the record. In this comment, the Commenter discusses the history of the Project Site and asks the City to preserve the

Project Site. The comment is noted for the record and will be submitted to decision makers. The petition will be included in the record and forwarded to the decision makers.

COMMENT 5.29.3

The W.L. Hardison Home should remain and could be furnished as a homestead with period pieces. Historical tours could be given by docents dressed in historical costumes. Visitors could patron every weekend and school kids could visit on field trips.

As a working farm, fresh fruits and vegetables could be picked as a tourist attraction; similar to Underwood Farms. Both our local 4H and FFA could work the farm, providing hands on agricultural learning experiences. Annual pumpkin patches could be held, it could be rented for movies, and used for weddings, parties and special events; similar to Camarillo Ranch. It would be a fabulous tourist attraction for our community.

Open rural areas and farmland are what make this region so unique and appealing for locals and tourists alike. This is why tourism is a large piece of our local economy.

[Change.org petition included in attached letter]

RESPONSE TO COMMENT 5.29.3

In this comment, the Commenter discusses an alternative use of the Project Site and the Hardison House. The purpose of the MND process under CEQA is to evaluate and disclose the environmental impacts of just the proposed project. The comment is noted for the record and will be forwarded to the decision makers.

COMMENT LETTER 5.30

Michael W. Mobley
673 Westfield Court
Ventura, CA 93004
February 17, 2016

COMMENT 5.30.1

RE: Proposed IS/MND - River Rock / Hardison House Project

Dear Mr. Williamson:

I strongly object to this project due to the fact that it does not follow the City of Santa Paula's current General Plan and the Circulation Element which describes the Fagan Canyon Future Expansion Area and the future access roads needed to connect Ojai Road (SR150) to Fagan Canyon. Specifically, the River

Rock project as currently proposed, would prevent the construction of a future access road that would be needed when Fagan Canyon is developed sometime in the future.

The Circulation Element clearly states the need for access roads to connect Fagan Canyon with Ojai Road and it is also shown on all the maps showing the City's Expansion Areas.

A very logical location for an access road to Fagan Canyon would be through the River Rock Project and over the hill on the parcel to the north due to a much lower elevation and gentler slope.

RESPONSE TO COMMENT 5.30.1

While the General Plan Circulation Element lists a connection between Ojai Road (SR 150) and Fagan Canyon as a circulation system improvement / new access connection, access through the Proposed Project is not discussed in the Circulation Element. The Circulation Element states:

> *Fagan Canyon. Access to this area would be provided by several connections to existing streets, which taken collectively, would provide access to the various development areas within the canyon. Anticipated connections include Ridge Crest Drive, Lassen Drive, Shasta Drive, Atmore Drive, Cemetery Road, Glade Drive, and 10th Street. Additional access may also be provided by a connection to SR 150 in the Hillside Drive area. (Circulation Element, page CI-28)*

Development of the Proposed Project would not prevent future through access to Fagan Canyon through any of the existing connections suggested in the Circulation Element. The driveway easement to the north of the Project Site that currently provides off-road access to the Fagan Canyon area is not within the Project Site boundaries and is not controlled by the Applicant. The easement road and the access would remain with the development of the Proposed Project. As such, the development of the Proposed Project would not interfere with this identified intersection improvement (refer to Table CI-7 on page CI-26 of the Circulation Element).

COMMENT LETTER 5.31

Shannon Nelson
Forest Dr., Santa Paula
February 7, 2016

COMMENT 5.31.1

I cannot impress upon you too much how awful it would be if you permit that developer to build 53 homes on that gorgeous property. I understand about private property rights, so i (sic) will not say anything about the number already permitted by zoning, but increasing that to 53 is way too many!.

RESPONSE TO COMMENT 5.31.1

The Project Site is zoned HR2-PD. Under the General Plan and current zoning, the Project Site is allowed a maximum density of 57 houses. The Proposed Project includes a total of 54 houses, which is within the allowed density for the Project Site.

COMMENT 5.31.2

Im (sic) sure you are aware of the horrendous gridlock that already exists on Ojai Rd at peak traffic times. This development would make that problem much worse. A traffic light might help, i (sic) suppose, but adds to loss of rural atmosphere and small town feel of our community.

RESPONSE TO COMMENT 5.31.2

Please refer to Response to Comment 5.7.2.

COMMENT 5.31.3

Beyond the traffic problem is the fact that Santa Paula really needs to increase its attractiveness to tourists. I grew up in Ojai and watched over the years as that town made planning decisions that resulted in it becoming one of the most popular tourist attractions in Ventura County. Some of those decisions were to: not allow development to completely destroy agriculture, avoiding a sea of tract home developments, preserving open space, not allowing chain stores to dominate, preserving historical buildings and locations, and following the advice of creative architectural review boards and planning commissions regarding the look and types of development allowed in the community.

Im (sic) not saying we should be exactly like Ojai—theyve (sic) gone way overboard with the tourist thing--but i (sic) believe Santa Paula can take a lesson from these steps and improve the look and attraction of the city and not make decisions based solely on perceived tax incentives. Lets work on preserving the beauty of what we have and building on that by making sensible land use decisions. 53 homes on the Procter property is NOT one of those decisions!

RESPONSE TO COMMENT 5.31.3

The Commenter discusses tourism in Santa Paula and states her opposition to the Proposed Project. This comment is noted for the record and will be forwarded to decision makers.

COMMENT LETTER 5.32

Elsbeth Nowak
1302 Ojai Road
Santa Paula, CA 93060
February 19, 2016

COMMENT 5.32.1

Project: River Rock/Hardison House (#2014-CDP-02; VTTM #5928; IS/MND dated 8 Feb 2016)

Dear Mr. Williamson:

I am very much opposed to the current version of the proposed project above. Allow me to list some of my concerns:

1. My husband and I built our home adjacent to the Proctor/Hardison property over 22 years ago. We selected our location based on its position and view. Much of our home's value is based on its outlook. I will not allow my view to be unduly ruined or my property value to suffer. This project, as is, threatens both.

RESPONSE TO COMMENT 5.32.1

The Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods.

Property values are not an issue analyzed under CEQA. The Commenter's concerns with property values are noted for the record and will be forwarded to the decision makers.

COMMENT 5.32.2

2. Fifty-three (53) homes are far too many to add to such a small area already subject to very high traffic. This excessive additional traffic will only make a bad thing worse and make accessing Ojai Road a much more dangerous situation.

RESPONSE TO COMMENT 5.32.2

Please refer to Response to Comment 5.19.2.

COMMENT 5.32.3

3. Thirteen (13) lots with mostly <u>two-story homes along our easement road is completely unacceptable.</u> It will completely block my view and that of my neighbors. It will also create a deep, closed-in "canyon effect" along the entire easement road that is both ugly and depressing. Our property values and lifestyles will be much the worse for it. <u>Under no circumstances should two-storey houses be allowed on lots 1 through 12.</u>

RESPONSE TO COMMENT 5.32.3

The development of two-story homes on the Project Site is allowed under the existing zoning (HR2-PD). Pursuant to Santa Paula Municipal Code Section 16.13.120, the HR2-PD allows for the development of

dwelling units with a maximum of 2.5 stories above finished grade. The proposed homes would comply with this requirement. Further, the Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods. The Commenter's concerns are noted for the record and will be forwarded to the decision makers.

COMMENT 5.32.4

4. Section C-C of Figure 2.7 (pg. 21) shows a cross-section at lot 12 which happens to be one of the highest lots. I need to see an accurate cross-section at the lot(s) closest to my house where the "cut" will no doubt be much shallower. I'm sure my neighbors would like the same for themselves.

RESPONSE TO COMMENT 5.32.4

The Draft MND is presented with enough information about the Proposed Project and Project Site. The cross sections presented in Figure 2.7 are representative of the Project plans. It is neither required nor feasible to provide specific cross sections upon request.

COMMENT 5.32.5

5. Our existing easement road is very narrow. Emergency vehicles already have a very difficult time accessing our homes (there are no defined areas to turn a round). The existing shabby chain link fence can be bumped up against when an emergency vehicle needs to maneuver with little consequence. A masonry wall is a vast improvement but a different matter. Since it is a permanent barrier it should be placed further inside the development's boundary so that emergency vehicles can maneuver without unnecessary difficulty.

RESPONSE TO COMMENT 5.32.5

The existing chain link fence demarcates the perimeter of the Project Site. An approximately five-foot wall would be set back approximately four feet from the property line along the north side of the property bordering the private easement road. A shallow lined drainage channel would run the length of the property between the new wall and the existing easement driveway. The existing chain link fence may need to be reconstructed and/or repaired to prevent vehicles from accidently driving into the drainage channel. The Applicant is required to repair or replace the existing easement drive fencing if the existing fence needs to be temporarily moved to construct the drainage channel. The Applicant will need to contact the fence owner and make separate arrangements regarding the existing and final fence along the easement driveway. The Proposed Project would not affect emergency vehicle access along the easement road.

COMMENT 5.32.6

6. The CC&R's of the proposed development's HOA must keep members from erecting or otherwise installing nuisance/eyesore structures or lighting in their backyards and from allowing trees or shrubbery to block the views of adjacent homes outside the development.

I appreciate your assistance in seeing that these issues are addressed and remedied and that the health, safety, quality of life, and property values of your fellow neighbors are protected.

RESPONSE TO COMMENT 5.32.6

As discussed in the Recirculated Draft MND (page 24), lighting for the proposed subdivision would involve illuminating residential roadways and interior and exterior residential lighting. Project lighting would be directed towards the interior of the Project site and away from nearby land uses. A lighting and illumination plan will be required at the time of the design review and plan check process.

As discussed in Mitigation Measure 3.1.2, HOA-owned common are lots and open areas not used for buildings, driveways, parking areas, or private rear and side yards shall be attractively landscaped and maintained by the homeowners association with accordance a landscape plan and an automatic irrigation plan prepared by a licensed Landscape Architect. The Commenter's concerns are noted for the record and will be submitted to the decision makers.

COMMENT LETTER 5.33

Esidro I. Prado
1203 Birch St.
Santa Paula, CA 93060
February 23, 2016

COMMENT 5.33.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.34

Steve Ramser
819 Ojai Road
Santa Paula, CA 93060
March 5, 2016

COMMENT 5.34.1

To Whom it May Concern,

I am writing to let you know I oppose the Hardison Home development project. Building 53 homes in an already traffic-congested area, is a bad idea; even 30 homes would be too many. It is already dangerous accessing Ojai Road; and building an entire neighborhood will only make it worse. The effect of construction on Ojai road traffic will be unbearable.

RESPONSE TO COMMENT 5.34.1

Please refer to Response to Comment 5.19.2.

Also, the temporary addition of construction vehicles onto the local street system would contribute to temporarily increased traffic in the Project area. Construction trip traffic is not expected to cause a significant impact at any of the study intersections. As discussed in Section 16(f), any lane closures that may occur during construction of the Proposed Project would be temporary in nature and may cause temporary inconvenience; although, they would not be expected to significantly interfere with public transportation services or alter public transportation routes or emergency access.

COMMENT 5.34.2

Preserving Santa Paula's history, farmland heritage, and cultural resources are valued by our citizens. The W.L. Hardison Home, Landmark #35, is closely associated with a significant historical event; the settlement of Santa Paula Canyon.

Wallace Hardison was one of the first settlers to purchase land in the 1880's. He was one of the founders of Limoneira Company. The property is one of only a handful of ranches in the canyon from this period that remain today. If only the home remains, the surrounding landscape features and cultural resources connected with framing (sic) and the citrus industry will be lost forever.

Developing the ranch for track homes is not the right plan for this property. As citizens we demand a better plan for this site. As a community we are asking that you protect this already deemed, Santa Paula historical landmark and fully preserve the W.L. Hardison Ranch.

RESPONSE TO COMMENT 5.34.2

The Draft MND evaluates the Project's impacts to cultural resources and determined that the development of the Project would result in a less than significant impact with the incorporated mitigation measures identified in Section 5, Cultural Resources. The Project's Historic Resources Report is contained in Appendix C.

COMMENT 5.34.3

The Hardison Home could be furnished as a homestead. Historical tours and field trips could be given by docents dressed in historical costumes. As a working farm, fruits and vegetables could be picked as a tourist attraction; similar to Underwood Farms. Both our local 4H and FFA would benefit from hands-on agricultural experiences. It could hold annual pumpkin patches, be rented for movies, and used for weddings, parties and special events; similar to Camarillo Ranch. It would be a fabulous tourist attraction for our community.

Open rural areas and farmland are what make Santa Paula unique and appealing for locals and tourists alike. This is why tourism is a large part of our local economy.
My family, neighbors, and I plead, that you to deny the Williams' Home request for a waiver to increase density and ask that you protect the small town lifestyle and historical significance of Santa Paula.

RESPONSE TO COMMENT 5.34.3

The Commenter discusses an alternative use of the Project Site and the Hardison House. The purpose of the CEQA MND is to evaluate and disclose the environmental impacts of a proposed project. The comment is noted for the record and will be forwarded to the decision makers.

COMMENT LETTER 5.35

Debra Renick
14397 Ojai Rd.
Santa Paula, CA 93060
February 11, 2016

COMMENT 5.35.1

What a terrible plan. We do not need 53 homes and a bunch of streets feeding onto Ojai Rd. The historic character of the house and barn in situ should be retained, with at most a few homes in a similar style on one feeder street, not 53 two story boxes.

RESPONSE TO COMMENT 5.35.1

The Project includes the redevelopment of the Project Site to provide a new residential subdivision with approximately 54 residential lots including 53 new single-family homes and the retention of the existing Hardison House and barn/stable on proposed parcel 35. The Project would provide one access point off the west side of Ojai Road at Royal Oaks Place. The Project density is consistent with the allowable General Plan and zoning density with concurrent approval of a Planned Development Permit. The current zoning on-site would allow a maximum house density of 57 homes, and the Project proposes a total of 54 dwelling units. As discussed in Section 5(a), the Project would be designed and incorporate mitigation measures (5.1 and 5.2) such that parcel 35 would maintain its eligibility for the NRHP, CRHR, and as a

City of Santa Paula Historic Landmark. The comment is noted for the record and will be forwarded to decision makers.

COMMENT LETTER 5.36

Janet W. Shephard
500 W. Santa Maria Street
Santa Paula, CA 93060
March 11, 2016

COMMENT 5.36.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.37

Harold and Beverly Shoemate
1351 Magnolia Drive
Santa Paula, CA 93060
February 23, 2016

COMMENT 5.37.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.38

Heather and Patrick Silva
322 Bradley Street
Santa Paula, CA 93060
March 6, 2016

COMMENT 5.38.1

We are writing to let you know we oppose the Hardison Home development project. Building 53 homes in an already traffic-congested area, is a bad idea; even 30 homes would be too many. It is already dangerous accessing Ojai Road; and building an entire neighborhood will only make it worse.

RESPONSE TO COMMENT 5.38.1

As discussed in Section 16(a), the Proposed Project would result in a less than significant impact to traffic with the addition of Mitigation Measure 16.1 (on page 124). With the incorporation of Mitigation Measure 16.1, all six study intersections would operate at LOS C or better.

COMMENT 5.38.2

Preserving Santa Paula's history, farmland heritage, and cultural resources are valued by our citizens. The W.L. Hardison Home, Landmark #35, is closely associated with a significant historical event; the settlement of Santa Paula Canyon.

Wallace Hardison was one of the first settlers to purchase land in the 1880's. He was one of the founders of Limoneira Company. The property is one of only a handful of ranches in the canyon from this period that remain today. If only the home remains, the surrounding landscape features and cultural resources connected with framing (sic) and the citrus industry will be lost forever.

Developing the ranch for track homes is not the right plan for this property. As citizens we demand a better plan for this site. As a community we are asking that you protect this already deemed, Santa Paula historical landmark and fully preserve the W.L. Hardison Ranch.

RESPONSE TO COMMENT 5.38.2

Please refer to Response to Comment 5.34.2, above.

COMMENT 5.38.3

The Hardison Home could be furnished as a homestead. Historical tours and field trips could be given by docents dressed in historical costumes. As a working farm, fruits and vegetables could be picked as a tourist attraction; similar to Underwood Farms. Both our local 4H and FFA would benefit from hands-on agricultural experiences. It could hold annual pumpkin patches, be rented for movies, and used for weddings, parties and special events; similar to Camarillo Ranch. It would be a fabulous tourist attraction for our community.

Open rural areas and farmland are what make Santa Paula unique and appealing for locals and tourists alike. This is why tourism is a large part of our local economy.

My family and neighbors pled that you to deny the Williams' Home request for a waiver to increase density and ask that you protect the small town lifestyle and historical significance of Santa Paula.

RESPONSE TO COMMENT 5.38.3

The Commenter discusses an alternative use of the Project Site and the Hardison House. The purpose of the CEQA MND is to evaluate and disclose the environmental impacts of a proposed project. The comment is noted for the record and will be forwarded to the decision makers.

COMMENT LETTER 5.39

John Stone (Resident Petition)
1006 Fuchsia Lane
Santa Paula, CA 93060
March 3, 2016

COMMENT 5.39.1

We are writing this letter on behalf of the residents located on Fuchsia Lane and Marigold Lane in the City of Santa Paula. This letter is in regards to the proposed River Rock/ Hardison House Tract development and the access road tie into Fuchsia Lane. We the residents at this location are strictly opposed to having our cul-de-sac street opened for access to this proposed development. If access through our neighborhood is granted the following potential problems will arise:

1) Compromised neighborhood safety

There are many children who live in the neighborhood as well as children attending a licensed day care. These children utilize the areas (sidewalks, front yards, etc.) in and around the street for travel, play, and other various activities. A substantial increase in traffic flow will significantly put these children at greater risk for an accident and/or injury to occur. In addition the increased traffic will increase the likelihood of a vehicle collision occurring as there are several "blind spots" located throughout the neighborhood.

RESPONSE TO COMMENT 5.39.1

Primary vehicular access to the Proposed Project will be provided by way of a full-access residential roadway that will intersect with the west side of Ojai Road (State Route 150) opposite Royal Oaks Place. As noted on the Vesting Tract Map, the internal streets would provide access and circulation through the tract on four proposed residential streets: Royal Oaks Place, Redbud Street (Fuschia Lane), Rosewood Street, and Dogwood Street.

Secondary access will be provided via an internal connection between the Project and the residential subdivision located immediately to the south. As shown on Figure 2.6, Proposed Site Plan, Redbud Street will be linked to the existing Fuchsia Lane, which presently terminates in a cul-de-sac. This internal connection will provide secondary access for both the Project and the neighboring residential subdivision, thus improving emergency vehicle access for both developments.

As discussed in the Section 16(a), the Proposed Project's traffic impacts would be less than significant with the incorporation of Mitigation Measure 16.1. The intersections identified for analysis, identified on page 99, were selected as the most likely to possibly be impacted by Project traffic. As discussed in Section 16(a), all six study intersections are expected to operate at LOS C or better with the implementation of Mitigation Measure 16.1. The Proposed Project would not substantially increase traffic. Further, the Proposed Project would not pose any design features that would create a safety risk.

COMMENT 5.39.2

2) Quality of Life

A majority of the residents in the area purchased/moved into the neighborhood because of the quietness, safety, and limited traffic which are all important things when considering where to live. An increase in traffic flow eliminates these elements from the neighborhood thus reducing the quality of life for its residents. In addition property values could substantially be affected as a result of the neighborhood geography being changed in addition to an increase in traffic flow. Home values are generally higher in neighborhoods where there is greater seclusion and privacy with minimal traffic. Neighborhoods that are access points for nearby neighborhoods and that have substantial traffic generally have lower home values. This reduction in value has a significant effect on quality of life due to its financial impact.

RESPONSE TO COMMENT 5.39.2

As discussed in Response to Comment 5.39.1, the Proposed Project would not result in substantial traffic impacts with the incorporation of Mitigation Measure 16.1. Property values are not an issue analyzed under CEQA. The Commenter's concerns with property values are noted for the record and will be forwarded to the decision makers.

COMMENT 5.39.3

In conclusion, though we are against Fuchsia Lane becoming an access point to the River Rock/Hardison House Tract, we do however understand that emergency vehicle access is imperative and would feel comfortable having a locked gate for emergency vehicle access only at the end of Fuchsia Lane. We hope you consider our comments and come up with an alternative access point for this development which does not affect Fuchsia Lane or Marigold Lane.

[Community petition included in attached letter (see Appendix M)]

RESPONSE TO COMMENT 5.39.3

Secondary access would be provided via an internal connection between the Project and the residential subdivision located immediately to the south. As shown on Figure 2.6, Proposed Site Plan, Redbud Street would be linked to the existing Fuchsia Lane, which presently terminates in a cul-de-sac. This internal connection will provide secondary access for both the Project and the neighboring residential subdivision, thus improving emergency vehicle access for both developments.

At the present time the proposal includes full through access from Redbud Street to Fuschia Lane. However, this plan is subject to the review and approval of the decision-makers, and the option remains to terminate Redbud Street at Fuschia with an emergency only access gate to allow for limited through access for emergency vehicles. This comment will be forwarded to the decision makers for their consideration.

COMMENT LETTER 5.40

Greg Thayer
February 11, 2016

COMMENT 5.40.1

The plans to cram 53 homes onto this historic parcel is terrible!

And adding multiple access roads onto Ojai Road is just beyond belief! If the city feels the need to allow development on this property, common sense would make a single access road to a reasonable number of homes seem obvious.

The current proposal should be rejected!

RESPONSE TO COMMENT 5.40.1

As discussed on page 77, under current General Plan and zoning land use designations, the Project Site is allowed a maximum density of 57 dwelling units. The Project proposes to develop 53 new single-family homes and retain the existing Hardison House and barn for a total of 54 dwelling units. As such, the Project Site is consistent with allowed density on-site with concurrent approval of the requested Planned Development Permit. Further, the Proposed Project includes only one ingress/egress vehicle access point of off the west side of Ojai Road at Royal Oaks Place. The comments are noted for the record and will be forwarded to decision makers.

COMMENT LETTER 5.41

Mary Vomund
March 3, 2016

COMMENT 5.41.1

I am very much opposed to the development of the Hardison property @ 1226 Ojai Rd. We have no water for the existing people already settled here. You do not ask people to conserve water and then add fifty three homes which will only add to the already short supply of water for agriculture and existing homes.

RESPONSE TO COMMENT 5.41.1

As discussed in Section 17(b) and 17(d), the Proposed Project could be accommodated by connection to the existing system and no expansion of existing water system are required. The water demand for the Proposed Project is included within the future projections of the City's Water System Master Plan as the project is an infill development consistent with buildout of the Santa Paula General Plan and would not exceed the planned growth demand for the existing land use. Further, the Proposed Project would include sustainable design features to reduce water consumption. Please refer to Response to Comment 5.23.10.

COMMENT 5.41.2

Ojai Rd is already impacted with traffic as it is. No no no to this plan.

RESPONSE TO COMMENT 5.41.2

The City of Santa Paula determines the significant traffic impact criteria for proposed land use projects. The City defines the minimum acceptable level of service for intersections as LOS C during the AM peak hour and PM peak hour. In consultation with City staff, six study intersections were selected for analysis in the Traffic Study. These intersections, identified on page 99, were selected as the most likely to be possibly impacted by Project traffic. As discussed in Section 16(a), all six study intersections are expected to operate at LOS C or better with the implementation of Mitigation Measure 16.1. With the implementation of Mitigation Measure 16.1, the Proposed Project's impacts to traffic and circulation would be considered less than significant.

COMMENT LETTER 5.42

Gene Wallace
1348 Magnolia Drive
Santa Paula, CA 93060
February 25, 2016

COMMENT 5.42.1

This comment letter is the same as COMMENT LETTER 5.19. Please refer to COMMENT LETTER 5.19 for comments and responses.

COMMENT LETTER 5.43

Richard M. and Sue Yamamoto
1330 Ojai Road
Santa Paula, CA 93060
March 3, 2016

COMMENT 5.43.1

As long time residents of Santa Paula and residing in the area directly impacted by the proposed River Rock/Hardison House project, we wish to voice our concern specifically on the size/density of the proposed development.

While maximizing the number of houses on the property may be the most profitable for the developers, we believe it would detrimentally impact the quality of life in the Oaks/Ojai Road area. While development within the city limits is certainly referable to sacrificing open space or agricultural land, 53 homes on these 19 acres seems excessive.

RESPONSE TO COMMENT 5.43.1

As discussed on page 77, under General Plan and current zoning designations, the Project Site is allowed a maximum density of 57 dwelling units. The Proposed Project proposes to develop 53 new single-family homes and retain the existing Hardison House and barn for a total of 54 dwelling units with concurrent approval of the requested Planned Development Permit. As such, the Project Site is consistent with allowed density on-site.

COMMENT 5.43.2

We feel there are multiple issues that should be considered before allowing a sizable project of this nature to go forward. Although current drought considerations might be lessened by anticipated El Nino rains, there is certainly no guarantee that rainfall will persist. With the East Area 1 project already authorized, how much further development is reasonable or realistic?

RESPONSE TO COMMENT 5.43.2

As discussed in Section 17(b) and 17(d), the Proposed Project could be accommodated by connection to the existing system and no expansion of existing water system are required. The water demand for the Proposed Project is included within the future projections of the City's Water System Master Plan as the project is an infill development anticipated by the General Plan and would not exceed the planned growth demand for the existing land use. Further, the Proposed Project would include sustainable design features to reduce water consumption.

As discussed in the Cumulative Impact (refer to page 133), Buildout of the cumulative developments identified in the City's Water Supply Master Plan is dependent upon the City's ability to meet the anticipated demands of each project based on the available supply of water at the time such developments are approved. As indicated above, the Proposed Project's water demand can be accommodated within the existing available water supply, the Project is conditioned to provide 21.2 AF/yr of water rights or in lieu fees, and the Project's contribution to cumulative impacts upon water supplies are less than significant. Further, each future project would be required to analyze their respective water demand and work with the lead agency to determine necessary mitigation measures and appropriate actions with respect to their project.

COMMENT 5.43.3

The most attractive part of living in Santa Paula is its quaint, small town atmosphere, and this is particularly true of the Oaks with its quiet, low density ambiance. So maintaining this quality should be a high priority.

Tax revenues might even be more beneficial with a higher end, more spacious project.

RESPONSE TO COMMENT 5.43.3

This comment is noted for the record and will be submitted to the decision makers. No analysis is required.

COMMENT 5.43.4

The present traffic conditions on Ojai Road are already problematic during peak traffic hours and certainly would be exacerbated with a larger development and more cars.

RESPONSE TO COMMENT 5.43.4

The City of Santa Paula determines the significant traffic impact criteria for proposed land use projects. The City defines the minimum acceptable level of service for intersections as LOS C during the AM peak hour and PM peak hour. In consultation with City staff, six study intersections were selected for analysis in the Traffic Study. These intersections, identified on page 99, were selected as the most likely to possibly be impacted by Project traffic. As discussed in Section 16(a), all six study intersections are expected to operate at LOS C or better with the implementation of Mitigation Measure 16.1. With the implementation of Mitigation Measure 16.1, the Proposed Project's impacts to traffic and circulation would be considered less than significant.

COMMENT 5.43.5

In conclusion, we hope that you will limit the size of the project to a size and character that will compliment our town and not detrimentally impact the quality of life in our precious Oaks area.

RESPONSE TO COMMENT 5.43.5

This comment is noted for the record and will be submitted to the decision makers. No analysis is required.

COMMENT LETTER 5.44

Anna M. Zalesak
March 5, 2016

COMMENT 5.44.1

This comment letter is the same as Comment Letter 5.19. Please refer to Comment Letter 5.19 for comments and responses.

6. REFERENCES

EEG Services, Phase I Environmental Site Assessment, November 18, 2013.

City of Santa Paula General Plan.

City of Santa Paula Municipal Code.

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Crain & Associates, River Rock Residential Project Traffic Impact Analysis, September 9, 2015.

National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.

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Williamson Act Program, California Division of Land Resource Protection, *website: ftp://ftp.consrv.ca.gov/pub/Dlrp/WA/2012%20Statewide%20Map/WA_2012_11x17.pdf*, accessed December 2014.

7. MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of the Public Resources Code and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines require adoption of a Mitigation Monitoring and Reporting Program (MMRP) for all projects for which an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) has been prepared. This requirement was originally mandated by Assembly Bill (AB) 3180 which was enacted on January 1, 1989 to ensure the implementation of all mitigation measures adopted through the CEQA process. Specifically, Section 21081.6 of the Public Resources Code states the following:

> *"In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."*

AB 3180 provided general guidelines for implementing monitoring and reporting programs, which are enumerated in more detail in Section 15097 of the CEQA Guidelines. However, specific reporting and/or monitoring requirements to be enforced during project implementation shall be defined prior to final approval of the proposed project by the decision-maker. In response to established CEQA requirements, the proposed MMRP shall be submitted to the City of Compton (Lead Agency) for consideration prior to completion of the environmental review process to enable the decision-makers appropriate response to the proposed project. Although the Lead Agency may delegate reporting or monitoring responsibilities to other agencies or entities, it "…remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The MMRP describes the procedures for the implementation of the mitigation measures to be adopted for the proposed project as identified in the Initial Study/Mitigated Negative Declaration (IS/MND). The MMRP for the Proposed Project shall be in place through all phases of the proposed project, including design (pre-construction), construction, and operation (post-construction both prior to and post-occupancy). The City of Santa Paula Planning Department shall be responsible for administering the MMRP activities or delegating them to staff, other City departments, consultants, or contractors. The City of Santa Paula Planning Department will also ensure that monitoring is documented through reports (as required) and that deficiencies are promptly corrected. The designated environmental monitor (e.g. City building inspector, project contractor, certified professionals, etc., depending on the provision specified below) will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

Each mitigation measure is categorized by environmental topic area and corresponding number, with identification of:

- The enforcement agency
- The monitoring agency
- The monitoring phase (i.e., the phase of the Project during which the measure should be monitored)
- The monitoring frequency
- The action indicating compliance with the mitigation measure

All agencies and departments are in the City of Santa Paula, unless otherwise noted.

Table 5-1
Mitigation Monitoring and Reporting Program

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
AESTHETICS			
3.1.1 Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties throughout the duration of the construction process. Such barricades or enclosures shall be maintained in appearance throughout the construction period.	Construction	Building and Safety	
3.1.2 All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the Planning Director.	Pre-Construction, Site Plan Review	Planning Department	
AGRICULTURE			
No mitigation measures are required.			
AIR QUALITY			
3.3.1 The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.	Construction	VCAPCD	
3.3.2 Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.	Construction	VCAPCD	
3.3.3 Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities: a) All trucks shall be required to cover their loads as required by California Vehicle Code §23114. b) All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust.	Construction	VCAPCD	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.			
3.3.4 Graded and/or excavated inactive areas of the construction site shall be monitored by (indicate by whom) at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.	Construction	VCAPCD	
3.3.5 Signs shall be posted on-site limiting traffic to 15 miles per hour or less.	Construction	VCAPCD	
3.3.6 During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive.	Construction	VCAPCD	
3.3.7 Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.	Construction	VCAPCD	
3.3.8 Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.	Construction	VCAPCD	
BIOLOGICAL RESOURCES			
4.1 Special status species focused surveys should be conducted no more than 3 weeks prior to the start of work. If special status species are present, additional regulatory coordination with the	Construction	Planning Dept., CA Dept. of Fish and	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
California Department of Fish and Wildlife and/or the U.S. Fish and Wildlife Service will be required.		Wildlife and/or the U.S. Fish and Wildlife Service	
4.2 A biological survey for nesting birds, including raptors, is required no more than 5 days prior to work from February 1 to September 15 if in or adjacent to suitable habitat.	Construction	Planning Dept., CA Dept. of Fish and Wildlife and/or the U.S. Fish and Wildlife Service	
4.3 If active bird nests are identified, work within 100-300 feet (500 feet for raptors) must be postponed until after September 15, unless the biologist determines the nest becomes inactive. Size of the buffer will be determined according to the type and level of disturbance and species.	Construction	Planning Dept., CA Dept. of Fish and Wildlife and/or the U.S. Fish and Wildlife Service	
4.4 If it is necessary to conduct the work while sensitive species are present or in proximity to the work areas, a species protection plan shall be developed, approved by relevant agency U.S. Fish & Wildlife Services or California Department of Fish & Wildlife, then implemented.	Construction	Planning Dept., CA Dept. of Fish and Wildlife and/or the U.S. Fish and Wildlife Service	
4.5 An approved biologist shall monitor removal of native vegetation and work within habitat areas for wildlife and relocate species as needed to minimize mortality.	Construction	Planning Dept., CA Dept. of Fish and Wildlife and/or the U.S. Fish and Wildlife Service	
4.6 Minimize sustained construction noise adjacent to sensitive wildlife during the nesting season, as directed by the biological monitor.	Construction	Planning Dept., CA Dept of Fish and Wildlife and/or the U.S. Fish and Wildlife Service	
4.7 When construction noise is anticipated to affect sensitive wildlife, environmental staff shall consult with regulatory agencies regarding additional mitigation measures.	Construction	Planning Dept., CA Dept of Fish and Wildlife and/or the U.S. Fish and Wildlife Service	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
4.8 In accordance with the standard best management practices recommended by the Ventura County Environmental Health Division, water impoundment(s) and "privately maintained" drainage easements should be maintained in a manner, which will not create mosquito breeding sources. The Applicant shall consult with the Vector Control Section of the Division regarding a mosquito abatement/control plan. The mosquito abatement/control plan shall include the following: (a) proposed physical control measures that will be utilized to promote drainage, (b) proposed chemical and biological control measures to be utilized if mosquito breeding occurs (c) a Mosquito monitoring program, and (d) design details, including cross-sections of all drainage areas.	Pre-Construction, Operation	Planning Dept., Ventural County Environmental Health Department	
CULTURAL RESOURCES			
5.1 Interpretive Measures **5.1.1 Interpretive Plan.** An historic preservation professional qualified in accordance with the Secretary of the Interior's Standards shall be selected to prepare an interpretative plan that includes the design of an on-site interpretation exhibit or plaque to be permanently installed on the Lot B public open space area of the Tentative Tract Map. The plan shall be designed in consultation with a qualified historic preservation professional and approved by the City of Santa Paula prior to issuance of building permits for the last phase of the new construction, and installed upon the completion of the Lot B public open space area, or no later than three years after the recording of the final tract map.	Construction	Planning Department	
5.2 Design Measures **5.2.1 Landscape Report Plan.** A qualified arborist or landscape architect shall prepare a report and plan to determine the feasibility of retaining and treating the mature landscape materials on the project site. The report shall be completed subject to the approval of the City of Santa Paula prior to the recording of the final tract map, and the recommended treatment measures implemented prior to the issuance of a grading permit for the project.	Construction	Planning Department	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
5.2.2 Fencing and Wall Treatment. To the greatest extent feasible, the wall and fencing treatment surrounding Lot 35 shall be visually compatible with the historic character of the property in terms of scale, details and materials. The fencing between Lot 35 and Lot B shall be visually porous and not unduly obstruct the views of the property from Ojai Road. **5.2.3 Construction Monitoring**. Stable A qualified historic preservation professional shall prepare a plan that specifies procedures for protecting historical resources and a monitoring method to be employed by the contractor while working near these resources. At a minimum, the plan shall address the method of bracing and moving of the Barn/Stable building, the operation of construction equipment near adjacent historical resources, storage of construction materials away from adjacent resources, and education/training of construction workers about the significance of the historical resources. **5.2.4 Documentation.** A qualified historic preservation professional shall produce a Documentation Report that generally consists of HABS-like archival quality photographs and negatives of exterior and interior views of the historic, a description of the historical significance of the property, and a full set of measured drawings of the historic resources depicting the existing or historic conditions. The printed publication consisting of the documentation report, interpretative information, photographs and negatives, and the Historic Resources Report prepared for this property shall be combined in a reference publication for the public and copies shall be donated to the City of Santa Paula, Museum of Ventura County, Ventura County Cultural Heritage Board and the Santa Paula Historical Society prior to issuance of any permits. **5.2.5 Preservation.** The conditions of the Tract Map and the CCRs applied to the property shall require that future exterior alterations to the Main Residence and Barn/Stable on Lot 35 be			

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
subject to the review and approval of the City of Santa Paula.			
5.3 **Archaeological Resources.** If any archaeological materials are encountered during the course of project development, all further development activity shall halt in the area of the discovery and the services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The archaeologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report to the satisfaction of the Planning Director. The archaeological survey, study or report shall be submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834.	Construction	Planning Department	
5.4 **Paleontological Resources.** If any paleontological materials are encountered during the course of project development, all further development activities shall halt in the area of the discovery and the services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report to the	Construction	Planning Department	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
satisfaction of the Planning Director. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.			
5.5 **Human Remains.** In the event that human remains are discovered during excavation activities, the contractors shall stop all activities in the immediate vicinity of the discovery and contact the County Coroner. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or; if the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.	Construction	Planning Department	
GEOLOGY/SOILS			
6.1 The design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Public Works Department of the City of Santa Paula.	Pre-Construction	Public Works	
6.2 All grading should be performed in accordance with the General Earthwork and Grading Specifications outlined in Appendix C to the Geotechnical Investigation, unless specifically revised or amended. Recommendations contained in Appendix C are general specifications for typical grading projects and may not be entirely applicable to this project. It is also recommended that all earthwork and grading be performed in accordance with Appendix J of the 2013 California Building Code (CBC) and all applicable governmental agency requirements. In the event of conflicts between the Project Geotechnical Report and CBC	Pre-Construction, Construction	Public Works	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
Appendix J, the recommendations of the Project Geotechnical Report shall govern.			
6.3. Stormwater Pollution Prevention Plan. In compliance with the Ventura County Municipal Separate Storm Sewer System Permit, before the City issues a grading permit, the developer shall prepare a Stormwater Pollution Prevention Plan for the site for review and approval by the Public Works Director, or designee. The SWPPP must fully comply with RWQCB requirements and contain specific BMPs to be implemented during project construction to reduce erosion and sedimentation to the maximum extent practicable.	Pre-Construction, Construction	Public Works	
6.4 Surface drainage should be directed away from the proposed structures into suitable drainage devices. Neither excess irrigation nor rainwater should be allowed to collect or pond against building foundations or within low-lying or level areas of the property. Surface waters should be diverted away from the tops of slopes and prevented from draining over the top of slopes and down the slope face.	Pre-Construction, Construction	Public Works	
GREENHOUSE GAS EMISSIONS			
No mitigation measures are required.			
HAZARDS / HAZARDOUS MATERIALS			
No mitigation measures are required.			
HYDROLOGY/WATER QUALITY			
9.1 Urban Impact Mitigation Plan (SQUIMP) in accordance with the requirements of the Ventura County Municipal Storm Water NPDES Permit No. CAS004002. The appropriate design and application of Best Management Practices (BMP) devices and facilities shall be determined by the Santa Paula Department of Public Works.	Pre-Construction, Construction	Public Works	
LAND USE AND PLANNING			
No mitigation measures are required.			
MINERAL RESOURCES			
No mitigation measures are required.			
NOISE			
12.1 Construction activity shall be restricted to the hours of 8:00 A.M. to 6:00 P.M. Monday through Saturday. No construction	Construction	Planning Department	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
activities shall occur on any Sunday or national holidays.			
12.2 The Project Applicant shall post an advisory notice on-site that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by Code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.	Construction	Public Works	
12.3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from the nearest noise- and vibration-sensitive land uses.	Construction	Planning Department	
12.4 Construction activities shall be scheduled so as to avoid as feasible operating several pieces of equipment simultaneously, which causes high noise levels.	Construction	Planning Department	
POPULATION AND HOUSING			
No mitigation measures are required.			
PUBLIC SERVICES			
14.1 Payment of school fees to the Santa Paula Unified School District to offset the impact of additional student enrollment at schools serving the project area shall be completed prior to issuance of the first building permit.	Prior to Certificate of Occupancy	Planning Department/ Building and Safety	
14.2 The developer and contractors shall maintain ongoing contact with the administrator of Bedell Elementary School during the construction process and shall ensure safe pedestrian routes are maintained at all times. The administrative offices should be contacted a minimum of 48 hours in advance of any demolition, grading or construction activity on the project site so that students and their parents will know when such activities are to occur. The developer shall guarantee that safe and convenient pedestrian and bus routes to the school be maintained. Copies of written correspondences shall be submitted to the City Planning Department, Building and Safety Department and Public Works	Construction	Planning Department	

Mitigation Measures	Timing/Implementation	Responsible Monitoring and Enforcement Agency	Signature/Date Completed
Department.			
RECREATION			
No mitigation measures are required.			
TRANSPORTATION/CIRCULATION			
16.1 The Project Applicant shall contribute the Project's fair share contribution (16.8 percent) toward physical improvements consisting of the provision of parking restrictions on Ojai Road (State Route 150) to allow for one additional southbound through travel lane in the AM peak period and one additional northbound through travel lane in the PM peak period, as well as the implementation of traffic signal control, at the intersection of Ojai Road (State Route 150) and Orchard Street. Proof of payment or bond shall be provided to the Planning Director prior to the issuance of the first certificate of occupancy.	Construction	Planning Department/ Public Works	
UTILITIES AND SERVICE SYSTEMS			
No mitigation measures are required.			

Source: City of Santa Paula Planning Department, 2016.