

EXHIBIT A
STATEMENT OF FINDINGS AND FACTS IN SUPPORT OF THE
EAST AREA 1 SPECIFIC PLAN AMENDMENT PROJECT SEIR; STATEMENT OF
OVERRIDING CONSIDERATIONS

1.0 INTRODUCTION

The City reviewed the East Gateway Project's environmental impacts in accordance with the California Environmental Quality Act (Public Resources Code §§ 21000, et seq., "CEQA") and the regulations promulgated thereunder (14 Cal. Code of Regulations §§ 15000, et seq., the "CEQA Guidelines"). CEQA § 21081 and CEQA Guidelines §15091 provide that:

- (a) "No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
 - (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record."

CEQA Guidelines § 15092 provides that:

- (a) "A public agency shall not decide to approve or carry out a project for which an EIR was prepared unless either:
 - (1) The project as approved will not have a significant effect on the environment, or
 - (2) The agency has:
 - (A) Eliminated or substantially lessened all significant effects on the environment where feasible as shown in findings under §15091, and
 - (B) Determined that any remaining significant effects on the environment found to be unavoidable under §15091 are acceptable due to overriding concerns as described in §15093."

When an EIR was already prepared and certified for a project, and the lead agency determines that a Supplemental EIR should be prepared as a result of proposed changes to the project (or other changes in circumstances or available information) that requires updating or revising the EIR to make it adequate to address the potentially significant effects of the project, the lead

agency must make the required findings under CEQA Guidelines § 15091 for each significant effect shown in the previous EIR as revised by the Supplemental EIR (*see* CEQA Guidelines § 15163).

A Supplemental EIR for the East Area 1 Specific Plan Amendment (SEIR) was prepared and was certified by the Santa Paula City Council by resolution. The Final SEIR updates and revises the FEIR that was certified in 2008 to reflect changes in a revised project (the “Amended Project”). In sum, the City reviewed the Amended Project as follows:

1. A Notice of Preparation (NOP) of a Draft SEIR was filed with the State Clearinghouse (SCH) Office of Planning and Research (OPR) on April 2, 2014. The SCH OPR assigned SCH Number 2006071134 to the environmental documentation, which is the same SCH Number previously assigned for the original East Area 1 Specific Plan EIR in 2006 (the “Original FEIR”).
2. The NOP was distributed to public agencies, interested parties, libraries and service providers. The 30-day public review period for the NOP started on April 2, 2014 and concluded on May 2, 2014. The NOP was also published in the Santa Paula Times. A Scoping Meeting to solicit public input on the issues proposed for consideration in the EIR was held on April 17, 2014 at 6:30 P.M. at the Santa Paula City Hall Council Chambers. A total of 14 written responses were received on the NOP.
3. A Notice of Completion (NOC) of the Draft SEIR was filed with the SCH OPR on October 13, 2014.
4. A 45-day public review period for the Draft SEIR pursuant to CEQA commenced on October 3, 2014 and ended on November 17, 2014. The DEIR was distributed to public agencies, interested parties, libraries and service providers by the City of Santa Paula. The distribution list is available at the City of Santa Paula’s Planning Department. A total of 16 written responses were received on the Draft SEIR.
5. A Final SEIR was prepared for the Amended Project. The following components comprise the Final SEIR:
 - a. The Draft SEIR and Technical Appendices (October 2014).
 - b. Comments received on the Draft SEIR and written responses to these comments
 - c. Clarifications and Revisions.
 - d. Mitigation Monitoring and Reporting Program (MMRP).
 - e. All attachments, incorporations and references to the documents identified in items a and b above.

Unless expressly stated otherwise, all references in these Findings to “Final EIR,” “Final SEIR” or “FINAL SEIR” includes the Original FEIR as supplemented, revised and updated by the Final SEIR.

The Final SEIR is on file and is available for public review at the City of Santa Paula offices at 970 Ventura Street, Santa Paula, California, 93060 and available on the City’s website in a portable document format (PDF) at: <http://www.ci.santa-paula.ca.us/eastareaone/>

The following sections make detailed findings with respect to the potential impacts of the Amended Project and refer, where appropriate, to the mitigation measures set forth in the Final SEIR and the Final MMRP to avoid or substantially reduce potentially significant adverse impacts of the Amended Project to the maximum extent feasible.

The Final SEIR and the administrative record concerning the Amended Project provide additional facts in support of these Findings. The Final SEIR and MMRP are incorporated by reference into these Findings in their entirety. The MMRP was developed in compliance with Public Resources Code § 21081.6 and is contained in a separate document within the Final EIR.

2.0 DESCRIPTION OF PROJECT PROPOSED FOR APPROVAL

The Amended Project is described in detail in Section 3.0 (Project Description) of the Final SEIR.

2.2 PROJECT LOCATION

The location of the Amended Project is described in detail in Section 3.0 (Project Description) of the Final SEIR.

2.3 ENVIRONMENTAL SETTING

The environmental setting of the Amended Project is described in detail in Section 3.0 (Project Description) of the Final SEIR. In addition, the City Council notes that the Project Site has not changed significantly since the Original FEIR was certified in 2008. Most of the site remains in active agricultural production with natural plant communities, including coastal sage scrub and chaparral in the relatively steep foothills located to the north and riparian vegetation along the boundary of Haun Creek. In April 2014, the City approved the excavation, processing, and removal of oversized rock for in accordance with the recommendations in the geotechnical study contained in the Original FEIR. This rock remediation activity is currently being conducted on approximately 55 acres in the southwest portion of the site, immediately north of the SPBL and west of Padre Lane.

2.4 EAST AREA 1 SPECIFIC PLAN AMENDMENT

The Final SEIR sets forth in detail the manner by which the Amended Project will change the existing East Area 1 Specific Plan. A summary of the Land Uses proposed by the Amended

Project is set forth below:

Summary of Land Uses in the EA1 SPA	
Land Use/Planning Area	Amount
<u>Residential Uses</u>	
Hallock Center and Neighborhood	1,500 units
<i>Total Residential Units:</i>	
	1,500 units
<u>Nonresidential Uses</u>	
Hallock Center, Light Industrial	25,000 sq. ft.
Hallock Center, Commercial (Hallock Center)	215,000 sq. ft.
Civic District, Institutional (schools)	19.2 acres
<u>Open Space, Parks, and Agriculture</u>	
Community Park ^a	37.8 acres
Neighborhood Parks ^b	8.0 acres
Santa Paula Creek Greenway	19.3 acres
Haun Creek Greenway	27.9 acres
Open Space Preserve	77.3 acres
Agricultural Preserve	55.0 acres

Notes:

^a Community Park will be shared with the Elementary and High School and include athletic facilities as well as open parkland

^b Includes Neighborhood Parks that approximately 1 acre in size, but there will numerous other smaller park areas interspersed throughout the residential neighborhoods.

The Amended Project also incorporates design features to comply with the mitigation measures identified in the Original FEIR. Some mitigation measures are removed or are revised in the Final SEIR as they may no longer apply or require modifications to reflect amendments to the Specific Plan, current conditions, or changes in regulations. The primary changes to the land use plan proposed by the Amended Project are as follows:

Increased Buffer along Santa Paula Creek Plan

The linear park along Santa Paula Creek on the western edge of the EA1 SP-3 area will be increased in width to provide a greater buffer, and to preserve the opportunity for future improvements to the existing Santa Paula Creek channel adjacent to the Project Site. In the adopted East Area 1 Specific Plan, the linear park was approximately 50 feet in width on the northern end and approximately 80 feet in width on the southern end. The increased width of the greenway along Santa Paula Creek will now vary from a minimum of about 150 feet to a

maximum of about 280 feet. This greenway will remain unimproved with the exception of landscaping. In addition, the EA1 SPA eliminates the northerly detention basin on the eastern edge of the Project Site along Haun Creek. This is because updated hydrology studies of Haun Creek and engineering studies related to preparation of the Master Vesting Tentative Map determined that only the retention basin at the southeast corner of the site is needed.

Hallock Center Update

The Hallock Center District includes approximately 31.5 acres on the east and west sides of East Area 1, at the primary entrance to East Area 1. The Hallock Center District incorporates the former East Santa Paula Railroad District as defined in the EA1 SP-3, and includes land planned for office and light industrial uses west of Hallock Drive, along with land east of Hallock Drive planned for retail commercial and multifamily uses. In addition, the new fire station site included in the EA1 SP-3 is relocated to the southwest corner of Hallock Drive and Telegraph Road to allow the fire station to more efficiently provide service to the eastern and central portions of the City of Santa Paula.

The northerly edge of Hallock Center is defined by an east–west green that incorporates the existing Pumphouse as a central landmark. The east edge is defined by the palm-lined street, Padre Lane, which is currently used as the access road to the East Area 1 Site. As with the EA1 SP-3, the Ranch Pumphouse would be preserved as part of the EA1 SPA. Hallock Drive has been realigned to end at a central green landscape feature entry amenity, situated between the planned elementary and high school sites.

The Hallock Center is planned for office and business park uses west of Hallock Drive and for neighborhood commercial-retail and multifamily uses east of Hallock Drive. The Hallock Center is the preferred location for potential senior housing and assisted-living uses and apartments, and is planned to accommodate a range of uses, including a postsecondary education center, county medical services facility, and office and business park uses. Live/work units would also be allowed in the Hallock Center.

Hallock Drive and Santa Paula Street will provide access to the Hallock Center. The commercial and light industrial uses located south of Santa Paula Street will be complementary with and extend the pattern of commercial and light uses located west of Santa Paula Creek and south of Santa Paula Street. The Hallock Center includes the following features:

- Approximately 25,000 sq. ft. of light industrial space
- Approximately 215,000 sq. ft. of commercial space (including 75,000 square feet of assisted living)
- 400 multi-family or apartment residential units
- 1.0-acre land dedication and construction of municipal facilities to support a joint use police and fire station.
- Building and land use frontage along the extension of Santa Paula Street for light industrial, offices, and limited residential uses.
- At least two mixed-use street types to generate the appropriate frontages and to connect with the Civic District and the Neighborhood

- Commercial frontage for neighborhood-serving uses along Hallock Drive
- Buildings located near or at frontage lines to spatially define a varied mixed-use streetscape
- Building design that creates a relatively continuous urban wall along the south side of Santa Paula Street, with major parking lots behind those buildings. This will also provide a noise barrier between SR 126 to the south and the Neighborhood to the north.

Civic District Plan Update

The Civic District is generally located in the southwest quadrant of the Project Site and includes sites for a 10.9-acre elementary school site and an 8.3-acre site for secondary school facilities integrated with a 37.8-acre community park site. The street system has also been reconfigured to improve access to the Project Site and the park and school sites. The Civic District was redesigned to reflect changes in the needs for public facilities in the City of Santa Paula. As originally planned, the Civic District included 35 acres of community parkland and sites for new high school, post-secondary education, and municipal facilities.

Neighborhood Plan Update

The Neighborhood Plan provides a reconfiguration of the EA1 SP-3 residential neighborhoods. This includes a combination of the former three residential neighborhoods previously planned separately as the Haun Creek Neighborhood, Santa Paula Neighborhood, and the Foothill Neighborhood. A summary of the features of the Neighborhood planning area of the EA1 SPA is as follows:

- Utilize residential street types that support walkability and define appropriately scaled blocks to provide multiple pedestrian and bicycle routes to Hallock Center and the Civic District.
- Provide public spaces that are defined by adjacent streets and buildings, creating an 'outdoor room' effect.
- Structure the pattern of blocks on lengths of 400 to 600 feet, breaking longer blocks with pedestrian paseos or mid-block playgrounds.
- Set buildings back from frontage lines, depending upon the context of a particular block, helping to define a more suburban streetscape and produce a variety of front yard designs that create an authentic sense of neighborhood.
- Provide a variety of building types including detached and attached single family residences and small-scale multifamily types to produce a varied neighborhood pattern.
- Integrate Haun Creek and the plan-area's east boundary with lower-intensity development that opens to the natural and agricultural open space to the east.
- Connect streets and pedestrian connections to multiuse trails along Santa Paula Creek, Haun Creek and into the foothills to the north.
- Concentrate development in areas that only requires moderate grading, leaving the steepest areas in agricultural production.
- Concentrate hillside development within the lower slope areas to the south to reduce the quantities of grading required in the upper areas to the north.
- In steeper slope areas provide street and block patterns that conform to the natural terrain to reduce required grading.
- Structure the pattern of blocks on lengths of 400 to 800 feet.

Open Space District

The EA1 SPA will increase the total amount of open space and parkland within the Plan area from approximately 223 acres to approximately 225.3 acres. The primary features of the Open Space District include:

- A substantial greenway buffer of 150 feet to 280 feet along Santa Paula Creek and a naturalized landscape buffer along Haun Creek.
- Athletic fields with dual use as a retention area for Haun Creek flood flows.
- Preservation of hillside open space and agricultural land in an agricultural preserve.
- Parks interspersed throughout the residential neighborhoods.
- Community park accessible by City residents and the planned elementary and high schools.
- Pedestrian trail connectivity throughout.

The EA1 SPA includes approximately 225.3 acres (45 percent of the total Project Site) of open space and park areas. Open space includes formal plazas and greens, community and neighborhood parks, pocket parks, playfields, greenways along the length of both the Santa Paula Creek and Haun Creek, and natural open space preserve. There are three general categories of parks and open space, which will be zoned OS-1 (Open Space 1), OS-2 (Open Space 2), and OS-3 (Open Space 3).

Parks and open space areas will be accessible via an integral system of sidewalks and multiuse paths designed to meet current accessibility standards. A looping trail system surrounds the EA1 SPA Area and links the residential neighborhoods with the Hallock Center, Civic District, and open space areas. The greenways along Haun and Santa Paula Creeks include hiking trails that connect to trails in the open space preserve in the northern portion of the EA1 SPA Area. Along the north edge of the Neighborhood, multiple trailheads will lead to recreational trails in the foothills. Similarly, trails within the greenway along Santa Paula Creek will connect the Santa Paula Branch Line Trail to the south with the foothills to the north. Trailheads will be constructed that lead pedestrians from the neighborhoods and community park to the greenways along Santa Paula and Haun Creeks, as well as the foothills to the north. There will also be a central roadway median open space area that links the Hallock Center and the Neighborhood near the soccer fields within the detention basin.

The community park in the Civic District is planned to include a variety of improved park facilities to serve residents of Santa Paula, including baseball, softball, and soccer fields and hard court facilities. Some of the community park facilities will be shared for use with the students of the adjacent Elementary and Secondary School Facilities. The park perimeter will be naturally landscaped with large trees to spatially contain this large open space, incorporating a multi-use trail that provides safe pedestrian and bicycle connections from the surrounding neighborhoods to the schools, parks and adjacent Hallock Center. The community park is designated OS-3.

Neighborhood parks are provided in each residential neighborhood and vary in size to accommodate different amenities, giving each park its own character while providing a combination of passive and active recreation opportunities. There are three neighborhood parks of approximately 1.0 acre or more identified in the land plan, for a total of approximately 4.7

acres. The actual size of these neighborhood parks will likely be greater as individual residential development plans will also include smaller park areas for open play, tot lots, etc. throughout the residential community. These neighborhood parks will be designated OS-2.

Greenways provide a buffer from both the neighboring agricultural areas east of Haun Creek and the residential areas west of Santa Paula Creek. The greenway along Santa Paula Creek on the western edge of the EA1 SPA Area would be increased in width to provide a greater buffer and to preserve the opportunity for future flood-control improvements to Santa Paula Creek. This greenway will feature a width of between approximately 150 feet and 280 feet, as compared to the EA1 SP-3 which included linear park with widths between 50 feet in the northern end and 80 feet in the southern end. The Haun Creek Greenway includes a park that contains 5.5 acres of soccer fields within the recreation area in the southeast portion of the EA1 SPA. This recreation area also serves as a retention basin for flows from Haun Creek. The Greenways will be designated OS-2.

The Open Space Preserve, approximately 77.3 acres, is located in the northern portion of the EA1 SPA Area and consists of natural, relatively undisturbed open space. This area is at a higher elevation than the development areas, and contains undulating hills with a network of trails that meander through the naturally vegetated slopes. The Open Space Preserve area will be designated OS-1.

Development Standards and Design Guidelines

The EA1 SPA modifies the Development Standards and Guidelines in the EA1 SP-3 to facilitate implementation in accordance with the intended planning and design characteristics. The Development Standards are intended to ensure that all buildings, related site improvements, and public improvements are consistent in providing a pedestrian-oriented public realm and remain consistent in scale and architectural design characteristics.

The Development Standards define the intended form, character, and uses of East Area 1 based on the policies of the EA1 SPA and help the City implement both the plan and the policies that have shaped it. The Development Standards will also regulate architectural styles, building materials, and other requirements. Additionally, the Development Standards will guide the design and construction of all improvements through the City's development review process.

A Regulating Plan illustrates the zones that would be established by the EA1 SPA to regulate land use. A brief description of these zones is provided below.

Hallock Center - Hallock Center is the walkable urban center of the plan, and is designed to support a range of commercial, retail, and housing options, as well as heavy pedestrian activity. The design prioritizes wide, shaded sidewalks and minimal driveway cuts and the appearance of off-street parking. Buildings may be up to 3 stories in height and would front directly onto sidewalks, with servicing and parking via alleys or shared driveways.

Neighborhood – The Neighborhood Zone accommodates a mix of single-family housing types, ranging from larger and smaller detached houses to attached townhomes, as well as house-form

multifamily buildings such as duplexes and triplexes. Buildings may be up to 2.5 stories, should front on the street, and should provide at least one curbside visitor parking space per unit. The street network should provide multiple through routes and blocks should be walkable in scale and pattern. Streets should serve as vehicular, pedestrian and bicycle circulation routes and should generally include sidewalks and parkway strips on both sides of the street. Streets abutting Santa Paula Creek, Haun Creek and on the hillside – where pedestrian volumes are expected to be lower – should provide a sidewalk on at least one side of each street. Streets should also provide pedestrian and bicycle connections to trailheads and greenways, providing residents with views of the surrounding hills, opens spaces and greenbelt.

Civic District – The Civic District includes sites for a future High School and Elementary School, with access to the adjacent community park.

East Center Overlay – The East Center Overlay applies to the Hallock Center parcels west of Hallock Drive. The Guidelines within this area allow a mixture of street-fronting retail commercial uses and frontage types, very light industrial and workshop uses, and upper floor residential uses.

West Center Overlay – The West Center Overlay applies to the Hallock Center parcels west of Hallock Drive. The Guidelines within this area provide for a mixture of street-fronting retail uses and frontage types, very light industrial and workshop uses, and upper floor residential uses.

Pedestrian-Priority Overlay – The Pedestrian Priority Overlay applies to the Hallock Center parcel containing the existing Packing house. In addition to the uses allowed within the rest of the Hallock Center, the Guidelines within this area allow for various light industrial uses not allowed within the rest of the Hallock Center or elsewhere in the EA1 SPA Area.

Agricultural Preserve (AG) – The AG planning area applies to areas intended to remain in active agricultural operation.

Open Space 1 (OS-1) – The OS-1 planning area applies to areas intended to remain undeveloped. Pedestrian, bicycle, and equestrian trails are allowed.

Open Space 2 (OS-2) – The OS-2 planning area applies to areas intended for passive and active recreation. It accommodates a range of greenways, community parks, and neighborhood parks and squares. Development is limited to trails, unlit athletic fields, playground equipment, small open structures such as picnic shelters, and structures necessary to support the specific purposes of each individual open space site.

Open Space 3 (OS-3) – The OS-3 planning area applies to areas reserved for athletic facilities associated with the adjacent K–12 schools and may include lighted athletic fields, as well as structures for indoor and outdoor athletic activities.

Circulation and Access

Access

Primary access to the Project Site will be from the south, via an extension of Hallock Drive. The existing at-grade railroad crossing of the Santa Paula Branch Line at Padre Lane will be closed and a new at-grade railroad crossing will be constructed at Hallock Drive.

Secondary access will be provided through an eastern extension of Santa Paula Street across the Santa Paula Creek via a span bridge. Santa Paula Street will connect to the internal street network near the southeast corner of the Civic District. Hallock Drive will provide a bikeway connection from the City's planned bikeway system with a link to the future Santa Paula Branch Line Trail and to the planned extension of the existing bicycle lanes on Santa Paula Street to the west.

The design and construction of access and utility improvements in state right of way include widening and signal modification at the intersection of Hallock Drive and SR 126; adding new signals at Telegraph Road and the new at grade railroad crossing outside state right of way; and raising the intersection of Telegraph Road and Hallock Drive by approximately seven feet. The Project applicant is coordinating with Caltrans on these improvement plans under a Highway Improvement Agreement which will result in the issuance of an encroachment permit to allow the construction of these improvements within Caltrans Right of Way.

Internal Circulation

The circulation network within the EA1 SPA Area will accommodate the updated configuration of the land use plan described previously. The planning and design principles that shape the EA1 SPA include the development of walkable neighborhoods with connections to existing City streets, walkways, and bike paths. These features include:

- A mix of land uses within close proximity to one another
- A network of pedestrian-oriented streets organizing the neighborhoods into walkable interconnected blocks
- Public spaces throughout in the form of parks, greens, plazas, paseos and walkable streets
- The circulation system consists of a hierarchical system of street classifications ranging from streets connecting the Project Site to the existing circulation network, to very short streets defining a public space, to pedestrian passages and alleyways.

Hallock Drive at grade Rail Crossing

The proposed at grade crossing of the Santa Paula Branch Rail Line would consist of 4 lanes southbound (1 left, 2 through, & 1 right at the Telegraph Road intersection) and 2 northbound through lanes. The nearby intersection of Telegraph Road and Hallock Drive would have a fully-actuated traffic signal with a pre-signal for southbound traffic at the railroad crossing. The traffic signal phasing operations would prevent vehicles from queuing between the crossing and Telegraph Road. Northbound traffic would be protected by a standard flashing light assembly

with automatic gate arm and additional flashing light signals on cantilever arm. Southbound traffic would be protected by a flashing light assembly with automatic gate arm. The traffic pre-signal will be interconnected to the railroad signal system.

Santa Paula Creek Bridge

The Santa Paula Creek Bridge would provide a vehicle travel lane in each direction with pedestrian- bicycle paths on either side. The vehicle lanes, bike lanes, and walkways would transition to the roadway curb and gutter and to sidewalks along Santa Paula Street, and the improvement would extend to the intersection with Grant Line Street. This bridge will include a single pier, approximately four feet in width, within Santa Paula Creek and abutments on both sides of the bridge.

Landscape Plan

The EA1 SPA includes Preliminary Landscape Guidelines that include a plant palette and planting scheme specific to various distinct areas within the EA1 SPA Area. These guidelines address landscaped areas within the commercial and industrial areas, residential areas, parks and paseos, and street parkways and greenways, as well as entry features, water features, trail heads, and other incidental amenities. Open space areas will include grass lawns and incorporate bioswales. Landscaping treatments within the commercial areas will be provided as decorative elements and to mask back-of-house retail/loading areas. Landscaping will also be used to screen utilities throughout the property.

Specific guidelines for other landscaped portions of the EA1 SPA Area are provided, including for utility screening and landscaping of the residential paseo/open space, residential recreation areas, and the retail commercial gathering spaces. The proposed revisions to the landscape plan in the EA1 SPA require the use of native plants in open space preserve areas, such as along the Haun Creek greenway.

Utilities

Development will require the extension of existing infrastructure and services. The EA1 SPA specifies the distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities to be needed to support the planned land uses.

Water Supply and Delivery System

EA1 SPA Area includes a domestic water well field, domestic water storage, domestic water delivery infrastructure system, and recycled water infrastructure. Water for the existing agricultural activities is currently supplied by three water wells located in the western portion of the Project Site near Santa Paula Creek, which currently provide water for both domestic use for the existing homes on the site and for agricultural irrigation. Three existing wells located adjacent to Haun Creek would be utilized for construction water as the site is graded. Two of these existing wells located on the eastern edge of the Project Site will remain in service and

would continue to supply water to property owners located east of Haun Creek through a series of pipes that will be constructed as part of the Project. The third existing well near Haun Creek will be upgraded to provide water for domestic use.

Well Field

The City's Potable Water System Master Plan identified the need for a new well field in the Santa Paula Basin, and a well upgrade is needed in the Fillmore Groundwater Basin within the Project Site to serve the development allowed by the EA1 SPA. Four new wells are planned in EA1 SPA Area. The first well will be located adjacent to Haun Creek. This is an existing well in the Fillmore Basin that will be upgraded. The other three wells are planned near the west edge of the Project Site within the development area and outside of the greenway planned along Santa Paula Creek. There will also be four standby wells constructed adjacent to each of the primary wells.

Water Storage and Delivery System

The EA1 SPA Domestic Water Master Plan is a double zone system, as shown in Figure 2.0-11. The new wells described above will feed a new 3.0-million-gallon (MG), in-ground reservoir set at a bottom elevation of 458 msl for the City and at the 200 Zone for the EA1 SPA Area. From the point of connection, a new 15-inch tank fill line will proceed north through the EA1 SPA Area, terminating at the new 3.0 million gallon reservoir. This new reservoir will serve as a source for domestic consumption in the EA1 SPA Area and will act as storage for the City. Lots within the EA1 SPA Area below 330 msl will be served from this reservoir, requiring 0.67 million gallons of storage. This leaves a surplus of 2.33 million gallons available for users in the City's 200 zone. The reservoir site will provide a domestic water supply system comprised of 8-inch and 15-inch mains. This distribution system will also connect to the City's existing water system over the Santa Paula Creek Bridge. An additional tank will be located at an elevation to provide required flows and pressure to the upper development area on the Project Site. Water levels in these tanks will create a new 300' pressure zone that is independent of the City's system and will act as the primary source for domestic use and fire storage. This tank will be supplied by wells located within the EA1 SPA Area.

An analysis prepared by the City's Public Works Department and contained within the Water Supply Assessment and Verification for the East Area 1 Specific Plan (see Appendix Q of this EIR) indicates that the proposed land uses would require from 1,174.4 AFY to 1,359.2 AFY of potable water. Of this total, between 866.0 AFY and 1,050.5 AFY is potable water demand and 308.7 AFY is non-potable water demand for irrigation of parks, athletic fields, and agricultural preserve. The City would supply the portions of the project overlying the respective groundwater basins with water from those basins. This will require between 854.0 AFY and 983.5 AFY of groundwater production from the Santa Paula Basin and between 320.7 AFY and 375.3 AFY of groundwater production from the Fillmore Basin.

The total demand for domestic and non-domestic purposes, between 1,174.7 AFY and 1,359.2 AFY, would be greater than the amount of water currently used for agricultural purposes, 816 AFY, and less than the current allocation of groundwater available for this site, 1,283.1 AFY

from the Santa Paula Basin plus the 329 AFY historically withdrawn from the Fillmore Basin (a total of 1,612.1 AFY).

Water Plan

According to the City's Potable Water System Master Plan, the City will be developing a recycled water system conveyance plan that will include a line in Telegraph Road, delivering recycled water to a point of connection (POC) near the intersection of Hallock Drive and the SPBL.

The Project includes a new recycled water distribution system comprised of a single 12-inch main to meet the higher irrigation flow demands of the schools and large landscape/park areas. The recycled water will terminate at two locations: 1) the end of Hallock Drive at the open space preserve; and 2) at the Soccer Field and Detention Area.

Wastewater

The City's Wastewater System Master Plan plans the construction and placement of wastewater collection facilities to serve the EAI SPA Area.

The Project wastewater system will connect to the City's system at a new lift station near the SR 126 Bridge on Lemonwood Drive. The existing lift station on Lemonwood Drive would still operate, however a much lower flow rate will be directed to this station than under current conditions and this existing lift station will also serve as backup to the new lift station. A 15-inch main will be extended from the Project Site at Hallock Drive and Telegraph Road, down Telegraph Road to Whipple Road, under SR 126, and down to Lemonwood Drive. The lift station will allow flows to cross Santa Paula Creek in a newly constructed 10-inch force main to a new sewer main that will be constructed in Santa Clara Street between the Santa Paula Creek Bridge and the intersection at 12th Street.

The Highway Improvement Agreement with Caltrans the applicant has entered into also addresses off-site sewer improvements in state right of way including the installation of a 24" steel casing for a sewer line crossing SR 126 adjacent to the Santa Paula Creek; and a replacement of an existing 6" sewer force main mounted to the Santa Paula Creek bridge along Highway 126 to a 12" force main.

Public Facilities

Schools

The EAI SPA includes sites for primary and secondary schools. The Civic District provides an approximately 10.9-acre site for a K-8 school centrally located within the Project Site so that it is readily accessible and functions as an integral part of the village urban core. In addition, the Civic District provides approximately 8.3 acres (not including streets and parks) for additional secondary (high school) facilities.

Public Safety Facility

A 1-acre parcel is identified within the Hallock Center District on Hallock Drive at Santa Paula Street for a public safety facility that will include a fire station and police sub-station.

Dry Utilities

Electricity

Electricity in Santa Paula is supplied by the Southern California Edison Company (SCE). High-voltage 66-kilovolt (kV) transmission lines currently cross Ojai Road (SR 150), travel along a portion of 12th Street south of Orchard Street, and along the south side of the railroad tracks east of 12th Street. An SCE substation, the Wakefield Substation, is located south of the railroad tracks at the intersection of 12th Street and the railroad tracks. SCE will service and maintain the electrical service facilities for the Project. There are currently wooden pole mounted electrical transmission lines that run the length of the western boundary of the Project Site serving uses north and east of the Project Site. The Project will include the relocation and undergrounding of the existing transmission lines along the Santa Paula Creek side of the Project. In addition, new underground electrical distribution lines will be constructed within the Project Site to serve the planned uses.

Gas

The Southern California Gas Company (SCG) provides natural gas service in Santa Paula. An existing 12-inch high-pressure supply line running east-west in Telegraph Avenue feeds pressure-reducing stations in the City. Major distribution lines run from these stations and branch into the network of smaller gas mains in all of the streets. Service connections will be provided and maintained throughout the EA1 SPA Area.

Telephone

Telephone service and maintenance to the area is provided by Verizon. Telephone facilities would be located underground within the street ROWs. No overhead telephone facilities would be permitted.

Cable

Cable television is provided in the area by Time Warner. This company would serve the EA1 SPA Area. Cable television facilities would be located underground within public ROWs, or easements on private property.

Grading

Conceptual Grading Master Plan

The grading plan addresses the lower and middle elevation zones of the EA1 SPA Area where development would occur, while preserving the steeper upper elevation zone in the foothills. The lower elevation zone will be graded to create a roughly 2 percent land gradient, with roadways and blocks in the lower with grades of 1 to 3 percent. Elevations would remain largely unchanged with cuts and fills generally 6 to 10 feet in the lower elevation zone, predominantly resulting from over excavation and compaction to create appropriate conditions for development.

Cuts and fills will be up to 30 feet to create terraces for development. Roadway grades in the middle elevation zone would vary between 2 and 8 percent, with some limited roadway segments approaching a 10 percent grade.

An estimated 1.2 million cubic yards (cu. yds.) of mass grading is planned using balance cut and fill grading techniques on-site, with the exception of oversized rock removal. Due to the large amount of oversized rock located on portions of Project Site, export of approximately, 385,000 cu. yds. of rock is anticipated. The removal is necessary to achieve appropriate soil compaction requirements to support structural development.

Drainage and Water Quality

On-Site Storm Drain System, Infiltration, and Flood Control

A Drainage Master Plan is provided with the EA1 SPA. Since the Original FEIR was certified for the EA1 SP-3, updated hydrology studies related to Santa Paula and Haun Creeks were prepared by the U.S. Army Corps of Engineers, Ventura County Watershed Protection District (WPD), and other agencies and parties. The East Area Drainage and Water Quality Plan has been updated in response to these studies.

The Drainage Master Plan would maintain the existing condition drainage patterns so that proposed peak flow rates are not greater than the existing condition. The majority of storm drain flows will be directed to the detention basin located at the southeast corner of the Project Site.

Drainage within the development area will be collected through onsite catch basins and routed through three separate storm drain systems down to the southeast detention basin. This detention basin will contain soccer fields elevated above the detention area with 1 foot of freeboard in a 100-year event.

Flows from the northerly tributary areas will be directed to the three detention/debris basins on the northern edge of the development area. These basins are sized to store debris volumes and detain peak flow rates in order to protect the development areas and allow for smaller downstream storm drain systems. The western basin will convey drainage flows from portions of the site that will not be developed to Santa Paula Creek through an existing drainage outlet. The other two basins will outlet to the storm drain system within the EA1 SPA Area.

As described above, the proposed land use plan incorporates a wider landscape buffer along Santa Paula Creek, between 150 and 280 feet in width, which would provide room for any future changes to the improvements to this portion of the creek completed as part of the Santa Paula Creek Flood Control Improvement Project by the U.S. Army Corps of Engineers. No changes are proposed to the existing channel improvements in Santa Paula Creek as part of the Amended Project. The proposed landscape buffer area along Santa Paula Creek is designed to partially drain into Santa Paula Creek through two existing drainage outlets with the remaining drainage flows held to infiltrate within the buffer area.

The Project Site does not currently discharge significant runoff to Haun Creek along the eastern boundary of the Specific Plan Area. The amount of runoff from the Project Site to Haun Creek will be reduced by the drainage improvements planned within the Project Site. Along with reducing the flows in Haun Creek, the proposed drainage improvements will also reduce the existing flooding that occasionally occurs in Haun Creek near the existing Highway 126 and Santa Paula Branch Line Railroad Bridges.

A new graded channel is proposed along the eastern edge of the Project Site parallel to Haun Creek for approximately 1,200 feet upstream of Hwy 126. This channel will convey any flows that overtop the existing western edge of the creek during major storm events. This channel is designed to accommodate flows from the 100 year design storm event. This parallel channel meets Haun Creek at SR-126, where flows will be redirected based on the elevation of flows in Haun Creek. Flows will either be diverted back to Haun Creek via a 40 foot long weir structure located on the western bank of the creek 20 feet upstream of the SR 126 culvert, through a channel at the front of the basin to the west, via a second weir, or into the detention basin via a third weir. During storm events that cause water to pond above the existing SR 126 culvert, any backwater can exit the creek at the overflow weir on the west side upstream of the bridge into the bypass channel and into the detention basin planned on the southwest corner of the EA1 SPA Area. Any overflows from Haun Creek will be combined with the flows from the within the EA1 SPA Area and directed into two existing box culverts under SR 126 that flow into an existing drainage south of SR 126 within the East Gateway Specific Plan Area.

The EA1 SPA Area is predominantly pervious; and as such, the vadose zone acts as a water quality filtration system for storm runoff. The three upstream debris/detention basins and bioswales will provide for passive water quality treatment in the streets and park areas. The three upstream basins will allow for infiltration and sediment settling, while reducing runoff flows. The landscape buffer along Santa Paula Creek, the southeastern detention basin and a portion of the community park site will also function as drainage infiltration areas.

These infiltration areas are sized to significantly exceed requirements under the County's current Ventura County Storm Water Quality Urban Impact Mitigation Plan (SQUIMP) guidelines. The LID stormwater management approach that is incorporated into the Project design fully treat storms up to the size of approximately the average annual storm event, and will also fully treat the initial stages ("first-flush") of more infrequent larger storms. The Project design incorporates dedicated open space areas, engineered infiltration features, and detention basins, to promote on-site infiltration of stormwater, provide stormwater peak flow attenuation, and provide for treatment of runoff. These proposed elements, together with the native rocky soil underlying the

Project site, will allow a large volume of stormwater to infiltrate the Project site and not enter the adjacent creeks as stormwater runoff.

2.6 VESTING MASTER TENTATIVE MAP

Vesting Master Tentative Map (VMTM) No. 5854 is proposed to subdivide East Area 1 into several separate lots to facilitate the development allowed by the Specific Plan. The VMTM will establish the primary boundaries of the development areas and the primary streets with individual final tract maps processed in the future.

The VMTM identifies typical cross sections for the planned streets and trails and for the landscape buffer areas planned along Santa Paula and Haun Creeks. The VMTM also identifies the approximate locations of easements for utilities, including sewer, water, storm drains and water wells.

The VMTM identifies preliminary phasing for the development of each neighborhood and district. The actual phasing of development may vary dependent on market conditions. However, the construction of the offsite utility infrastructure would be completed in conformance with the Amended and Restated Development Agreement and the conditions of approval for the Amended Project so that all such infrastructure is completed in a timely manner.

2.7 DEVELOPMENT TIME FRAME

Development of the Project is anticipated to occur over approximately 10 years. For purposes of this Supplemental EIR, development is assumed to start in 2015 and be completed by 2025. Construction would occur continuously during this 10-year period. This construction phasing sequence is designed to provide for orderly development, but remains subject to market and economic conditions.

2.8 PERMITS AND APPROVALS

Development of the Project will require several approvals from both the City of Santa Paula and other agencies.

City of Santa Paula

- East Area 1 Specific Plan Amendment
- Development Agreement Amendment
- Master Vesting Tentative Map

Other Public Agencies

- A permit from the US Army Corps of Engineers to allow alteration of drainage features pursuant to 33 U.S.C. § 1251, *et seq.* (the “Clean Water Act”)
- Streambed Alteration Agreement under Fish and Game Code § 1603 from the California Department of Fish and Wildlife

- Water Quality Certification from the Regional Water Quality Control Board pursuant to the Clean Water Act
- Encroachment Permit by the California Department of Transportation for the construction of roadway and utility improvements in state right of way.
- Encroachment Permit from the Ventura County Watershed Protection District for the construction of the pier for the proposed Santa Paula Creek Bridge and a Watercourse Permit from the Ventura County Watershed Protection District for the weir structure in Haun Creek.
- Approval of a Formal Application for an at grade crossing of the Santa Paula Branch Rail Line by Hallock Drive by the California Public Utilities Commission.

3.0 FINDINGS ON SIGNIFICANT ADVERSE IMPACTS OF THE PROPOSED PROJECT WHICH CANNOT BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

3.1 IMPACTS RELATED TO AGRICULTURAL RESOURCES

3.1.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AGRICULTURAL RESOURCES

When the City Council certified the Original FEIR in 2008, it found that the Original Project would have significant and unavoidable impacts on agricultural resources, including the loss of 352 acres of Prime and Unique Farmland. The Amended Project would also result in significant and unavoidable adverse impacts related to agricultural resources, although the number of impacted acres has been reduced.

3.1.1.1 Findings Related to Agricultural Resources

Implementation of the Amended Project would result in the following significant and unavoidable impacts: (1) project specific and cumulative loss of agricultural resources, including Prime and Unique Farmland (344 acres); and (2) project-specific and cumulative conversion of cultivated farmland to urban uses. These impacts are similar to the significant and unavoidable impacts to agricultural resources previously found to result from the Original Project, except that the number of impacted acres of Prime and Unique Farmland has been reduced from 352 acres to 344 acres. With respect to these impacts, the City Council finds that:

- Changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen these significant effects to the maximum extent feasible. However, these mitigation measures (as described in the Final SEIR) will not reduce impacts the impacts to agricultural resources to a level of less-than-significant because there will be a net loss of agricultural resources and a net conversion of cultivated farmland in the area, which cannot be avoided; and
- Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR, if any, that could further substantially reduce these impacts to a level of less-than-significant. Specifically,

the Final SEIR identifies only the No Project/No Development Alternative that could substantially lessen the Amended Project's impacts to agricultural resources to a level of less-than-significant. However, that Alternative is rejected by the City Council because it fails to satisfy any of the Amended Project's basic objectives and is inconsistent with the existing entitlements for the site. Alternative's 2-4 could potentially have a nominally reduced impact to agricultural resources; however, these Alternatives are also being rejected because they would not substantially lessen or avoid the Amended Project's impacts on agricultural resources, and because they are not as consistent with the City's vision for this Project site, as evidenced by the City's prior approval of the Original Project, as ratified by the City's voters. The No Project/Original Project Alternative would not reduce impacts to agricultural resources because it would result in the conversion of more acres of Prime and Unique Farmland than the Amended Project.

In addition, the City Council is adopting a Statement of Overriding Considerations, based upon the fact that specific environmental, economic, social, and other benefits of the Amended Project outweigh these significant and unavoidable impacts to agricultural resources, as more fully set forth in the attached Statement of Overriding Considerations that is incorporated by reference.

3.1.1.2 Facts in Support of the Findings Related to Agricultural Resources

As with the Original Project, implementation of the Amended Project would result in loss of agricultural resources, including Prime and Unique Farmland, and the conversion of cultivated farmland to urban uses. These impacts are similar to the significant and unavoidable impacts to agricultural resources previously found to result from the Original Project, except that the number of impacted acres of Prime and Unique Farmland was reduced from 352 acres to 344 acres. The City Council adopted mitigation measures A-1, A-2, and A-3 to mitigate these impacts to the maximum extent feasible. Such mitigation measures are also set forth in the MMRP.

3.2 IMPACTS RELATED TO AIR QUALITY

3.2.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AIR QUALITY

When the City Council certified the Original FEIR in 2008, it found that the Original Project would have significant and unavoidable impacts on air quality, including project-specific and cumulative impacts from both construction and operational emissions of ROG and NOx. The Amended Project would also result in significant and unavoidable adverse impacts related to air quality, although these impacts would be less than analyzed in the Original FEIR for the Original Project.

3.2.1.1 Findings Related to Air Quality

Implementation of the Amended Project would result in significant and unavoidable regional air quality impacts which cannot be mitigated to below a level of significance. Specifically, the Amended Project would result in construction and operational emissions of ROG and NOx that

exceed applicable thresholds, which constitutes both project-specific and cumulative impacts. These impacts are similar to, but less than the significant and unavoidable air quality impacts previously found to result from the Original Project because of the reduced overall amount of development proposed under the Amended Project. With respect to these impacts, the City Council finds that:

- Changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen these significant effects to the maximum extent feasible. However, these mitigation measures (as described in the Final SEIR) will not reduce impacts the Amended Project's air quality impacts to a level of less-than-significant because total emissions of ROG and NOx will still exceed the regional construction and operational emissions thresholds; and
- Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR, if any, that could further substantially reduce these impacts to a level of less-than-significant. Specifically, the Final SEIR identifies only the No Project/No Development Alternative that could substantially lessen the Amended Project's air quality impacts to a level of less-than-significant; however, that Alternative is being rejected by the City because it fails to satisfy any of the Amended Project's basic objectives. Alternative's 2-4 could potentially have a nominally reduced impact on air quality; however, these Alternatives are also being rejected because they would not substantially lessen or avoid the Amended Project's significant air quality impacts, and because they are not as consistent with the City's vision for this Project site, as evidenced by the City's prior approval of the Original Project, as ratified by the City's voters. The No Project/Original Project Alternative would not reduce impacts to air quality because it would generate greater emissions of ROG and NOx than the Amended Project.

In addition, the City Council is adopting a Statement of Overriding Considerations, based upon the fact that specific environmental, economic, social, and other benefits of the Amended Project outweigh these significant and unavoidable impacts to agricultural resources, as more fully set forth in the attached Statement of Overriding Considerations that is incorporated by reference.

3.2.1.2 Facts in Support of the Findings Related to Air Quality

As with the Original Project, mitigation is not possible to avoid or substantially lessen the significant adverse project impacts related to air quality to a less than significant level. Impacts from the emissions of ROG and NOx for both construction and operations would be less than those identified previously for the Original Project and will be substantially reduced by the mitigation measures described below. However, total emissions of ROG and NOx will still exceed the regional construction and operational emissions thresholds, and impacts at both the project-specific and cumulative levels will remain significant and unavoidable after mitigation. The City Council is adopting mitigation measures AQ-1, AQ-2, AQ-6, AQ-7, AQ-8, AQ-9, AQ-

13, and AQ-14, all as set forth in the Final SEIR, to substantially reduce this impact to the maximum extent feasible. Such conditions are also incorporated into the Amended Project conditions of approval and the MMRP.

3.3 IMPACTS RELATED TO AESTHETICS

3.3.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AESTHETICS

When the City Council certified the Original FEIR in 2008, it found that the Original Project would have significant and unavoidable aesthetic impacts because the Original Project would permanently change the visual character of the project site from agricultural lands to developed suburban and urban uses, which would also impact views of the site from scenic vistas. The Amended Project would also result in these same significant and unavoidable adverse impacts related to aesthetics, although fewer total acres of agricultural lands would be developed.

3.3.1.1 Findings Related to Aesthetics

Implementation of the Amended Project would result in the following significant and unavoidable aesthetic impacts: (1) substantial changes to the existing open space and agricultural visual character of the project site; and (2) diminished views of these visual resources from scenic vistas, including SR 126. These impacts are considered both project-specific and cumulative, and are similar to the significant and unavoidable aesthetic impacts previously found to result from the Original Project, except that the number of acres of agricultural lands that will be developed has been reduced from 352 acres to 344 acres and the buffer along the Santa Paula Creek has been expanded, both of which reduce the aesthetic impacts of the Amended Project, as compared to the Original Project. As determined in the Original FEIR, and as amended by the Final SEIR, these impacts cannot be feasibly mitigated because the visual character of the site will be permanently altered by any development of the site. With respect to these impacts, the City Council further finds that:

Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR, if any, that could substantially reduce these impacts to a level of less-than-significant. Specifically, the Final SEIR identifies only the No Project/No Development Alternative that could substantially lessen the Amended Project's aesthetic impacts to a level of less-than-significant. However, that Alternative is being rejected by the City Council because it fails to satisfy any of the Amended Project's basic objectives. Alternative's 2-4 could potentially have a nominally reduced impact on aesthetic resources. However, these Alternatives are also being rejected because they would not substantially lessen or avoid the Amended Project's impacts on aesthetic resources, and because they are not as consistent with the City's vision for this Project site, as evidenced by the City's prior approval of the Original Project, as ratified by the City's voters. The No Project/Original Project Alternative would not reduce aesthetic impacts because it would result in the same changes to the visual character of the Site, except that it would convert and develop an additional 8 acres of agricultural lands.

In addition, the City Council is adopting a Statement of Overriding Considerations, based upon the fact that specific environmental, economic, social, and other benefits of the Amended Project outweigh these significant and unavoidable impacts to agricultural resources, as more fully set forth in the attached Statement of Overriding Considerations that is incorporated by reference.

3.3.1.2 Facts in Support of the Findings Related to Aesthetics

Mitigation is not possible to avoid or substantially reduce the significant adverse project impacts related to aesthetics to a less than significant level because any development of the site would permanently alter its visual character. Therefore, the significant and avoidable impacts to scenic views and visual resources identified in the Original FEIR would remain significant and unavoidable with the Amended Project, although to a somewhat lesser extent. As was determined in the Original FEIR, the Final EIR determined that no mitigation measures are feasible to reduce these aesthetic impacts related to the permanent change in views.

3.4 IMPACTS RELATED TO CULTURAL RESOURCES

3.4.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO CULTURAL AND HISTORICAL RESOURCES

When the City Council certified the Original FEIR in 2008, it found that the Original Project would have significant and unavoidable impacts to cultural and historic resources because the Original Project would result in the loss of eligible historic resources, and in particular that certain buildings and other features that made the Teague-McKevett Ranch eligible for listing on NRHP and CRHR, as well as potentially designated as a City of Santa Paula Landmark. The Amended Project would also result in these same significant and unavoidable adverse impacts related to cultural and historic resources.

3.4.1.1 Findings Related to Cultural Resources

Development of the Amended Project will result in the demolition of buildings and the removal of agricultural features that contribute toward the eligibility of the Teague-McKevett Ranch property for individual listing on the NRHP and CRHR lists, and toward its eligibility for designation as a City of Santa Paula Landmark. As with the Original Project, the Amended Project will result in the property becoming ineligible for listing or designation, which is considered a potentially significant impact. Implementation of Mitigation Measure C-10, as set forth in the Final SEIR, will reduce significant adverse impacts of the Project related to historic resources to the fullest extent feasible. However, due to the loss of eligible historic resources, the residual impact on cultural and historic resources, after mitigation, will remain significant and unavoidable. With respect to these impacts, the City Council finds that:

- Changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen these significant effects to the maximum extent feasible. However, these mitigation measures (as described in the Final SEIR) will not

reduce impacts to cultural and historic resources to a level of less-than-significant because there will still be a loss of eligible historic resources, which cannot be avoided; and

- Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR, if any, that could further substantially reduce these impacts to a level of less-than-significant. Specifically, the Final SEIR identifies only the No Project/No Development Alternative that could substantially lessen the Amended Project's impacts to cultural and historic resources to a level of less-than-significant; however, that Alternative is being rejected by the City because it fails to satisfy any of the Amended Project's basic objectives. Alternative's 2-4 would not substantially lessen or avoid the Amended Project's impacts on cultural and historic resources, and these Alternatives are being rejected because, as compared to the Amended Project, they are not as consistent with the City's vision for this Project site, as evidenced by the City's prior approval of the Original Project, which was subsequently ratified by the City's voters. The Project/Original Project Alternative would not reduce impacts to cultural and historic resources because it would result in demolition of the same buildings and removal of the same agricultural features as the Amended Project.

In addition, the City Council is adopting a Statement of Overriding Considerations, based upon the fact that specific environmental, economic, social, and other benefits of the Amended Project outweigh these significant and unavoidable impacts to cultural and historic resources, as more fully set forth in the attached Statement of Overriding Considerations that is incorporated by reference.

3.4.1.2 Facts in Support of the Findings Related to Cultural and Historical Resources

Mitigation is not possible to avoid or substantially lessen the significant adverse project impacts related to cultural and historic resources to a less than significant level. Nevertheless, the City Council is adopting mitigation measure C-10, as set forth in the Final SEIR, to substantially reduce these impacts to the maximum extent feasible. This mitigation measure is also incorporated into the Amended Project conditions of approval and the MMRP.

3.5 IMPACTS RELATED TO TRANSPORTATION AND TRAFFIC

3.5.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO TRANSPORTATION AND TRAFFIC

When the City Council certified the Original FEIR in 2008, it found that the potentially significant traffic and transportation impacts of the Original Project could all be mitigated to a level of less than significant with implementation of the recommended mitigation measures described in the Original FEIR. Based upon the revised traffic study that was completed in connection with the Final SEIR, the Amended Project would have significant and unavoidable traffic and transportation impacts on three intersections: (1) Ojai Rd./10th St. and Santa Paula St. (Intersection 12 in the SEIR); (2) 10th St. and Santa Barbara St. (Intersection 13 in the SEIR); and (3) 10th St. and Harvard Blvd. (Intersection 15 in the SEIR). These impacts remain despite

the Amended Project generating less traffic than the Original Project because of a reduction in light industrial and commercial development.

3.5.1.1 Findings Related to Transportation and Traffic

With respect to the significant and unavoidable impacts identified above, the City Council finds that:

- (1) Changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen these significant effects to the maximum extent feasible. However, these mitigation measures (as described in the Final SEIR) will not reduce the impacts to these intersections to a level of less-than-significant. Even after implementation of these feasible mitigation measures, Intersection 12 is projected to operate at LOS D in the p.m. peak hour, Intersection 13 is projected to operate at LOS E in the a.m. peak hour, and Intersection 15 is projected to operate at LOS E in both the a.m. and p.m. peak hours; and
- (2) Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR, if any, that could further substantially reduce these impacts to a level of less-than-significant. Specifically, the Final SEIR identifies only the No Project/No Development Alternative that could substantially lessen the Amended Project's impacts to these intersections to a level of less-than-significant. However, that Alternative is being rejected by the City Council because it fails to satisfy any of the Amended Project's basic objectives. Alternatives 2-4 could potentially have a nominally reduced impact to these intersections. However, these Alternatives are also being rejected because they would not substantially lessen or avoid the Amended Project's impacts on Intersections 12, 13 and 15, and because they are not as consistent with the City's vision for this Project site, as evidenced by the City's prior approval of the Original Project. The City Council also finds that further widening of 10th Street in the vicinity of these intersections is infeasible as a result of the City's plan to add Class II bikeways to 10th Street in the downtown area, which is a City priority. The No Project/Original Project Alternative would not reduce impacts to these intersections because it would generate more traffic at these intersections than the Amended Project.

In addition, the City Council is adopting a Statement of Overriding Considerations, based upon the fact that specific environmental, economic, social, and other benefits of the Amended Project outweigh these significant and unavoidable transportation and traffic impacts, as more fully set forth in the attached Statement of Overriding Considerations that is incorporated by reference.

3.5.1.2 Facts in Support of the Findings Related to Transportation/Traffic

The Amended Project would result in significant and unavoidable impacts to Intersections 12, 13 and 15. With respect to Intersection 12 (Ojai Rd./10th St. and Santa Paula St.), the Final SEIR identifies mitigation that would substantially lessen the impact to the maximum extent feasible by reconfiguring the intersection and adding an additional travel lane during peak traffic hours. Mitigation Measure T-7 (as amended) reduces this impact to the maximum extent feasible; Mitigation Measure T-7 is incorporated into the Amended Project conditions of approval and MMRP. With this mitigation, Intersection 12 will operate at LOS E during the a.m. peak hour and at LOS D during the p.m. peak hour, which is better than the intersection is projected to operate in 2025 without development of the Amended Project. With respect to Intersections 13 and 15 (10th St. and Santa Barbara St.; 10th St. and Harvard Blvd.), the Final SEIR concludes that there is no feasible mitigation for the impact to these intersections because of the City's approved new bicycle lanes along 10th Street, which are part of the City's beautification project and preclude further widening of this road. However, it is important to note that implementation of the Amended Project will substantially reduce the congestion at these intersections (as compared to projected 2025 conditions without the project) because the new bridge across Santa Paula Creek will divert traffic away from 10th St. in the downtown area.

4.0 FINDINGS ON SIGNIFICANT ADVERSE IMPACTS OF THE PROPOSED PROJECT WHICH CAN BE AVOIDED OR MITIGATED TO BELOW A LEVEL OF SIGNIFICANCE

4.1 IMPACTS RELATED TO TRANSPORTATION & CIRCULATION

4.1.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO TRANSPORTATION & CIRCULATION

In addition to the impacts identified in Section 3 of these Findings, the Amended Project would result in significant adverse impacts related to transportation and circulation, including project-specific and cumulative impacts to intersections in the City. These impacts are similar to the impacts previously identified in the Original FEIR and include one additional impacted intersection (10th St. and SR 126 Eastbound Ramps) that results from changes to the existing operating condition at this intersection since the Original FEIR was certified. The traffic study completed in connection with the Final SEIR also determined that the certain intersections previously identified as impacted by the Original Project will no longer have any significant impacts as a result of the Amended Project, at least in part because the Amended Project will generate less overall traffic.

4.1.1.1 Findings Related to Transportation & Circulation

Intersections

Existing (Year 2014) Plus Project Conditions

As set forth in table 4.4-5 of the Final SEIR (which is incorporated by this reference), implementation of the Amended Project would cause significant impacts at the following five intersections projected to operate at LOS D, E, or F, during one or both peak hours:

1. SR 126 and South Hallock Drive (AM and PM peak hours)
4. 12th Street and Santa Paula Street (AM peak hour)
15. 10th Street and Harvard Boulevard (AM and PM peak hour)
17. 10th Street and SR 126 Eastbound Ramps (PM peak hour)
34. Peck Road and SR 126 Eastbound Ramps (PM peak hour)

Some of the LOS at intersections studied will improve due to the estimated shift in background traffic away from the 10th Street and Ojai Road corridor, after the Santa Paula Street extension is completed.

Projected (Year 2025) Plus Project Conditions

As set forth in table 4.4-8 of the Final SEIR (which is incorporated by this reference), implementation of the Amended Project will create a significant adverse project impact and/or contribute to cumulative traffic impacts at the following intersections:

1. SR-126 and Hallock Drive
2. Telegraph Road and Hallock Drive
4. 12th Street and Santa Paula Street
9. Ojai Road and Richmond Road
10. Ojai Road and Orchard Street
17. 10th St. and SR 126 Eastbound Ramps
21. 6th St. and Santa Paula Street
22. Palm Avenue and Santa Paula Street
27. Palm Avenue and SR 126 Eastbound Ramps
32. Peck Rd. and Main St./Harvard Blvd.
34. Peck Rd. and SR 126 Westbound Ramps
35. Faulkner Rd. and SR 126 Westbound Ramps
36. S. Hallock Drive and Old Hallock Drive

The intersection of Ojai Road and Saticoy Street (Intersection 11) will operate at unacceptable LOS E and D during the A.M. and P.M. peak hours, respectively, for the Cumulative Base scenario. However, implementation of the proposed project will not contribute to a significant adverse cumulative impact because the delay at this intersection improves with the proposed project, which will provide additional road capacities and shift some of the background traffic away from this intersection.

In addition, the traffic study completed in connection with the Final SEIR determined that the Amended Project will not have any significant impacts at the following intersections, which were previously determined to be impacted by the Original Project:

- 18. 8th Street and Santa Paula Street
- 28. Steckel Drive and Santa Paula Street

With respect to the each and every one of these potentially significant transportation and circulation impacts to the intersections identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects as identified in the Final SEIR to a level of less than significant.

4.1.1.2 Facts in Support of the Findings Related to Transportation & Circulation

The mitigation measures adopted as part of the mitigation monitoring and reporting program included with the Original FEIR were updated to reflect the results of the updated traffic analysis. Where previously identified impacts from the Original FEIR will no longer occur, a notation is provided and the previous mitigation measure is not included. Where new impacts are identified with the updated traffic analysis, new mitigation measures are added. Where impacted intersections under the updated traffic analysis are the same as those identified in the Original FEIR, the mitigation measures are restated and amended. Field checks were conducted to confirm that the all improvements identified below are physically feasible. Mitigation Measures T-1 through T-27, as set forth in the Final SEIR, are included in the Amended Project conditions of approval and MMRP. The implementation of Mitigation Measures T-1 through T-27 will mitigate projected project-specific and cumulative impacts at buildout (in 2025) at all intersections, with the exception of intersections 12, 13 and 15, to less than significant.

4.2 IMPACTS RELATED TO NOISE

4.2.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO NOISE

The Amended Project would result in significant adverse impacts related to noise, including noise and vibration related impacts during construction, operational and railroad noise for uses in the southern portion of the project site, and increased traffic noise along Hallock Drive. These impacts are very similar to the noise impacts identified in the Original FEIR, except that the updated traffic and noise studies show that projected traffic noise on Santa Paula Street, between 10th St. and 12th St., is no longer significant, but projected traffic noise on Hallock Drive, between SR 126 and Telegraph Rd., is now considered significant.

4.2.1.1 Findings Related to Noise

Construction

Construction of the Amended Project will be similar to the Original Project, and construction related noise impacts will be similar to that identified in the Original FEIR. As described in the Original FEIR, when construction equipment is operating, noise levels can range from 73 to 95 dB(A) at a distance of 50 feet from individual pieces of equipment. The maximum noise level generated by construction equipment would be 95 dB(A) associated with a tractor used for earthmoving. Construction equipment may also create potentially significant ground borne vibration during construction. Future development of uses allowed by the Amended Project will occur over approximately ten years. Individual development projects within the Specific Plan will be occupied as they are completed while construction activity will be ongoing in the remainder of the Amended Project until fully developed by year 2025. While temporary noise and vibration from construction activities is not expected to be significant, the Original FEIR identified measures to mitigate these potential construction-related noise impacts to the fullest extent feasible, and these adopted mitigation measures will also be adopted for the Amended Project.

Operational Noise

Roadway Noise

The analysis of impacts from traffic noise was updated using the traffic volumes from the updated traffic study for the weekday AM peak hour (between 7:00 and 9:00 AM) and the weekday PM peak hour (between 4:00 and 6:00 PM) for the following scenarios:

- Existing Conditions (Year 2014)
- Existing plus Project Conditions (Year 2014)
- Cumulative Base Conditions (Year 2025)
- Cumulative plus Project Conditions (Year 2025)

Traffic from the Amended Project will result in potentially significant noise impacts along three street segments, including Hallock Drive north of SR 126 (increase of 5.3 dB[A]), Hallock Drive north of Telegraph Road (increase of 4.3 dB[A]), and Hallock Drive south of Telegraph Road (increase of 7.2 dB[A]). An increase of 3 dB(A) or greater in traffic noise levels that occurs from project-related activities would be considered significant if the resulting noise levels would exceed the City Noise Compatibility Matrix for “acceptable” exterior or interior noise levels. As the increase in noise levels on these street segments would exceed 3 dB(A), impacts are considered to be potentially significant.

The noise impacts on two of these segments, Hallock Drive north of SR 126 and Hallock Drive south of Telegraph, were previously identified by the City of Santa Paula in the East Gateway Project EIR and mitigation was also identified to reduce the impact along these segments to less

than significant. Future uses within the Project Site along the planned extension of Hallock Drive north would be exposed to noise levels of about 60 dB(A). Mitigation measures are identified in the Final SEIR to reduce any impacts along these three street segments to less than significant.

Railroad Noise

Exterior Noise

While there is currently no use of the SPBL (Santa Paula Branch Line), if operations resume at the level analyzed in the Original FEIR, noise from rail operations will represent an intermittent noise source. While there has been no recent freight use of the portion of the SPBL adjacent to the Project Site, and there is no planned freight use on the SPBL, the potential impacts from use of the SPBL for freight operations were considered in the Original FEIR. Light industrial, commercial, and live/work uses would be allowed near the southern boundary of the Amended Project. Predicted noise levels at 90 feet from the railway centerline would be 63 dB(A) CNEL. When combined with traffic noise, overall exterior noise levels would be approximately 72.2 dB(A) CNEL at 75 feet from the Telegraph Road centerline. Due to its proximity to the railroad track, uses allowed within the southern portion of the Amended Project are not sensitive to train noise at that estimated level. These allowed uses primarily consist of light industrial, office, fire station, limited retail, open space and roads. However, apartments, live/work or assisted living units are also allowed within the Hallock Center. As such, if they include outdoor living space, these areas would be sensitive to railroad noise, and without appropriate setbacks, could be significantly impacted by rail noise.

Interior Noise

Limited residential uses in the form of live/work units or apartments units would be sensitive to railroad noise and without appropriate setbacks, design and orientation, could be impacted by rail noise. Assuming the noise levels at 72.2 dB(A) CNEL within 75 feet of the Telegraph Road centerline and standard construction with closed windows, the interior noise could be reduced by 25 dB(A) to 47.2 dB(A). As identified in the Original FEIR, this level exceeds the General Plan noise threshold of 45 dB(A). The Amended Project will generally maintain the same land use types and patterns as was considered in the Original FEIR. Therefore, as with the Original Project, potential interior noise within residential units allowed by Amended Project would be considered potentially significant.

With respect to each and every one of these potentially significant noise-related impacts identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects as identified in the Final SEIR to a level of less than significant.

4.2.1.2 Facts in Support of the Findings Related to Noise

As with the Original Project, the construction noise and vibration impacts will be mitigated by the construction noise mitigation measures adopted for the Original Project and the Amended Project. As with the Original Project, residential units allowed by the Amended Project in the

Hallock Center District are potentially subject to significant noise impacts, and mitigation adopted for the Original Project is also being adopted for the Amended Project to mitigate all such potential impacts to less than significant. Because the cumulative impact of traffic noise on Hallock Drive is considered significant, new Mitigation Measures N-11 and N-12, as set forth in the Final SEIR, are identified to mitigate impacts to uses along this street segment to less than significant.

The following mitigation measures have been identified in the Final SEIR to avoid or substantially lessen the adverse impacts set forth above, are hereby adopted by the City Council and included in the Amended Project conditions of approval and MMRP: N-1, N-3, N-4, N-8, N-11, and N-12.

Implementation of Mitigation Measures N-1 and N-3 will reduce noise and vibration related impacts generated during construction to below a level of significance. Implementation of Mitigation Measure N-8 will reduce noise related impacts generated during operation to below a level of significance. Repaving of the three identified roadway segments with rubberized asphalt, as provided in Mitigation Measure N-11 and N-12, will reduce the traffic noise levels by 3 to 5 dB(A) and to less than significant. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation identified above.

4.3 IMPACTS RELATED TO BIOLOGICAL RESOURCES

4.3.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO BIOLOGICAL RESOURCES

The Amended Project would result in significant adverse impacts related to biological resources, including direct impacts to sensitive plant and wildlife species, sensitive habitat, wetlands and protected waters, and wildlife movement corridors, as well as indirect impacts to biological resources, as set forth in the Final SEIR. These impacts are similar to the impacts identified in the Original FEIR, and the Amended Project will not result in any new or more significant impacts than previously disclosed and analyzed in the Original FEIR. The mitigation measures identified in the Original FEIR apply to the Amended Project and will mitigate these adverse impacts to a less than significant level.

4.3.1.1 Findings Related to Biological Resources

Direct Impacts

Loss of Special-Status Plant Species

The potential for special-status plant species to occur on site is in the northern, native portion of the Specific Plan Area. However, this part of the site is outside the proposed development area, is designated for preservation in the Amended Project, and would not be directly impacted by construction or grading activities. The Amended Project does not change the Open Space and Agricultural land use designations for the northern portion of the Project Site included in the

Original Project. No special-status plant species are expected to be present within the non-native vegetation communities impacted by the Amended Project including the Fallow Agricultural Field, Orchard, Ornamental Landscaping, Southern Riparian Scrub, and Tree Windrow communities. Therefore, the Amended Project would not cause the direct loss of special-status plant species by habitat removal, and this potential impact is considered less than significant

Loss of Special-Status Wildlife Species

Cooper's Hawk (Accipiter cooperii) and White-Tailed Kite (Elanus leucurus)

Both of these raptor species have the potential to nest in several areas within the Project Site. A Cooper's hawk was observed foraging over the Project Site in December 2006 and in May 2014. Construction-related activities could result in the direct loss of an active nest or the abandonment of an active nest by adult birds during that year's nesting season. As with the Original Project, the Amended Project could result in potentially significant impacts to the Cooper's hawk and the white-tailed kite if active nests of either species are impacted by construction of the Amended Project.

Western Burrowing Owl (Athene cunicularia)

Marginal burrowing owl habitat occurs in a fallow agricultural field located in the eastern portion of the site. No burrowing owls were observed during the habitat assessment surveys conducted in 2006 or 2014. Should breeding or non-breeding burrowing owls occupy any existing burrows on the site prior to construction, impacts could result. Therefore, as with the Original Project, the Amended Project could result in potentially significant impacts to the Western burrowing owl if occupied burrows are disturbed by construction activities.

Yellow Warbler (Dendroica petechia brewsteri) and Yellow-Breasted Chat (Icteria virens)

Habitat for these two species occurs in the Southern Riparian Scrub community on site, which is located in several of the drainages in the northern, uncultivated portion of the Project Site as well as in Haun Creek. Santa Paula Creek does not support characteristic riparian vegetation for this species. Construction activities could result in the direct loss of an active nest or the abandonment of an active nest by adult birds during that year's nesting season. As with the Original Project, the Amended Project could result in potentially significant impacts to the Yellow warbler and yellow breasted chat.

Least Bell's Vireo (Vireo bellii pusillus) and Southwestern Willow Flycatcher (Empidonax traillii extimus)

Habitat for these two species occurs in areas containing willow trees and riparian vegetation, such as Haun Creek, which could potentially be used as nesting habitat. Presence/absence surveys were conducted for the Least Bell's vireo in accordance with the Least Bell's Vireo Survey Guidelines published by the USFWS (USFWS 2001) and for the flycatcher in accordance with the Southwestern Willow Flycatcher Protocol published by the USFWS (USFWS 2000). No

least Bell's vireo or southwestern willow flycatchers were recorded on site in 2007 or 2010. Nevertheless, as with the Original Project, the Amended Project is conservatively considered to have the potential to result in potentially significant impacts to the Least Bell's vireo and Southwestern willow flycatcher.

California Horned Lark (Eremophila alpestris actia)

The fallow agricultural field along Haun Creek in the eastern portion of the site is suitable nesting habitat for the California horned lark. Construction-related activities could result in the direct loss of an active nest or the abandonment of an active nest by adult birds during that year's nesting season. Depending on the number and extent of nests within the Project Site that may be destroyed or removed, if any, the loss or abandonment of an active California horned lark nest would be a significant impact. As with the Original Project, the Amended Project could result in potentially significant impacts result to the California horned lark if nests are disturbed by construction activities.

Loggerhead Shrike (Lanius ludovicianus)

Suitable nesting habitat for the loggerhead shrike occurs in the orchards adjacent to open land, in this case fallow agricultural fields. Individual shrikes could be lost if grading or construction activities occur during the nesting season of this species. As with the Original Project, the Amended Project could result in potentially significant impacts to the loggerhead shrike.

Western Red Bat (Lasiurus blossevilli)

One special-status bat species, the western red bat, has the potential to occur on site. Individual bats could be lost when grading or construction activities occur. As with the Original Project, the Amended Project would result in potentially significant impacts to the western red bat.

American Badger (Taxidea taxus)

The fallow agricultural field on site contains suitable habitat for the American badger. Individuals could be lost when grading or construction activities occur. As with the Original Project, the Amended Project could result in potentially significant impacts to the American badger.

Loss of Sensitive Natural Communities: Southern Riparian Scrub and Coast Prickly Pear Succulent Scrub

Several areas on site are characterized as Southern Riparian Scrub and Coast Prickly Pear Succulent Scrub, which are identified as rare vegetation communities by the California Department of Fish and Wildlife (CDFW). Implementation of the Project would result in the direct loss of 0.7 acre (1%) of Southern Riparian Scrub within the on-site portion of Haun Creek in the northeast corner of the site as well as within several ephemeral drainages near the northern border of the Project Site. The Coast Prickly Pear Succulent Scrub present on the Project Site would not be impacted, as the natural communities in the northern portion of the site are to be preserved as open space. Because of the ecological importance of Southern Riparian Scrub

vegetation (including its value as nesting/foraging habitat for a variety of common and special-status species), and the sensitivity of Southern Riparian Scrub, the loss of 0.7 acres this community is considered a significant impact. As with the Original Project, the Amended Project would result in potentially significant impacts to Southern Riparian Coast and Coast Prickly Pear Succulent Scrub.

Loss of Foraging and Nesting Habitat for Common Wildlife Species

The plant communities within the Project Site provide foraging and breeding habitat for a number of small mammals, reptiles, amphibians, and invertebrates that, in turn, provide a source of prey for a variety of common and special-status birds (including passerines and both local and wintering raptors) and mammal species. The development of the site would remove approximately 351.0 acres of orchard habitat, 11.0 acres of fallow agricultural field, 8.6 acres of ornamental landscaping, 6.7 acres of tree windrows, and 0.7 acre of Southern Riparian Scrub. Although the agricultural habitats provide foraging and nesting opportunities for common reptile, mammal, and bird species, the loss of this non-native vegetation would not substantially reduce the populations of native wildlife or their habitats. Existing foraging habitat consists of undeveloped land with native vegetation occurs to the north, with similar agricultural habitats adjacent to the east; therefore, this loss would not be considered a significant impact.

As with the Original Project, the Amended Project would cause short-term impacts from the vegetation removal that could result in the loss of an active nest by a native bird species, which would constitute a significant impact.

Migratory Movements

Haun Creek, located along the eastern border of the site is considered part of a landscape linkage identified by the County of Ventura and the CDFW. Haun Creek constitutes the western boundary of the landscape linkage, which connects open space east of Santa Paula with open space to the south of SR 126. Creek modifications would not hamper or block the existing wildlife movement corridor, as the creek bed itself is the corridor of travel. In addition, the impacted areas would be replanted with native vegetation, including a buffer of native trees. As with the Original Project, the Amended Project would result in potentially significant impacts to the movement of resident or migratory fish or wildlife species.

Conflicts With Policies Protecting Biological Resources

Santa Paula Trees

Approximately 150-200 blue gum, cottonwood, Canary Island date palm, and oak trees that would be under the jurisdiction of the City of Santa Paula occur in several different locations within the Project Site. As with the Original Project, the Amended Project would result in potentially significant impacts to these trees.

Final Recovery Plan for the least Bell's vireo

The Project is consistent with the recovery plan for this species because the least Bell's vireo habitat present on the site would not be impacted, but since the Amended Project would result in potentially significant impacts to the least Bell's vireo, mitigation measures included within the Original FEIR are included within this Final SEIR. In addition, habitat would be improved with the removal of *Arundo donax* from Haun Creek. This would provide stable habitat for least Bell's vireo individuals in the Santa Clara River watershed.

Final Recovery Plan for the Southwestern Willow Flycatcher

The Project is consistent with the recovery plan for this species because if southwestern willow flycatchers are located on site, they would not be permanently impacted. Nevertheless, as with the Original Project, the Amended Project would result in potentially significant impacts to the southwestern willow flycatcher so mitigation measures included within the Original FEIR are included within the Final SEIR to ensure consistency with the adopted recovery plan.

City of Santa Paula General Plan

The goals, objectives, and policies in the Conservation and Open Space Element guide the protection of natural resources, open space, and sensitive biological resources. There is potential for eight special-status plant species, 22 special-status wildlife species, and two sensitive natural communities to occur on the Project Site. Similar to the Original Project, the Amended Project is designed to avoid areas containing sensitive natural communities or special-status species. In addition, mitigation measures included within the mitigation monitoring and reporting program of the Original FEIR are included within the Final SEIR. The Amended Project would be consistent with the General Plan.

Indirect Impacts

Increases in Light and Glare

Developing the Project Site would increase the number of nighttime light and glare sources on the site, which can "spillover" into adjacent open space areas and adversely affect some species of animals in natural areas, including disturbing breeding and foraging behavior of nocturnal birds, mammals, and invertebrates, which is considered a significant impact. However, as with the Original Project, the Amended Project contains vegetation buffers that would adequately buffer adjacent open space areas from light and glare impacts of the Project.

Increase in Human and Domestic Animal Presence

Implementation of the Project could result in indirect impacts to special-status wildlife and their habitats, and to sensitive plant communities, as a result of the increased human presence associated with the Project. Increased human activity would potentially cause the degradation of adjacent preserved habitats through recreational usage (for example, recreational hiking) or from road, facilities, and grounds maintenance.

In addition, development of the Project Site with residential uses will increase the number of domestic and feral animals on the site, which can disturb nesting or roosting sites and disrupt the normal foraging activities of wildlife, which may have a long-term effect on the behavior of both common and special-status animals in open space areas within and adjacent to the Project Site. As with the Original Project, the Amended Project would result in potentially significant impacts with regard to human and domestic animal presence.

Indirect impacts resulting from increased human activity could also cause the loss of potential special-status plant species within the open space areas. Impacts may result from the trampling of ground-dwelling flora through recreational or maintenance activities; compaction of soils; increased amount of refuse, pollutants, and non-native species in the area; or an increase in the chance of accidental fire occurrence. As with the Original Project, the Amended Project would result in potentially significant impacts to special-status plant species.

Urban Runoff

Implementation of the Amended Project would change the quality of stormwater runoff from the site as urban development occurs that could have indirect impacts to the biological resources in the adjacent waters of the Santa Paula Creek and Haun Creek, along with the downstream portions of the Santa Clara River Watershed (which includes creeks, rivers and the estuary). However, as described in the Final SEIR, the Amended Project was designed to include stormwater infiltration and treatment, including low impact development best management practices (BMPs), to ensure that the Amended Project does not result in adverse effects to water quality in the adjacent creeks or in the Santa Clara River Watershed. These BMPs include detention basins, infiltration areas, and bioswales that allow a large volume of stormwater to infiltrate the Project site rather than enter the adjacent creeks. They are also designed to improve the water quality of the remaining rainfall by removing metals and other constituents so that stormwater runoff entering the creeks will comply with all regulatory requirements established to protect biological resources in these waters, including steelhead and other salmonoids. These regulatory requirements, which will be satisfied by the Amended Project, include those set forth in the LARWQCB Municipal Stormwater Permit, the Ventura County Stormwater Quality Management Ordinance, the Ventura County MS4 Permit, the Ventura County Stormwater Quality Management Plan, and the NPDES permit. All runoff from urban development within the Project boundary during small and medium storm events will be captured and infiltrated on site. During larger storm events that exceed the Project's infiltration capacity, all runoff will be routed through stormwater BMP treatment facilities with only the later-stage flows of the larger rainfall events allowed to discharge off site. In addition, these BMPs are designed to treat flows by allowing particulates and pollutants to settle out and be retained onsite thereby improving the water quality of the stormwater before it is discharged. Vegetation in the flow detention features will further reduce concentrations of metals in runoff through natural metabolic uptake and sorption processes. The Project will be able to fully infiltrate the 85th percentile storm event (approximately 1.0 inch of rainfall) on the Project site. In combination, the various BMPs will capture and infiltrate up to 1.8 inches of rainfall, which is approximately the 1-year recurrence storm event for the Project area. Therefore, all precipitation falling within the Project boundary during storms up to the 1-year storm event, as well as all non-storm event "nuisance" flows, will be captured and infiltrated within the Project. For larger storm events, the runoff from the initial

1.0 – 1.8 inches of rainfall (which would constitute what is qualitatively known as the “first-flush” component of the storm) will be captured and infiltrated on the Project site, with the remainder of the rainfall discharged as runoff to the adjacent creeks, with all runoff from developed areas passing through the site BMPs before discharge off site. Based upon all of the evidence set forth in the Final SEIR, including Appendix B, Evaluation of Potential Effects of Stormwater Runoff from the East Area 1 Project, and all other expert submissions contained in the administrative record, the City Council finds that the Amended Project will not have any significant impacts on water quality or biological resources as a result of stormwater or urban runoff. Where there is any conflict in the evidence regarding potential impacts upon steelhead smolt and other aquatic species and habitat in the Santa Clara River Watershed (including creeks, rivers, and the estuary), the City Council finds that the more recent studies and expert reports completed in 2015 by AECOM and GSI Water Solutions, Inc. to be more credible, and persuasive, in determining that all such impacts are less than significant. These findings and conclusions are further supported by the City’s independent peer review experts, PMC, which reviewed all arguments and evidence submitted by Ventura Coastkeepers, as well as all expert reports, studies, and opinions from GSI Water Solutions, Inc., and AECOM, and confirmed as reasonable the conclusions stated by AECOM and GSI Water Solutions, Inc.

Increase in Non-Native Plants

Plants typical of an urban environment already occur to some degree in the region, due to the presence of development in the immediate vicinity. Because non-native and exotic plants are commonly included in landscaping plans of both common areas and private lots of new development projects, the Project will increase non-native and exotic plant populations, and as with the Original Project, this is considered a potentially significant impact of the Amended Project.

With respect to each and every one of these potentially significant impacts to biological resources identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects identified in the Final SEIR to a level of less than significant.

4.3.1.2 Facts in Supports of the Findings Related to Biological Resources

The findings set forth above are supported by the facts, expert opinions and other substantial evidence set forth in several additional studies and expert assessments, completed since the Original FEIR was certified, as set forth in the Final SEIR. These studies and reports confirm that the Amended Project would not result in any new or increased significant impacts to biological resources, beyond what was previously identified in the Original FEIR. Therefore, no new mitigation is required, but the mitigation measures previously adopted with the Original FEIR mitigation monitoring and reporting program have been updated, and are identified below.

The mitigation measures identified in the Final SEIR will avoid or substantially lessen the adverse impacts set forth above. These are included in the Amended Project conditions of approval and MMRP. The Mitigation Measures are BR-1, BR-2, BR-3, BR-4, BR-5, BR-6, and BR-7.

Through the implementation of the adopted mitigation measures set forth in the Final SEIR and the MMRP, all significant adverse impacts to biological resources would be avoided or reduced to a level below significance. There are no significant unavoidable adverse project impacts related to biological resources which would result after implementation of these mitigation measures.

4.4 IMPACTS RELATED TO GEOLOGY & SOILS

4.4.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO GEOLOGY & SOILS

The Amended Project would result in potentially significant adverse impacts related to geology and soils, including impacts related to geologic characteristics, faulting, seismic shaking, soils, and slope stability, as set forth in the Final SEIR, which is incorporated by this reference. These impacts are similar to the impacts of the Original Project, and the Amended Project will not result in any new or more significant impacts than previously disclosed and analyzed in the Original FEIR.

4.4.1.1 Findings Related to Geology & Soils

Seismically Induced Settlement

The Project Site is subject to some level of damaging ground shaking as a result of movement along the major active, and potentially active, fault zones that characterize this region. Strong seismic ground shaking potential hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure (e.g., severe structural damage and building collapse). The Project Site could be subject to strong ground shaking in the event of an earthquake originating along one of the many faults in the region.

As part of the preparation of the 2012 Supplemental Geotechnical Investigation Report, and the 2014 Geotechnical Review of the Amended Project, additional subsurface explorations were performed to establish required removal depths and delineate the transition from the finer-grained soils in the eastern portion of the Project Site to the rocky soils in the western part, and to determine if any areas are susceptible to seismically-induced settlement. The Supplemental Geotechnical Investigation did not identify any conditions that change the conclusions of the 2007 Preliminary Geotechnical Investigation Report and the Original FEIR. The Project Site is suitable to support the development allowed by the Amended Project, and specific geotechnical engineering will determine design specification to address settlement.

Slope Instability and Erosion

A slope stability analysis of the proposed reservoir/water tank designs was completed based on the geotechnical conditions of the proposed sites for these tanks. This analysis determined that the both the water tank and water reservoir designs that incorporate 2:1 (horizontal:vertical) cut and fill slopes are stable with factors of safety in excess of typical minimum standards, and that retaining walls could be constructed to limit the inclination of slopes to 2:1 (h:v) or flatter to

ensure stability. The in-ground design includes a front berm for the reservoir constructed with compacted fill and slopes inclined at 2:1 (horizontal to vertical; h:v) or flatter. The two water tank designs include a cut slope behind the reservoir to create the relatively level tank pad. Large-diameter borings were made in the area of the planned water reservoir and tank to observe the subsurface conditions. Both borings encountered older alluvial soil are considered suitable to support the water reservoir. This report does not change the conclusions of the 2007 Preliminary Geotechnical Investigation Report and the Original FEIR relative to landslides.

With respect to each and every one of the potentially significant impacts related to geology and soils as identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects identified in the Final SEIR to a level of less than significant.

4.4.1.2 Facts in Support of the Findings Related to Geology & Soils

Mitigation measures included in the mitigation monitoring and reporting program included with the Original FEIR require additional geotechnical investigation before commencing development activity to further determine certain soils and other geotechnical conditions on-site. These further studies were completed in 2012 (Supplemental Geotechnical Investigation Report) and 2014 (Geotechnical Review of East Area Specific Plan), as further described in the Final SEIR. These additional studies satisfied a number of the mitigation measures identified in the Original FEIR, and also determined that the Amended Project will not have any new or more severe impacts than previously identified in the Original FEIR. Based upon the results of the additional studies, the mitigation measures from the Original FEIR were revised, and Mitigation Measures G-1 through G-21 were replaced with Mitigation Measure G-22. As set forth in the Final SEIR, the Amended Project's impacts related to geologic characteristics, faulting, seismic shaking, soils, and slope stability, will be addressed by implementation of Mitigation Measure G-22 and current standards in the California Building Code, International Building Code, and National Earthquakes Hazards Reduction Program, as applicable.

Mitigation Measure G-22 was identified in the Final SEIR to avoid or substantially lessen the adverse impacts set forth above. It is included in the Amended Project conditions of approval and MMRP.

All potential impacts related to geologic characteristics, faulting, seismic shaking, soils and slope stability, will be mitigated to less than significant by implementation of Mitigation Measures G-22. In addition, the Project site is not susceptible to impacts related to subsidence, flooding, tsunami affects, and/or dam inundation. As such, all impacts related to geology and soils conditions are considered less than significant. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted above.

4.5 IMPACTS RELATED TO HAZARDS & HAZARDOUS MATERIALS

4.5.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO HAZARDS AND HAZARDOUS MATERIALS

The Amended Project would result in potentially significant adverse impacts related to hazards and hazardous materials, including construction related impacts to emergency evacuation plans and operational fire safety impacts. These impacts are similar to the impacts of the Original Project, and the Amended Project will not result in any new or more significant impacts than previously disclosed and analyzed in the Original FEIR.

4.5.1.1 Findings Related to Hazards & Hazardous Materials

Construction

Construction activities may require the temporary closure of vehicle travel lanes in order to construct roadway and utility improvements. As identified in the Original FEIR, this could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Construction activities may require temporary road detours and/or closures resulting in localized increase in traffic and circuitous traffic routes. In addition, during certain periods of construction, the transport of oversized materials and equipment will be required, which will necessitate the use of large and often slow-moving vehicles. Combined, these activities could result in short-term adverse and significant impacts on the implementation of an evacuation plan. As with the Original Project, the Amended Project will result in a potentially significant impact.

Operations

The Amended Project would increase the width of the buffer area along the Santa Paula Creek and includes the minor reconfiguration of the planned land use areas. The Amended Project includes the Agriculture Preserve area within the northern portion of the Project Site included in the Original Project. The mountainous open space area in the north portion of the Project Site contains an open space preservation designation on 77.3 acres that will be accessible to residents for hiking on designated trails. Portions of this area contain native plant communities that are considered highly combustible. In addition, the General Plan designated this open space area as a High Fire Threat Zone. Therefore, as with the Original Project, the potential for wildland fires associated with the proposed Amended Project is potentially significant.

The Amended Project will be developed in accordance with the SPMC. In addition, the SPFD must be consulted before new development, particularly in hillside areas where access is critical to retarding and/or eliminating a wildland brush fire. The mitigation measures adopted to address both operational safety procedures and appropriate clearing of brush and other potential fuels along trails and roadways within the open space area apply to the Amended Project and will mitigate potential impacts to less than significant.

With respect to each and every one of the potentially significant impacts related to hazards and hazardous materials identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects identified in the Final SEIR to a less than significant level.

4.5.1.2 Facts in Support of the Findings Related to Hazards & Hazardous Materials

The mitigation measures in the Final SEIR will avoid or substantially lessen the adverse impacts identified in the Final SEIR. Mitigation Measures HM-2, HM-3, HM-4, HM-5, HM-6 and HM-7 are included in the Amended Project conditions of approval and MMRP.

As previously determined in the Original FEIR, implementation of these mitigation measures will reduce all potential hazards and hazardous materials impacts to less than significant. The wildland fire protections set forth in these mitigation measures will ensure that project residents and structures will not be exposed to any significant risk of harm from wildland fires. Accordingly, there are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures set forth in the Final SEIR and adopted herein.

4.6 IMPACTS RELATED TO AESTHETICS

4.6.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AESTHETICS

The Amended Project would result in potentially significant adverse impacts related to aesthetics, including introducing new sources of nighttime lighting. These impacts are similar to the impacts of the Original Project, and the Amended Project will not result in any new or more significant impacts than previously disclosed and analyzed in the Original FEIR.

4.6.1.1 Findings Related to Aesthetics

Impacts Related to Light

The Project's nighttime sources of light will be similar to those identified in the Original FEIR, and include outdoor lights in the residential, commercial, light industrial, civic, and park areas; lighted signs mounted to commercial buildings; parking lot lighting; interior building lights; and the headlights of vehicles. Impacts related to nighttime light and glare were identified as potentially significant in the Original FEIR, and this same potential for impacts would result from the Amended Project.

With respect to each and every one of the potentially significant impacts related to aesthetics identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects identified in the Final SEIR to a level of less than significant.

4.6.1.2 Facts in Support of the Findings Related to Aesthetics

Mitigation Measure AES-1 is identified in the Final SEIR to avoid or substantially lessen the adverse impacts set forth above. It is included in the Amended Project conditions of approval and MMRP.

With the implementation of Mitigation Measure AES-1, the outward and upward migration of nighttime light would be minimized and impacts related to light and glare will be reduced to less than significant. Accordingly, there are no significant unavoidable adverse project impacts related to light and glare which would result after implementation of the mitigation measure set forth in the Final SEIR and adopted herein.

4.7 IMPACTS RELATED TO CULTURAL RESOURCES

4.7.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO CULTURAL RESOURCES

The Amended Project would result in potentially significant adverse impacts to cultural resources, including impacts to paleontological, archaeological, and historic resources. These impacts are similar to the impacts of the Original Project, and the Amended Project will not result in any new or more significant impacts than previously disclosed and analyzed in the Original FEIR.

4.7.1.1 Findings Related to Cultural Resources

Paleontological Resources

Saugus Formation

The Saugus Formation occurs mainly in the designated open space at the northern portion of the Specific Plan area, which includes approximately 77.3 acres as an open space preserve and a 55-acre portion designated as agricultural preserve to continue existing agricultural orchard production. There would be two water storage tanks, debris basins, and access road to the water tank in the northern portion, and a hiking trail system through the open space preserve. These features would involve some grading or excavation (storage tanks and debris basin) and clearing (trails) in the Saugus Formation. These ground disturbing activities within in the Saugus Formation are considered to be of high potential for the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data. With increased human activity in these areas (e.g., construction workers and general public), unauthorized fossil collecting in the designated open space at the northern portion of the Specific Plan area could occur. The Amended Project will not result in any change to the potential impacts to paleontological resources that may be present within the Saugus Formation, as identified in the Original FEIR, and therefore, potential impacts are considered potentially significant.

Older Alluvium

There is a moderate potential for the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data as a result of development-related earthmoving activities and unauthorized fossil collecting within older alluvium at the Project Site. For this reason, impacts to paleontological resources on older alluvium that might result from these activities would be considered to be of moderate to high potential. As with the Original Project, the Amended Project will have a potentially significant impact on paleontological resources during earthwork within the older alluvium, but these potential impacts are not new or more severe than are those identified in the Original FEIR.

Younger Alluvium

At shallow depths, the younger alluvium is considered too young to contain remains old enough to be considered fossilized. Surface disturbances within the top 5 feet are not considered sensitive for fossil-bearing (paleontological) deposits at the depths that would be affected by development under the Amended Project. However, much of the development areas may require excavation below the surficial layer during soil preparation activities (e.g., over-excavation, rock removal, and recompaction). For this reason, impacts on younger alluvium that might result from these activities at depths greater than about 5 feet below current grade would have a moderate potential for the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data. Similar to the potential impacts identified in the Original FEIR, the Amended Project has the potential to cause significant impacts to paleontological resources that may be present at depths greater than 5 feet below grade in younger alluvium.

Archaeological Resources

The Project disturbance area is consistent with the area of disturbance considered in the Original FEIR. The single prehistoric site (L-1, P-56-001792) would be preserved within an open space portion of the Amended Project; no further mitigation is required. Based on the Amended Project, the four archaeologically historic sites (L-2 through L-5) are within or are tangential to the areas of the Civic District and the Hallock Center. Most of the Project area (over 400 acres) has been extensively farmed with orchards and rows crops, which has continually disturbed the surface of the soils. The historical sites were associated with the Teague-McKevett Ranch, but were not found to contain intact surface or subsurface archaeological deposits. Accordingly, these sites lack integrity and cannot contribute significantly to the City Council's understanding of local history. The updated review and site survey conducted in 2014, as part of the Amended Project, did not identify any additional historical or potentially significant archaeological sites within the Specific Plan, and no new information regarding the existing sites has been uncovered. Although surveys of the Project Site did not reveal sensitive archaeological resources within the disturbance area, the general Santa Clara River Valley is generally considered sensitive given the history and prehistory of the region. There is a potential for unknown resources to be uncovered by activities, such as grading, that disturb the ground surface. Therefore, impacts related to the Amended Project are considered potentially significant.

Historical Resources

A number of buildings, structures, and features were assessed during preparation of the Original FEIR to determine their significance based on CRHR, NRHP, and local significance criteria. These consist of residential buildings, an office building, storage and shed buildings, a barn, a pump house, garages, landscape features, and the packinghouse. None of these features has significantly changed, nor have additional resources been discovered, since the Original FEIR was certified in 2008. The Amended Project would result in relatively the same level of disturbance within the same boundaries as were considered for the Original Project. Based on the Original FEIR, and updates within the Final SEIR, the Amended Project will result in potentially significant impacts to historical resources. The Amended Project site contains features that contribute to the eligibility of an NRHP rural historic landscape district. Removal or location of these resources as a result of the development of uses allowed by the Amended Project will potentially reduce the integrity of design, setting, feeling, and association for this historical district. The Amended Project will not result in the reduction of any additional NRHP eligible areas not previously considered in the Original FEIR, but as with the Original Project, the Amended Project would result in a potentially significant impact to this historical resource.

With respect to each and every one of the potentially significant impacts to cultural resources identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects identified in the Final SEIR to a level of less than significant.

4.7.1.2 Facts in Support of the Findings Related to Cultural Resources

The Mitigation Measures C-1 to C-10 are identified in the Final SEIR to avoid or substantially lessen the adverse impacts set forth above. These are included in the Amended Project conditions of approval and MMRP.

As set forth in the Final SEIR, implementation of these Mitigation Measures will reduce impacts related to paleontological resources, archaeological resources and historical resources to below a level of significance.

4.8 IMPACTS RELATED UTILITIES & SERVICES

4.8.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO UTILITIES AND SERVICES

The Amended Project would result in potentially significant adverse impacts related to utilities and services, including construction and operational impacts relating to solid waste. These impacts are similar to the impacts of the Original Project, and the Amended Project will not result in any new or more significant impacts than previously disclosed and analyzed in the Original FEIR.

4.8.1.1 Findings Related to Utilities and Services

Impacts Related to Solid Waste

The Amended Project would generate solid waste during construction. This waste would be generated as a result of the demolition of existing on-site structures and pavement as well as the construction of new residential and commercial development. Much of the solid waste generated from construction of the Amended Project would be recyclable, such as wood and metal scrap and formed construction board (cement and drywall board). As provide by the SPMC Chapter 50.140 Construction and Demolition Diversion, demolition and construction must divert 50 percent of waste tonnage from landfills. Separate calculations and reports are required for the demolition and construction portion of projects involving both activities. Since the Amended Project would reduce the total development allowed, the impacts are reduced from the Original Project. However, as with the Original Project, until the construction waste recycling plan is in place, construction solid waste generation is considered potentially significant.

Under the Amended Project, future operations will generate approximately 5,904.9 tons per year of solid waste, which equates to approximately 22.7 tons of solid waste per day that will be delivered to landfills. This is a reduction from the Original Project, which was estimated to produce approximately 7,701 tons per year, or 29.6 tons per day. The Toland Road Landfill, due to its location and capacity, is the primary provider of solid waste disposal to the City of Santa Paula; other landfills in the region are also used, but to a lesser extent. Solid waste generated during construction and operation of the Amended Project is required to comply with all federal, state, and local statutes and regulations to reduce and recycle solid waste. While the total solid waste generation will be reduced under the Amended Project, given that future landfill capacity may not be ensured through the life of the development and for many years after full occupancy, impacts to solid waste are considered potentially significant.

With respect to each and every one of these potentially significant impacts related to utilities and services, as identified in the Final SEIR, the City Council finds that changes or alterations have been required in, or incorporated into, the Amended Project which avoid or substantially lessen the significant effects identified in the Final SEIR to a level of less than significant.

4.8.1.2 Facts in Support of the Findings Related to Utilities & Services

No new or increased severity of impacts would occur with the Amended Project. Consequently, no new mitigation measures are necessary. Mitigation Measures U-1 through U-2 provided in the mitigation monitoring and reporting program adopted with the certification of the Original FEIR address impacts related to solid waste and will be implemented. Former mitigation measures U-4 and U-5 are not required as they are not relevant to an identified environmental impact, and former mitigation measure U-3 merely states already applicable legal requirements and thus is superfluous.

Implementation of Mitigation Measures U-1 through U-2 would reduce impacts to utilities and services to less than significant levels. Accordingly, the Amended Project would not have any significant unavoidable adverse project impacts related to utilities and services, as set forth in the Final SEIR, which is incorporated by this reference.

5.0 FINDINGS ON IMPACTS OF THE PROPOSED PROJECT THAT WERE DETERMINED NOT TO BE SIGNIFICANT

In evaluating the environmental impacts associated with the Amended Project, the Final SEIR documented some potential effects that are not be considered significant. CEQA does not require findings for less than significant impacts and for which mitigation is, accordingly, not required. Nevertheless, the City Council incorporates the findings and discussion from the Final SEIR as part of its findings.

5.1 IMPACTS RELATED TO LAND USE AND PLANNING

The Original FEIR found that, after voter approval of General Plan Amendments, the Original Project would be consistent with the General Plan. Following voter approval in 2008 and the LAFCo annexation approval in 2011, all mitigation measures adopted by the City related to land use were implemented. Consequently, the Amended Project will not have any significant impacts related to land use and planning.

5.1.1 CONSISTENCY WITH CITY LAND USE REGULATIONS

Development of the Project Site is anticipated to take approximately 10 years with complete development expected by 2025. During this time, an average annual number of approximately 150 residential units would be constructed. However, as noted in the Original FEIR, the City could issue up to 500 building permits per calendar year for residential construction within the Specific Plan Area. If any of the 500 residential building permits allocated for a given calendar year remain unissued, the unissued permits will carry over to the subsequent calendar year and be added to that calendar year's residential building permit allocation. The Amended Project will not change the amount of building permits that may be issued on an annual basis and would maintain consistency with applicable City land use regulations.

5.1.2 CONSISTENCY WITH SCAG REGIONAL PLANS AND POLICIES

As with the Original Project, the Amended Project will be consistent with SCAG's regional plans and policies, including the 2012 Regional Transportation Plan.

5.1.3 CONSISTENCY WITH VENTURA LAFCO POLICIES

The Original Project was determined to be consistent with all applicable Ventura LAFCo policies and annexation of the site to the City was approved by LAFCo in 2011. The Amended Project is likewise consistent with all applicable Ventura LAFCo policies.

5.2 AGRICULTURAL RESOURCES

As with the Original Project, the Amended Project will not have any significant impacts based upon conflicts with existing zoning for agricultural uses or Williamson Act conflicts. The Project Site was annexed to the City of Santa Paula in February 2013. All uses allowed by the Amended Project are provided for within appropriate land use and zoning designations, which include a 55-acre agricultural preserve designation. There are no Williamson Act contracts applicable to any portion of the Project Site. Therefore, the Amended Project will not conflict with existing zoning for agricultural use or Williamson Act contracts.

5.3 MINERAL RESOURCES

As with the Original Project, the City Council finds that the Amended Project will not have any significant environmental effects relating to mineral resources. The Project Site does not contain mineral resources that are mapped by the State Department of Conservation, the County of Ventura, or the City of Santa Paula. Also, there are no state designated mineral extraction areas within or adjacent to the Project Site.

The Amended Project will not result in an inconsistency with the uses allowed by the City General Plan or other local plans relating to mineral resources and mineral resource designated areas within General Plan, Specific Plans, or other land use plans.

No known mineral resources of local or statewide importance occur within the Specific Plan area or in the limited infrastructure improvement areas outside the Specific Plan boundary. Furthermore, there are no existing mineral resource extraction operations within any areas of Santa Paula that are mapped under the City's Mineral Resource Overlay designation or within the unincorporated County that are mapped as MRZ-2 that will be affected by uses allowed by the Amended Project.

No new mapping of aggregate resources in the area has been completed since the Original FEIR was certified in 2008. The nearest State and County designated MRZ-2 zone and City of Santa Paula Mineral Resource Overlay zone is within the Santa Clara River, which is located approximately 3,000 feet (½ mile) to the south. There are currently no active mineral resource extraction operations occurring in the River or within this area. Accordingly, the Amended Project will result in less than significant impacts to important mineral resource areas or permitted aggregate extraction operations.

5.4 TRANSPORTATION & CIRCULATION

The Amended Project will result in certain significant and unavoidable traffic impacts and will also have potentially significant impacts that will be mitigated to a level of less than significant, as described in Sections 3 and 4 of these Findings. As set forth in the Final SEIR, the project will not have any significant impacts relating to (1) freeways and multilane highways, including SR 126; (2) consistency with the Circulation Element of the Santa Paula General Plan; (3)

consistency with Ventura County's congestion management plan; (4) changes in air traffic patterns; (5) roadway design or use hazards; (6) emergency access; or (7) conflicts with public transit, bicycle, and pedestrian plans and policies.

SR 126

As with the Original Project, the Amended Project will not have any significant impacts on SR 126, including the five segments studied in the Project vicinity and the ramps. The five freeway segments currently operate at LOS D or better in both directions during both peak periods. On the multilane highway segment, the current operating conditions are LOS B or better in both directions during both peak periods. Consistent with the significance thresholds in the Ventura County CMP, the Project will not cause SR 126 to operate at LOS F after the addition of project traffic and the Amended Project does not cause a net increase in traffic demand of 2 percent of capacity or more. Likewise, the Amended Project is consistent with the applicable significance thresholds for the SR 126 on-ramps and off-ramps. Therefore, the Amended Project will result in less than significant impacts to freeway and multilane highways, including SR 126.

Santa Paula General Plan

The Circulation Element of the Santa Paula General Plan recommends a series of roadway improvements to accommodate the projected growth in traffic volume to accommodate General Plan build-out. The Amended Project and the recommended mitigation measures are consistent with the future roadway improvements identified in the City's General Plan. Accordingly, impacts will be less than significant.

Ventura County Congestion Management Plan

An analysis was completed to comply with the monitoring requirements found in the Ventura County Transportation Commission's (VCTC) 2009 VCCMP. The VCTC has adopted LOS E as a minimum system-wide level of service on all VCCMP roadways. In the study area, SR 126 and SR 150, as well as Harvard Boulevard/Telegraph Road west of SR 150 (including intersections 15, 20, 25, 30 and 32) are part of the CMP roadway network. As determined by the traffic study completed in connection with the Final SEIR, these facilities would operate at LOS E or better during both peak hours under cumulative base plus project conditions in the year 2025. Therefore, impacts will be less than significant.

Air Traffic Patterns

The nearest airport is the Santa Paula Airport is located to the southwest of the Specific Plan Area. The Project Site is not located within any of the various safety zones established by the Comprehensive Land Use Plan (CLUP), nor is it within the Safety Zone which includes the Inner Safety Zone (ISZ), the Outer Safety Zone (OSZ), and the Traffic Pattern Zone (TPZ), as provided in the City's General Plan Safety Element. Furthermore, the Amended Project will not significantly change the development pattern of the Original Project nor will it increase the

heights of any structure beyond 3 stories as provided in the development standards of the Amended Project. Therefore, as with the Original Project, the Amended Project will result in a less than significant impact to air traffic patterns.

Roadway Design Features and Incompatible Use Impacts

As provided with the approved Original Project, the internal circulation network will be constructed in compliance with the Santa Paula Municipal Code and will not contain dangerous design features (e.g., sharp curves, dangerous intersections). Occasional use of some farm equipment will occur in connection with the 55-acre Agricultural Preserve in the northern portion of the EA1 SP-3 Area. However, these vehicles would be subject to standard roadway use and operation requirements. Therefore, implementation of the Amended Project would result in less than significant impacts related to roadway design features and incompatible uses.

Emergency Access

As with the Original Project, the Amended Project includes no roadway or other changes that will impact emergency access. As provided in the Original FEIR, the City of Santa Paula Fire Department (SPFD) provides minimum standards for emergency access, which will be satisfied by the Amended Project. Therefore, the Amended Project will not have any significant impact on emergency access.

Conflict With Adopted Policies, Plans, or Programs

The General Plan includes goals to ensure that City residents have alternative transportation opportunities such as transit, bikeways, and pedestrian routes. As with the Original Project, the Amended Project includes a circulation system that encourages walking and bicycle use instead of the automobile. The Amended Project will maintain a looping trail system throughout and the bridge connection of Santa Paul Street to the east. The Amended Project also includes a series of bicycle trails (Class I Bikeways) and walking trails, which would connect the on-site neighborhoods with the City's existing and planned trail system.

Designated bicycle facilities in the City of Santa Paula are located on Santa Paula Street and along the railroad tracks between Peck Road and 9th Street. There are no existing bicycle facilities on the East Area 1 site. Portions of South Hallock Road provide sidewalk, and crosswalks, which are provided at the intersection of SR 126 and South Hallock Road. The Amended Project will enhance the pedestrian environment by expanding the pedestrian and bicycle facilities into the 501-acre Specific Plan area and providing a more connected network with the existing City facilities. Therefore, implementation of the Amended Project will result in a beneficial impact related to alternative transportation modes since it would reduce overall dependence on the automobile and would encourage walking and bicycling. Therefore, impacts to public transit, bicycle, or pedestrian facilities will be less than significant.

5.5 AIR QUALITY

As with the Original Project, the Amended Project will not have any significant air quality impacts with respect to (1) conflicts with applicable air quality plans; (2) odor impacts; (3) valley fever; and (4) local carbon monoxide hotspots.

Conflict with applicable Air Quality Plan

The 2007 AQMP was prepared to reduce the high levels of pollutants within Ventura County, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because they were included in the projections utilized in the formulation of the AQMP.

According to the VCAPCD Guidelines, to be consistent with the AQMP, a project must conform to the local general plan and must not result in or contribute to an exceedance of the City's projected population growth forecast. As compared to the Original Project, the Amended Project will provide the same amount of housing and will reduce the amount of non-residential development allowed with the Specific Plan area. In addition, the population increase (5,274 people) that could result from the Amended Project is within the most recent growth projections of SCAG for the City of Santa Paula. The growth forecast is also within the population growth parameters considered in the AQMP, which is updated by the VCAPCD to manage air emissions in the County of Ventura in accordance with local, state, and federal standards. As with the Original Project, implementation of the Amended Project will not obstruct implementation of the AQMP or attainment of state or federal air quality standards. Therefore, impacts regarding the consistency of the Amended Project with applicable air quality plans are considered less than significant.

Odor Impacts

As with the Original Project, the potential impacts associated with objectionable odors will be less than significant because no uses are proposed that would generate objectionable odors.

Valley Fever

As with the Original Project, the Amended Project will include grading activities that will cut soil from the higher elevations of the Project Site for use as fill at the lower elevations. These activities could be considered conducive to disturbing the *Coccidioides immitis* spores if they are present. The Valley Fever fungus tends to be found at the base of hillsides in undisturbed soil and usually grows in the top few inches of soil. However, due to the historical use of the Project Site for agriculture purposes, involving periodic grading, ripping, excavation, and soil preparation (such as fertilizing) for planting, the soils over most of the Project Site have been disturbed over the top several feet of the soil. The likelihood of causing previously undisturbed *Coccidioides immitis* spores to become airborne and cause infection from inhalation is considered minimal. Also, during periods of high dust in the grading phase, crews must use respirators in accordance with California Department of Occupational Safety and Health regulations. Furthermore, the construction activities will be required to conform to VCAPCD

Rule 403 to control fugitive dust, along with other rules, that will prevent significant dust. Consequently, impacts related to exposure of people to Valley Fever will remain less than significant with construction related to the Amended Project.

Local Carbon Monoxide Hotspots

Motor vehicles are a primary source of pollutants within the Project vicinity. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO, and where localized ambient concentrations exceed State and/or federal standards, these are termed CO “hotspots.” All but one study-area intersection is projected to operate at LOS D or better with the addition of the traffic generated by the Amended Project. The only intersection that would require further analysis based on VCAPCD standards would be Intersection 15 at 10th Street (SR-150) and Harvard Boulevard. This intersection is expected to operate at LOS E during both the AM and PM peak hours. Overall, the Amended Project will reduce trip generation relative to the Original Project at this intersection location, and relative to the future no project condition. In addition, this intersection is a freeway ramp and there are no sensitive receptors located within close proximity so as to be affected by vehicle emissions at this intersection. Consequently, the Project will not expose sensitive receptors to substantial pollutant concentrations, and impacts will be less than significant.

5.6 NOISE

The Amended Project will have certain noise impacts that are considered significant, but will be mitigated to a level of less than significant based upon the mitigation measures adopted by the City. In addition, as set forth in the Final SEIR, the City Council finds that the Amended Project will not have significant noise and vibration impacts with respect to (1) project uses that cause vibration; (2) railroad vibration; (3) on-site roadway noise; and (4) airport noise.

VIBRATION

Operational Vibration

The primary sources of vibration from occupancy and use of the new development that would be allowed under the Amended Project could include passenger vehicles, delivery truck for light-industrial and commercial uses, and school buses. Operations within the light-industrial and commercial planning areas (such as those allowed in the Hallock Center) will likely include typical commercial-grade stationary mechanical and electrical equipment such as air handling units, air condenser units, exhaust air fans, and electrical power generators that could produce vibration. Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the Project’s operational-related vibration sources, such as mechanical and electrical equipment, would incorporate vibration attenuation mounts, as required by the particular equipment specifications. Therefore, operation of the Amended Project would not increase the existing vibration levels at off-site surrounding uses; and as such, vibration impacts associated with operations will be less than significant.

Railroad Vibration

Operating trains are a source of ground-borne vibration. The Santa Paula Branch Line railroad tracks run adjacent to the southern boundary of the Project Site. The tracks are not currently being operated, but should trains operate on the tracks in the future, trains could potentially create vibration at the Project Site. To maintain compatibility with the railroad tracks, the Amended Project provides for predominantly light industrial and commercial uses in the Hallock Center at the southern portion of the Specific Plan, and a limited amount of live/work units. According to the 2002 Caltrans Transportation Related Earthborne Vibrations study, train-generated vibration passes below the threshold of perception or 65 VdB at a distance of 90 meters, or 295 feet, from train tracks. This Caltrans study identifies the threshold of annoyance or approximately 80 VdB as 20 meters, or 66 feet, from train tracks, assuming that vibration is constant. In this case, the vibration from the railroad track would not be constant (up to 6 trains trips per day), would be approximately 75 feet from the track, and below 80 VdB resulting in less than significant impacts.

On-Site Roadway Noise

The noise that could be generated from within the Amended Project from traffic will not substantially increase the ambient noise conditions in the project area. Furthermore, the Amended Project will result in a reduction in light-industrial uses and a reduction in overall vehicle trip generation. Therefore, on-site roadway noise impacts from the Amended Project will be less than significant.

Airport Noise

Noise levels from the Santa Paula Airport are below 60 dB(A) on the Project Site and people residing, attending school, or working within the future land uses of the Amended Project would not be exposed to excessive noise due to the aircraft travel pattern. Therefore, as with the Original Project, implementation of the Amended Project will result in less than significant impacts related to noise generated by the Santa Paula Airport.

5.7 BIOLOGICAL RESOURCES

The Amended Project will have certain impacts to biological resources that are considered significant, but will be mitigated to a level of less than significant based upon the mitigation measures adopted by the City. In addition, as set forth in the Final SEIR that is incorporated by this reference, the City Council finds that the Amended Project will not have significant impacts to biological resources with respect to (1) the direct loss of common wildlife species; and (2) cumulative effects on biological resources. These findings are based on the fact that the majority of the land that will be developed is already in a disturbed state and actively used for agriculture, and therefore, does not provide habitat for a high diversity of plant or animal species.

5.8 GEOLOGY & SOILS

The Amended Project will have certain impacts to geology and soils that are considered significant, but will be mitigated to a level of less than significant based upon the mitigation measures adopted by the City. In addition, as set forth in the Final SEIR, the City Council finds that the Amended Project will not have significant geological impacts relating to faults, seismicity, liquefaction, subsidence and expansive soils. These findings are based on the following facts: (1) the project site is not located in an established fault zone and there are no active faults crossing the project site; (2) the project site is not located in a liquefaction zone and does not have shallow groundwater; (3) the withdrawal of groundwater for the project will not substantially increase the amount of groundwater currently being pumped from the site and will not create a significant risk of subsidence; and (4) the soils on the portion of the project site to be developed have a very low expansion potential.

5.9 HYDROLOGY & WATER QUALITY

As set forth in the Final SEIR, the City Council finds that the Amended Project will not have any significant hydrology and water quality impacts. The Original FEIR also determined that there would be no significant hydrology and water quality impacts. As set forth in the Final SEIR, the City Council finds that: the Amended Project's potential impacts to the Santa Clara Ecosystem, including potential sublethal toxicity and other impacts to Southern California steelhead smolt and migrating adults, are less than significant based upon the entirety of the administrative record. These findings are based upon all of the information in the Final SEIR, including the evidence showing that the Amended Project's stormwater infiltration and treatment features, including low impact development best management practices, will ensure that the stormwater runoff that enters the Santa Clara River ecosystem will not have any significant water quality impacts. These BMPs ensure that all nuisance runoff and most stormwater runoff will be treated and retained onsite, and that the stormwater runoff that will flow into the Santa Clara River ecosystem, during larger storm events above the 85th percentile of storm events, will comply with all applicable standards for water quality, including dissolved copper and other metals, and will be similar to or have better water quality than the receiving waters adjacent to the project site and downstream. The City Council also incorporates by reference the findings and facts described in Section 4.3.1 of these Findings with respect to potential stormwater runoff impacts. As previously determined in the Original FEIR, the City Council also finds that the project will not have any other significant hydrology impacts, including with respect to groundwater supplies, flooding, erosion, and mudflows, as set forth in the Final SEIR incorporated herein by this reference.

5.10 HAZARDS & HAZARDOUS MATERIALS

The Amended Project will have certain impacts relating to hazards and hazardous materials that are considered significant, but will be mitigated to a level of less than significant based upon the mitigation measures adopted by the City. In addition, as set forth in the Final SEIR that is incorporated by this reference, the City Council finds that the Amended Project's potential impacts to the following issues related to hazards and hazardous materials would be less than significant: (1) the use, transport, and disposal of hazardous materials; (2) risks associated with

the emission or accidental release of hazardous materials; (3) aviation related risks associated with the Santa Paula Airport; and (4) cumulative risks associated with potential hazards and hazardous materials. As also determined in the Original FEIR, these potential impacts are all determined to be less than significant in the Final SEIR because the Amended Project will not include uses requiring any unusual hazards or hazardous materials, will be subject to and compliant with all applicable state and federal regulations concerning hazardous materials, and is not located within the Traffic Pattern Zone for the Santa Paula Airport.

5.11 AESTHETICS

The Amended Project will have certain significant and unavoidable aesthetic impacts and will also have potentially significant impacts that will be mitigated to a level of less than significant by the mitigation measures identified in the Final SEIR and adopted by the City Council. In addition, as set forth in the Final SEIR, the City Council finds that the Amended Project's potential aesthetic impacts related to glare in the daytime hours would be less than significant because the use of reflective, glare causing materials is prohibited.

5.12 CULTURAL RESOURCES

The Amended Project will have certain impacts relating to cultural resources that are considered significant, but will be mitigated to a level of less than significant based upon the mitigation measures adopted by the City. As set forth in the Final SEIR that is incorporated by this reference, the City Council finds that the Amended Project's potential impacts to paleontological resources located within stream channel deposits would be less than significant because stream channel deposits are not old enough to contain fossilized resources.

5.13 PUBLIC SERVICES

As with the Original Project, the City Council finds that the Amended Project will not have any significant environmental effects relating to public services, including fire protection, police protection, emergency services, public education, and library services. These findings are based on the information contained in the Final SEIR including the following facts: (1) the developer is required to dedicate a site and provide funding of \$4 million for a new fire and police station; (2) the developer is required to fund up to an additional \$2 million for any shortfall in the City's budget for public services resulting from development of the Amended Project; (3) the Amended Project includes sites for an elementary school (K-8) and additional secondary school facilities planned in conjunction with the Santa Paula Unified School District, and provides funding for those school facilities through the payment of school fees, consistent with the existing mitigation agreements with the Santa Paula Unified School District and state-mandated school fees; (4) the developer is required to pay the City's library developer fee; and (5) the properties within the Specific Plan will be subject to an annual parcel tax to provide ongoing funding for the City's library facilities.

5.14 RECREATION

As with the Original Project, the City Council finds that the Amended Project will not have any significant environmental effects relating to recreational facilities, including with respect to the potential increase in the use of the City's existing recreational facilities, the need for the expansion or construction of recreational facilities, and the adequacy of recreational facilities to serve the residents of the Amended Project. These findings are based on the information contained in the Final SEIR, which is hereby incorporated by this reference, including the following facts: (1) the Amended Project will provide parks, trails and open space at a ratio of approximately 18.2 acres per 1,000 residents, which far exceeds the City's standard of 5 acres per 1,000 residents; (2) the Amended Project will include construction of a new community park, including ball fields and hard court play facilities, that will serve all of the residents of the City; (3) the Amended Project will not require the expansion of the City's existing parks and recreational facilities.

5.15 UTILITIES & SERVICES

The Amended Project will have certain impacts relating to utilities and services that are considered significant, but will be mitigated to a level of less than significant based upon the mitigation measures adopted by the City. In addition, as set forth in the Final SEIR that is incorporated by this reference, the City Council finds that the Amended Project's potential impacts to the following issues related to utilities and services would be less than significant: (1) wastewater treatment capacity and facilities; (2) water and recycled water facilities; (3) water supply availability and reliability; (4) electricity; and (5) other utilities (cable, telephone, etc.). These findings are based upon the information contained in the Final SEIR including the following facts: (1) the City's water recycling facility has a normal operating capacity of 3.15 mgd, well in excess of the capacity needed for existing development and the Amended Project; (2) the City will have sufficient water supplies to meet the anticipated demand from the Amended Project, and its other water demands, during normal, single-dry and multiple-dry years, as determined by the Water Supply Assessment; (3) Southern California Edison will supply the Amended Project's electricity and will service and maintain the electrical facilities; (4) the Amended Project includes energy conservation features and design standards; and (5) all necessary on-site utility infrastructure will be installed in ground within the street rights-of-way to service the Amended Project.

5.16 POPULATION & HOUSING

As with the Original Project, the City Council finds that the Amended Project will not have any significant environmental effects relating to population, housing and employment. These findings are based on the information contained in the Final SEIR including the following facts: (1) the anticipated population growth from the Amended Project is consistent with the City's General Plan population projection and its growth management regulations and is below SCAG's population projections for the area; (2) the Amended Project will not induce growth on adjacent undeveloped areas because those areas (north and east of the Project site) are subject to greenbelt

or open space restrictions; (3) the Amended Project will not displace substantial numbers of existing homes; and (4) the Amended Project will not create the need for replacement housing elsewhere in the City.

5.17 GREENHOUSE GASES

The City Council finds that the Amended Project's impacts related to greenhouse gases will be less than significant, including with respect to both construction and operational generation of GHG emissions. These findings are based upon the information and evidence contained in the Final SEIR, which is hereby incorporated by this reference, including the following facts:

5.17.1 CONSTRUCTION

Construction activities associated with the Project would generate 7,728 MTCO_{2e} GHG emissions. The SCAQMD recommends annualizing construction-related GHG emissions over a project's lifetime, defined as a 30-year period, in order to include these emissions as part of the annual total operational emissions. Therefore, construction-related GHG emissions have been annualized over this period and included in the annual operational emissions analysis.

5.17.2 OPERATION

The following is a list of project design features that would reduce GHG emissions:

- **Residential Density:** High-density, live/work type residential developments would reduce the number of Project-generated vehicle trips.
- **Energy Efficiency:** The Project would be designed to meet the requirements of Title 24.
- **Water Conservation:** The Project would be designed to reduce water consumption compared to conventionally designed projects of similar size and scope. Such features would include low flow faucets, toilets, shower, and water-efficient irrigation systems.
- **Solid Waste Reduction:** The Project would be designed to reduce solid waste generation by including a recycling and composting program per City of Santa Paula Municipal Code requirements.

The business as usual scenario would result in GHG emissions (without Code of California Regulations ("CCR") Title 24 efficiencies, design features, or mitigation measures) of 26,531.7 MTCO_{2e} per year. The Amended Project would result in 5,573 MTCO_{2e} fewer emissions per year, or approximately 20.2 percent from the business as usual scenario. The Amended Project results in greater than 19 percent reduction in GHG emissions as recommended by the CARB Scoping Plan. Under both the service population and BAU methodologies, impacts would be less than significant.

The Amended Project would incorporate measures that reduce GHG emissions compared to a conventional project of similar size and scope. The Amended Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of a building's life-cycle. These designs would increase the structures energy efficiency, water efficiency, and overall sustainability. The Amended Project would meet or exceed CCR Title 24 energy

requirements by 15 percent consistent with the Voluntary Green Building Program. The Project is also located in an urban area that would reduce vehicle trips and vehicles miles traveled due to the urban infill characteristics and proximity to public transit stops. These measures and features are consistent with existing recommendations to reduce GHG emissions. Because the Amended Project meets the service population ratio and results in a greater than 15 percent reduction in GHG emissions from 1990 levels by 2020, the Amended Project would be consistent with the 2020 reduction in GHG emissions from 1990 levels set forth in the 2008 Scoping Plan and 2014 Updated Scoping Plan. Therefore, the Amended Project would not conflict with the 2008 Scoping Plan and the 2014 Updated Scoping Plan, and would result in less than significant impacts relating to GHG emissions

6.0 FINDINGS REGARDING ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires that an EIR describe a range of reasonable alternatives to the project or the location of the project, which could feasibly attain the basic objectives of the project and to evaluate the comparative merits of those alternatives (CEQA Guidelines § 15126.6). Analysis of every possible alternative or option or combination of options would overburden the EIR with an unnecessary amount of detail that would be redundant and complex and would, as a result, fail to provide meaningful information for the City Council to consider in its review of the Amended Project. In this case, the Amended Project will not result in any new or more severe significant environmental effects than identified in the Original FEIR, and the City Council finds that the Alternatives analysis in the Original FEIR contains a reasonable range of alternatives and is adequate for the Amended Project. In making these alternatives findings, the City Council finds that it has independently reviewed and considered the information on alternatives provided in the Original FEIR, including the information provided in the comments and response to comments in the Draft SEIR. The analysis of these alternatives contained in the Original FEIR is not repeated in these Findings, but the discussion and analysis of the alternatives in the Original FEIR is incorporated in these Findings by reference.

The proposed project was compared to five Alternatives which included:

- Alternative 1: No Project
- Alternative 2: City of Santa Paula General Plan-900 Dwelling Units
- Alternative 3: East Area 1 Specific Plan- 1,000 Dwelling Units
- Alternative 4: East Area 1 Specific Plan - 1,250 Dwelling Units
- Alternative 5: East Area 1 Specific Plan- State Route 150 ByPass

The analysis in the Final SEIR, and as summarized in these Findings, concludes that the Amended Project will result in some short and long term significant adverse impacts which cannot be mitigated to a less than significant level. These unavoidable adverse impacts (previously described) are related to agricultural resources, air quality, aesthetics, cultural and historic resources, and transportation.

The Amended Project, as proposed, represents the culmination of plans developed by the City of Santa Paula and approved by the City of Santa Paula Planning Commission and City Council. The project incorporates comments and review from the following:

1. Analysis of the Amended Project by City employees and consultants.
2. Analysis of the Amended Project by the City of Santa Paula Planning Commission and the City Council.
3. Responses to comments on the Notice of Preparation.
4. Responses to Comments on the Draft SEIR.
5. Input from meetings conducted by the City of Santa Paula and public review of the Draft SEIR for the Amended Project.
6. The entire administrative record related to the Original Project and Amended Project.

6.1 ALTERNATIVE NO. 1- NO PROJECT ALTERNATIVE

6.1.1 DESCRIPTION OF THE NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Under the No Project/No Development Alternative, neither the Original Project nor the Amended Project would be developed and the land would likely continue to be used for agricultural production. The project site was annexed to the City in 2013. Consequently, the No Project/No Development alternative would result in ongoing agricultural operations at the Project site as a legal nonconforming use within the City's jurisdiction. Moreover, the proposed flood control improvements to Haun Creek would not be constructed, so Haun Creek at SR-126 would continue to experience flooding during normal storm events. Although this alternative would hypothetically be considered the environmentally superior alternative because it would avoid the significant and unavoidable impacts of the Original Project and the Amended Project, it is deemed both unacceptable and unrealistic for at least two reasons: (1) the Original Project allows the project site to be urbanized notwithstanding its current agricultural use; and (2) because the Original Project redesignated the project site in the Santa Paula General Plan and rezoned it, land uses on the project site must conform with the Original Project approvals within five years from 2013 (when the project site was annexed into the City's jurisdiction) pursuant to SPMC Chapter 16.110 and absent any additional discretionary approvals from the City. Furthermore, this alternative is rejected by the City Council because it would fail to meet any of the objectives of the Amended Project.

6.1.2 DESCRIPTION OF THE NO PROJECT/ORIGINAL PROJECT ALTERNATIVE

The No Project/Original Project Alternative would still allow the applicant to develop the project site in accordance with the Original Project approvals; the City has not rescinded the previous approvals. Under this alternative, the Original Project would have all of the significant and unavoidable impacts set forth in the Original EIR, which are more severe than the impacts of the Amended Project because the Original Project includes substantially more non-residential development. Accordingly, this Alternative would not substantially reduce any of the significant and unavoidable impacts of the Amended Project.

6.2 ALTERNATIVE 2: CITY OF SANTA PAULA GENERAL PLAN- 900 DWELLING UNITS

6.2.1 DESCRIPTION OF ALTERNATIVE 2

This alternative is based on the City of Santa Paula's prior General Plan (1998) description for East Area 1, which would allow for the construction of 900 dwelling units, up to 76,230 square feet of neighborhood commercial, a school, parks, and a hotel and golf course.

6.2.2 SUMMARY OF ENVIRONMENTAL IMPACTS OF ALTERNATIVE 2

Similar to the proposed Project, Alternative 2 would convert the project site from agriculture to urban land uses. However, the proposed land uses and intensities for this alternative would not be consistent with the Santa Paula General Plan's vision of this area as amended in 2008. In addition, it would also result in impacts similar to the Amended Project, but slightly reduced due to the reduced intensity of development. Nevertheless, this alternative would not substantially reduce or avoid any of the significant and unavoidable impacts of the Amended Project. In addition, this alternative would result in greater impacts related to land use and planning since it reflects the planned use of this area, as envisioned in the prior General Plan, and is not consistent with current General Plan or the approved Original Project.

6.2.3 ABILITY OF ALTERNATIVE 2 TO MEET THE PROJECT OBJECTIVES

Overall, implementation of this alternative would not be consistent with the objectives of the Amended Project because it fails to allow for development of a sufficient range of open space, park and recreational facilities to serve the City's residents, and is inconsistent with the City's General Plan. Therefore, this alternative is rejected by the City Council as unacceptable and inconsistent with the City Council's vision for this site.

6.3 ALTERNATIVE 3-EAST AREA 1 SPECIFIC PLAN-1,000 DWELLING UNITS

6.3.1 DESCRIPTION OF ALTERNATIVE 3

The Regulating Plan for Alternative 3 is the same as the Specific Plan base case but contains 500 fewer dwelling units. It contains a total of 1,000 dwellings units, as well as *mix* of various educational, commercial and open space uses.

The lower number of units is achieved by changing the allowed building types and minimum lot widths in each zone. Alternative 3 contains the following percentage of unit types:

- 564 units (56%)- single-family detached
- 188 units (19%)- single-family attached
- 248 units (25%)- multi-family

6.3.2 SUMMARY OF ENVIRONMENTAL IMPACTS OF ALTERNATIVE 3

Similar to the Amended Project, Alternative 3 would convert the site from agriculture to urban land uses. However, the proposed land uses and intensities noted for this alternative would not be consistent with the Santa Paula General Plan's vision of this area as determined by voters in 2008. Because of the reduction in residential units, the significant and unavoidable impacts of the Amended Project may be slightly reduced, but none of those significant impacts would be substantially reduced or avoided under this Alternative. Overall, impacts from this alternative would not be markedly different from the proposed project.

6.3.3 ABILITY OF ALTERNATIVE 3 TO MEET THE PROJECT OBJECTIVES

Implementation of this alternative would not be consistent with the objectives of the Amended Project because it would not allow for a sufficient number of homes to support viable neighborhood serving commercial uses within close proximity to the City's residential areas, and is inconsistent with the General Plan as amended by the voters. Therefore, this alternative is rejected by the City Council as unacceptable and inconsistent with the City's vision for this site.

6.4 ALTERNATIVE 4- EAST AREA 1 SPECIFIC PLAN- 1,250 DWELLING UNITS

6.4.1 DESCRIPTION OF ALTERNATIVE 4

The Regulating Plan for Alternative 4 is the same as the Specific Plan base case, but contains 250 fewer dwelling units. It contains a total of 1,250 dwellings units, as well as mix of various educational, commercial and open space uses.

The lower number of units is achieved by changing the allowed building types and minimum lot widths in each zone. The percentage of unit types would be distributed approximately as follows:

- 627 units (50%)-single-family detached
- 223 units (18%)-single-family attached
- 400 units (32%)-multi-family

A range of services, commercial uses and work place facilities would be provided on-site and could be accessed by walking and/or a short drive away. Essential, daily needs would require limited off-site vehicular trips.

6.4.2 SUMMARY OF ENVIRONMENTAL IMPACTS OF ALTERNATIVE 4

Similar to the Amended Project, Alternative 4 would convert the site from agriculture to urban land uses. However, the proposed land uses and intensities noted for this alternative would not be consistent with the Santa Paula General Plan's vision of this area. Because of the reduction in the total number of residential units, the significant and unavoidable impacts of the Amended Project may be slightly reduced under this alternative, but none of the significant and

unavoidable impacts of the Amended Project would be substantially reduced or avoided. Overall, impacts from this alternative would not be markedly different from the proposed project.

6.4.3 ABILITY OF ALTERNATIVE 4 TO MEET THE PROJECT OBJECTIVES

Implementation of this alternative would be generally consistent with the objectives of the Amended Project, but it does not provide the range of housing options desired by the City Council, including a greater number of single-family attached and multi-family units. Therefore, this alternative is rejected by the City Council as unacceptable and inconsistent with the City's vision for this site.

6.5 ALTERNATIVE 5- EAST AREA 1 SPECIFIC PLAN-STATE ROUTE 150 BYPASS

6.5.1 DESCRIPTION OF ALTERNATIVE 5

Under Alternative 5, the proposed project as described in Section 3.0 (Project Description) of the Original EIR would be constructed. However, a By-Pass to State Route 150 (Ojai Road) would also be constructed. The By-Pass would follow Hallock Road beginning at Telegraph Road and extend northwest through the project site before eventually heading west across Santa Paula Creek. The exact location of the crossing would need to be evaluated within a future study. As currently considered in the traffic report, the roadway would end at Santa Paula Creek.

6.5.2 SUMMARY OF ENVIRONMENTAL IMPACTS OF ALTERNATIVE 5

Similar to the Amended Project, Alternative 5 would convert the site from agriculture to urban land uses, and would allow for the same development as the Original Project. Overall however, impacts from this alternative would be somewhat greater than the Amended Project because this alternative would include more non-residential development. This alternative would not substantially reduce or avoid any of the significant and unavoidable impacts of the Amended Project.

6.5.3 ABILITY OF ALTERNATIVE 5 TO MEET THE PROJECT OBJECTIVES

Implementation of this alternative would be generally consistent with the objectives of the Amended Project.

7.0 COMPARISON OF IMPACTS

Each of the alternatives involving development of the site would result in environmental impacts greater than would occur under the short term, i.e., less than five years, No Project/No Development Alternative. Therefore, the No Project/No Development Alternative is the environmentally superior alternative, although it would not meet project objectives. Section 15126.6(e) of the CEQA Guidelines states that if the No Project Alternative is selected as the environmentally superior alternative, then the EIR must also identify an environmental superior alternative among the other alternatives.

The No Project/Original Project Alternative would have all of the significant and unavoidable impacts set forth in the Original EIR, which are more severe than the impacts of the Amended Project because the Original Project includes substantially more non-residential development. Therefore, the No Project/Original Project Alternative would not be the environmentally superior alternative. Of the remaining alternatives, the Amended Project and Alternatives 2, 3, 4 and 5 would result in similar levels of impacts. However, there are a number of variations amongst and between the Amended Project and these alternatives which would result in slightly differing levels of impacts for some environmental parameters.

Alternatives 2, 3 and 5 would generate additional traffic, noise and air quality impacts when compared to the Amended Project and Alternative 4. Alternatives 2 and 3 would include the construction of 900 and 1,000 residential units, respectively. This level of development would likely not be able to support the range of commercial/office uses proposed for these alternatives. This would require most residents to travel off-site to other areas within the City or adjacent areas to the west (City of San Buenaventura) and east (cities of Fillmore and Santa Clarita). Alternative 5 would include the construction of the proposed State Route 150 (Ojai Road) By-Pass. The construction of the By-Pass would result in a greater number of vehicle trips along Hallock Road connecting to SR-150 as people seek to avoid existing congestion along 10th Street and Ojai Road. Therefore, the environmentally superior alternatives are the Amended Project and Alternative 4. The City Council further finds that Alternative 4 will not substantially reduce any of the significant impacts of the Amended Project, and finds that Alternative 4 is not as desirable as the Amended Project for meeting the City's vision for the project site.

8.0 GENERAL FINDINGS

1. The plans for the Amended Project were prepared and analyzed so as to provide for public involvement in the planning and the CEQA processes.
2. To the degree that any impacts described in the Final SEIR are perceived to have a significant adverse effect on the environment, or such impacts appear ambiguous as to their effect on the environment, any significant adverse effect of such impacts has been substantially lessened or avoided by the mitigation measures set forth in the Final SEIR or is outweighed by the facts set forth in the Statement of Overriding Considerations (SOC).
3. Comments regarding the Draft SEIR received during the public review period have been adequately addressed in the Responses to Comments Report included in the Final SEIR. Any significant adverse effects described in such comments were avoided or substantially lessened by the mitigation measures described in the Final SEIR or are outweighed by the facts set forth in the SOC.
4. Although the Amended Project is substantially similar to the Original Project, and involves a slight reduction in the overall intensity of development, the City decided to require a Supplemental EIR in an abundance of caution to augment, revise and update the Original EIR so that it is adequate to disclose and analyze the potentially significant environmental effects of the Amended Project, as well as feasible mitigation measures and project alternatives that substantially lessen or avoid these potentially significant effects to the

maximum extent feasible.

5. Pursuant to CEQA Guidelines § 15090, the Final SEIR reflects the City's independent judgment and analysis. The Planning Commission and the City Council have independently reviewed and analyzed the Final SEIR prepared for the proposed East Area 1 Specific Plan Amendment project. The City Council finds that the Final SEIR is accurate, and combined with the Original EIR, contains a complete statement of the potential environmental impacts of the Amended Project, as well as the feasible mitigation measures and project alternatives that substantially lessen or avoid such potentially significant effects to the maximum extent feasible.

6. All summaries of information, conclusions and analysis in these findings and the Statement of Overriding Considerations, are based on the substantial evidence in the entire record, including all analysis and conclusions in the Final EIR, as updated by the Final SEIR, all of which is hereby incorporated into each and every finding contained herein, whether or not specifically referenced therein. The absence of any particular fact, conclusion or analysis from any such summary or finding is not an indication that a particular finding is not based in part on that fact, conclusion or analysis.

**STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE EAST AREA 1 SPECIFIC PLAN AMENDMENT SEIR**

1.0 INTRODUCTION

The City of Santa Paula is the Lead Agency under the California Environmental Quality Act (CEQA), responsible for preparation, review and certification of the Final Environmental Impact Report (FEIR) for the East Area 1 Specific Plan (SP-3) (SCH# 2006071134), and the Final SEIR for the Amended Project. As the Lead Agency, the City is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant. CEQA then requires the Lead Agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether or not to approve the proposed action.

In making this determination the Lead Agency is guided by the CEQA Guidelines § 15093 which provides as follows:

- a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- b) When the Lead Agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The Statement of Overriding Considerations shall be supported by substantial evidence in the record.
- c) If an agency makes a Statement of Overriding Considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination.

In addition, Public Resources Code § 21082(b) requires that where a public agency finds that economic, legal, social, technical or other reasons make the mitigation measures or alternatives identified in the EIR infeasible and thereby leave significant unavoidable adverse project effects, the public agency must also find that overriding economic, legal, social, technical or other benefits of the project outweigh the significant unavoidable adverse effects of the project.

Although most potential environmental impacts identified in the Final SEIR for the Amended Project have been substantially avoided or mitigated through the identification and adoption of Project Design Features, and Mitigation Measures (as more specifically described in the Final SEIR and Statement of Findings and Facts approved for the project), some impacts including those which the City believes are adequately mitigated, remain, or may be asserted to remain, for which complete mitigation is not feasible or may not be sufficient in some other manner. As to

any impacts considered significant and unavoidable if the project is approved and implemented, after balancing the specific economic, legal, social, technological and other benefits of the project, the City of Santa Paula has determined that the unavoidable, adverse environmental impacts, as addressed in the Final SEIR, are considered acceptable in light of the considerations, specifically identified below, which outweigh the unavoidable, adverse environmental impacts of the project as specifically identified or subsequently determined. The City Council further finds that each of the overriding considerations set forth herein, standing alone, would be sufficient to outweigh all of the significant and unavoidable impacts of the Amended Project.

The City of Santa Paula, acting as the Lead Agency and having reviewed the Final SEIR and public records, adopts this Statement of Overriding Considerations (SOC), which has balanced the benefits of the Amended Project against its unavoidable adverse impacts in reaching a decision to approve the Amended Project.

2.0 UNAVOIDABLE ADVERSE SIGNIFICANT IMPACTS

2.1 AGRICULTURAL RESOURCES

2.1.1 IMPACT

Implementation of the Amended Project would result in the following: (1) loss of agricultural resources, including Prime and Unique Farmland (344 acres); and (2) conversion of cultivated farmland to urban uses. The mitigation measures identified in the FEIR would substantially lessen the significant adverse impacts, but would not completely avoid these impacts.

2.2 TRANSPORTATION AND TRAFFIC

2.2.1 IMPACT

The Amended Project will result in potentially significant and unavoidable impacts at three of the City's intersections. For intersection 12, Ojai Road/10th Street & Santa Paula Street, the mitigation measure will partly mitigate the impact (to LOS D, rather than to LOS C). At Intersection 13 (10th St. and Santa Barbara St.) and Intersection 15 (10th Street and Harvard Boulevard), LOS C cannot be achieved due to constraints related to future bicycle lanes. Widening of 10th street to gain capacity is not possible due to the proposed bicycle lanes along 10th Street, which are included in a City beautification project. Therefore, impacts at Intersections 13 and 15 cannot be fully mitigated and the significant impact at these intersections will remain.

2.3 AIR QUALITY

2.3.1 IMPACT

Implementation of the Amended Project would result in significant and unavoidable regional air quality impacts which cannot be mitigated to below a level of significance and which, therefore, are considered to be significant unavoidable adverse impacts. The mitigation measures identified

in the Final SEIR would substantially lessen these significant adverse impacts, but would not completely avoid these impacts.

2.4 AESTHETICS

2.4.1 IMPACT

Implementation of the Amended Project would permanently change the views of the project site from agricultural lands to developed suburban and urban uses resulting in significant adverse impacts which cannot be mitigated to below a level of significance and which, therefore, are considered to be unavoidable adverse impacts.

2.5 CULTURAL RESOURCES

2.5.1 IMPACT

Implementation of the Amended Project would result in the demolition of buildings and the removal of agricultural features which contribute towards the eligibility of the Teague-McKevett Ranch property for individual listing on the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR), and towards its eligibility for designation as a City of Santa Paula Landmark; Therefore, implementation of the Amended Project would result in significant adverse impacts which cannot be mitigated to below a level of significance and which, therefore, are considered to be unavoidable adverse impacts. The mitigation measures identified in the Final SEIR would substantially lessen the adverse impacts but would not completely avoid these impacts.

3.0 ABSENCE OF SIGNIFICANT NEW INFORMATION

CEQA Guidelines § 15088.5 requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR, but before certification of the Final EIR. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project proponent declines to implement. The CEQA Guidelines provide examples of significant new information under this standard. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. While new information was provided to clarify and amplify the Final SEIR, no information requiring recirculation was provided.

Accordingly, the City Council finds that no significant new information was added to the Draft or Final SEIR, since public notice was given of the availability of the Draft SEIR that would require recirculation of the Draft SEIR.

4.0 OVERRIDING CONSIDERATIONS

The proposed action consists of the adoption of the East Area 1 Specific Plan Amendment for the project site which is comprised of 501 acres located in unincorporated Ventura County, California. Analysis in the Final SEIR for this Amended Project concluded that it will result in agricultural resources, air quality, aesthetics, cultural and historic resources, and transportation impacts that cannot be mitigated to a less than significant level. All other potential significant adverse impacts of the Amended Project have been mitigated to a level less than significant based on mitigation measures in the Final SEIR. All significant unavoidable adverse impacts are identified in the Final SEIR and are addressed in the Statement of Findings and Facts.

The City Council finds and determines, on the basis of the Original FEIR, the Final SEIR and the entire administrative record, that the unavoidable significant impacts to agricultural resources, air quality, aesthetics, cultural and historic resources, and transportation, resulting from the implementation of the Amended Project, which will remain after mitigation, are acceptable when balanced against the benefits of the Amended Project. Having balanced the benefits of the Amended Project against these unavoidable significant impacts, and after considering the entirety of the administrative record, the City Council determines that these significant and unavoidable impacts are acceptable in light of the Project's benefits, and that approval of the Project is warranted, notwithstanding that all identified impacts are not mitigated to a less than significant level (CEQA Guidelines §§ 15043, 15092, and 15093). Each benefit set forth below constitutes an overriding consideration warranting approval of the Project independent of the other benefits.

1. Impacts are indicative of the General Plan's vision of a planned development at the project site and not the Amended Project itself.

The Original Project was previously approved for this site and voters approved General Plan Amendments in 2008 to allow development of the project site. While the Original Project identified significant and unavoidable impacts associated with that development, the City Council previously adopted findings of fact and a statement of overriding considerations to allow development to move forward for the project site. The Original Project, however, was not constructed since the applicant found there was no market for it. Upon additional consultation with the building industry, the applicant proposed revisions to the Original Project as set forth in the amended Specific Plan. The changes proposed in the Amended Project, however, are consistent with the General Plan's (as amended by voters in 2008) vision for the project site, i.e., for mixed commercial and residential development. The General Plan no longer envisions the project site as continuing its historical agricultural operations. Rather, whether the Original Project, the Amended Project, or some other development project is built at the site, the General Plan projects that the historically agricultural property will be urbanized. Since the voters confirmed this change in 2008, the City Council finds that the environmental impacts associated with the Amended Project are outweighed by the public desire to urbanize the project site.

The Amended Project uses design strategies to minimize significant and unavoidable impacts to aesthetic resources, but significant impacts remain. As shown by the Final SEIR analysis, any proposed marketable development for the project site that complies with the General Plan and

zoning designation would create substantially similar environmental impacts as the Amended Project since urbanization disrupts the historically agricultural land.

The impacts identified in this SOC and the Final SEIR above are not indicative of this Amended Project by itself. Rather, any proposed marketable development meeting the land use goals of the General Plan and Santa Paula Municipal Code (“SPMC”) would have substantially similar impacts.

2. The Amended Project is consistent with the General Plan’s East Area 1 Specific Plan (SP-3) character

The Project is located within the General Plan’s East Area 1 Specific Plan (SP-3) area that was amended by voters in 2008. The General Plan describes the character of this area to include, without limitation, development of residential, commercial recreational, and educational facilities. The General Plan anticipates that this area will also include public safety facilities to service the new community. The Specific Plan approved by the City Council for the Original Project anticipates well planned neighborhoods with extensive architectural design; meandering walkways; bike trails; open space; and other planned amenities. The Amended Project meets and implements these expectations.

3. The Amended Project ties together the urban fabric.

The project site is located directly adjacent to the City’s urban areas. The Amended Project (like the Original Project) provides for interconnectivity with the City’s established community through bike lanes; roadways; bus transit; and other, similar, routes. Moreover, the Amended Project provides for community gathering areas such as educational facilities, parks, and soccer fields. The Amended Project provides a pathway for blending the City’s historical boundaries with the newly incorporated community of East Area 1. The architectural design guidelines required for new housing and buildings will help ensure that improvements within the project area will pay homage to the existing infrastructure and Santa Paula community. This social fabric is crucial to the future of Santa Paula and the Santa Clara River Valley communities.

Collectively, the Amended Project is anticipated to encourage efficiency, and reduce vehicle traffic, by providing a mixture of land uses and offering activities onsite; generate additional economic activity in the community; help maintain an appropriate jobs-to-housing balance; and fulfill desirable zoning and planning practices.

4. Long-Term Employment Opportunities.

The project would result in the creation of 705 long-term employment opportunities, which would result in earnings and wages would be contributed to the local economy.

5. City of Santa Paula Revenues

As set forth in the administrative record including, without limitation, the Fiscal Impact Analysis prepared for the Original Project, and the updated fiscal impact analysis for the Amended Project

dated November 14, 2013 prepared by Stanley R. Hoffman Associates; the Amended Project would generate \$1.296 million annually in revenue to the City's General Fund above the City's cost to provide public services to the Amended Project that will directly benefit the City of Santa Paula and its ability to provide needed services to residents, businesses, and visitors.

6. Reduction in Impacts Compared to Original Project

As set forth in the entire administrative record, including the Final SEIR, the Amended Project will reduce or eliminate many of the unavoidable significant impacts that were identified in the FEIR prepared for the Original Project. Not approving the Amended Project would allow the applicant to move forward in constructing the development approved in the Original Project. This would result in greater environmental impacts than anticipated for the Amended Project.

7. Help meet the goals, policies and objectives of the Housing Element set forth in the Santa Paula General Plan.

As with the Original Project, the Amended Project will provide opportunities for affordable housing to assist community members with achieving part of the American Dream: owning a home. The City's Housing Element, the SPMC, and public expressions made by the City Council all support the notion that qualified households should be able to obtain decent housing. First responders and teachers frequently constitute those professionals who are most in need of affordable housing – particularly in desirable areas such as Southern California. The Amended Project provides opportunities for the City to encourage additional development of appropriate affordable housing throughout the community.

8. Preparing for future expansion.

The Amended Project will allow the City to plan for the overall community's future by securing financial stability of the City's General Fund; improving public infrastructure throughout the City; and preparing for reduction in certain resources such as water and wastewater. As to the public treasury, the Amended Plan will pay for itself and will also help off-set expensive public projects such as the Water Recycling Facility. Such financial contributions result not only from monies secured through the project approvals (e.g., the Development Agreement), but also from revenue garnered through property tax, sales tax, and the expansion of water and wastewater ratepayer that will help stabilize utility rates throughout the City.

Moreover, the Amended Project will improve aging traffic and wastewater infrastructure throughout the City. In particular, infrastructure improvements will occur along Santa Paula Street and will include construction of a new bridge to ensure a connection between East Area I and the established Santa Paula community.

The Amended Project will supply its own potable water to meet expected demand. In addition, however, the Amended Project will install infrastructure capable of utilizing recycled water – that could be eventually transported from the City's Water Recycling Facility – in order to

further reduce the Amended Project's potable water demand. As California's climate, and that of Ventura County in particular, continues to change, planning for water shortages will become more important. The Amended Project helps the City in preparing for this eventuality.

5.0 LOCATION AND CUSTODIAN OF RECORDS

The documents and other materials that constitute the record of proceedings on which the City's findings and decisions are based are located at City of Santa Paula, 970 East Ventura Street, Santa Paula, CA 93060. The custodian for these documents is the Planning Director. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and 14 Cal. Code of Regulations § 15091(e).