

RESOLUTION NO. 6458

A RESOLUTION CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR PROJECT NO. 2006-CDP-02, ADOPTING FINDINGS OF FACT, AND ADOPTING STATEMENTS OF OVERRIDING CONSIDERATIONS.

The City Council of the City of Santa Paula does resolve as follows:

SECTION 1: The City Council finds and declares as follows:

- A. On May 16, 2006, Limoneira Company ("Applicant") filed an application with the City for a General Plan Amendment, zone change, prezone/specific plan, and reorganization (annexation) for the East Area 1 ("EA1") Expansion Area. The Project consists of the following: 1,500 dwelling units, 150,000 square feet of light industrial, 285,000 square feet of commercial, 375,800 square feet of civic, 66.8 acres of parkland and greenways, 55 acres of Agricultural Preserve (proposed to be actively farmed) and 80 acres of natural open space (collectively, the "Project").
- B. If approved, the Project would require a number of discretionary approvals including, without limitation, a General Plan Amendment for the East Area 1 Specific Plan ("EA1SP") including, without limitation, adjustment of the City Urban Restriction Boundary ("CURB"); annexation of real property into the City's jurisdictional boundaries; rezoning of property as EA1SP (East Area 1 Specific Plan, SP-3); and adoption of a Development Agreement. The General Plan Amendment that amends the CURB and approves an Intensification of Use (as defined by Santa Paula Municipal Code Chapter 16.237) require voter approval. Such discretionary approvals are not part of this Resolution, but are part of the Project considered by the Final Environmental Impact Report ("FEIR") analysis.
- C. The Project was reviewed by City's Planning Department for, in part, for consistency with the General Plan and conformity with the Santa Paula Municipal Code ("SPMC").
- D. On February 25, 2008 and February 26, 2008, the Planning Commission held joint public hearings with the City Council regarding the Project. This Resolution, and its findings, is adopted based upon the evidence set forth in the entire record including, without limitation, documentary and testimonial evidence; the staff report; and such additional information set forth in the administrative record that is too voluminous to reference.

SECTION 2: *Factual Findings and Conclusions.* The City Council finds that the following facts exist and makes the following conclusions:

- A. The Applicant proposes to develop a portion of real property located within the EA1 Expansion Area that is legally described in the Application (the "Property"). The Property consists of approximately 501 acres of the EA1 Expansion Area and includes the following Ventura County Assessor Parcel numbers (APNs): 040-0-180-565, 040-0-180-435, 107-0-200-115, and 107-0-045-015. The Property is located east of Santa Paula Creek, north of Telegraph Road, west of Haun/Orcutt Creeks and south of the Topatopa Mountains within unincorporated Ventura County. The Project includes developing the following: 1,500 dwelling units, 150,000 square feet of light industrial, 285,000 square feet of commercial, 375,800 square feet of civic, 66.8 acres of parkland and greenways, 55 acres of Agricultural Preserve (proposed to be actively farmed) and 80 acres of natural open space.
- B. The Property is currently vacant with the exception of nine existing residences, agricultural related facilities (e.g., barn, chemical storage areas, packinghouse) and agriculture uses.
- C. The Property is bounded by Santa Paula Creek to the west. Areas to the north and east are comprised of agriculture and natural lands. Lands to the south are comprised of light industrial and residential uses.
- D. The Property is located within the City's Area of Interest, but outside of its current Sphere of Influence. It is within an area contemplated by the General Plan for future development of urban uses. The City designated the EA1 location as a General Plan Expansion Area on April 13, 1998. If the Project is approved by the City Council, and the voters approve a General Plan Amendment, an application for reorganization (annexation) of the Property into the City will be filed with the Ventura Local Agency Formation Commission ("LAFCO") pursuant to City annexation guidelines.
- E. The Property is currently not zoned by the SPMC. Approving the proposed EA1SP will constitute rezoning for the Property.
- F. No portion of the Property is subject to a Land Conservation Contracts for agricultural use.
- G. The Project is located outside of the City Urban Restriction Boundary ("CURB"). In accordance with General Plan Section III(F), voter approval is required to amend General Plan Figure LU-4a for expanding the CURB around the Property.
- H. In accordance with General Plan Section III(G) and SPMC Chapter 16.237, the Project also requires voter approval to increase the density and land use intensity set forth in General Plan Figure LU-5 and Table LU-7 as they affect East Area 1 and, more specifically, the Property.

- I. It is possible to efficiently and effectively expand City services and infrastructure, including police and fire protection, sewer and water infrastructure, road improvements, City park facilities, and school district capacity to accommodate the development of EA1SP.
- J. In addition (and without limitation) to the findings set forth above, the City Council incorporates the factual findings and conclusions set forth in the "Statement of Findings and Facts in Support of the East Area 1 Specific Plan FEIR" attached as Exhibit "A," and incorporated by reference ("Additional Findings").
- K. In accordance with CEQA Guidelines § 15091, the record upon which the City Council's findings are based is located at the Planning Department, City of Santa Paula, 970 Ventura Street. The custodian of records is the Planning Director.

SECTION 3: Environmental Assessment:

- A. Because of the facts and conclusions identified in Section 2 of this Resolution and in accordance with the CEQA requirements (Section 15082 of the Guidelines), a Notice of Preparation (NOP) of a Draft EIR (DEIR) was filed with the State Clearinghouse (SCH) Office of Planning and Research (OPR) on July 28, 2006. The SCH OPR assigned SCH Number 2006071134 to the environmental documentation for the proposed East Area 1 Specific Plan.
- B. The NOP was distributed to public agencies, interested parties, libraries and service providers. The 30-day public review period for the NOP started on July 28, 2006 and concluded on September 5, 2006. 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 August 9, 2006 at 6:30 P.M. at the Santa Paula City Hall Council Chambers. On August 25, 2006, the City extended the comment period for the NOP an additional 30 days in order to solicit additional public comments. The extended NOP comment period ended on September 23, 2006. A total of eleven written responses were received on the NOP.
- C. In accordance with the CEQA requirements, a Notice of Completion (NOC) of the DEIR was filed with the SCH OPR on November 16, 2007.
- D. A 45 day public review period for the DEIR pursuant to CEQA commenced on November 16, 2007 and ended on January 7, 2008. 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 22 written responses were received on the DEIR.
- E. Comments received during the public review period for the DEIR were responded to in the Responses to Comments Report (P&D Consultants, February 2008).

- F. A Final Environmental Impact Report (“FEIR”), entitled Proposed Final Environmental Impact Report for the East Area 1 Specific Plan (February 2008), was prepared for the proposed East Area 1 Specific Plan. The following components comprise the FEIR:
1. DEIR and Technical Appendices (two volumes), (November 2007).
 2. Comments received on the DEIR and responses to those comments documented in the Responses to Comments Report (February 2008).
 3. Clarifications and Revisions.
 4. Mitigation Monitoring and Reporting Program (MMRP).
 5. All attachments, incorporations and references to the documents identified in items 1 and 2 above.
- G. The FEIR (including documents and other materials that constitute the record of proceedings on which the City’s findings and decisions are based) is located at City of Santa Paula, 970 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).
- H. The FEIR is incorporated into this Resolution by reference as if fully set forth.
- I. Pursuant to CEQA Guidelines § 15090, the FEIR reflects the City’s independent judgment and analysis. The City Council has independently reviewed and analyzed the DEIR prepared for the proposed East Area 1 Specific Plan project. The DEIR and FEIR are accurate and complete statements of the potential environmental impacts of the project.
- J. Because of the facts identified in this Resolution including, without limitation, the facts contained in the Additional Findings, the DEIR showed that a Statement of Overriding Considerations would be required in order for the Project to be approved.
- K. The FEIR generally identifies, for each potentially significant impact of the project, one or more corresponding mitigation measures to reduce such impact to a level of insignificance, with the exception of Agricultural Resources, Air Quality, Aesthetics and Cultural and Historic Resources. The City Council finds that many of the mitigation measures described in the FEIR may lessen or avoid impacts in impact categories other than the categories for which they are specifically proposed. Accordingly, the City Council finds that each potentially significant impact identified by the FEIR is mitigated by its corresponding

mitigation measures to the extent set forth in the FEIR (“specific mitigation”) and by other, non-corresponding, mitigation measures recommended for approval by the City Council that were already incorporated into the project (“general mitigation”). These findings will be applicable wherever supported by the evidence in the record regardless of whether a specific finding or an instance of such general mitigation is made.

SECTION 5: *Actions.* The City Council takes the following actions:

- A. The City Council adopts the Additional Findings and the “Statement of Overriding Considerations for the East Area 1 Specific Plan Project” set forth in Exhibit “A,” which is incorporated into this Resolution by reference.
- B. Pursuant to Public Resources Code §§ 21081(a) and 21081.6, the City Council adopts the Mitigation Monitoring and Reporting Program (“MMRP”) set forth in attached Exhibit “B,” which is incorporated into this Resolution by reference. The mitigation measures set forth in this Resolution would be conditions of approval for the proposed Revised Project. Should the terms or provisions of any such mitigation measure conflict with the terms and provisions of any other project conditions or approval subsequently adopted, the terms and provisions of such other project conditions should control. Compliance with applicable codes, policies, and regulations will further ensure that the environmental impacts of the proposed project will not be greater than set forth in the FEIR and these findings.
- C. The City Council certifies the Final Environmental Impact Report for the East Area 1 Specific Plan project (2006-CDP-02).

SECTION 6: *Reliance on the Record.* Each and all of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the project. The findings and determinations constitute the independent findings and determinations of the City Council in all respects and are fully and completely supported by substantial evidence in the record as a whole.

SECTION 7: *Limitations.* The City Council’s analysis and evaluation of the project is based on the best information currently available. It is inevitable that in evaluating a project that absolute and perfect knowledge of all possible aspects of the project will not exist. One of the major limitations on analysis of the project is the lack of knowledge of future events. In all instances, best efforts were made to form accurate assumptions.

SECTION 8: *Summaries of Information.* All summaries of information in the findings, which precede this section, are based on the substantial evidence in the record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact.

SECTION 9: This Resolution will remain effective unless superseded by a subsequent

resolution.

SECTION 10:The City Clerk is directed to mail a copy of this Resolution to Applicant and Applicant's Representative and to any other person requesting a copy.

SECTION 11: This Resolution becomes effective immediately upon adoption and constitutes the City Council's final decision. Note that persons dissatisfied with this decision may appeal it to a court of competent jurisdiction pursuant to Code of Civil Procedure § 1094.6 and/or Public Resources Code § 21167.

PASSED AND ADOPTED this ____ day of February, 2008.

Robert S. Gonzales,
Mayor

ATTEST:

_____,
Josie Guzman Herrera, City Clerk

APPROVED AS TO FORM:

Karl H. Berger,
City Attorney

Exhibit A
FINDINGS AND SOC

STATEMENT OF FINDINGS AND FACTS IN SUPPORT OF THE EAST AREA 1 SPECIFIC PLAN EIR

1.0 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code Section 21081 and CEQA Guidelines Section 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.”

Section 15092 of the CEQA Guidelines further stipulates that:

- “(b) 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 Section 15091, and
 - (B) Determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093.”

An Environmental Impact Report (EIR) for the East Area 1 Specific Plan was prepared and certified as complete by the Santa Paula City Council. The Final EIR (FEIR) identifies certain significant adverse impacts which may occur as a result of the implementation of the proposed project, either alone or on a cumulative basis in conjunction with other past, present and reasonably foreseeable future projects. The environmental review process for the proposed Specific Plan is summarized below:

1. In accordance with the CEQA requirements, a Notice of Preparation (NOP) of a Draft EIR (DEIR) was filed with the State Clearinghouse (SCH) Office of Planning and Research (OPR) on July 28, 2006. The SCH OPR assigned SCH Number 2006071134 to the environmental documentation for the proposed East Area 1 Specific Plan.
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 July 28, 2006 and concluded on September 5, 2006. 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 August 9, 2006 at 6:30 P.M. at the Santa Paula City Hall Council Chambers. On August 25, 2006, the City extended the comment period for the NOP an additional 30 days in order to solicit additional public comments. The extended NOP comment period ended on September 23, 2006. A total of eleven written responses were received on the NOP.
3. In accordance with the CEQA requirements, a Notice of Completion (NOC) of the DEIR was filed with the SCH OPR on November 16, 2007.
4. A 45 day public review period for the DEIR pursuant to CEQA commenced on November 16, 2007 and ended on January 7, 2008. 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 22 written responses were received on the DEIR.
5. Comments received during the public review period for the DEIR were responded to in the Responses to Comments Report (P&D Consultants, February 2008).
6. An FEIR was prepared for the proposed East Area 1 Specific Plan. The following components comprise the FEIR:
 - a. DEIR and Technical Appendices (two volumes), (November 2007).
 - b. Comments received on the DEIR and responses to those comments documented in the Responses to Comments Report (February 2008).
 - c. Mitigation Monitoring and Reporting Program (MMRP).
 - d. All attachments, incorporations and references to the documents identified in items a and b above.

The FEIR 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/index.htm>

The City of Santa Paula is the Lead Agency with respect to the proposed East Area 1 Specific Plan pursuant to the Section 15367 of the CEQA Guidelines. As Lead Agency, the City is required by CEQA to make findings with respect to each significant effect of the proposed East Area 1 Specific Plan.

The City of Santa Paula reviewed the FEIR. The following sections make detailed findings with respect to the potential impacts of the proposed East Area 1 Specific Plan and refer, where appropriate, to the mitigation measures set forth in the FEIR and the Final MMRP to avoid or substantially reduce potentially significant adverse impacts of the proposed East Area 1 Specific Plan.

The FEIR and the administrative record concerning the proposed East Area 1 Specific Plan provide additional facts in support of the findings. The FEIR and MMRP are incorporated by reference into these Findings in its entirety. The MMRP was developed in compliance with Public Resources Code

Section 21081.6 and is contained in a separate document within the FEIR for the proposed East Area 1 Specific Plan.

2.0 DESCRIPTION OF PROJECT PROPOSED FOR APPROVAL

As described in detail in Section 3.0 (Project Description) in the FEIR, the purpose of the proposed East Area 1 Specific Plan is the implementation of urban uses within a planned Expansion Area identified within the City's General Plan. As proposed, a mixture of land uses including residential, commercial, light industrial, civic and open space/agricultural preserve would be constructed and/or preserved. These components of the proposed project are described in detail in the following Sections.

2.1 PROPOSED PROJECT

2.1.1 NEIGHBORHOODS & DISTRICTS

The Specific Plan envisions the development of a number of neighborhoods and districts that are integrated through complimentary land uses and which are easily accessible and within close proximity to City residents. The Illustrative Plan shown in Figure 3-4 (see Section 3.0 (Project Description) of this FEIR) defines the location and character of the land uses, roadways and ancillary facilities associated with the proposed Specific Plan.

The Specific Plan provides for a variety of dwelling units within the proposed neighborhoods and districts and includes:

- Single-family Detached (SFD) – These dwelling units consist of free-standing residential buildings generally built on land larger than the building and containing yards.
- Single-family Attached (SFA) - These dwelling units consist of attached residential buildings generally built on land larger than the building and containing yards. These residences generally include town homes, duplexes and triplexes.
- Multi-Family (MF) - These dwelling units consist of attached residential buildings generally built on land larger than the building and containing yards. These residences generally include apartment buildings (four or more units).
- Work/Live Units (LWU) – These include a structure designed primarily for nonresidential uses with secondary residential uses above. Work/Live buildings have a separation of occupancy between the nonresidential and residential floors.

A description of the proposed neighborhoods and districts and the residential unit type(s) proposed is contained below.

Santa Paula Creek Neighborhood - The Santa Paula Creek Neighborhood is located in the northwest quadrant of the Specific Plan area, along the east bank of Santa Paula Creek, north of the Santa Paula Creek Civic District and west of the foothills. This neighborhood will include a range of residence types, but will be characterized by a predominance of single-family residences, some attached but most detached. The neighborhood is flanked by parks – along Santa Paula Creek, along Hallock Drive, and along the north edge of the Santa Paula Creek Civic District – with trail heads leading to the foothills and along the Santa Paula Creek to the Santa Paula Branch Line Trail. The neighborhood also contains a neighborhood park and a neighborhood green, both of which are to be surrounded by homes for which special design criteria are defined in the Development Standards (discussed below). A total of 326 residential units are proposed within this neighborhood and include 191 SFD, 115 SFA and 20 MF.

Foothill Neighborhood - The Foothill Neighborhood occupies the northeast quadrant of the Specific Plan area. This neighborhood rises from the relatively flat terrain of the southerly half of the project site up the shallower portions of the slopes of the hills to the north. Development is limited to those portions of the foothills that require only moderate grading, leaving the steeper and more visible portions of the hills untouched and in agricultural production. This neighborhood will be characterized by almost exclusively single-family detached residences, many with dramatic views of the Santa Clara River valley below and the hills above. At the center of the neighborhood is Foothill Neighborhood Park, which will provide play areas and unimproved areas. Along the north edge of this neighborhood, multiple trail heads are to be provided leading to recreational trails in the foothills. A total of 359 residential units are proposed within this neighborhood and include 323 SFD and 36 SFA. No MF units are proposed within this neighborhood.

Santa Paula Creek Civic District - The Santa Paula Creek Civic District, located in the southwest quadrant of the Specific Plan area, is substantially reserved for a high school, community college or other post-secondary educational institution, community facilities and community play fields. Alternatively, the area could be developed with a housing and care facility for seniors, providing a continuum of care that might include skilled nursing care and other medical facilities.

Haun Creek Neighborhood - The Haun Creek Neighborhood is located on the historic Teague-McKevett Ranch site, in the southeast corner of the Specific Plan area. This neighborhood is intended to include a wide variety of residence types, ranging from single-family detached residences along the creek, to residential and livework rowhouses, to apartments and condominiums, some of which will be in mixed-use buildings with ground-floor commercial uses. The center of this neighborhood is organized around a public green in which the historic Ranch Pumphouse will be a central landmark, and along the westerly edge of the neighborhood a mixed-use neighborhood-serving commercial center is located along Hallock Drive. This neighborhood is the preferred location for senior housing and assisted living uses for which an alternate site is provided in a portion of the Civic District. A total of 745 residential units are proposed within this neighborhood and include 93 SFD, 115 SFA and 537 MF.

East Santa Paula Railroad District - The Santa Paula Railroad District abuts the Ventura County Transportation Commission railroad right-of-way along the south edge of the Santa Paula Creek Civic District. This area is provided with this designation for a number of specific reasons. First, the property abuts the Santa Paula Branch Line Railroad, and the development and uses must be compatible with the noise created by that line. Second, the property flanks the south side of Santa Paula Street, the main direct connection between Downtown Santa Paula and East Area 1. Third, this property lies across Santa Paula Street from both the Santa Paula Creek Civic District and from the mixed-use core of the Haun Creek Neighborhood. Accordingly, this District is intended to include a mix of light industrial, office, and limited retail uses, with the possibility of limited residential uses in the form of work-live units, or upper floor residences over commercial space. The Development Standards establishes special standards for this District to help ensure that this mix of uses is realized in buildings that are compatible with the Railroad. This District also has the potential to accommodate additional postsecondary educational facilities, or related commercial and light industrial uses. A total of 70 work/live units are proposed within this district.

Table 2-1 contains a summary of proposed land uses by neighborhood and district within the Specific Plan.

**TABLE 2-1
SUMMARY OF PROPOSED LAND USES BY NEIGHBORHOOD & DISTRICT**

PLANNING AREA	LAND USE/NEIGHBORHOOD	ACREAGE	LIGHT INDUSTRIAL	COMMERCIAL	CIVIC	DWELLING UNITS
A	<i>Santa Paula Creek Neighborhood:</i>					
	Residential	33.1				326
	Agricultural Preserve	14.3				
	Open Space – Park	5.1				
	Open Space – Roads, Medians	21.4				
	Subtotal	73.9				326
B	<i>Foothill Neighborhood:</i>					
	Residential	66.4				359
	Open Space	79.4				
	Agricultural Preserve	40.7				
	Open Space – Parks, Greenways	11.4				
	Open Space – Roads, Medians	26.0				
	Subtotal	223.9				359
C	<i>Santa Paula Creek Civic District:</i>					
	Civic – School	8.3			110,400	
	Civic – Shared Facilities	5.6			65,000	
	Civic – Community College	11.6			165,000	
	Open Space – Shared Athletic Fields	23.2				
	Open Space – Parks, Greenways	12.0				
	Open Space – Roads, Medians	13.1				
	Subtotal	73.8			340,400	0
D	<i>Haun Creek Neighborhood:</i>					
	Residential	28.0				745
	Commercial – Assisted Living	3.0		75,000		
	Commercial – Office/Retail	10.0		150,000		
	Civic – School	10.8			35,400	
	Open Space – Parks, Greenways	37.3				
	Open Space – Roads, Medians	21.0				
	Subtotal	110.1		225,000	35,400	745
E	<i>East Santa Paula Railroad District:</i>					
	Work/Live	7.3				70
	Work – Light Industrial/Employ.	7.3	150,000			
	Commercial – Office/Retail	2.4		60,000		
	Open Space – Roads, Medians	2.4				
	Subtotal	19.4	150,000	60,000		70
TOTAL SPECIFIC PLAN AREA		501.1	150,000	285,000	375,800	1,500

Source: East Area 1 Specific Plan, September, 2007

2.1.2 DEVELOPMENT STANDARDS

In order to ensure orderly implementation of the Specific Plan, land uses would be governed by Development Standards. The Development Standards will also regulate architectural styles, building materials and other requirements.

2.1.2.1 Regulating Zones

As noted in Figure 3-4 (see Section 3.0 of this FEIR), a series of Regulating Zones are proposed and would include:

Neighborhood Edge (NE) - The NE zone is applied to areas appropriate for detached houses on larger lots. The NE zone provides the transition between the developed area and the undeveloped open space.

Neighborhood General 1 (NG-1) - The NG-1 zone is applied to areas appropriate for a mix of houses on medium to large lot sizes. Detached houses and some duplexes are appropriate.

Neighborhood General 2 (NG-2) - The NG-2 zone is applied to areas appropriate for a mix of houses, duplexes, and rowhouses, on a wide variety of lot sizes.

Neighborhood General 3 (NG-3) - The NG-3 zone is applied to areas appropriate for a mix of detached houses on small lots, rowhouses, duplexes, tri-plexes, and quadplexes.

Neighborhood Center (NC) - The NC zone is applied to areas appropriate for a variety of retail, office and residential uses in mixed-use buildings, as well as courtyard housing and apartment buildings.

Railroad District (RD) - The RD zone is applied to areas focused on employment uses in a variety of configurations, including office buildings, workshops, and work/live buildings.

Civic/Institutional (CV) - The CV zone allows for a variety of civic and quasi-civic uses, including public and private schools and related civic uses, religious institutions, community college, library, senior housing and care facilities, and medical facilities.

Open Space 1 (OS-1) - The OS-1 zone is applied to areas intended to remain undeveloped. Pedestrian, bicycle and equestrian trails are permissible.

Open Space 2 (OS-2) - The OS-2 zone is applied to areas intended for passive and active recreation and 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 zone is applied to areas reserved for athletic facilities associated with the adjacent K-12 schools and may include lit athletic fields and structures for indoor and outdoor athletic activities.

2.1.2.2 Neighborhoods & District Overlays

In addition to Regulating Zones, the Development Standards also utilize a number of Neighborhood and District Overlays. The purpose of these overlays is to provide residents and visitors with a “sense of place.” Building styles and types would be applied to specific neighborhoods, as follows:

Foothill Neighborhood - 100% of the buildings in this overlay must be designed in one of the following architectural styles: Monterey, Spanish Revival, Tudor, Craftsman, or Victorian, as defined in the Architectural Standards.

Santa Paula Creek Neighborhood - At least 85% of the buildings in this overlay must be primarily clad in wood and designed in one of the following architectural styles: Victorian, Italianate, Craftsman, or Monterey, as defined in the Architectural Standards.

Haun Creek Neighborhood - At least 75% of the buildings in this overlay must be primarily clad in stone, brick or stucco, and designed in one of the following architectural styles: Monterey, Spanish Revival, Tudor, Italianate, or Art Deco, as defined in the Architectural Standards.

Santa Paula Creek Civic District - Civic and institutional buildings. Buildings in the Civic District must be primarily clad in stone or stucco, and designed in one of the following architectural styles: Monterey, Spanish Revival, or Art Deco, as defined in the Architectural Standards.

East Santa Paula Railroad District - 100% of the buildings in this overlay must be primarily clad in stone, stucco, concrete, concrete block, or metal, and designed in one of the following architectural styles: Spanish Revival, Art Deco, or Contemporary Industrial, as defined in the Architectural Standards.

2.1.2.3 Special Address Overlays

The Development Standards would also employ Special Address Overlays such as the following:

Foothill Center - At least 75% of the buildings in this overlay must be designed in the Victorian Style.

Santa Paula Creek Center - At least 75% of the buildings in this overlay must be designed in the Craftsman Style.

Park Blocks - At least 75% of the buildings in this overlay must be designed in the Spanish Revival or Monterey Style.

Central Park - 100% of the buildings in this overlay must be 2 to 3 stories tall and designed in the Spanish Revival or Monterey Style.

Hallock Green - At least 75% of the buildings in this overlay must be work-live or live-work buildings with shopfronts.

Hallock Main Street - 100% of the buildings in this overlay must be at least two stories tall and have either Shopfronts with awnings or Galleries with storefronts along at least 80% of each building's Hallock Main Street frontage.

2.1.3 OPEN SPACE, PARKLAND, TRAILS & AGRICULTURAL PRESERVE

2.1.3.1 Open Space

A total of approximately 80 acres of natural lands located immediately north of the Agricultural Preserve (see below) and the Santa Paula Creek and Foothill Neighborhoods would be dedicated as Open Space under the Specific Plan.¹ These areas are mountainous, containing south-trending minor canyons comprised of native plant communities including coastal sage scrub and chaparral. The location of these Open Space areas is shown in Figure 3-4 (see Section 3.0 of this FEIR).

2.1.3.2 Parkland

The Specific Plan proposes constructing approximately 66 acres of parkland and greenways. Of this total, 64.4 acres is proposed as passive park space and greenways, while the remaining 1.4 acres would be active parkland containing basketball courts and ball fields. Section 4.14 (Recreation) of this FEIR contains a detailed discussion of these facilities, including acreage and amenities. The Specific Plan would also provide a total of approximately 23 acres of shared athletic facilities. The location of the Parks & Shared Facilities is shown in Figure 3-5 (see Section 3.0 of this FEIR).

¹ Note: The approximately 80 acres of open space would be dedicated to the City by the Limoneira Company.

2.1.3.3 Trails

Recreational trails are proposed to be located along the Santa Paula Creek and Foothill Neighborhoods. Along the north edge of the Foothill Neighborhood, multiple trail heads are to be provided leading to recreational trails in the foothills. Similarly, within the Santa Paula Creek neighborhood, trail heads leading to the foothills and along Santa Paula Creek to the Santa Paula Branch Line Trail would be constructed. Trailheads would be constructed in a number of parks and/or greenway areas including the proposed Santa Paula Creek Recreational Park, Santa Paula Creek Linear Park, Hallock Trailhead Park and Haun Creek Greenway. The location of the on-site trails is shown in Figure 3-6 (see Section 3.0 of this FEIR).

2.1.3.4 Agricultural Preserve

An Agricultural Preserve (Preserve) is proposed for the areas comprising the Santa Paula Creek and Foothill Neighborhoods. The Preserve would be comprised of approximately 55 acres of existing avocado orchards located immediately north of these neighborhoods. These orchards would continue to be actively farmed. The location of the Preserve is shown in Figure 3-4 (see Section 3.0 of this FEIR).²

2.1.4 CIRCULATION NETWORK

2.1.4.1 Thoroughfares & Roadways

The Specific Plan includes the development of an extensive circulation network designed to accommodate the use of all travel modes including automobiles, pedestrians, bicycles, and transit. The Specific Plan identifies specific thoroughfare design standards for both the traveled way (parking lanes, travel lanes, medians) and the pedestrian way (sidewalks, trails, curbside landscaping). Hallock and Santa Paula Creek Drive provide the primary north-south vehicular access, while Teague- McKevevett and Santa Paula Boulevards provide primary east-west vehicular access. All thoroughfares are designed to encourage an attractive and comfortable pedestrian environment. Hallock's right-of-way and alignment are designed to accommodate its future function as a connection across Santa Paula Creek to the neighborhoods in the north. A total of approximately 84 acres of roadways and medians are proposed on-site. Figure 3-6 (see Section 3.0 of this FEIR) shows the proposed circulation system within the Specific Plan.

The right-of-way (ROW) widths for thoroughfares would vary within the Specific Plan are dependent upon their intended use. The ROW widths are designed to accommodate such components as travel lanes, medians, parking, bicycle lanes, street lights and landscaping (although some components may not be present for some thoroughfares). Principal access points to the project site (i.e., major commercial/commercial/industrial street classifications) are proposed to be constructed with between 78 foot and 92 foot ROW widths. Similarly, neighborhood streets (residential collector classification) would contain ROWs varying from 60 to 92 feet. Roadway grades are proposed to vary between two percent and eight percent with some limited roadway reaches approaching ten percent.

Alleys are also proposed and would be located in the rear of lots. These thoroughfares would provide the primary vehicular access to residential property. The ROW widths are proposed to be 20 feet.

² Note: The Agricultural Preserve would be fenced in order to control right of entry to this area. However, trail access points would be included to allow City resident entry to the approximately 80 acres of natural areas that would remain undeveloped within the northern portion of the Specific Plan site and adjacent to the Agricultural Preserve. In addition, the Limoneira Company would dedicate the approximately 55 acres Agricultural Preserve to the City. If permitted by the City, the Limoneira Company would lease back the 55 acres currently in agricultural production and continue the existing operations.

Thoroughfare ROWs would be designed to accommodate walkways. These facilities would range from five feet in width (neighborhood streets) to a maximum of 14 feet (major commercial streets).

2.1.4.2 Santa Paula Street Bridge

Santa Paula Creek Bridge would serve as the eastern Gateway from downtown Santa Paula and would require extending Santa Paula Street east across Santa Paula Creek. This facility is proposed as a single-span bridge and would not require the construction of support pilings within Santa Paula Creek. It features a two-way bicycle trail, separated from vehicular and pedestrian traffic, which links with the multi-use trail running north parallel to Santa Paula Creek. The ROW width would be 60 feet with two travel lanes and turn lane.

2.1.5 INFRASTRUCTURE PLAN

Implementation of the Specific Plan would require construction and/or extension of both on- and off-site infrastructure including sewer, storm drains, potable water, electricity, natural gas and other facilities associated with urban development. Additional on-site public services such as fire, police and trash pick up and disposal would also be needed.

2.1.5.1 Water Supply & Conveyance

Domestic Water Supply

At present, water supplies for irrigation originate from three on-site wells. These wells draw from the Santa Paula and Fillmore Groundwater Basins and supply the domestic and agricultural needs of the project site. Currently, a total of 405 acres are under agricultural production with the remainder comprised of non-irrigated open space. Over the last five years, the average annual groundwater consumption has been 816.3 acre-feet per year (AFY). The property owners have a combined on-site groundwater rights of 1,283.1 AFY.

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.³ 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).

³ Note: The demand estimate uses a range for domestic demand of 132 gallons per day person and 163 gallons per day person, respectively.

Domestic Water Conveyance

Domestic water supplied on-site is limited to small diameter pipes which serve the packinghouse and residences located along Padre Lane. The project would require the construction of a domestic water backbone and internal facilities system, water wells and domestic water tanks. Two (2) domestic water supply scenarios are contemplated under the Specific Plan and include:

Scenario 1

Project Backbone Facilities – A looped system in the major north-south road (Hallock Drive) and the major east-west road (Central Boulevard) will serve as the internal backbone domestic water system. These domestic water lines are 10-inch and 12-inch diameter facilities. Additionally, a ring around the outside of the project's five main phases will complete the project backbone looped system. These domestic water lines are 10-inch and 12-inch diameter facilities as well. Figure 3-7 (see Section 3.0 of this FEIR) shows the proposed backbone system. Since the phasing of the project would be dependent upon market conditions and other factors, the backbone system has been designed to allow maximum flexibility. As noted in Figure 3-7 (see Section 3.0 of this FEIR), the backbone system rings all Phases of the Specific Plan, thus allowing development to occur independent of the system as a whole.

Project Internal Facilities– Within each of the Specific Plan Phases are several other domestic water lines. Typically these will be the lines that individual customers will hook up to. The majority of these internal facilities are eight-inch diameter pipes. A few reaches of internal facilities at the northern end of in the northeast district have been upsized to 12-inch.

Wells - A total of five (5) new wells (three duty and two standby) are proposed and their locations can be seen in Figure 3-7 (see Section 3.0 of this FEIR). Water supplied from these wells would be treated at the City's existing Steckel Conditioning Facility and distributed via the City existing distribution system and the East Area 1 project site.

Water Tanks - A new domestic water tank is proposed to service the Specific Plan and can be seen on Figure 3-7 (see Section 3.0 of this FEIR). The domestic water tank would be capable of holding three million gallons and would be located at an elevation of 555 feet above mean sea level. In order to provide system redundancy necessary in the event of an emergency and/or necessary repairs, a secondary tank capable of holding two million gallons would be required and will be located at an elevation of 400 feet above mean sea level.

Scenario 2

Scenario 2 is similar to Scenario 1 with the following exceptions:

Project Backbone Facilities –Pressure reducing valves would be implemented creating two zones. Zone 1 would be comprised of the higher elevation located at the northeast portion of the project site, while the remainder of the site would form Zone 2. Both Zone 1 and 2 would be constructed within the City's existing water supply zones, respectively.

Project Internal Facilities – No changes proposed.

Wells - No changes proposed.

Water Tanks – These tanks would be comprised of one tank capable of holding two million gallons and one tank capable of holding three million gallons. The two tanks would be constructed at elevations

of 488 and 658 feet above mean sea level. The location of the proposed tanks is shown in Figure 3-7 (see Section 3.0 of this FEIR).

Recycled Water Plan

The Specific Plan proposes to install a recycled water backbone and internal facilities system capable of utilizing future supplies made available by the City's planned Water Recycling Facility.⁴ Figure 3-8 (see Section 3.0 of this FEIR) contains the proposed recycled water system design layout.

Project Backbone Facilities – This system would follow the same routes as those proposed for Scenarios 1 and 2 of the Potable Water Plan noted previously. The recycled water pipeline diameters would vary from six to eight-inches in diameter.

Project Internal Facilities – This system would follow the same routes as those proposed for Scenarios 1 and 2 of the Potable Water Plan noted previously. The recycled water pipeline diameters would be six-inches in diameter and would serve homeowner associations and public agencies (e.g., Public Works Department, etc.).

2.1.5.2 Wastewater Conveyance

Domestic Sewer Plan

Sewer service on-site is currently provided via septic systems. The Specific Plan requires construction of a sanitary sewer backbone and internal facilities system, force main and sewer lift station. Figure 3-9 (see Section 3.0 of this FEIR) contains the proposed layout of the sanitary sewer system. As noted in Figure 3-9 (see Section 3.0 of this FEIR), a series of pipes ranging in diameter from eight to 15-inches would serve the project site. A six-inch force main would be constructed to serve the project site and would cross Santa Paula Creek. In addition, a new sewer lift station capable of conveying a daily average of 0.5009 million gallons per day (MGD) and a peak flow of 1.2524 MGD would also be constructed in the vicinity of Hallock Drive and Main Street.⁵

2.1.5.3 Stormwater Conveyance and Detention

The project site is located within the greater Santa Clara River watershed. The project site drainage is tributary to the Santa Clara River, and is divided into three drainage sub-areas: Orcutt Canyon Creek, Farm Creek Drainage, and Overland Drainage areas. Combined, these areas drain an area of over 2,600 acres. As previously discussed, the terrain of the project site is relatively flat or gentle sloping in the south (two to seven percent slopes) to rugged terrain (in excess of 25 percent slopes) in the northern portion. Haun Creek forms the project site's eastern boundary (un-channelized), while Santa Paula Creek (channelized) forms its western boundary. Earth berms were built on both sides of the creeks by the property owners to provide flood protection. South of the project site in the vicinity of SR-126, flooding is problematic during storm events and periodically requires the closure of this major east/west roadway.

Existing conditions for Haun Creek include extreme flow velocities during rain events that are created north of the project site. As noted in Section 4.9 (Hydrology & Water Quality) of this FEIR, flows in

⁴ Note: The City of Santa Paula will begin construction of a new Water Recycling Facility in 2008 which will be capable of producing California Code of Regulations Title 22, unrestricted reuse water. However, no conveyance facilities are in place to serve the recycled water needs of the East Area 1 Specific Plan project.

⁵ Note: The sewer lift station capacity was designed to address future development associated with the East Area 2 expansion area.

excess of 7000 cubic feet per second are experienced within Haun Creek. In order to control these flows and decrease velocities, on-site weirs and detention basins were designed and incorporated into the project (see Figure 3-4 of this FEIR) and include:

- Haun Creek Weirs – A weir (low dam) would be constructed parallel to the western bank of Haun Creek in order to divert some of the Creek's flow. It would then flow within a trapezoidal channel, before entering an additional weir and finally into two proposed detention basin.
- Northern Detention Basin – This approximately 10.3 acres facility would retain approximately 51 acre-feet (ac-ft) of water; and
- Southern Detention Basin – This approximately 12.2 acres facility would retain approximately 50 ac-ft of water.

Both basins have been designed to accommodate flows from Haun Creek up to and including a 100-year (Q_{100}) storm event. The outlet structure of the detention basin will permit flows to enter Santa Paula Creek or Haun Creek. These detention basins are necessary to solve the existing flooding problem downstream at the SR-126 bridge at Haun Creek.

Tributary flows or streams north of the project site originating in the Topatopa foothills and mountains would necessitate the construction of debris basins (located north of the Santa Paula Creek Neighborhood) in order to capture these flows. The debris basins would be include trash grates, designed to remove large fragments and convey these flows into a storm drain pipe to the underground storm drain system within the project site.

Future site runoff will be conveyed through via surface drainage and underground structures from the northern portions of the project site south. The site will drain into Haun Creek and Santa Paula Creek along the east and west perimeters, respectively.

The detention and debris basins would also provide water quality benefits, as discussed in Section 4.9 of this FEIR.

2.1.5.4 Utilities & Service Systems

Solid Waste Collection & Disposal

Solid waste collection within the project site is provided by private commercial services. Agricultural waste is periodically burned in accordance with the Ventura County Air Pollution Control District rules. Once annexation/reorganization of the project site is approved by the Ventura Local Agency Formation Commission, residential (single-family residences) solid waste would be collected and disposed of by the City's Public Works Department. Multi-family residential and commercial land uses would be required to contract with outside private service providers approved by the City. All residences and business would be subject to the City's solid waste recycling regulations.

Utilities

Utilities (e.g., natural gas, electricity, telephone) are currently available on-site via existing service providers. Implementation of the Specific Plan would require upgrades to both existing on- and off-site facilities by local service providers. Section 4.15 (Utilities & Service Systems) of this FEIR contains a detailed description of existing conditions and required upgrades.

2.1.5.5 Police & Fire

Law enforcement and fire suppression are currently provided on-site by the Ventura County Sheriff's Department and Ventura County Fire District. Once the project area is annexed to the City, public safety services would be provided by the City of Santa Paula Police Department and Santa Paula Fire Department, respectively. The analysis contained within Section 4.13 (Public Services) of this FEIR indicates that a total of 5.5 sworn officers (and associated equipment, civilian support staff and on-site office space) would be needed to serve the project site. In addition, a new on-site fire station, engine (pumper), 12 full time fire personnel and two fulltime civilian personnel would be needed in order to meet fire and medical emergency response times and suppression requirements.

2.1.5.6 Schools and Post-Secondary Educational Facilities

The Santa Paula Creek Civic District (District) is intended to serve the greater Santa Paula community as well as the residents of the East Area 1 neighborhoods (see Figure 3-4 of this FEIR). The District is intended to accommodate a High School and a Community College with shared athletic and community facilities. Alternate uses for a portion of this area include institutional uses such as senior housing, assisted living and medical care facilities. As currently proposed, the following educational facilities could be accommodated on-site:

- Community park, High School/shared athletic fields and structures (24 acres)
- Community College buildings, High School/shared athletic fields and structures (14.1 acres)
- High School building and parking (8.3 acres)
- Community College buildings, shared community facilities (such as library or meeting hall), and parking (5.6 acres)
- Community College buildings and parking (8.3 acres)

2.2 OFF-SITE IMPROVEMENTS, COVENANTS & CAPITAL IMPROVEMENT PROGRAMS

In addition to the facilities proposed for the Specific Plan, a number of off-site improvements, recorded covenants, and participation in City Capital Improvement programs would be required, as conditions of project approval and would include, without limitation:

- Sewer Lift Station located at Hallock Drive/Telegraph Road
- Six-inch Sewer Force Main to be constructed across Santa Paula Creek
- Recycled Water Line Point of Connection at Hallock Drive/Telegraph Road
- A domestic water supply line will be constructed across Santa Paula Creek to supply potable water to the project site (within the City's 400 foot elevation zone) and in order to provide water supply redundancies in the event the on-site water tank(s) require maintenance.
- Roadway improvements, including widening, re-striping and signalization of intersections (see Section 4.4 (Transportation & Circulation) of this FEIR for a complete discussion of proposed improvements)
- Improvements to Harvard Boulevard, Main Street and Telegraph Road as outlined in the Traffic Study (see Appendix D (Traffic Study) of this FEIR).
- Recordation of an agricultural covenant on 34 acres (located southwest of the City, within the Santa Paula-San Buenaventura Greenbelt and within its Area of Interest) to address impacts associated with loss of agricultural lands within the Fillmore-Santa Paula Greenbelt.
- The Project Applicant will also be required to participate in the City's future Recycled Water Infrastructure Capital Improvements project.

2.2.1 PROJECT OBJECTIVES

The East Area 1 Specific Plan has the following objectives:

The City of Santa Paula and the project applicants, Limoneira Company and the Newsom Family Trust, identified the following objectives for the East Area 1 Specific Plan based on the City's General Plan and the existing physical, environmental, demographic and market conditions:

- Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.
- Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas.
- Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.
- Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.
- Establish new residential neighborhoods and districts with supporting commercial and institutional uses.
- Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.
- Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.
- Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.
- Provide sites for a wide range of educational facilities including primary, secondary and post – secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.

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

3.1 IMPACTS RELATED TO AGRICULTURAL RESOURCES

3.1.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AGRICULTURAL RESOURCES

The proposed project would result in significant adverse impacts related to agricultural resources.

3.1.1.1 Findings Related to Agricultural Resources

Implementation of the proposed project would result in the following: (1) loss of agricultural resources, including Prime and Unique Farmland (352 acres); and (2) conversion of cultivated farmland to urban uses.

3.1.1.2 Facts in Support of the Findings Related to Agricultural Resources

Mitigation is not possible to avoid the significant adverse project impacts related to the conversion of agricultural resources to a less than significant level. However, the following mitigation measures are included:

- A-1 The applicant must record a conservation covenant, in a form approved by the City of Santa Paula, on the 55 acres of land currently in agricultural production in the proposed agricultural preserve located along the northern portion of the East Area 1 site that restricts activities to agricultural operations. This covenant will also require use of modified farming cultural practices, such as the restriction of the use of agricultural chemicals and practices that would generate high levels of dust, noise and odors.
- A-2 The applicant must record an agricultural conservation covenant, in a form approved by the City of Santa Paula, on 34 acres of other agricultural land owned by the applicant and currently under agricultural production within the City of Santa Paula's Area of Interest.
- A-3 A reinforced 8-foot chain link fence with top bar must be constructed by the Applicant and/or its contractor before issuance of residential occupancy permits. The fence must extend along the entire eastern portion of the property boundary along Haun Creek beginning in the northern property boundary and extending south to State Route 126. Deviations to this route due to terrain or other potential limitations must first be approved by the City's Planning Director.

3.2 IMPACTS RELATED TO AIR QUALITY

3.2.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AIR QUALITY

The proposed project would result in significant adverse impacts related to air quality.

3.2.1.1 Findings Related to Air Quality

Implementation of the proposed 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.

3.2.1.2 Facts in Support of the Findings Related to Air Quality

Mitigation is not possible to avoid the significant adverse project impacts related to air quality to a less than significant level. However, the following mitigation measures are included:

Construction Emissions

Grading and Excavation

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

- On-site vehicle speed is not to exceed 15 miles per hour (the site will contain posted signs with the speed limit);
- All on-site construction roads with vehicle traffic must be watered periodically;
- Streets adjacent to the project reach must be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust.
- All material excavated or graded must be sufficiently watered to prevent excessive amounts of dust. Watering will occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day;
- All clearing, grading, earth moving, or excavation activities must cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust (contact the VCAPCD meteorologist for current information about average wind speeds);
- All material transported off-site must be either sufficiently watered or securely covered to prevent excessive amounts of dust; and
- The area disturbed by clearing, grading, earth moving, or excavation operations must be minimized so as to prevent excessive amounts of dust.

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

AQ-2 Project grading plans must show that for the duration of construction, ozone precursor emissions from construction equipment vehicles must be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Compliance with this measure will be subject to periodic inspections of construction equipment vehicles by the Public Works Department.

AQ-3 All trucks that will haul excavated or graded material on-site must comply with California Vehicle Code § 23114, with special attention to subsections 23114(b)(F), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.

AQ-4 A comprehensive Fugitive Dust Control Plan must be developed by the Applicant and approved by the VCAPCD before the applicant commences grading and excavation operations. The Plan must include all feasible, but environmentally safe, dust control methods. If a particular dust control method is determined or believed not to be feasible, or if it would conflict with other regulations, justification for not including the subject method must be provided at the time the Fugitive Dust Control Plan is submitted to the VCAPCD. The Plan must identify all fugitive dust sources, the means by which fugitive dust from each identified source will be minimized, and the schedule or frequency that each dust control method will be applied for each identified source.

Building Construction

AQ-5 The construction contractor must adhere to VCAPCD Rule 74.2 (Architectural Coatings) for limiting volatile organic compounds from architectural coatings. This rule specifies architectural coatings storage, clean up and labeling requirements.

Operations Emissions

Area Source Emissions

The proposed project would result in significant and unavoidable impacts with regard to ROC and NO_x. VCAPCD recommends that feasible area source mitigation measures be included in all projects that have been determined to have a significant air quality impact. The following mitigation measure is provided in Section 7.5.1 of the VCAPCD Guidelines along with the approximate emission reduction (ER).

AQ-6 Use low emission water heaters for residential, retail, and commercial water heating (Emissions reduction of 11% for ROC and 9.5% for NO_x).

Mobile Source Emissions

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

AQ-8 Provide shuttle/minibus service between Project residential and Project retail areas and the Santa Paula downtown area.

AQ-9 Provide shuttle/minibus service between the Project commercial and industrial land uses and the Project retail land uses and the Santa Paula downtown area during the lunchtime period (11:00 A.M. to 2:00 P.M.).

Valley Fever

AQ-10 To the extent feasible, construction employees will be hired from local populations, since it is more likely that they have been previously exposed to the fungus and are therefore immune. An individual is quite likely to be affected by valley fever if he or she lives in an area where the fungus is prevalent. A person (or animal) with a positive skin test has had a valley fever infection and has developed immunity to the fungus and therefore will never contract valley fever again. (Valley Fever Vaccine Project of America, <http://www.valleyfever.com/primer.htm>, June 8, 2005.)

AQ-11 During periods of high dust in the grading phase, crews must use respirators in accordance with California Division of Occupational Safety and Health regulations.

AQ-12 The operator cab of area grading and construction equipment must be enclosed and air-conditioned.

Long-Term Operational Emissions

AQ-13 The Applicant and/or its contractor must plant and maintain shade trees to reduce heat build-up on structures.

AQ-14 The Applicant and/or its contractor must prepare a Transportation Demand Management Program (TDM) for review and approval by the City and VCAPCD, before the City issues building permits. The plan must incorporate reasonable and feasible measures to reduce project-related traffic and vehicle miles traveled. At minimum, the TDM Program must include the following measures:

- Provision of connections to identified adjacent City or regional trails;
- Provision of adequate way-finding features to direct pedestrians and bicyclists to nearby project and City destinations, such as school, retail, and civic facilities;
- Provision of homeowner information packets before close of escrow, identifying local and regional non-vehicular transportation options, and providing homeowners with basic information regarding telecommuting options; and
- Providing adequate setbacks and design features such that the proposed future enhancement of commuter rail opportunities is not hindered by project design.
- Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeway or lanes. Sidewalks and bikeways should be landscaped with trees; and
- Perform a traffic light synchronization study on streets impacted by project development to reduce vehicle queuing time.

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

AQ-15 The Applicant and/or its contractor are required to install EPA-certified wood-burning stoves or fireplace inserts. If this is not feasible, then the installation of a ceramic coating on the honeycomb inside a catalytic combustor must be utilized or the use of natural gas fireplaces may be used as a feasible alternative.

3.2.1.3 Additional Mitigation Measures

Area Source Emissions

The proposed project would result in significant and unavoidable impacts with regard to ROC and NO_x. VCAPCD recommends that feasible area source mitigation measures be included in all projects that have been determined to have a significant air quality impact. The following mitigation measure is provided in Section 7.5.1 of the VCAPCD Guidelines along with the approximate emission reduction (ER).

3.3 IMPACTS RELATED AESTHETICS

3.3.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AESTHETICS

The proposed project would result in significant adverse impacts related to aesthetics.

3.3.1.1 Findings Related to Aesthetics

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

3.3.1.2 Facts in Support of the Findings Related to Aesthetics

Mitigation is not possible to avoid the significant adverse project impacts related to aesthetics to a less than significant level. However, the following mitigation measure is included:

- A-1 Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula, Planning Director for approval that identifies the types of shielding that will be used for outside lighting. Shielding will eliminate uplighting and ensure that light generated on the site does not spill over onto adjacent off-site properties.

3.4 IMPACTS RELATED TO CULTURAL AND HISTORICAL RESOURCES

3.4.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO CULTURAL AND HISTORICAL RESOURCES

The proposed project would result in significant adverse impacts related to cultural and historic resources.

3.4.1.1 Findings Related to Cultural and Historical Resources

Implementation of the proposed project would result in the following: (1) 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; and (2) result in the removal of a property which is an important element contributing to the eligibility of an NRHP rural landscape district and would result in a reduction of integrity of design, setting, feeling and association for this district. Therefore, implementation of the proposed 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.

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

Mitigation is not possible to avoid the significant adverse project impacts related to aesthetics to a less than significant level. However, the following mitigation measures are included:

- C-1 Before the initiation of earthmoving activities associated with the development of the project site, the services of a qualified paleontologist approved by the City and LACM will be retained.
- C-2 Before the initiation of earthmoving activities associated with the development of the project site, the paleontologist or another mitigation program staff member will conduct a field survey of that portion of the project site underlain by older alluvium to locate and recover any larger fossil remains that might occur at currently unrecorded fossil sites, and to document the presence of strata suitable for containing larger fossil remains or for the collection and processing of sediment or rock samples to allow for the recovery of smaller fossil remains.

- C-3 The paleontologist will develop a formal agreement with a recognized museum repository, such as the LACM, regarding final disposition and permanent storage and maintenance of any fossil remains that might be recovered as a result of the mitigation program, the archiving of associated specimen data and corresponding geologic and geographic site data, and the level of treatment (preparation, identification, curation, cataloguing) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage.
- C-4 The paleontologist or another mitigation program staff member will coordinate with appropriate construction contractor personnel to provide information regarding City and County requirements concerning the protection of paleontologic resources. Contractor personnel, particularly heavy-equipment operators, also will be briefed on procedures to be followed in the event that fossil remains and a currently unrecorded fossil site are encountered by earthmoving activities, particularly when the monitor is not on-site. The briefing will be presented to new contractor personnel as necessary. Names and telephone numbers of the monitor and other appropriate mitigation program personnel will be provided to appropriate contractor personnel.
- C-5 Earthmoving activities will be monitored by the paleontologist only in those areas of the project site where these activities will disturb previously undisturbed strata. Monitoring will be conducted on a full-time basis in areas underlain by the Saugus Formation, on a half-time basis in areas underlain by older alluvium and, at depths greater than 5 feet below current grade, the younger alluvium. If fossil remains are encountered by earthmoving activities in an area underlain by older or younger alluvium and following approval from the City, monitoring will be increased to full time, at least in the vicinity of the fossil site. On the other hand, if no fossil remains are found once 50 percent of earthmoving activities have been completed in an area underlain by a particular rock unit, monitoring can be reduced to half time in the remainder of the area underlain by the Saugus Formation, and to quarter time in an area underlain by older or younger alluvium following approval from the City.
- C-6 If any paleontological resources are encountered during construction in this area, activities in the immediate area of the find will be halted and the discovery assessed. The paleontologist will recommend appropriate mitigation measures pursuant to guidelines developed by the Society of Vertebrate Paleontologists (SVP).
- C-7 All fossil specimens recovered from the project site as a result of the mitigation program, including those recovered as the result of processing fossiliferous rock samples, will be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock or sediment samples from the older and younger alluvium will be submitted to commercial laboratories for microfossil, pollen, radiometric dating, or other analysis, as appropriate.
- C-8 The paleontologist will maintain daily monitoring logs that include the particular tasks accomplished, the earthmoving activity monitored, the location where monitoring was conducted, the rock unit encountered, the fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data. A final technical report of results and findings will be prepared by the paleontologist, in accordance with any City requirement.

Though the construction of the proposed project is not expected to result in significant adverse impacts related to archaeological resources, the following mitigation measure has been added to minimize impacts to the extent feasible.

- C-9 An archaeologist monitor must be present during topsoil grading of any of the historical archaeological sites L-2 through L-5.
- C-10 The following mitigation measures were developed to avoid or minimize the potential impacts of the proposed project related to historic resources.

Impact A:

Interpretative Plan. The applicant is required to produce an historical interpretation plan for the property. This plan must include a permanent, on-site display within a public area which will provide historic information about the founding and history of the Teague-McKevett Ranch. Historic and/or contemporary photographs and other artifacts and materials should be included within the display. Other indoor or outdoor interpretive displays must be produced, as appropriate. The precise content, format, and location and design must be determined by a qualified historic preservation professional, and subject to the approval by the City of Santa Paula. The Teague-McKevett Ranch archives must be used in the preparation of the exhibit and will include but not be limited to journals, annual reports, financial records, shipping records, ledgers, correspondence, maps, photographs, and architectural plans. In addition, interviews with former employees must be undertaken by an historian qualified to document oral history.

Documentation. In consultation with a qualified historic preservation professional, the applicant must produce a Documentation Report consisting of archival quality photographs and a measured site plan of the buildings, structures and landscape features to be demolished or relocated. As a part of the Documentation Report, the applicant must compile a comprehensive inventory of historic features on the property, including without limitation buildings, structures, objects, irrigation and drainage features, and landscape materials. Copies of the Documentation Report must be submitted to appropriate local archives.

The Teague-McKevett Company archives must be located and a comprehensive inventory completed by a qualified archivist. The archive must be donated to an appropriate public library or museum repository. Possible repositories include the Ventura County Museum library and/or the Huntington Library.

Rehabilitation/Adaptive Reuse Plan. A rehabilitation and adaptive reuse plan for all eligible buildings, structures and objects which will be preserved must be developed. The plan must conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties and be prepared by a qualified historic preservation professional and be based to the greatest extent feasible on historical data. To the greatest extent feasible, the preservation and rehabilitation of historic features on the property must be incorporated into the development plan.

Impact B:

Design. The new construction must be screened from the historic district in such a manner as to minimize its visual impact upon the district. Screening methods may include historic landscape materials (e.g., citrus trees) planted along perimeter fences or walls, and/or tall skyline trees planted within the site to simulate wind rows, or other such materials as may be effective and appropriate for the purposes of integrating the new construction into the agricultural landscape to the greatest extent feasible.

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 LAND USE & PLANNING

4.1.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO LAND USE & PLANNING

The proposed project would result in significant adverse impacts related to land use and planning.

4.1.1.1 Findings Related to Land Use & Planning

Implementation of the proposed project would result in land use density standards that currently exceed those contained within the General Plan. In addition, as shown in Figure 4.1-3 (see Section 4.1 (Land Use & Planning of the FEIR), reorganization (annexation) of the project site would result in the creation of islands of unincorporated territory within the City's boundaries. Pursuant to Government Code § 56744, Local Agency Formation Commissions (LAFCOs) are generally prohibited from annexing territory to a City if, as a result of that annexation, unincorporated territory is completely surrounded by that City.¹⁹ Therefore, implementation of the proposed project would result in an adverse significant impact related to LAFCO reorganization policy.

4.1.1.2 Facts in Support of the Findings Related to Land Use & Planning

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

- LU-1 Before the East Area 1 Specific Plan (SP3) can become effective, a General Plan amendment must be approved by a majority of registered voters within the City of Santa Paula. The General Plan amendment would involve amending Figure LU-4a, Figure LU-5, and Table LU-7.
- LU-2 The General Plan must be amended to change the CURB boundaries (Figure LU-4a) in accordance with Section III(G) of the General Plan Land Use Element to include the 501 acres comprising the East Area 1 Specific Plan (SP3) project site.
- LU-3 The City must prepare and process a Sphere of Influence Amendment and a reorganization request with Ventura LAFCO.

Implementation of mitigation measures LU-1 through LU-3 provided above will reduce the potentially significant adverse impact of the proposed East Area 1 Specific Plan related to General Plan inconsistencies and the creation of islands of unincorporated territory associated with annexation. There are no significant unavoidable adverse project impacts related to General Plan inconsistency and LAFCO reorganization policy which would result after implementation of these mitigation measures.

¹⁹ Source: Correspondence from Everett Millais, Executive Officer Ventura LAFCO, dated September 22, 2006 and Government Code § 56744.

4.2 IMPACTS RELATED TO TRANSPORTATION & CIRCULATION

4.2.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO TRANSPORTATION & CIRCULATION

The proposed project would result in significant adverse impacts related to transportation and circulation.

4.2.1.1 Findings Related to Transportation & Circulation

Impacts to Level of Service for Year 2020

Intersections

As shown in Table 4.4-12 of this FEIR, 11 intersections will operate at unacceptable LOS D or worse during either the A.M. or P.M. peak hour for the Cumulative Base scenario. As shown in Table 4.4-12 of this FEIR, 13 intersections will operate at unacceptable LOS D or worse during either the A.M. or P.M. peak hour for the Cumulative Plus Project scenario. Implementation of the proposed project will contribute to a significant adverse cumulative impact to these ten intersections listed below:

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
12. Ojai Road/10th Street and Santa Paula Street
15. 10th Street and Harvard Boulevard
32. Peck Road and Main Street/Harvard Boulevard
34. Peck Road and SR-126 eastbound ramps
35. Faulkner Road and SR-126 westbound ramps

Implementation of the proposed project will create a significant adverse project impact to these three intersections listed below:

18. 8th Street and Santa Paula Street
22. Palm Avenue and Santa Paula Street
28. Steckel Drive and Santa Paula Street

Even though 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, 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. The delay at this intersection improves because the proposed project will provide additional road capacities and shift some of the background traffic away from this intersection.

Freeways and Multilane Highways

As shown in Table 4.4-13 of this FEIR, SR-126 between Peck Road and Briggs Road will operate at unacceptable LOS F during the P.M. peak hour for the Cumulative Plus Project scenario. Implementation of the proposed project will create a significant adverse project impact to SR-126 between Peck Road and Briggs Road.

Impacts to Level of Service for Year 2015

This section discusses the estimated traffic impacts of the proposed project in year 2015 for the study intersections. As shown in Table 4.4-16 of this FEIR, nine intersections will operate at unacceptable LOS D or worse during the A.M. or P.M. peak hour for the Interim Base and the Interim Plus Project scenarios based on the estimated V/C ratio or delay. Implementation of the proposed project will contribute to a significant adverse cumulative impact at these eight intersections listed below:

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
12. Ojai Road/10th Street and Harvard Boulevard
15. 10th Street and Harvard Boulevard
34. Peck Road and SR-126 eastbound ramps

Even though 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 Interim Base scenario, 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. The delay at this intersection improves because the proposed project will provide additional road capacities and shift some of the background traffic away from this intersection.

Other Traffic Issues

General Plan Consistency

In addition to the extension of Santa Paula Street over Santa Paula Creek and the improvement of Hallock Drive south of the project site, the Circulation Element of the Santa Paula General Plan anticipates one other road improvement in conjunction with the development of the project site: a new road connection from westbound SR-126 to Telegraph Road to relieve traffic from the intersection of SR-126 and Hallock Drive. The primary effect is that most vehicles previously performing the westbound right turn at Hallock Drive would divert to this new road link located west of Hallock Drive. As shown above, implementation of the proposed project without this new road link will contribute to a significant adverse cumulative impact to the intersection of SR-126 and Hallock Drive (Intersection 1) and to the intersection of Hallock Drive and Telegraph Road (Intersection 2). However, construction of this new road connection would not avoid significant adverse impacts at those two locations but would necessitate different mitigation measures, as discussed further in the Traffic Impact Analysis in Appendix D of this FEIR.

Congestion Management Plan Analysis

An analysis was completed to comply with the monitoring requirements found in the 2004/2005 VCCMP. The VCTC has adopted LOS E as the minimum system-wide LOS on all VCCMP roads. Within the study area SR-126, SR-150 and Harvard Boulevard/Telegraph Road west of SR-150 are part of the VCCMP road network. According to the Traffic Impact Analysis (Appendix D of this FEIR), all transportation facilities will operate at acceptable LOS E or better except for SR-126 between Peck Road and Briggs Road during the P.M. peak hour for the Cumulative Plus Project scenario. The freeway segment will operate at unacceptable LOS F. As discussed in Section 4.4.4.1 (Impacts to Level of

Service for Year 2020) of this FEIR. Implementation of the proposed project would create a significant adverse project impact to SR-126 between Peck Road and Briggs Road.

Peak Period Parking Restrictions on Ojai Road/10th Street

As determined necessary to meet the Santa Paula General Plan acceptable LOS C standards for intersections, the City will impose a peak period parking restriction on Ojai Road/10th Street to allow for an additional travel lane during the designated peak periods. The restriction would require striping the pavement to indicate the additional lane and signage noting the parking restriction. In the study area, the affected sections include Ojai Road from Richmond Road to Santa Paula Street and a portion of 10th Street north of Harvard Boulevard. During the A.M. peak period, on-street parking would be restricted along the west side of the street to provide one additional southbound travel lane. Conversely, during the P.M. peak period, on-street parking would be restricted along the east side of the street to provide one additional northbound travel lane. Implementation of the parking restriction on Ojai Road/10th Street has the potential to contribute to an indirect significant adverse parking impact near Ojai Road/10th Street.

Emergency Access Impacts

The City of Santa Paula Fire Department (SPFD) provides minimum standards for emergency access. The minimum roadbed clearance width is 20 feet to permit two response vehicles to pass one another without obstruction. The minimum roadbed clearance width is 24 feet at locations within the operational zone of a building to permit vehicles to pass an emergency vehicle engaged in firefighting operations. The minimum roadbed clearance width is 28 feet when a building's eave or parapet exceeds 28 feet high where it may be necessary to accommodate aerial devices such as vehicle-mounted ladders, elevating platforms or snorkel buckets.

The minimum turning radius is 17 feet measured to the inside of the turn. The maximum road grade is 15 percent. However, road grades from 15 to 20 percent with an average of 17 percent are permitted if they do not exceed 200 feet in length with a minimum 50-foot break in between grades. The pavement structural section must be designed to support a rear axle weight of 46,000 pounds per axle and a front axle weight of 22,000 pounds.

The proposed internal circulation system will consist of four primary roads (Hallock Drive, Santa Paula Creek Drive, Santa Paula Street, and Teague-McKevett Boulevard) and multiple secondary roads. The primary roads typically do not meet or exceed the minimum roadbed clearance widths because they typically consist of a raised median and two 20-foot roadbed widths for one 12-foot travel lane and one eight-foot parking lane. The secondary roads typically do not meet or exceed the minimum roadbed clearance widths because they typically consist of one 34-foot roadbed width for two ten-foot travel lanes and two seven-foot parking lanes. The secondary roads may meet or exceed the minimum roadbed clearance widths by eliminating on-street parking on one side.

The road grades typically vary between two percent to eight percent with a maximum grade of ten percent at some locations. The structural pavement section will be designed to accommodate the weight of a fire truck. Based on the road designs described above, implementation of the proposed project has the potential to create a significant adverse impact related to emergency access to the project site because it does not provide the minimum roadbed width clearances.

Parking Impacts

Parking details were not available at the time of preparation of the traffic impact analysis or the FEIR. It is anticipated that the proposed project will provide parking spaces per the Santa Paula Municipal Code. Implementation of the proposed project has the potential however, to create a significant adverse parking impact if the proposed project does not provide the minimum parking spaces per the Santa Paula Municipal Code.

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

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

T-1 SR-126 and Hallock Drive (Intersection 1) – The applicant must pay its pro rata costs to widen and reconfigure the intersection on all four approaches. The northbound approach on Hallock Drive may require additional right-of-way to accommodate the proposed lane configurations. SR-126 would be widened on both approaches to accommodate an additional through lane at the intersection.

The southbound approach would provide two left-turn lanes, one through lane, one shared through/right-turn lane, and one right-turn lane. The westbound approach would provide one left-turn lane, three through lanes and one right-turn lane. The northbound approach would provide one left-turn lane, one through lane and one right-turn lane. The eastbound approach would provide two left-turn lanes, three through lanes and one right-turn lane. These recommended mitigation measures would require coordination with and approval by Caltrans. The design and construction of Mitigation Measures T-1 and T-2 should be closely coordinated because of their proximity to one another.

T-2 Telegraph Road and Hallock Drive (Intersection 2) – The applicant must pay its pro rata cost to install a traffic signal and to reconfigure the intersection on all four approaches as follows: (1) the southbound approach must provide one left-turn lane, two through lanes and one right-turn lane; (2) the westbound approach must provide one left-turn lane and one shared through/right-turn lane; (3) the northbound approach must provide one left-turn lane, one through lane and one shared through/right-turn lane; and (4) the eastbound approach must provide one left-turn lane, one through lane and one right-turn lane. The design and construction of Mitigation Measures T-1 and T-2 should be closely coordinated because of their proximity to one another.

T-3 12th Street and Santa Paula Street (Intersection 4) – The applicant must pay its pro rata cost to install a traffic signal, to reconfigure the intersection on three approaches, and to widen the west leg. The westbound approach must provide one left-turn lane and one shared through/right-turn lane. The northbound approach must provide one shared through/left-turn lane and one right-turn lane. The eastbound approach must provide one left-turn lane, one through lane and one right-turn lane. The west leg of the intersection must be widened to provide 50 feet from curb to curb as recommended in the Circulation Element.

T-4 Ojai Road (SR-150) and Richmond Road (Intersection 9) – The applicant must pay its pro rata cost to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period, to restrict the westbound left-turn movement during both peak periods, and to widen Ojai Road. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. Ojai Road must be widened to provide 50 feet from curb to curb as recommended in

- the Circulation Element. These recommended mitigation measures would require coordination with and approval by Caltrans.
- T-5 Ojai Road (SR-150) and Orchard Road (Intersection 10) – The applicant must pay its pro rata cost to install a traffic signal and to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. These recommended mitigation measures require coordination with and approval by Caltrans.
- T-6 Ojai Road (SR-150) and Saticoy Street (Intersection 11) – The applicant must pay its pro rata cost to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period and to restrict the westbound left-turn movements during both peak periods. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. These recommended mitigation measures require coordination with and approval by Caltrans.
- T-7 Ojai Road (SR-150)/10th Street and Santa Paula Street (Intersection 12) – The applicant must pay its pro rata cost to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period, to reconfigure the intersection and to widen Ojai Road/10th Street. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. The five-legged intersections must be reconfigured to a typical four-legged intersection. The southbound and northbound approaches must provide one left-turn lane and one shared through/right-turn lane during the off-peak periods. The eastbound and westbound approaches must provide one left-turn lane, one through lane and one right-turn lane. The fifth leg of the intersection, 10th Street north of Santa Paula Street, must be restricted to right turn only to and from Ojai Road. Ojai Road must be widened to provide 50 feet from curb to curb as recommended in the Circulation Element. These recommended mitigation measures require coordination with and approval by Caltrans.
- T-8 10th Street and Harvard Boulevard (Intersection 15) – The applicant must pay its pro rata cost to restrict the southbound on-street parking during both peak periods and to reconfigure the northbound approach. The parking restriction must provide one additional southbound lane during both peak hours. The northbound approach must provide one left-turn lane, one through lane and one right-turn lane.
- T-9 8th Street and Santa Paula Street (Intersection 18) – The applicant must pay all costs to widen and reconfigure the northbound approach. The northbound approach must provide one shared through/left-turn lane and one right-turn lane.
- T-10 Palm Avenue and Santa Paula Street (Intersection 22) – The applicant must pay all costs to reconfigure the northbound and westbound approaches. The northbound approach must provide one shared through/left-turn lane and one right-turn lane. The westbound approach must provide one left-turn lane and one shared through/right-turn lane.
- T-11 Steckel Drive and Santa Paula Street (Intersection 28) – The applicant must pay all costs to reconfigure the westbound approach. The westbound approach must provide one left-turn lane and one shared through/right-turn lane.

- T-12 Peck Road and Main Street and Harvard Boulevard (Intersection 32) – The applicant must pay its pro rata cost to reconfigure the northbound and southbound approaches to provide one additional through lane. The northbound approach must provide one left-turn lane, two through lanes and one right-turn lane. The southbound approach must provide one left-turn lane, one through lane and one shared through/right-turn lane.
- T-13 Peck Road and SR-126 Eastbound Ramps (Intersection 34) – The applicant must pay its pro rata cost to install a traffic signal. This mitigation measure requires coordination with and approval by Caltrans.
- T-14 Faulkner Road and SR-126 Westbound Ramps (Intersection 35) – The applicant must pay its pro rata cost to reconfigure the westbound approach by converting one through lane to one left-turn lane. The westbound approach must provide two left-turn lanes and one shared through/right-turn lane. This mitigation measure requires coordination with and approval by Caltrans.
- T-15 SR-126 between Peck Road and Briggs Road – The applicant must pay its pro rata cost to widen SR-126 to provide three travel lanes in each direction for a total of six lanes. The freeway widening can be completed within the existing right-of-way. This mitigation measure requires coordination with and approval by Caltrans.
- T-16 Restricted parking on Ojai Road/10th Street during the peak periods – The City must monitor the parking situation on Ojai Road from Richmond Road to Santa Paula Street and on 10th Street north of Harvard Boulevard during the A.M. and P.M. peak periods to determine if the implementation of the parking restrictions on Ojai Road and 10th Street will create an indirect significant adverse parking impact. If necessary, the City will construct additional parking and the applicant must pay its pro rata cost to provide additional parking spaces during the A.M. and P.M. peak periods near the vicinity of Ojai Road and 10th Street.
- T-17 Emergency Access Impacts – The applicant must submit emergency access plans to the SPFD for review and approval. The applicant must comply with the recommendations provided by the SPFD.
- T-18 Parking Impacts – The applicant will prepare a parking study if the proposed project does not provide parking spaces per the Santa Paula Municipal Code.
- T-19 Traffic Impact Mitigation Fee – The Applicant and/or its contractor must comply with the County's Traffic Impact Mitigation Fee (TIMF) and pay the required fee before the City issues any building permit. Based on the fee schedule established in accordance with the County TIMF Ordinance Code §§ 8601-0 *et seq.* for the Santa Paula Impact Fee District, the fee due is as follows and is based upon information contained in the DEIR as follows:
- 30,329 Average Daily Trips (ADT) multiplied by \$44.16/ADT which equals \$1,339,328.64
- The fee is subject to adjustment at the time of deposit, due to provisions in the TIMF Ordinance allowing the fee to be adjusted for inflation based upon the Engineering News Record construction cost index.
- T-20 Before start of construction, the Applicant and/or its contractor must prepare and submit a Traffic Management Plan (TMP) to the City, County Transportation Department and the State of California Department of Transportation (Caltrans). The TMP must provide mitigation measures acceptable to the City, County Transportation Department and Caltrans for any impacts the

project may have on roadways and network systems under their jurisdiction and in particular, any impacts on Telegraph Road.

- T-21 The Applicant and/or its contractor must reconstruct any damaged or defaced asphalt concrete paving and driveway per City, City and/or Caltrans standards. Before commencing construction, the Applicant and/or its contractor must videotape the existing roadway impacted by this project. The videotape prepared and submitted by the Applicant and/or its contractor must be used in conjunction with an after hauling inspection to determine if any of the above existing surface improvements were damaged by trucks during hauling. The TMP must also identify the truck routes the project proposes to use. The traffic control plan for any lane closures/reductions within the County right-of-way must be also approved by the County Transportation Department.
- T-22 The Applicant and/or its contractor must prepare a fencing plan (Plan) for the at-grade crossing planned at Telegraph Road/Hallock Drive and immediate vicinity. The Plan must be submitted for review by the City and must meet the design and construction requirements of the California Public Utilities Commission or other applicable jurisdiction with oversight over the existing railroad right-of-way.

Implementation of mitigation measures T-1 through T-22, provided above will reduce the potentially significant adverse impact of the proposed East Area 1 Specific Plan related to transportation and circulation and parking. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.3 IMPACTS RELATED TO NOISE

4.3.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO NOISE

The proposed project would result in significant adverse impacts related to noise.

4.3.1.1 Findings Related to Noise

Construction Noise Impacts

Vibration

On-site Sensitive Receptors

Exterior Vibration. As noted previously, future sensitive receptors include occupied residential units, schools, and assisted living facilities within completed portions of the project site. In addition, the proposed project would be implemented in consecutive phases. While many of the existing buildings within the project site would remain, some demolition activities are proposed. In the event that completed and occupied residential units, schools and assisted living facilities are adjacent to an area under construction and demolition is required, significant vibration impacts could occur. Therefore, impacts associated with vibration during construction are adverse and significant.

Operations Noise Impacts

Railroad Noise

Off- and On-site Sensitive Receptors

Exterior Noise. As previously noted, trains traveling on the Fillmore & Western Railway Company right-of-way represents an intermittent noise source. Currently, the Fillmore & Western Railway Company operates tourist-oriented trains between 12:00 P.M. and 3:00 P.M. on Saturdays and Sundays. The tracks are also used by one freight train, which passes by the Specific Plan area twice on Mondays, Wednesdays, and Fridays between the hours of 8:00 A.M. and 12:00 P.M. As shown in Figure 3-4 (East Area 1 Illustrative Plan) (see Section 3.0 (Project Description) of this FEIR), light industrial/mixed use and open space land uses are proposed along the southern Specific Plan area boundary. The Santa Paula Branch Rail Line Corridor is currently classified as Federal Railroad Administration Track Class 1, the lowest track classification. Class 1 limits freight to a maximum speed of 10 mph, and passenger trains to 15 mph.⁶ Because the Fillmore & Western Company has an at-grade crossing at Highway 126, and is entering and exiting the City of Santa Paula near project site, trains speed of less than 10 mph.⁷ Assuming an average of three trains (6 pass-bys) per day and speed of 10 miles per hour along the southern boundary of the Specific Plan, predicted noise levels at 90 feet from the railway centerline would be 63 dB(A) CNEL.⁸ 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 Fillmore & Western Railway Company railroad track, uses proposed within southern portion of the Specific Plan are primarily non-noise-sensitive and include light industrial, office, limited retail, open space and roads. However, limited residential uses in the form of work/live units on upper floor residences over commercial spaces are proposed. Work/live and residential units would be sensitive receptors to railroad noise and an adverse significant impact could result depending on building orientation and design.

4.3.1.2 Facts in Support of the Findings Related to Noise

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

- N-1 Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible during all phases of project construction.
- N-2 All construction equipment must be equipped with appropriate mufflers in good working condition.
- N-3 Before any site activity, the contractor will be required to submit a material haul route plan to the City of Santa Paula and Ventura County for review and approval. The contractor must ensure that the approved haul routes are used for all materials hauling, to minimize exposure of sensitive receivers to potential adverse noise levels from hauling operations.

⁶ Ventura County Transportation Commission, Draft Final Report Santa Pula Branch Line Rail Study, March 2007.

⁷ Telephone conversation with Teresa Wilkerson, Owner, Fillmore & Western Railway Company, 1 November 2007.

⁸ Advanced Engineering Acoustics, July 2006.

The following mitigation measures are proposed to minimize vibration impacts during construction:

- N-4 Notification must be provided to all occupied residences within 200 feet of an area where construction activities are anticipated to result in ground-borne vibration of more than 80 VdB at least 10 days in advance of such activities.
- N-5 During all site preparation, grading and construction, the construction contractor must ensure that all stockpiling and vehicle staging areas are located away from existing residences to the extent feasible.

4.3.1.3 Mitigation Measures for Operations Noise

The following measures are proposed to minimize noise impacts generated during project operation:

- N-6 Where feasible and consistent with City standards, any paving or repaving of Santa Paula Street between 12th Street and 10th Street that must be conducted in conjunction with implementation of the proposed project should utilize asphalt rubber paving material consisting of 20 percent or more recycled rubber and 80 percent paving grade asphalt.
- N-7 Where feasible and consistent with City standards, speed limits on arterials experiencing significant noise impacts such as Santa Paula Street between 12th Street and 10th Street should be reduced. Each 5 mile per hour reduction in speed limits can decrease the CNEL level by about 1 dB(A)
- N-8 Noise sensitive work/live and residential units proposed within Specific Plan Planning Area E must be designed so that interior noise levels attributable to exterior sources exceeding 60 dB(A) CNEL do not exceed City interior noise standard (45 dB(A) CNEL). An acoustical analysis of the effectiveness of noise insulation of proposed construction must be required and documented during permit review, showing that the building materials and construction specifications are adequate to meet the interior noise standard (45 dB(A) CNEL). Examples of building materials and construction specifications that may be used to meet the interior noise standard include the following:
 - Exterior livable space, such as balconies, must be oriented northward;
 - South-facing windows and sliding glass doors must be double-paned, mounted in frames with low rates of air filtration (0.5 cubic foot per minute or less, per American National Standard Institute specifications) and a sound transmission coefficient rating of 30 or greater;
 - Solid-core exterior doors must be constructed with perimeter weather stripping and threshold seals; and
 - South-facing roof or attic vents must be baffled.
- N-9 Written disclosure of maximum exterior and interior noise levels expected at work/live and residential units and at light industrial, office, and retail uses within Planning Area E must be provided to those purchasing or leasing such uses.
- N-10 Work/live and residential units, light industrial, office, and retail uses within Planning Area E must be located a minimum of 66 feet from the railroad tracks.

Implementation of mitigation measures N-1 through N-10, provided above will reduce the potentially significant adverse impact of the proposed East Area 1 Specific Plan related to noise. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.4 IMPACTS RELATED TO BIOLOGICAL RESOURCES

4.4.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO BIOLOGICAL RESOURCES

The proposed project would result in significant adverse impacts related to biological resources.

4.4.1.1 Findings Related to Biological Resources

Jurisdictional Resources

United States Army Corps of Engineers (ACOE) review and certification of the Jurisdictional Delineation (see Appendix G of this FEIR) is required to confirm the findings of the report and to verify ACOE jurisdictional area on the project site. Fill in areas determined by the ACOE to fall under its jurisdiction will require a Clean Water Act Section 404 Nationwide Permit (NWP). Additionally, areas determined to be federally protected by the ACOE will also fall under the jurisdiction of the Regional Water Quality Control Board (RWQCB), and a Clean Water Act Section 401 Water Quality Certification (401 Certification) will be required from the RWQCB for impacts to those areas.

Impacts could occur to areas of ACOE jurisdiction within Santa Paula Creek, which has been identified as "waters of the United States" by the ACOE (ACOE 2007). Impacts to ACOE jurisdictions in Santa Paula Creek could result from temporary framework during the construction of a bridge crossing the creek bed. Falsework will take place within ACOE jurisdiction, outside of the Santa Paula Creek bottom, but below the ordinary high water mark. In addition, construction would occur during the non-rainy season, from April 15 - October 15 to avoid the potential presence of sensitive fish species. However, construction activities have the potential to result in short-term adverse impacts.

Alteration of state-protected waters and associated riparian vegetation will require the acquisition of a Fish and Game Code Section 1600 Streambed Alteration Agreement (SAA) from the CDFG. Due to the high habitat value that drainages and swales are known to provide for wildlife and because these areas are under the jurisdiction of the CDFG, the proposed removal of these waters is considered a significant impact. Impacts to areas that are under the jurisdiction of the CDFG will occur within Santa Paula and Haun Creeks, as well as in several drainages that originate in the Topatopa Foothills and Mountains just north of the site.

Impacts to CDFG jurisdictions in Santa Paula Creek will consist of temporary framework during the construction of a bridge crossing the creek bed, as well as the actual bridge itself. Falsework will take place within CDFG jurisdiction, outside of the Santa Paula Creek bottom. The bridge will cover areas of CDFG jurisdiction and could potentially result in short-term adverse impacts.

4.4.1.2 Facts in Support of the Findings Related to Biological Resources

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

BR-1a Before the City issues a grading permit for areas that require state or federal permits, the applicant and/or its contractor must coordinate with the CDFG to verify the impact to state-protected waters and associated vegetation on the project site. A Streambed Alteration Agreement (SAA) must be obtained and mitigation measures recommended by the CDFG as part of the SAA must be implemented. The SAA must be provided to the City before issuance of a grading permit.

The applicant and/or its contractor must mitigate for temporary and permanent impacts to jurisdictional waters as administered by the CDFG jurisdiction by restoring habitats within those jurisdictions acceptable to the resource agency for permanent impacts and temporary impacts. The applicant must prepare a Conceptual Streambed Restoration Plan (CSRP) to document the mitigation program. Habitat must be mitigated on-site or within the same watershed, if feasible. The goal of the CSRP will be to recreate the functions and values of the habitat being affected. These mitigation requirements will be outlined in the CSRP prepared for this project, with monitoring requirements and specific criteria to measure the success of the restoration. Guidelines for the CSRP must include:

- The mitigation site(s) must have been evaluated and selected on the basis of their suitability for use as riparian mitigation areas.
- The mitigation area must provide procedures to prepare soils in the mitigation area, provide detailed seeding/planting mixtures, provide seeding/planting methods, and other procedures that will be used for successful re-vegetation.
- Impacts to jurisdictional waters must be avoided to the extent feasible in the design phase of the project.
- Maintenance and monitoring requirements must be established, including quarterly and annual monitoring reports to CDFG.

BR-1b Where Southern Riparian Scrub, a sensitive natural community, will be impacted as part of project implementation, mitigation for acreage impacted must be implemented at a minimum of a one to one (1:1) ratio and/or as determined appropriate by the CDFG. Acceptable mitigation will replace or enhance the existing Southern Riparian Scrub vegetation. This will be a part of the mitigation resulting from impacts to jurisdictional resources and will be the responsibility of the project applicant and/or its contractor.

BR-1c The project applicant and/or its contractor must mitigate for the loss of the on-site Southern Riparian Scrub plant community. This must include the removal and elimination of false bamboo (giant reed) (*Arundo donax*) from Haun Creek. False bamboo (giant reed) must be eradicated and controlled before the enhancement or replacement of the current vegetation, as in the implementation of Mitigation Measures B-1a, and B-1b.

BR-1d Before the City issues a grading permit, for areas that require state or federal permits, the applicant and/or its contractor must coordinate with the ACOE to verify the impact to federally-regulated waters on the project site. A Section 7 Biological Consultation will be required, as Santa Paula Creek is designated critical steelhead habitat. A NWP must be obtained and mitigation measures recommended by the ACOE, and National Marine Fisheries, as part of the NWP must be implemented. The NWP must be provided to the City before initiating construction of the bridge crossing Santa Paula Creek.

Areas determined to be federally regulated by the ACOE will also fall under the jurisdiction of the RWQCB, and a Clean Water Act Section 401 Water Quality Certification (401 Certification) will be

required from the RWQCB for impacts to those areas. A Biological Assessment to support a Section 7 Biological Consultation will be required, as the area is within designated steelhead habitat.

Implementation of mitigation measure BR-1 provided above will reduce the potentially significant adverse impact of the proposed East Area 1 Specific Plan related to biological resources. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.5 IMPACTS RELATED TO GEOLOGY & SOILS

4.5.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO GEOLOGY & SOILS

The proposed project would result in significant adverse impacts related to geology and soils.

4.5.1.1 Findings Related to Geology & Soils

Seismically Induced Settlement

The analysis contained within the PGIR concluded that seismically induced settlement is expected to occur within portions of the project site. In the western parts of the project site, the seismically induced settlement is expected to be negligible. However, the eastern parts of the project site may experience up to several inches of seismically induced settlement in the event of strong ground motion. Therefore, implementation of the proposed project would result in an adverse and significant impact related to seismically induced settlement.

Slope Instability and Erosion

The PGIR noted that the north and northwestern parts of the project site border hillsides that have the potential to result in seismically-induced landslides. Moreover, the preliminary slope stability analyses performed as part of the PGIR indicates that slopes near the northwest part of the project site may result in seismically induced landslides due to their existing slope safety factor (i.e., 1.5). However, to address these safety issues the PGIR identified a Preliminary Setback zone along the western and northern portions of the project site (see Appendix H, Plate 1 of this FEIR) which precludes the construction of habitable structures within this area of the project site. It should be noted though that the western and northern portions of the project site, respectively are designated by the Specific Plan as Open Space and Agricultural Preserve. These areas would be accessible to area residents for walking and hiking. The proximity of people to an area known to potentially be susceptible to seismically induced landslides could expose these persons to substantial risks. Therefore, implementation of the proposed project could result in significant adverse impacts related to exposure of people to seismically induced landslides.

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

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

- G-1 Additional explorations must be performed at the tentative tract map and grading plan review stages of the development planning. The purpose of the explorations would be to establish required removal depths and delineate the transition from the finer-grained soils in the eastern portion of the project site deemed susceptible to seismically-induced settlement to the rocky soils of the western part where the soils are not deemed vulnerable to seismically-induced settlement.
- G-2 Additional explorations (deep bucket auger borings or continuous core drilling) of the slope and ridgelines above the planned Santa Paula Creek neighborhood (Unit A) should be performed at the tentative tract map stage in order to verify their susceptibility to landslides, mudflows, and seismically-induced instability.
- G-3 To the greatest extent possible, equipment that can penetrate very boulder-rich strata should be used for the exploratory drilling.
- G-4 To aid in planning and to provide data for use in analyses, water level monitoring wells should be installed at the project site. At least four monitoring wells, one well in each quadrant of the project site, should be installed. The wells should extend to at least 60 feet bgs and should be protected with vaults. The wells should be installed as soon as possible and monitored at least monthly until the basic water level patterns have been determined and at least quarterly thereafter for assessment of yearly trends.
- G-5 Within the northwest corner of the project site, below the slope that faces west toward Santa Paula Creek, habitable or essential service structures should not be planned within the "Preliminary Setback" zone depicted on Plate 1 of the Preliminary Geotechnical Investigation Report or the adjacent slopes. The setback line is based on the location of the toe of an imaginary slope composed of same materials as the existing slope and having a static factor of safety of at least 1.5 and a pseudo-static factor of safety of at least 1.1.
- G-6 Water should not be allowed to pond or accumulate anywhere on the project site except in designated detention or debris basins. Pad drainage should be designed to collect and direct surface water away from structures to approved drainage facilities.
- G-7 Detention basins or debris basins should be incorporated into the project design below canyon areas.
- G-8 Grading at the project site should consist of removal and replacement of the upper on-site soils and placement of compacted fill. Over excavation of the upper soils should be performed to provide support for foundations, floor slabs, and paving. Backfills will be required for utilities, walls, and foundations.
- G-9 Field investigations indicate that a significant amount of oversized material (boulders) would be encountered during grading. Oversize materials (generally greater than 8 inches; refer to "Material for Fill" below) can cause problems with utility trenching and foundations for structures. The presence of the oversize materials may make it prudent to over excavate areas where utilities and other subsurface construction will occur. The need for processing and special handling of oversized materials (i.e., screening, crushing, or disposal of) should be considered.
- G-10 Project site preparation should include the following:
- Removal of existing vegetation and debris from the project site.
 - Over excavation of the upper soils to remove soils disturbed by past site uses and demolition activities.

- Additional over excavation to allow placement of compacted fill beneath the proposed building foundations. For preliminary planning purposes, the over excavation should be expected to extend at least 5 feet below the existing grade or as required to allow placement of at least 3 feet of compacted fill beneath the proposed building foundations. The over excavation should extend beyond the building footings in plan view at least a distance equal to the thickness of the fill underlying the footings, but no less than 5 feet. Deeper removals should be made where obviously unsuitable materials are encountered.
- Generally, to provide suitable soils for support of the proposed paving, at least the upper 2 feet of the soils in those areas should be excavated. The over excavation should extend at least 2 feet beyond the paved areas in plan. However, for roads under the jurisdiction of the California Department of Transportation (Caltrans), the over excavation should comply with the Caltrans requirements. Deeper removals should be made where obviously unsuitable materials are encountered.
- To facilitate installation of utilities, including storm drains, the on-site materials should be over excavated to at least one-half of the diameter/width of the utility or I-foot, whichever is deeper, below the proposed invert of the utilities. The excavated materials should be replaced with soils containing materials less than 3 inches in size with no more than 25 percent larger than 1½ inches in size. The over excavation should extend in plan view 1 foot beyond the utility or one-half the depth of the over excavation, whichever is greater.

G-11 Required fill soils should be placed in accordance with the following recommendations:

- The fill soils should be placed in loose layers that do not exceed 8 inches in thickness per layer. Each layer should be spread evenly and thoroughly mixed during spreading to promote uniformity of the materials and moisture content.
- The moisture content of the fill soils at the time of compaction should be brought to approximately 110 percent to 120 percent of optimum moisture content. The moisture content should be uniform throughout the soils.
- Fill soils should be mechanically compacted to at least 90 percent of their maximum dry density as determined by the ASTM Designation D1557 Method of Soil Compaction.
- Flooding should not be permitted. For Caltrans roads, the upper 2~ feet of the sub grade soils should be compacted to at least 95 percent.
- The placement and compaction of fill materials should be under the continuous observation of the Geotechnical Consultant.

G-12 The on-site soils, less debris or organic matter, may be used in required fills and backfills. Soils with an expansion index of 30 or higher should not be used within 5 feet of the sub grade beneath floor slabs. The expansion index of the upper fill soils should be checked before and at the completion of grading. Some of the on-site clay soils are expansive and their placement in fills beneath buildings, flatwork, pools, and other structures should be avoided.

G-13 Generally, rocks larger than 8 inches in greatest dimension should not be placed in fills. However, in deeper (approximately 15- foot deep) fills, rocks up to 12 inches in size may be placed in the deeper portions of the fills in accordance with specific recommendations. Rocks larger than 4 inches in greatest dimension should not be placed in utility backfills. Gravel and cobbles incorporated into fills should be thoroughly mixed into the soil, and should not be clumped or segregated in heaps. Observations of the materials at the project site indicate a significant amount of oversize material should be expected to require processing for use in compacted fills.

- G-14 Approximately 15 percent to 20 percent shrinkage of the upper, approximately 5 feet, soils should be expected when they are over excavated and replaced as compacted fill. Crushing of oversized materials will cause apparent bulking that is not considered in the quoted shrinkage value. Shrinkage value should be revised to accommodate the crushing of oversized material.
- G-15 Manufactured permanent slopes should be inclined at 2: 1 or flatter.
- G-16 The reworking of the upper soils and the compaction of all required fill and backfill should be observed and tested during placement by the Geotechnical Consultant of Record.
- G-17 The governmental agencies having jurisdiction over the project should be notified before commencement of grading so that the necessary grading permits can be obtained and arrangements made for the required inspection or inspections.
- G-18 Provided that the soils loosened by clearing of the project site, together with over excavation and recompacted of the upper soils, it is expected that low- to relatively light mid-rise buildings in the western portion of the project site may be supported on conventional shallow footings underlain by compacted fill. In the eastern portion of the project site, the low-rise buildings may be supported on post-tensioned slabs or mat-type foundations. More detailed recommendations should be developed at the completion of additional explorations and testing.
- G-19 It is expected that taller or relatively heavy buildings or structures in the western portion of the project site can be supported on conventional shallow footings. In the eastern portion of the project site, building specific investigations should be performed and project specific recommendations developed.
- G-20 As with foundations, provided that the soils loosened by clearing of the project site, together with over excavation and recompacted of the upper soils, it is expected that floor slabs in the western portions of the project site may be supported on-grade. If desired, post-tensioned floor slabs may be used for these structures. Floor slabs beneath indoor living spaces, as opposed to garages or patios, in all areas of the project site should be underlain by a vapor retarder or barrier.
- G-21 Under the Earthquake Design regulations of Chapter 16, Divisions IV and V of the 2001 edition of the California Building Code (CBC) and ASCE7-05, the following coefficients and factors apply to lateral-force design for structures at the project site:

SEISMIC COEFFICIENTS

Seismic Zone, Z	0.4
Soil Profile Type	S _C
Near-Source Factor N _a	1.3
Near-Source Factor N _v	1.6
Seismic Coefficient C _a	0.57
Seismic Coefficient C _v	1.02
Period T _o *	0.14
Period T _s *	0.72

Source: Leighton & Associates, 2007.

*Use with Figure 16-3 of the CBC.

Fault Type	Nearest Fault	Distance (km)	Magnitude
A	San Andreas (1857 Rupture)	52	7.8
B	Oak Ridge	1.5	7.0

Source: Leighton & Associates, 2007.

Implementation of mitigation measures G-1 through G-21 provided above will reduce the potentially significant adverse impacts of the proposed East Area 1 Specific Plan related to geology and soils. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.6 IMPACTS RELATED TO HAZARDS & HAZARDOUS MATERIALS

4.6.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO HAZARDS & HAZARDOUS MATERIALS

The proposed project would result in significant adverse impacts related to hazards and hazardous materials.

4.6.1.1 Findings Related to Hazards & Hazardous Materials

Construction Impacts

During construction, trucks containing hazardous materials (e.g., paint, solvents) would pass within one-quarter of a mile of three (3) existing school via SR-126. In addition, construction activities would also require deliveries of construction materials within close proximity of residences located along Padre Lane. Although truck deliveries associated with the construction of the proposed project would likely only contain construction materials (e.g., wood, pipes) and other non-hazardous materials required for construction, it is possible that these deliveries could contain hazardous materials destined for other project sites. Should a spill or release of a hazardous material occur within close proximity of these schools or residences, a potentially short-term adverse significant impact related to the transport of hazardous materials could occur.

The proposed project could impair implementation of or physically interfere with an adopted emergency response plan (see Sections 4.4 (Transportation & Circulation), 4.8 (Geology & Soils), 4.9 (Hydrology & Water Quality) and 4.13 (Public Services) of this FEIR for a complete discussion of potential emergency response service impacts) or emergency evacuation plan. During the construction period (anticipated to be ten years) 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/or equipment will be required necessitating 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.

Foreseeable potential sources of ignition for wildland fires at the project site during construction include incidents such as sparks from exhaust pipes, discarded cigarette butts, contact of mufflers with dry grass, other sources of sparks or flame, and spills or releases of flammable materials such as gasoline. The potential for wildland fires associated with construction of the project is significant and would require appropriate mitigation in the form of preventive measures, including both construction safety procedures and appropriate clearing of brush and other potential fuels. As such, impacts are considered short-term adverse and significant for wildland fires.

Operations Impacts

Agricultural operations within the Agriculture Preserve would continue to require the use and storage of hazardous materials during operation and maintenance of these orchards and associated facilities (e.g., smudge pots, well pumps). However, the elimination of much of the existing orchards and row crops would reduce the overall amount of chemicals necessary for on-site operations and delivery. As such, chemical delivery frequency would be gradually reduced for on-site agricultural operations and maintenance. However, some chemicals necessary for maintenance of the Agricultural Preserve would be needed. The existing agricultural operations involve growing and harvesting avocados. This crop is typically sprayed only with Avermectin, either by air or ground. Spraying is typically done twice a year, in June and July, either from the ground or because of the height of the trees, from the air by helicopters (fixed wing aircraft are not used in this area). Avermectin is not a restricted material, but it is illegal for farmers to allow the material to drift beyond their acreage. Incidences of overspray and drift could occur on-site and would represent a potentially adversely impact on adjacent residences.

The Specific Plan includes an area designated for Agriculture Preserve within the northern portion of the project site. This area would remain in agricultural production, but would not be accessible to area residents for hiking and walking. Portions of this area contain native plant communities which are highly combustible. In addition, this area is designated by the City's General Plan as a high fire threat zone. The presence of local residents and agriculture machinery could increase the potential for incidents of fire within this location. Potential ignition sources may include sparks from exhaust pipes, discarded cigarette butts, contact of mufflers with dry grass, other sources of sparks or flame, and spills or releases of flammable materials such as gasoline. The potential for wildland fires associated with implementation of the proposed project is significant and would require appropriate mitigation in the form of preventive measures, including both operational safety procedures and appropriate clearing of brush and other potential fuels along trails and roadways within the open space area. As such, impacts are considered short-term adverse and significant related to wildland fires.

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

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

Construction

- HM-1 The project applicant and/or its contractor must ensure that material deliveries associated with construction of the proposed project do not contain hazardous materials that would be transported along Padre Lane or within one-quarter mile of a school.
- HM-2 The applicant and/or its contractor must coordinate in advance of construction with the Santa Paula Fire Department to ensure that road closures (temporary or permanent) are identified and that alternate access and evacuation routes are determined in the event of an emergency and/or natural disaster.
- HM-3 The applicant and/or its contractor must coordinate in advance of construction with the Santa Paula Fire Department to ensure that a Health Safety Plan or procedures are in place to address potential incidences of wildfires occurring on-site or originating off-site.

Operation

HM-4 Procedures to minimize the generation of sparks, open flames, and other potential ignition sources, and the release of hazardous or flammable substances such as gasoline or diesel, must be instituted during operational and maintenance activities associated with the Agriculture Preserve and be contained within a Health and Safety Plan located on-site and provided to all employees working within this area. In addition, the Health and Safety Plan must be developed in advance of project approvals and in coordination with the Santa Paula Fire Department.

HM-5 A Fire Protection Plan (FPP) must be prepared in advance of construction of all phases of development of the proposed project and submitted for review and approval by the Santa Paula Fire Department. The FPP at a minimum will be required to address the following:

- Fuel Management Program incorporating fuel modification at the community edge and irrigated landscaping and maintenance of the community landscape
- Landscape palettes approved by the Santa Paula Fire Department in the fuel modification zones
- Design and building construction fire safety features including:
 1. Automatic fire sprinkler systems (per state requirements) in all enclosed, occupied structures, community wide
 2. Class A roofs community wide
 3. Additional building construction features, including boxed in eaves, on sides of structures adjacent to fuel modification zones.

HM-6 A Fuel Modification Plan (FMP) must be prepared in advance of construction of all phases of development of the proposed project and submitted for review and approval by the Santa Paula Fire Department. The following additional requirements must also be adhered to:

1. Combustible fencing must not occur within 20' of the property line or immediately adjacent to fuel modification zones, to reduce the threat of fire spreading to the structure.
2. Backyard restrictions
 - Homeowners must remove portions of trees which extend within 10 feet of the outlet of the chimney.
 - Homeowners must maintain trees adjacent to or overhanging a building free of deadwood.
 - Homeowners must maintain the roof of a structure free of leaves, needles or other dead vegetative growth.
3. Off-site fuel modification must be required where 200' of fuel modification is not provided within the project boundary. The plan must identify the methods to provide a total of 200' band of fuel modification, or provide an alternative design with justification to the SPFD. The off-site fuel modification requirements must be coordinated with and approved by the SPFD.
4. Provide a blending of the fuel modification areas and ornamental plantings where they are adjacent to each other to visually provide for a seamless transition of plantings. Those areas identified on the landscape plan as ornamental plantings will be treated as fuel modification where they are adjacent to open space.
5. The plans must demonstrate how the irrigation will maintain moisture in the vegetation in the irrigated zones.

6. A fuel modification plant palette must be submitted for review and approval by the SPFD. The plant palette can be developed by utilizing approved plant material from regionally approved plant lists, or by modifying the community plant palette.
7. Trees may be grouped in clusters of 3-5 maximum with minimum separation of 35'.
8. Maintain roadway clearance where fuel modification, natural or open space is adjacent to the roadway. Ten feet on each side of portions of roadways must be cleared of flammable vegetation and other vegetative growth.
9. Interior slopes must be maintained and irrigated by the Home Owners Association (HOA). Plans must demonstrate the detail the proposed maintenance practices. These must include removal of dead and dying plant material.
10. A 20' minimum structure setback must be required where lots are immediately adjacent to fuel modification zones, to reduce the threat of structure ignition from radiant and convective heat.

Submittal Criteria: Conceptual Fuel Modification Plans

Conceptual fuel modification plans must be submitted to and approved by the SPFD concurrent with review and approval of any tentative map. Three (3) sets of plans, prepared by a licensed landscape architect or other design professional with equivalent credentials must be submitted to the SPFD for review and approval.

The following must be included on the conceptual fuel modification plan:

1. Delineation of each fuel modification zone (irrigated, and thinning) with a general description of each zone's dimensions and character, i.e., 70' Zone 2, with existing vegetation removed, irrigated, and planted with drought-tolerant and fire-resistant plant material.
2. The removal of undesirable plant species as determined by the SPFD.
3. Existing vegetation impacted by the required fuel modification and, if available, proposed vegetation to be planted in the fuel modification area. The conceptual plans should be sensitive to rare and endangered species. The design professional must be prepared to address their disposition in the final plans.
4. The design of the proposed development, showing all property lines, contour lines, and the proposed location of all structures nearest to the fuel modification area, if available.
5. Photographs of the area which show the type of vegetation that currently exists, including height and density, and the topography of the site.
6. Description of the methods to be used for vegetation removal, if appropriate, i.e., mechanical or manual.
7. Location of emergency and maintenance access easements, to the satisfaction of SPFD, every 500' of the fuel modification area is suggested. The main and primary purpose is to provide maintenance access in to the fuel modification areas. Access easements must have a minimum 10' width and must be relatively flat and clear of obstructions to provide pedestrian and hand equipment access. If the access point is to be required on private homeowner lots, gates must be placed adjacent to the fuel modification areas.
8. Identification of what exists 300' beyond the development property lines in all directions, e.g., construction, natural vegetation, roads, parks.
9. Statement of who has ultimate maintenance responsibility.
10. Identification of all proposed off-site fuel modification areas and appropriate legal agreements with adjacent property owners.

Submittal Criteria: Final Fuel Modification

Final fuel modification plans must include all information required on conceptual fuel modification plans and the following additional information:

1. Location and detail of permanent zone markers.
2. Completed planting plans and specifications, including both the botanical and common names of existing vegetation within the fuel modification area and those plantings, which are proposed. The plants are to be installed in accordance with the spacing guidelines.
3. Irrigation plans and specifications.
4. Building footprints or statement that clearly indicates the limits of proposed development.
5. All applicable maintenance requirements and assignment of responsibility.
6. Tract or project conditions, covenants, conditions and restrictions (CC&R) and/or deed restrictions relative to fuel modifications.

Delineation

Fuel modification plans must depict fuel modification activities to scale. Minimal dimensional requirements for fuel modification necessitate evaluation by a SPFD representative in consultation with the appropriate jurisdictional authority. Exact delineation of the fuel modification zones with respect to topographical features and wildland exposure is required. All zone dimensions are measure on a horizontal plane; however, the actual dimensions of the zones on a slope will vary from the horizontal dimensions on the plans.

Fuel modification zones should be located within common lettered lots owned and maintained by association representing common ownership; e.g., homeowners' associations. The integrity and longevity of the fuel modification zones must be maintained with sufficient tract/project conditions and CC&Rs to specifically identify the restrictions within the fuel modification areas. If the fuel modification zones are located on private property, deed restrictions will be required to specifically identify the restrictions on any portion of the property subject to fuel modification.

Plant List

A plant palette must be submitted containing both the botanical and common names of all plant materials that are to be used. In the irrigated zone areas (which commonly serve as a screening buffer between development and open space/parkland), plants must be fire resistant and drought-tolerant. Plant materials used outside of the irrigated zones must be fire resistant. Plants prone to fire (as determined by the SPFD) must not be introduced into the fuel modification areas. All plants must be reviewed and approved by the SPFD.

Fuel Modification Zones

The following criteria apply to fuel modification zones:

Zone 1 – Irrigated Zone (30' wide)

This portion of fuel modification consists of irrigated landscaping. The plans must delineate that portion of the fuel modification area that will be permanently irrigated. Plant material selection, irrigation system design, and the landscape maintenance management plan must sensitively address water conservation practices and include methods of erosion control to protect against slope failure. This irrigated zone is a minimum of 30 feet in width and may be increased as conditions warrant. Zone 1 must be cleared of all undesirable plant species, irrigated, and planted with plants approved by the SPFD. Exceptions to save desirable species may be submitted for approval by the fire chief on a site-specific basis. Combustible construction is not allowed in Zone 1.

Zone 1 – Specific Requirements

1. Groundcover must be maintained at a height not to exceed 24 inches.
2. Native grasses, when used, must be cut after annual seeding. Heights must not exceed 12 inches.
3. Permanent irrigation must be designed to supplement native vegetation, and establish and maintain planted natives and ornamentals.
4. Any plants selected for planting in this zone must be selected from the approved plant list for the fuel modification plan.
5. Planting will be in accordance with planting guidelines and spacing standards established in this guideline.
6. In all Zones sensitive and/or protected plant species must be identified on the fuel modification plans and tagged in the field for further disposition.
7. Trees and large tree-form shrubs (e.g., oaks, sumac, toyon) which are being retained with the approval of the SPFD must be pruned to provide clearance of three times the height of the under story plant material or 10 feet, whichever is higher. Dead and excessively twiggy growth must also be removed.
8. Trees and tree-form shrubs may be grouped in clusters of 3-5 maximum with a minimum separation of 35'.
9. A distance of 20 feet must separate all existing plants or plant groupings, except cacti, succulents, trees, and tree-form shrubs.
10. All irrigation must be kept a minimum of 20 feet from the drip line of any existing native Quercus (oak) species.
11. Special consideration should be given for rare and endangered species, geological hazards, tree submitted for project approval, upon further review.
12. Removal of undesirable plant species (as determined by the SPFD).
13. Debris and trimmings produced by the removal process should be removed from the site, or left, must be converted into mulch by a chipping machine and evenly dispersed to a maximum depth of (6) inches.

Zone 2- Irrigated Zone (70' wide)

This portion of fuel modification consists of irrigated landscaping, a minimum of 70' in width. The fuel modification zone has the same requirements of Zone 1, however, the plantings selected from this zone include a higher percentage of low-growing, spreading

plant material and fewer ornamental plants, which provides a visual transition to the grasslands, beyond, in the open space areas.

Zone 2- Specific Requirements

1. The irrigation plan must demonstrate the methods to ensure that the perennials and annuals are kept in a healthy, turgid state.
2. All specific requirements listed for Zone 1 must also apply to Zone 2.

Zone 3- Thinning Zones- Non-Irrigated

Zone 3 is 100 feet in width and requires the first 50' to include 50% removal of the existing vegetation, including removal of all dead and dying undesirable species. The next 50 feet in width requires 30% removal of existing vegetation, including all dead and dying growth and undesirable species. Remaining plant material will be selectively pruned to remove 30-40% of the plant mass.

Zone 3- Specific Requirements

1. Remove all dead and dying vegetation, all fine fuels reduced to a maximum of 12 inches in height.
2. Native grasses, when used, must be cut after annual seeding. Heights must not exceed 12 inches.
3. Any plants selected for plating in this zone will be chosen from the approved plant list for the fuel modification plan (as determined by the SPFD).
4. Special consideration will be given for rare and endangered species, geologic hazards, tree ordinances, or other conflicting restrictions.
5. Reduce fuel loading by reducing the fuel in each remaining shrub or tree without substantial decrease in the canopy cover or removal of tree holding root systems.
6. In Zones 1-3, sensitive and/or protected plant species must be identified in the fuel modification plans and tagged in the field for further disposition.
7. Trees and large tree-form shrubs (e.g., oaks, sumac, toyon) which are being retained with the approval of the SPFD must be pruned to provide clearance of three times the height of the under story plant material or 10 feet, whichever is higher. Dead and excessively twiggy growth must also be removed.
8. A distance of 20 feet must separate all existing plants or plant groupings except cacti, succulents, trees, and tree-form shrubs.
9. Maintain sufficient cover to prevent erosion without being requiring planting.
10. Debris and trimmings produced by the removal process must be removed from the site, or if left, must be converted into mulch by a chipping machine evenly dispersed to a maximum depth of (6) inches.

Permanent Identification of Fuel Modification Zones

To ensure long-term identification and maintenance each fuel modification zone must be identified by a permanent marker system meeting the approval of SPFD.

Maintenance and Enforcement

Provisions for continuous maintenance must be documented on the fuel modification plans, i.e., by the homeowner's associations, property owners, or other entities.

Maintenance refers to anything needed to maintain the fuel modification area in a fire-safe condition as required by the SPFD, including the periodical removal of undesirable vegetation; replacement of dead/dying fire-resistant plantings; maintenance of the operational integrity and programming of the irrigation system; and preservation of identification markers. Written evidence indicating responsibility or maintenance must be submitted with both the preliminary and final fuel modification plans.

Ongoing maintenance must be in accordance with the original fuel modification plan.

Transfer of Maintenance Responsibility

Before the transfer of approved and installed fuel modification zones from the project applicant and/or developer to the homeowner's association or party(s) responsible for continuing maintenance, an inspection by the SPFD in company with the project applicant and/or developer, home-or property-owner's association representatives, and landscape maintenance contractor, must be made to determine if the fuel modification meets the standards and to provide fuel modification requirements to those responsible for continued maintenance. Once approved a built fuel modification plans and specifications, maintenance manuals, documents, and photographs of the completed, established fuel modification must be turned over to the party having responsibility for continuing maintenance.

Fuel Modification Implementation and Required Inspections

1. Before Rough Grading Permit: The project applicant and/or developer/builder must have approved/stamped Conceptual Fuel Modification Plan.
2. Before Final Grading Permit: The project applicant and/or developer/builder must have approved/stamped Final Fuel Modification Plan, with applicable note stating maintenance language will be provided in CC&Rs and reviewed before the City issues a certificate of occupancy for the first residential, commercial, light industrial or civic building.
3. Before Building Permit: The project applicant and/or developer/builder must implement those portions of the approved fuel modification plan determined by to be necessary by the SPFD before the introduction of any combustible materials into the area (removal of undesirable species may meet this requirement). This generally involves thinning of plant materials indicated on the approved plan. An inspection and/or release letter to the building department is required.
4. Before certificates of occupancy: The fuel modification zones adjacent to structures must be installed, irrigated, and inspected. This includes physical installation of features identified in the approved Final fuel modification plan (including, without limitation, plant establishment, thinning, irrigation, zone markers, access easements, etc). An SPFD Fire Inspector will provide written approval of completion at the time of this final inspection. The CC&R language for maintenance must also be provided and approved.
5. Before Home Owner Association (HOA) Acceptance: This activity must include the SPFD Fire Inspector and the following representatives:
 - Landscape design professional
 - Installing landscape contractor
 - HOA management representative
 - HOA landscape maintenance contractor

The fuel modification must be maintained as originally installed and approved. A copy of the approved plans must be provided to the HOA representatives at this time. Landscape professionals must convey ongoing maintenance requirements to HOA representatives.

Annual Inspection and Maintenance: The property owner is responsible for all maintenance of the fuel modification. All areas must be maintained in accordance with approved fuel modification plans. This generally includes a minimum of two growth reduction maintenance activities throughout the fuel modification areas each year (spring and fall). Other activities include maintenance of irrigation systems, replacement of dead or dying vegetation with approved materials, removal of dead plant material, and removal of undesirable species. The SPFD conducts regular inspections of established fuel modification areas. Ongoing maintenance must be conducted regardless of the date of these inspections.

- HM-7 If deemed necessary, the Santa Paula Fire Department may at its discretion require exclusionary fencing around the Agriculture Preserve and/or limit access to this area by local residents during high fire potential days (e.g., “Red Flag Days”).
- HM-8 A 300 foot setback will be required for all residential and parkland uses located adjacent to the Agricultural Preserve.

Implementation of mitigation measures HM-1 through HM-8 provided above will reduce the potentially significant adverse impacts of the proposed East Area 1 Specific Plan related to hazards and hazardous materials. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.7 IMPACTS RELATED TO AESTHETICS

4.7.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO AESTHETICS

The proposed project would result in significant adverse impacts related to aesthetics.

4.7.1.1 Findings Related to Aesthetics

Impacts Related to Light

Nighttime sources of light would include outdoor lights in residential, commercial, light industrial, civic, and park areas, lighted signs mounted to commercial buildings, parking lot lighting, interior building lights, and the headlights of automobiles and trucks. Given that the site presently produces little or no light, the additional lighting resulting from implementation of the proposed project would constitute a substantial new light source on the project site. This would result in a significant adverse impact related to light.

4.7.1.2 Facts in Support of the Findings Related to Aesthetics

A mitigation measure has been incorporated into the FEIR to address this adverse impact and includes the following:

- A-1 Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula, Planning Director for approval that identifies the types of shielding that will be used for outside lighting. Shielding will eliminate uplighting and ensure that light generated on the site does not spill over onto adjacent off-site properties.

Implementation of mitigation measure A-1 provided above will reduce the potentially significant adverse impact of the proposed East Area 1 Specific Plan related to aesthetics. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.8 IMPACTS RELATED TO PUBLIC SERVICES

4.8.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO PUBLIC SERVICES

The proposed project would result in significant adverse impacts related to public services.

4.8.1.1 Findings Related to Public Services

Construction Impacts

Construction access for employees, machinery and materials delivery for the proposed project site would be limited to SR-126, Hallock Drive and Telegraph Road. Increased traffic along these and adjacent roads may increase the potential for vehicle congestion and accidents during the construction of the proposed project. In addition, the delivery of over-size equipment and/or machinery may require temporary road closures (i.e., limited to a one to three hour period) or traffic detours. These temporary activities may affect response times and/or service routes, thereby affecting the provision of police services, fire suppression and emergency medical services in the immediate vicinity of the project site. These potential project-related impacts to response times and the provision of police services, fire suppression and emergency medical services during construction would be adverse and significant.

Operational Impacts

Common guidelines for serious medical emergencies (e.g., heart attack) recommend response times within five minutes of notification. Similarly, national standards for fire response also have a five minute response benchmark for intervention of incipient fires to prevent rapid fire escalation and extensive or life threatening fire development. However, national guidance on emergency vehicle response speeds recommends no response speed greater than 20 miles per hour (MPH) beyond the posted speed limit. Although Stations 81 and 82 are located approximately 2.0 and 3.5 miles west of the project site,⁹ respectively, the age of the SPFD vehicles and some on-site roadway grades of eight to 10 percent would reduce response times to northern areas of the project site. It is estimated that response times¹⁰ to these areas from Stations 81 and 82 would be approximately 5.0 and 7.25 minutes,¹¹ respectively. Utilizing national standards and the SPFD's average incident response times, implementation of the proposed project would exceed response time standards for both Station 81 and Station 82 without a new fire

⁹ Note: Distance to project site is estimated as being the northeast corner of the East Area 1 Specific Plan.

¹⁰ Note: Roadway speed is assumed to be 40 miles per hour (MPH) since higher speeds may not be achievable due to elevation gains within the northern portion of the site.

¹¹ Note: Response times assume the following: (1) Call and dispatch time of 2.00 minutes; (2) Station distance (miles) to northeast corner of project site divided by miles per hour (40 mph) multiplied by 60 minutes.

station located on-site or within close proximity of the project site. Therefore, impacts on response times from implementation of the proposed project would be adverse and significant.

Although new development within the project site would be constructed incrementally and required to pay development impact fees to offset the impacts to existing fire and emergency services, such as paying for new equipment, expanded facilities, and new staff, neither Stations 81 nor 82 would currently be capable of accommodating these new resources. In addition, the proposed project would add a substantial new geographic area (501 acres or 0.78 square miles) and emergency call demands for the SPFD. As previously noted, the City's existing equipment is antiquated and has largely reached the end of its useful life. Based upon land uses and population estimates proposed under the Specific Plan the following additional personnel and equipment would be required in order to meet projected emergency service calls and fire suppression demands:

- Equipment
 - New Fire Station located within the proposed Santa Paula Creek Civic District or Railroad District
 - One new fire engine apparatus (pumper)
- Fire Personnel
 - 12 full time fire personnel comprised of the following:
 - Three Battalion Chiefs
 - Three Captains
 - Three Engineers
 - Three Fire fighters
- Civilian Staff
 - One Fire Prevention Officer
 - One Office Secretary

Therefore, implementation of the proposed project would result in an adverse and significant impact to the provision of emergency services and fire suppression.

4.8.1.2 Facts in Support of the Findings Related to Public Services

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

Fire and Emergency Mitigation Measures

PS-1 The project applicant and/or its contractor must dedicate one acre of land (at no cost to the City) within the proposed Santa Paula Creek Civic District or Railroad District, the location of which is to be determined in consultation with the SPFD. The facility must include office and living features necessary to serve assigned employees. The location must not be within a flood zone or seismic zone of concern, protected from wildfire, and have good road access unhindered from potential collapse threats such as bridges or power lines. In addition, the land must meet all facility standards within adopted code.

PS-2 The project applicant and/or its contractor must provide a new type one fire apparatus (pumper) to meet fire suppression, medical emergency and response time requirements for the proposed project.

PS-3 The project applicant and/or its contractor must contribute its fare share portion for the following:

- Fire Personnel
 - 12 full time fire personnel comprised of the following:
 - Three Battalion Chiefs
 - Three Captains
 - Three Engineers
 - Three Fire fighters
- Civilian Staff
 - One Fire Prevention Officer
 - One Office Secretary

PS-4 Automatic fire sprinkler systems must be installed in all new construction within the project site (as required by State law). The design and installation of this automatic fire sprinkler system must follow the applicable NFPA 13, 13-D, or 13-R requirements. Before installation, plans must be submitted for approval to the City of Santa Paula Fire Department. In addition, all underground and overhead portions of fire sprinkler systems and their water supplies must be inspected, tested, and accepted as witnessed by the SPFD before occupancy.

Police Services

PS-5 The project applicant and/or its contractor must dedicate office space totaling 2,142 square feet (at no cost to the City) within the proposed Civic District, the location of which is to be determined in consultation with the SPPD. The facility must include office and facilities necessary to serve sworn officers and civilian staff. The location must not be within a flood zone or seismic zone of concern, protected from wildfire, and have good road access unhindered from potential collapse threats such as bridges or power lines.

Implementation of mitigation measures PS-1 through PS-5 provided above will reduce the potentially significant adverse impacts of the proposed East Area 1 Specific Plan related to public services. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.9 IMPACTS RELATED TO RECREATION

4.9.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO RECREATION

The proposed project would result in significant adverse impacts related to recreation.

4.9.1.1 Findings Related to Recreation

Implementation of the proposed project would result in additional demand for existing City parks and recreational facilities. As previously discussed, the City's existing parks and recreational facilities are over utilized and overburdened. Any additional demand would exacerbate these conditions, thereby resulting substantial and/or accelerated physical deterioration of these facilities. In addition, the additional residential population and employment would create additional demand for these facilities which would require the construction or expansion of recreational facilities, resulting in an adverse physical effect on the environment.

4.9.1.2 Facts in Support of the Findings Related to Recreation

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

- R-1 As a project design feature, the applicant and/or its contractor must provide at least 26.4 acres of parkland within the Specific Plan project site, as identified within Section 3.0 (Project Description) (shown on Figure 3-5) and Table 4.14-3 of this EIR (see Section 4.14 (Recreation) of this EIR).
- R-3 The applicant and/or its contractor must pay the impact fees to the City of Santa Paula. If agreed to by the City, the applicant's provision of the amenities described in mitigation measures R-1 and R-2 above can be in lieu of all or a portion of the development fees payable to the City. To ensure that the City of Santa Paula has adequate funds to finance park and recreation improvements, the applicant and/or its contractor must either pay the City's related impact fees or provide certain additional project amenities in lieu of all or a portion of such development fees, as negotiated with and agreed to by the City. If agreed to by the City, the amenities in mitigation measures R-1 and R-2 may satisfy the in-lieu-of-fees condition of this mitigation measure (i.e., R-3). The applicant will not be required to provide park or open space amenities and pay related impact fees, unless otherwise agreed to with the City.

Implementation of mitigation measures R-1 and R-3 provided above will reduce the potentially significant adverse impacts of the proposed East Area 1 Specific Plan related to recreation. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

4.10 IMPACTS RELATED UTILITIES & SERVICES

4.10.1 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS RELATED TO UTILITIES & SERVICES

The proposed project would result in significant adverse impacts related to utilities and services.

4.10.1.1 Findings Related to Utilities & Services

Impacts Related to Wastewater

Conveyance

The Specific Plan requires construction of an on-site sanitary sewer backbone and internal facilities system. Figure 3-9 (Wastewater Conveyance Schematic Layout) (see Section 3.0 (Project Description) of this FEIR) contains the proposed layout of the sanitary sewer system. As noted in Figure 3-9, a series of pipes ranging in diameter from eight to 15-inches would serve the project site. All on-site flows would be conveyed via gravity.

The City's "Wastewater System Master Plan" identified several off-site mainline capacity deficiencies that would need to be addressed before implementation of the proposed project. The main collector at Harvard Boulevard has been identified as in poor condition and certain segments are currently operating above capacity. The addition of the proposed project would create severe capacity problems from Teague Park easterly to 12th Street. This reach has been identified as a major capital project for the City with topmost priority. Additionally, this reach, along with the proposed northeasterly extension in Harvard

Boulevard and easterly in Telegraph Road, has been identified as the source for future sewerage of the property.

In order for the sewer system to connect to the City's Harvard/Telegraph trunk line, the system would need to cross the existing Santa Paula Creek with a force main. The force main would extend from the western side of the Santa Paula Creek/Telegraph Road crossing to the point of connection (POC) at Hallock Drive and Telegraph Road. A new sewer lift station would need to be constructed near this intersection to service the proposed project.

Without providing these off-site conveyance facilities, implementation of the proposed project would result in an adverse and significant impact related to wastewater conveyance capacity.

Impacts Related to Solid Waste

Implementation of the proposed project has the potential to result in a significant adverse impact related to solid waste disposal since the Toland Road Landfill may not have sufficient permitted capacity to accommodate the proposed project's residential solid waste disposal needs (9.7 daily tons).

Implementation of the proposed project has the potential to result in a significant adverse impact related to solid waste disposal since the Chiquita Canyon Sanitary Landfill may not have sufficient permitted capacity to accommodate the proposed project's non-residential solid waste disposal needs (19.9 daily tons).

Impacts Related to Electricity

Implementation of the proposed project would result in increased demand for electrical service to the Specific Plan site. According to SCE, new equipment (electrical lines, conduits, transmission mains) would need to be constructed. SCE has also indicated that the electrical load that would be generated by the proposed project may or may not be within the parameters of SCE's projected load growth. Implementation of the proposed Specific Plan would therefore have the potential to result in significant impacts related to electricity.

Impacts Related to Other Utilities

The existing facilities (cable and telephone/internet) at the project site would not be adequate to service the project site. Implementation of the proposed project would require the need for more equipment and/or infrastructure and facilities related to cable and telephone/internet to serve the project site. Therefore, implementation of the proposed project has the potential to result in significant adverse impacts related to other utilities (cable and telephone/internet).

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

Mitigation measures have been incorporated into the FEIR to address these adverse impacts and include the following:

- U-1 Before construction, the applicant is responsible for the preparation of an assessment of landfill capacities at Toland Road Sanitary Landfill and Chiquita Canyon Sanitary Landfill. The applicant must coordinate with the both landfill operators to determine whether or not these landfills have adequate capacity to serve the proposed project.

- U-2 The applicant must implement waste reduction and recycling programs to divert construction and operations solid waste from the area landfill. A construction recycling plan must be submitted and approved by the Director of Public Works. A final report as to the amount recycled must be provided to the Director of Public Works.
- U-3 Solid waste generated during construction and operation of the proposed project must comply with all federal, state and local statutes and regulations to reduce and recycle solid waste.
- U-4 Before construction, the applicant must coordinate with SCE to determine the electricity consumption related to the proposed project. The applicant must provide detailed site plans which will assist SCE determine the load calculations and the location and amount of new equipment (electrical lines, conduits, transmission mains) needed. SCE will then make the determination of whether the proposed project's electricity consumption is within the parameters of SCE's projected load growth
- U-5 Before construction, the applicant must coordinate with the cable and telephone/internet providers to determine the amount of new equipment and/or infrastructure and facilities needed to provide adequate service to customers within the project site.

Implementation of mitigation measures U-1 through U-5 provided above will reduce the potentially significant adverse impacts of the proposed East Area 1 Specific Plan related to utilities and services. There are no significant unavoidable adverse project impacts related to these issues which would result after implementation of the mitigation measures noted.

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

In evaluating the environmental impacts associated with the proposed East Area 1 Specific Plan, the FEIR documented some potential impacts that would not be considered significant. CEQA does not require findings for less than significant impacts and for which mitigation is, accordingly, not required. The following information summarizes the determinations of non-significance for various potential project impacts as identified in the FEIR.

5.1 IMPACTS RELATED TO LAND USE AND PLANNING

5.1.1 CONSISTENCY WITH GENERAL PLAN AND NON-COASTAL ZONING ORDINANCE

The project site is proposed for a Sphere of Influence amendment and reorganization which will entail annexation of territory to the City of Santa Paula and detachment of the same territory from the Ventura County Resource Conservation District and from the Fire Protection District. Provided LAFCO approves such reorganization, the project site would no longer be subject to Ventura County land use and zoning controls, as contained within Ventura County's General Plan and Non-Coastal Zoning Ordinance. Consequently, if LAFCO approves a reorganization application, implementing the proposed project would not conflict with the Ventura County General Plan or Non-Coastal Zoning Ordinance.

5.1.2 CONSISTENCY WITH ORDINANCES AND MEASURES

The proposed project would be implemented in four (4) phases over a ten year period.¹³ As noted previously, the Specific Plan would adopt its own growth management regulations to regulate annual residential development on-site. Although the current East Area 1 Specific Plan phasing plan indicates that an average of 160 residential dwelling units per year would be constructed, the City could issue up to a total of five hundred (500) building permits for residential construction within the East Area 1 Specific Plan area per calendar year. Further, if any part of the annual five hundred (500) residential building permit allocation remains unissued for any calendar year, then such unissued residential building permits will carry over to the subsequent calendar year and be added to such subsequent calendar year's five hundred (500) residential building permit allocation. Therefore, the proposed project would be consistent with the GMO and impacts would be less than significant.

5.1.2.1 Measure I – Save Open-Space and Agricultural Resources

The Specific Plan proposes the construction of urban uses within an Expansion Area that is outside of the current CURB. As previously noted, any proposed extension of urban services or urbanized use to property located outside of the CURB (such as East Area 1) generally requires voter approval. In order for urban development to be constructed within East Area 1, a CURB amendment is required. With the implementation of these actions, the proposed project would be consistent with Measure I and impacts would be less than significant.

5.1.2.2 Measure L6 – Citizens Advocating Responsible Expansion Santa Paula General Plan Amendment Initiative

Measure L6 generally requires voter approval for existing developments; proposed developments; or “land use designations”¹⁵ under the following circumstances:

- (1) if the Land Use Element of the Santa Paula General Plan is amended to either (a) increase the residential or commercial density; or (b) to intensify land use; and (2) when a development or land use designation is on land that either (a) constitutes 81 or more contiguous acres; or (b) is contiguous to other land for which the City Council amended the Land Use Element as described above at any time during the preceding five (5) consecutive calendar years where the cumulative acreage of all the property comprises 81 or more acres.

As noted throughout this FEIR, the proposed project will require a General Plan Amendment to increase the residential and commercial density within the East Area 1 Expansion Area; intensify land use within that area; and affects 501 acres. Accordingly, voter approval is required for the proposed General Plan Amendment. With the implementation of these actions, the proposed project would be consistent with Measure L6 and impacts would be less than significant.

¹³ Note: Construction of project phases would be contingent upon market conditions and may vary accordingly. In addition, a minimum of 123 dwelling units to a maximum of 273 dwelling units per year could be constructed. Source: East Area 1 Specific Plan Fiscal Analysis of Annexation City of Santa Paula, Stanley R. Hoffman Associates, Inc., August 20, 2007.

¹⁵ L6, p.1, Section 3(A); p.2, Section 3(B); p.2, subsection (A) under “Amendment Procedures.”

5.1.3 SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Of the 28 policies evaluated in Table 4.1-4 of this FEIR, the proposed project would be consistent with all of these. In addition, of the four (4) principles evaluated, the proposed project would be consistent with all of these. Therefore, impacts related to consistency with SCAG's RCPG and Growth Visioning would be less than significant.

The project site has limited housing (i.e., nine dwelling units) which is dedicated for use by ranch employees. These housing units do not constitute an established community and as such, implementation of the proposed project would not divide an established community. Therefore, impacts related to the project's potential to result in the division of an established community are less than significant.

5.2 AGRICULTURAL RESOURCES

The construction of a buffers/vegetative screen between adjacent urban and agricultural uses would reduce the potential impacts of spray drift and, therefore, would be less than significant.

Implementation of the proposed project would reduce lemon and avocado production locally. The loss of avocados and lemons at the project site will result in fewer of these crops being harvested. However, given the poor site conditions, the impact on the economic integrity of these crops will be limited. The loss of approximately 118 acres of avocados and 233 acres of lemon will represent approximately 0.6 percent and 1.1 percent of the current harvested acreage in the County, respectively. Impacts on the economic integrity of the agricultural industry in Ventura County would be less than significant.

Adherence to Board Order No. 00-108, the implementation of standard BMPs and the preparation of a Business Plan, as discussed in Section 4.10 (Hazards and Hazardous Materials) of this FEIR would reduce the incidence and quantities of urban pollutants potentially affecting surface and groundwater. In addition, the proposed project includes features such as detention basins that would help to reduce the potential for contaminants entering the groundwater system or leaving the site in surface water runoff. Therefore, impacts to surface and/or groundwater would be less than significant with the incorporation of project design features and best management practices and adherence to NPDES permit conditions.

The water demand for the Specific Plan provides an estimated 111.1 AFY for continued irrigation of the orchards within the agricultural preserve.¹² This demand is based on existing uses for irrigation of the orchards on the site. As the project proposes adequate water for existing agricultural use, there will be no impacts to water supply. The project as proposed therefore will not result in any impacts to the availability of groundwater in the Santa Paula or Fillmore Basins needed to support agriculture. Because the site will not cause a net decrease in water available for agriculture, and because the site does not utilize imported water, impacts to the quantity of water available for agricultural uses would be less than significant.

The proposed project is within 0.25 mile of other existing agricultural operation. These lands (located to the east) would be potentially impacted from dust generated during construction activities on the project site. However, these activities would be short-term in duration. Additionally, construction activities would be required to comply with the requirements of the Ventura County Air Pollution District as they relate to dust suppression. These impacts would be less than significant with the incorporation of dust suppression.

¹² City of Santa Paula. 2007. *Water Supply Assessment & Verification for the East Area 1 Specific Plan*.

The proposed project would not decrease solar access to existing agricultural areas. The areas of the agricultural preserve to remain on-site are upslope from the development areas and would not be impacted. Off-site areas would not be impacted from development as buffer areas would be established as previously discussed to the agricultural lands to the east. Therefore, impacts associated with solar access would be less than significant.

There are existing tree rows located on the project site. These include palms located along Padre Lane, cottonwoods within the upper portions of the project site and trees located along Haun Creek. The proposed project offers to maintain the tree rows along Padre Lane and Haun Creek and incorporate them as part of the landscape plan. The existing cottonwood trees that are located in the upper portion of the site along existing drainages may be retained (pending finalization of the grading and site plan). However, these tree rows, should they be removed, would not be adjacent to any agricultural areas, therefore, their removal would be less than significant.

5.3 MINERAL RESOURCES

Based on a review of the City's GP and SCREMP, the proposed project is not located within an area identified for mineral extraction, currently undergoing mineral extraction, or within a petroleum resource area. Therefore, implementation of the proposed project would not result in a significant adverse impact relative to the loss of mineral resources.

According to the Ventura County GP Resource Protection Map (South Half), the project site is not located in a mineral resource zone. The closest mineral resources extraction zone is located in, and adjacent to, the Santa Clara River approximately 3,000 feet (approximately one-half mile) south of the project site. Therefore, implementation of the proposed project would not result in a significant adverse impact relative to the loss of mineral resources.

The site for the proposed project is located north of any identified mineral resource area, where there are known, and previously mined, aggregate resources. In addition, none of the project components, actions and/or approvals needed or requested by the proposed project would result in either direct or indirect impacts to this area that would preclude its use for mineral resource extraction, as currently designated by the City of Santa Paula or County of Ventura GPs. Therefore, the proposed project would not impact any known mineral resources as a result of changed land use conditions.

The proposed project does not include zoning changes that would limit or restrict access to known mineral resources. Therefore, there would be no impacts on mineral resources related to changes in zoning restrictions as a result of the proposed project.

The proposed project is not located in a County of Ventura GP-designated mineral resource zone or City of Santa Paula GP-designated or SCREMP-designated mineral extraction area. The proposed project is however, located approximately 3,000 feet (one-half mile) north of the Santa Clara River in which a County of Ventura GP-designated mineral resource zone is located. Currently, access to the County-designated mineral resource zone is limited to SR 126 and 12th Street which will remain accessible during construction and operation of the proposed project. Even though SR 126 also serves as the regional access to the project site (during construction and operation), it will not preclude access to mineral extraction activities located approximately 3,000 feet (one-half mile) south of the project site. Therefore, implementation of the proposed project would not result in a significant adverse impact associated with access to mineral resources.

5.4 TRANSPORTATION & CIRCULATION

5.4.1 RAMPS AND RAMP JUNCTIONS

As shown in Table 4.4-14 of this FEIR, the ramps and ramp junctions will operate at acceptable LOS E or better. Implementation of the proposed project will not contribute to significant adverse impacts on the freeway ramps and ramp junctions.

5.4.2 INTERNAL INTERSECTIONS

As shown in Table 4.4-15 of this FEIR, the internal intersections will operate at acceptable LOS C or better. Implementation of the proposed project will not create a significant adverse impact to the future internal intersections within the project site.

5.4.3 ROADWAY DESIGN FEATURES AND INCOMPATIBLE USE IMPACTS

On-site thoroughfares would be constructed in compliance with the Santa Paula Municipal Code and would not contain dangerous design features (e.g., sharp curves, dangerous intersections). It is anticipated that farm equipment would be needed seasonally to harvest agricultural produce and fruit associated with the on-site orchards contained within the Agricultural Preserve. Slow moving equipment and trucks utilized to transport the avocados off-site would be needed. However, these vehicles would be subject to standard roadway use and operation requirements. Therefore, implementation of the proposed project would result in less than significant impacts related to roadway design features and incompatible uses.

5.5 AIR QUALITY

As presented in Table 4.5-7 of this FEIR, CO concentrations are well below the U.S. Environmental Protection Agency 1-hour and 8-hour and standards of 35 ppm and 9 ppm, respectively, and the State of California 1-hour 20 ppm and 8-hour 9.0 ppm CO standards. Impacts with regard to CO hot spots would be less than significant.

5.5.1 ODOR IMPACTS

The proposed project would develop additional urban uses on the project site, similar to uses already existing on and around the project site. The project does not propose uses that would generate significant objectionable odors, although it is possible that odors from restaurant operations may be occasionally perceptible. Operation of the proposed project will involve the disposal of refuse, including domestic and food service refuse from residential and retail uses. Existing restaurants may also dispose of refuse in trash containers near to proposed residential uses. This refuse would be disposed of in outdoor trash receptacles and could generate occasional odors pending regular collection and ultimate disposal into a sanitary landfill. However, project-generated refuse would be disposed into appropriate trash collection containers, which would be covered and enclosed as required by the City. As a result, impacts from odors would remain less than significant.

5.5.1.1 Valley Fever

The San Joaquin Valley Fever is an infectious disease caused by the fungus *Coccidioides immitis*. The proposed project would include earth-moving activities during the grading phase that will cut soil from the higher elevations of the Project site for use as fill at the lower elevations of the site. These activities would be

conducive to disturbing the *Coccidioides immitis* spores that tend to be found at the base of hillsides, but due to the former use of the Project site for agriculture purposes, the probability of infection from the inhalation of *Coccidioides immitis* spores is unlikely. Therefore, impacts related to exposure of people to Valley Fever would be less than significant.

5.6 NOISE

5.6.1 ON-SITE SENSITIVE RECEPTORS

5.6.1.1 Exterior Noise

Not all of the land uses proposed within the Specific Plan would be built concurrently within the project site. Construction is contemplated to occur in four phases over approximately ten years. Consequently, sensitive receptors could be located within close proximity of construction activities and include occupied residential units, schools, and assisted living facilities within completed portions of the project site.¹³ As development within the project site occurs over time, there is a potential for completed and occupied homes and other noise-sensitive uses within the project site to be affected by noise from construction within the project site. Except for construction activities occurring between 8:00 A.M. and 6:00 P.M., SPMC § 93.21 establishes an exterior noise standard at residential uses of 65 dB(A) from 7:00 A.M. through 10:00 P.M.

Noise generated by on-site construction activities complying with the SPMC (a temporary noise permit can be obtained pursuant to SPMC §93.06) would be less than significant.

5.6.1.2 Interior Noise

Sensitive receptors could be located within close proximity of construction activities and include occupied residential units, schools, and assisted living facilities within completed portions of the project site.¹⁴ As development within the project site occurs over time, there is a potential for completed and occupied homes and other noise-sensitive uses within the project site to be affected by noise from construction within the project site. The City of Santa Paula Noise Element sets an interior noise standard at residential uses of 45 dB(A)¹⁵. Although the City considers construction noise temporary and intermittent, future development within the project site would be required to comply with SPMC §93.21 which generally requires construction noise to be restricted to the hours of 8:00 A.M. to 6:00 P.M. Monday through Friday (though a temporary noise permit can be obtained pursuant to SPMC §93.06). Therefore, noise generated by on-site construction activities would be less than significant.

5.6.2 OFF-SITE SENSITIVE RECEPTORS

5.6.2.1 Exterior Noise

Existing sensitive receptors include single-family residences across Santa Paula Creek and to the south between Telegraph Road and SR-126. Both residential locations are approximately 250 feet from the project site at the closest point. Based on an attenuation rate of 7.5 dB(A) per doubling distance for noise generated by a point source at an acoustically “soft” site, the maximum noise level at the single-family residences to west across Santa Paula Creek and to the south between Telegraph Road and SR-126 would

¹³ Note: See Section 3.0 (Project Description) of this EIR for a discussion of the proposed phasing plan.

¹⁴ Note: See Section 3.0 (Project Description) of this EIR for a discussion of the proposed phasing plan.

¹⁵ City of Santa Paula Noise Element, 13 April 1998, page N-19..

be approximately 78 dB(A). Except for construction activities occurring between 8:00 A.M. and 6:00 P.M., SPMC § 93.21 establishes an exterior noise standard at residential uses of 65 dB(A) from 7:00 A.M. through 10:00 P.M. Noise generated by on-site construction activities complying with the SPMC (a temporary noise permit can be obtained pursuant to SPMC §93.06) would be less than significant.

5.6.2.2 Interior Noise

The City of Santa Paula Noise Element sets an interior noise standard at residential uses of 45 dB(A) Noise generated by on-site construction activities complying with the SPMC (a temporary noise permit can be obtained pursuant to SPMC §93.06) would be less than significant.

5.6.3 VIBRATION

5.6.3.1 Off-site Sensitive Receptors

Exterior Vibration

Existing off-site sensitive receptors include single-family residences to the west across Santa Paula Creek and to the south between Telegraph Road and SR-126. Both residential uses are approximately 250 feet from the project site at the closest point. Construction activities in the area of the residential area to the west and south would be in excess of 100 feet of the project site and would not exceed the 80 VdB threshold for residences and buildings. In addition, if annexed to the City, the project site would be subject to the SPMC which restricts construction activities and their associated noise levels. Construction activities would be limited to daytime hours between 8:00 A.M. and 6:00 P.M. Therefore, ground-borne vibration impacts to residences (within the City of Santa Paula) to the west and south of the project site during project construction would be less than significant.

5.6.4 ROADWAY NOISE

5.6.4.1 Off- and On-Site Sensitive Receptors

Exterior Noise

Traffic volumes on Harvard Boulevard between Steckel Drive and Palm Avenue, would generate a noise level of 67.2 dB(A) CNEL. As the modeled noise level along this segment under future without project conditions is 64.9 dB(A) CNEL, the proposed project would result in an increase in the ambient noise level along this roadway segment of 2.3 dB(A). As previously discussed, noise level increases up to 3 dB(A) are inaudible to the human ear. Therefore, an increase of 2.3 dB(A) along Harvard Boulevard between Steckel Drive and Palm Avenue would not be perceptible and would not be considered a significant adverse impact.

Two studied roadway segments, Telegraph Road between Harvard Boulevard (which includes the County island areas to south and west of the project site) and Hallock Drive, and South Mountain Road between Harvard Boulevard and Lemon Road, are within Ventura County jurisdiction. The County noise standard of the General Plan would apply to these two roadway segments. As shown in Table 4.6-5, noise level increases along these roadway segments due to Specific Plan implementation would be 0.4 and 0.5 dB(A) CNEL, respectively. Neither of these noise increases would expose sensitive receptors to a three dB(A) noise increase over ambient exterior conditions. Therefore, impacts along these two roadway segments would be less than significant.

Interior Noise

Along Santa Paula Street between 12th Street and 10th Street exterior noise levels of 61.1 dB(A) CNEL would be experienced due to an increase in the ambient noise level along this roadway segment of 3.2 dB(A). Nonetheless, assuming a 25 dB(A) reduction in exterior to interior noise levels resulting from standard building construction, interior noise levels would be below threshold level of 45 dB(A) resulting in less than significant impact.

5.6.5 AIRPORT NOISE

5.6.5.1 Off- and On-Site Sensitive Receptors

Exterior Noise

The Santa Paula Airport is located on a 38-acre site south of SR-126, approximately one mile southwest of the project site. According to the Noise Element of the Santa Paula General Plan, aircraft noise is generally not a problem in the City because the general aircraft travel pattern is south of the City, over the Santa Clara River, and the required approach and departure altitude is at least 1,500 feet.¹⁶ Figure 4.6-3 shows noise contours from SR-126, SR-150, and the Santa Paula Airport. As shown, the 60 dB(A) contour extends approximately 1,000 feet into the southern portion of the project site. Open space is proposed within the majority of this portion of the project site.

Residential, commercial, and neighborhood center uses are proposed within the remainder of the 60 dB(A) noise contour and project site overlap. According to City of Santa Paula thresholds, an exterior noise level of 60 dB(A) would be acceptable for sensitive receptors and, therefore, any uses proposed within that portion of the project site would not be exposed to significant noise levels. Impacts would be less than significant.

Thus, as discussed above, while the proposed project is located within one mile of the Santa Paula Airport, it would not expose people residing or working in the project site to excessive noise due to the aircraft travel pattern. Therefore, implementation of the proposed project would not result in significant impacts related to noise generated by the nearby public airport.

Interior Noise

As previously indicated, the 60 dB(A) contour extends approximately 1,000 feet into the southern portion of the project site. Residential, commercial, and neighborhood center uses are proposed within the 60 dB(A) noise contour and project site overlap. According to City of Santa Paula thresholds, interior noise level of 45 dB(A) would be acceptable for sensitive receptors. Assuming a standard construction reduction of approximately 25 dB(A), overall noise level on the project site as a result of aircraft noise would be below 45 dB(A), and, therefore, any uses proposed within that portion of the project site would not be exposed to significant noise levels. Impacts would be less than significant.

¹⁶ City of Santa Paula. "Noise Element." *City of Santa Paula General Plan*. 13 April 1998. p. N-7.

5.6.6 VIBRATION

5.6.6.1 Off- and On-Site Sensitive Receptors

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.¹⁷ The Caltrans study identifies the threshold of annoyance of approximately 80 VdB as 20 meters, or 66 feet, from train tracks, given 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.

5.7 BIOLOGICAL RESOURCES

The FEIR determined that impacts to the following biological resources would be less than significant:

- Loss of Foraging and Nesting Habitat for Common Wildlife Species
- Direct Loss of Common Wildlife (excluding birds)
- Direct Loss of Special Status Plant Species
- Direct Loss of Special Status Wildlife Species
- Wildlife Movement Corridors

5.8 GEOLOGY & SOILS

The FEIR determined that impacts to the following issues related to geology and soils would be less than significant:

- Faults
- Seismicity
- Liquefaction
- Subsidence
- Expansive Soils
- Erosion
- Loss of Topsoil

5.9 HYDROLOGY & WATER QUALITY

The FEIR determined that impacts to the following issues related to hydrology and water quality would be less than significant:

5.9.1 CONSTRUCTION

- Water quality

¹⁷ California Department of Transportation, Division of Environmental Analysis. *Transportation Related Earthborne Vibrations*. 20 February 2002. p. 17.

5.9.2 OPERATION

- Surface Hydrology (related to exceeding capacity of existing or planned stormwater drainage facilities)
- Flood Plain & Flood Hazard
- Seiche and Tsunami
- Hydrogeology
- Stormwater Runoff & Water Quality

5.10 HAZARDS & HAZARDOUS MATERIALS

The FEIR determined that impacts to the following issues related to hazards and hazardous materials would be less than significant:

5.10.1 CONSTRUCTION

- Water quality

5.10.2 OPERATION

- Transport of hazardous materials
- Interference with emergency response plans and/or routes
- Incidents of wildfire

5.11 AESTHETICS

The FEIR determined that impacts to the following issues related to aesthetics would be less than significant:

- Light and glare

5.12 CULTURAL & HISTORIC RESOURCE

The FEIR determined that impacts to the following issues related to cultural and historic resources would be less than significant:

- Paleontological resources related to younger alluvium located five feet below grade or located within stream channel deposits.
- Archaeological resources related to Sites L-1 through L-5.

5.13 PUBLIC SERVICES

The FEIR determined that impacts to the following issues related to public services would be less than significant:

5.13.1 CONSTRUCTION

- Fire prevention or suppression services or emergency medical services.

5.13.2 OPERATION

- Schools and libraries

5.14 RECREATION

The FEIR determined that impacts to the following issues related to recreation would be less than significant:

- County of Ventura parks and recreational facilities.

5.15 UTILITIES & SERVICES

The FEIR determined that impacts to the following issues related to utilities and services would be less than significant:

Wastewater- treatment capacity, construct or expand treatment facilities or exceed wastewater treatment requirements of the RWQCB- Los Angeles.

- Water Supply Availability & Reliability
- Fire flow requirements
- Natural gas

5.16 POPULATION & HOUSING

The FEIR determined that impacts to the following issues related to population and housing would be less than significant:

- Population, housing and employment

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 (Section 15126.6 of the CEQA Guidelines). 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 of Santa Paula to consider in its review of the proposed East Area 1 Specific Plan. To develop the alternatives that were analyzed in the EIR, a range of potential alternatives was identified. For that analysis, the alternatives were evaluated to determine the extent to which they meet the defined project objectives, while avoiding or substantially lessening any significant adverse impacts of the proposed project. In making the following alternatives findings, the City of Santa Paula certifies that it has independently reviewed and considered the information on alternatives provided in the FEIR, including the information provided in the comments on the DEIR and the Responses thereto. The FEIR analysis of these alternatives is not repeated in these Findings, but the discussion and analysis of the alternatives in the 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 FEIR, and as summarized in these Findings, concludes that the proposed East Area 1 Specific Plan will result in some short and long term significant adverse impacts which can not be mitigated to a less than significant level. These unavoidable adverse impacts (previously described) are related to land use and planning, agricultural resources, air quality, aesthetics, and cultural and historic resources.

The 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 project by staff of various City of Santa Paula and County of Ventura departments.
2. Analysis of the project by the City of Santa Paul Planning Commission and the City of Santa Paula City Council.
3. Responses to comments on the Notice of Preparation.
4. Responses to comments on the DEIR.
5. Input from meetings conducted by the City of Santa Paula and public review of the DEIR for the proposed project.

6.1 ALTERNATIVE NO. 1 – NO PROJECT ALTERNATIVE

6.1.1 DESCRIPTION OF THE NO PROJECT ALTERNATIVE

As shown in Table 6-1, the East Area 1 project site would continue to be actively farmed, and Ventura County General Plan and Non-Coastal Zoning Ordinance land use and zoning designations, respectively would apply. The project site would not be annexed by the City of Santa Paula and would remain under Ventura County jurisdiction.

6.1.2 SUMMARY OF ENVIRONMENTAL IMPACTS OF THE NO PROJECT ALTERNATIVE

The No Project Alternative would preclude the construction of land uses identified for the proposed project. As previously noted, the existing agricultural operations would continue on-site and conditions would remain unchanged. However, under this alternative Haun Creek at SR-126 would continue to experience flooding during normal storm events.

**TABLE 6-1
LAND USES PROPOSED FOR ALTERNATIVE 1: NO PROJECT**

Lands Use	Unit Counts/Size
Residential Dwelling Units	9 units
Workplace Buildings	0 sf
Retail/Office	0 sf
Assisted Living	0 sf
Elementary School	0 ac
High School/Post Secondary School	0 ac
Shared Athletic Fields	0 ac
Parks and Greenways	0 ac
Agriculture	501 ac

Source: P&D Consultants, 2007

6.1.3 ABILITY OF THE NO PROJECT ALTERNATIVE TO MEET THE PROJECT OBJECTIVES

The No Project Alternative would not meet the following defined project objectives as shown in Table 6-2:

**TABLE 6-2
ABILITY OF ALTERNATIVE 1 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.	No
Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas	No
Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.	No
Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.	No
Establish new residential neighborhoods and districts with supporting commercial and institutional uses.	No
Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.	No
Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.	No
Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.	No
Provide sites for a wide range of educational facilities including primary, secondary and post-secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.	No

Source: P&D Consultants, 2007.

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 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. Table 6-3 summarizes the proposed land uses for this alternative.

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, consistent with the Santa Paula General Plan’s vision of this area. In addition, it would also result in similar impacts as the proposed project, provided mitigation measures contained within this EIR are implemented. This alternative would result in fewer impacts related to land use and planning since it reflects the planned use of this area, as envisioned in the General Plan. However, impacts associated with public services related to schools (high school) and libraries would be significant since the provision of these services is not planned for under this alternative.

**TABLE 6-3
LAND USES PROPOSED FOR ALTERNATIVE 2: SANTA PAULA GENERAL PLAN – 900 DWELLING UNITS**

LANDS USE	UNIT COUNTS/SIZE
Residential Dwelling Units	900 units ¹
Workplace Buildings	0 sf
Retail/Office	76,230 sf
Assisted Living	0 sf
Elementary School	10 ac
High School/Post Secondary School	0 ac
Shared Athletic Fields	0 ac
Parks and Greenways	13.5 ac ²
Agriculture	0 ac
Golf Course and Hotel	150 ac

Source: City of Santa Paula General Plan. Pgs. LU-25 and 34.

Notes:

¹ Includes 742 single-family dwelling units and 158 multi-family dwelling units.

² Total is for parks only. The General Plan does not identify the acres of greenways.

6.2.3 ABILITY OF ALTERNATIVE 2 TO MEET THE PROJECT OBJECTIVES

Overall, as noted in Table 6-4, implementation of this alternative would not be consistent with the objectives of the proposed project.

**TABLE 6-4
ABILITY OF ALTERNATIVE 2 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.	Yes
Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas	Yes
Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.	Yes
Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.	Yes
Establish new residential neighborhoods and districts with supporting commercial and institutional uses.	Yes
Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.	Yes
Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.	No
Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.	No
Provide sites for a wide range of educational facilities including primary, secondary and post-secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.	No

Source: P&D Consultants, 2007.

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. Table 6-5 summarizes the proposed land uses for this alternative.

The lower number of units is achieved by changing the allowed building types and minimum lot widths in each zone. Alternative 3 contains a limited range of unit types and sizes. Multi-family units are limited to the Neighborhood Center, while the remainders of the units are predominantly detached single family buildings with some attached single family buildings mixed in. The percentage of unit types would be distributed approximately as follows:

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

**TABLE 6-5
LAND USES PROPOSED FOR ALTERNATIVE 3: EAST AREA 1
SPECIFIC PLAN – 1,000 DWELLING UNITS**

Lands Use	Unit Counts/Size
Residential Dwelling Units	1,000 units
Workplace Buildings	150,000 sf
Retail/Office	210,000 sf
Assisted Living	75,000 sf
Elementary School	10.8 ac
High School/Post Secondary School	25.6 ac
Shared Athletic Fields	23.2 ac
Parks and Greenways	65.8 ac
Agriculture	134.4 ac

Source: HDR Town Planning, 2007.

The level of development would likely not be sufficient to support the proposed commercial uses and thus might require off-site vehicle trips for daily needs.

6.3.2 SUMMARY OF ENVIRONMENTAL IMPACTS OF ALTERNATIVE 3

Similar to the proposed 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. Among other things, this alternative would exceed General Plan land use density standards and would include a Growth Management Ordinance which is not entirely consistent with that contained within the Santa Paula Municipal Code. Overall however, 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

As noted in Table 6-6, implementation of this alternative would not be consistent with the objectives of the proposed project.

**TABLE 6-6
ABILITY OF ALTERNATIVE 3 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.	Yes
Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas	Yes
Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.	Yes
Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.	Yes

**TABLE 6-6
ABILITY OF ALTERNATIVE 3 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Establish new residential neighborhoods and districts with supporting commercial and institutional uses.	Yes
Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.	Yes
Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.	No
Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.	Yes
Provide sites for a wide range of educational facilities including primary, secondary and post –secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.	Yes

Source: P&D Consultants, 2007.

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. Table 6-7 summarizes the proposed land uses for this alternative.

**TABLE 6-7
LAND USES PROPOSED FOR ALTERNATIVE 4: EAST AREA 1
SPECIFIC PLAN – 1,250 DWELLING UNITS**

LANDS USE	UNIT COUNTS/SIZE
Residential Dwelling Units	1,250 units
Workplace Buildings	150,000 sf
Retail/Office	210,000 sf
Assisted Living	75,000 sf
Elementary School	10.8 ac
High School/Post Secondary School	25.6 ac
Shared Athletic Fields	23.2 ac
Parks and Greenways	65.8 ac
Agriculture	134.4 ac

Source: HDR Town Planning, 2007.

The lower number of units is achieved by changing the allowed building types and minimum lot widths in each zone. The full range of unit types from the Specific Plan would be utilized, but Alternative 4 has more detached single family homes than the base case. Each neighborhood has a range of lot sizes and types. However, there would be fewer mid-range attached units. 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 proposed 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. Among other things, this alternative would exceed General Plan land use density standards and would include a Growth Management Ordinance which is not entirely consistent with that contained within the Santa Paula Municipal Code. Overall however, 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

As noted in Table 6-8, implementation of this alternative would be consistent with the objectives of the proposed project.

**TABLE 6-8
ABILITY OF ALTERNATIVE 4 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.	Yes
Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas	Yes
Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.	Yes
Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.	Yes
Establish new residential neighborhoods and districts with supporting commercial and institutional uses.	Yes
Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.	Yes
Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.	Yes
Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community’s identity and connection to its natural and agricultural surroundings.	Yes

**TABLE 6-8
ABILITY OF ALTERNATIVE 4 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Provide sites for a wide range of educational facilities including primary, secondary and post –secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.	Yes

Source: P&D Consultants, 2007.

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 currently described in Section 3.0 (Project Description) of the 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 proposed project, Alternative 5 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. Among other things, this alternative would exceed General Plan land use density standards and would include a Growth Management Ordinance which is not entirely consistent with that contained within the Santa Paula Municipal Code. Overall however, impacts from this alternative would be similar to the proposed project.

6.5.3 ABILITY OF ALTERNATIVE 5 TO MEET THE PROJECT OBJECTIVES

As noted in Table 6-9, implementation of this alternative would be consistent with the objectives of the proposed project.

**TABLE 6-9
ABILITY OF ALTERNATIVE 5 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.	Yes
Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas	Yes

**TABLE 6-9
ABILITY OF ALTERNATIVE 5 TO MEET THE PROJECT OBJECTIVES**

PROJECT OBJECTIVE	DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE?
Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.	Yes
Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.	Yes
Establish new residential neighborhoods and districts with supporting commercial and institutional uses.	Yes
Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.	Yes
Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.	Yes
Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.	Yes
Provide sites for a wide range of educational facilities including primary, secondary and post-secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.	Yes

Source: P&D Consultants, 2007.

7.0 COMPARISON OF IMPACTS

Table 7-1 shows a comparison of the environmental effects of the proposed project, the project alternatives and the No Project Alternative. Each of the build alternatives would result in environmental impacts greater than would occur under the No Project Alternative. Therefore, the No Project Alternative is the environmentally superior alternative, although it would not meet project objectives, as discussed earlier. 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. Of the remaining alternatives, the proposed 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 proposed 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 proposed 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 proposed project and Alternative 4.

**TABLE 7-1
COMPARISON OF THE ENVIRONMENTAL IMPACTS OF ALL PROJECT ALTERNATIVES**

Environmental Parameter	Proposed Project	No Project Alternative	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Land Use and Planning	3	1	3	3	3	3
Agriculture Resources	3	1	3	3	3	3
Mineral Resources	1	1	1	1	1	1
Transportation and Circulation	2	1	2	2	2	2
Air Quality	3	1	3	3	3	3
Noise	2	1	2	2	2	2
Biological Resources	2	1	2	2	2	2
Geology and Soils	2	1	2	2	2	2
Hydrology and Water Quality	2	1	2	2	2	2
Hazards and Hazardous Materials	2	2	2	2	2	2
Aesthetics	3	1	3	3	3	3
Cultural and Historic Resources	3	1	3	3	3	3
Public Services	2	1	2	2	2	2
Recreation	2	1	2	2	2	2
Utilities and Service Systems	2	1	2	2	2	2
Population and Housing	1	1	1	1	1	1

Source: P&D Consultants, Inc. (2007).

Legend

1. Insignificant or no impact.
2. Impact that can be mitigated to a level of insignificance.
3. Impact that can not be mitigated to a level of insignificance.

8.0 GENERAL FINDINGS

1. The plans for the proposed East Area 1 Specific Plan have been 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 DEIR 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 FEIR or is outweighed by the facts set forth in the Statement of Overriding Considerations (SOC).
3. Comments regarding the DEIR received during the public review period have been adequately addressed in the Responses to Comments Report included in the FEIR. Any significant adverse effects described in such comments were avoided or substantially lessened by the mitigation measures described in the DEIR or are outweighed by the facts set forth in the SOC.

STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE EAST AREA 1 SPECIFIC PLAN EIR

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). 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 Section 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 Section 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 FEIR for the 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 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 FEIR 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 FEIR identified a number of alternatives to the East Area 1 Specific Plan (proposed project) to evaluate and determine the extent to which they meet the basic project objectives, while avoiding or substantially lessening any significant adverse impacts of the proposed project. However, for the reasons detailed in the Statement of Findings of Facts in Support of the East Area 1 Specific Plan, the proposed project and Alternative 4: East Area 1 Specific Plan – 1,250 Dwelling Units were found to be the environmentally superior alternatives.

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

2.0 UNAVOIDABLE ADVERSE SIGNIFICANT IMPACTS

2.1 AGRICULTURAL RESOURCES

2.1.1 IMPACT

Implementation of the proposed project would result in the following: (1) loss of agricultural resources, including Prime and Unique Farmland (352 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 AIR QUALITY

2.2.1 IMPACT

Implementation of the proposed 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 FEIR would substantially lessen the significant adverse impacts but would not completely avoid these impacts.

2.3 AESTHETICS

2.3.1 IMPACT

Implementation of the proposed project would permanently change the views of the project site from agricultural lands to developed suburban and urban uses resulting in a significant adverse impact which cannot be mitigated to below a level of significance and which, therefore, is considered to be unavoidable adverse impacts. The mitigation measures identified in the FEIR would substantially lessen the adverse impacts but would not completely avoid these impacts.

2.4 CULTURAL & HISTORIC RESOURCES

2.4.1 IMPACT

Implementation of the proposed project would result in the following: (1) 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; and (2) result in the removal of a property which is an important element contributing to the eligibility of an NRHP rural landscape district and would result in a reduction of integrity of design, setting, feeling and association for this district. Therefore, implementation of the proposed 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 FEIR would substantially lessen the adverse impacts but would not completely avoid these impacts.

3.0 ABSENCE OF SIGNIFICANT NEW INFORMATION

CEQA Guidelines Section 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 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. No such information has been provided.

Therefore, the City of Santa Paula hereby finds that no significant new information has been added to the FEIR since public notice was given of the availability of the DEIR that would require recirculation of the EIR.

4.0 OVERRIDING CONSIDERATIONS

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

The City has determined that the significant unavoidable adverse impacts to agricultural resources, air quality, aesthetics, and cultural and historic resources resulting from the implementation of the proposed project, which will remain after mitigation, are acceptable and are outweighed by specific social, economic and other benefits of the project. In making this determination, the following factors and public benefits were considered as overriding considerations which apply to the unavoidable significant adverse impacts of the proposed project:

1. The proposed project is located within a planned Expansion Area (East Area 1), as identified within the City's General Plan.
2. The proposed project is consistent with the goals, policies and objectives contained within the General Plan. In addition, it is consistent with policy and/or principals of the Southern California Association of Governments as it relates to its Regional Comprehensive Plan and Guide, Growth Visioning and Regional Transportation Plan.
3. A Specific Plan was prepared for the project site in compliance with requirements of the General Plan.

4. The proposed project contains many of the uses and amenities originally contemplated within the General Plan for this Expansion Area.
5. The proposed project would result in modification of the Santa Paula-Fillmore Greenbelt which was previously contemplated in the General Plan.
6. The proposed project would include mixed use development as encouraged in the General Plan.
7. The proposed project would require a Sphere of Influence amendment for the East Area 1 Expansion Area consistent with the General Plan.
8. The proposed project would include development standards, amenities and facilities for the East Area 1 which are consistent with those identified for this area in the General Plan.
9. The proposed project would implement many of the roadway improvements noted in the General Plan and associated with the East Area 1 Expansion Area.
10. The proposed project does not include parcels which are included in a Land Conservation Act (Williamson Act) contract.
11. The proposed project would include drainage improvements to Haun Creek which would eliminate flooding at State Route 126.
12. The proposed project would include multi-purpose trails consistent with the General Plan.
13. The proposed project would include the provision of infrastructure and services which could adequately serve the project site.
14. The Fiscal Impact Analysis Report prepared for the proposed project indicates that reorganization (annexation) of the project site would not result in fiscal impacts that would be detrimental to the City of Santa Paula.

The proposed project would also be consistent with its established objectives which include:

1. Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.
2. Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas.
3. Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.
4. Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.
5. Establish new residential neighborhoods and districts with supporting commercial and institutional uses.

6. Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.
7. Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.
8. Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.
9. Provide sites for a wide range of educational facilities including primary, secondary and post – secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.

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 Section 21081.6(a)(2) and 14 Cal. Code of Regulations Section 15091(e).

MITIGATION MONITORING AND REPORTING PROGRAM FOR THE EAST AREA 1 SPECIFIC PLAN EIR

1.0 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an environmental impact report has been certified which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "...reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code §§ 21081, 21081.6). A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures are successfully implemented for the East Area 1 Specific Plan project (proposed project). The City of Santa Paula is the Lead Agency for the proposed project and is responsible for implementing the MMRP. This report describes the MMRP for the proposed project and identifies the departments in the City of Santa Paula that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

2.0 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the project will be active through all phases of the project, including design, construction, and operation. The project will be developed in phases and may include permits required for implementation of project components. In addition, there are some mitigation measures that must be continuously implemented throughout the development and operation of the project.

The attached table identifies the required mitigation program that must be implemented by City departments for the proposed project. The table identifies those mitigation measures required by the City to mitigate or avoid significant adverse impacts associated with the implementation of the proposed project, the timing of implementation, and the individual responsible for monitoring compliance. The MMRP also includes columns that will be used by the compliance monitor to document when implementation of the measure is completed. As individual mitigation measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required mitigation measure has been completed for the subject period. The compliance monitor will also note the documentation (title of the monitoring report) that was submitted for each mitigation measure.

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
LAND USE AND PLANNING					
Measure LU-1 Before the East Area 1 Specific Plan (SP3) can become effective, a General Plan amendment must be approved by a majority of registered voters within the City of Santa Paula. The General Plan amendment would involve amending Figure LU-4a, Figure LU-5, and Table LU-7.	City of Santa Paula	Before tentative map approvals	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
Measure LU-2 The General Plan must be amended to change the CURB boundaries (Figure LU-4a) in accordance with Section III(G) of the General Plan Land Use Element to include the 501 acres comprising the East Area 1 Specific Plan (SP3) project site.	City of Santa Paula	Before tentative map approvals	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
Measure LU-3 The City must prepare and process a Sphere of Influence Amendment and a reorganization request with Ventura LAFCO.	City of Santa Paula	Before tentative map approvals	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
AGRICULTURAL RESOURCES					
Measure A-1 The applicant must record a conservation covenant, in a form approved by the City of Santa Paula, on the 55 acres of land currently in agricultural production in the proposed agricultural preserve located along the northern portion of the East Area 1 site that restricts activities to agricultural operations. This covenant will also require use of modified farming cultural practices, such as the restriction of the use of agricultural chemicals and practices that would generate high levels of dust, noise and odors.	City of Santa Paula	During tentative map approvals	Planning Director and Director of Building & Safety	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>Measure A-2 The applicant must record an agricultural conservation covenant, in a form approved by the City of Santa Paula, on 34 acres of other agricultural land owned by the applicant and currently under agricultural production within the City of Santa Paula's Area of Interest.</p>	City of Santa Paula	During tentative map approvals	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure A-3 A reinforced 8-foot chain link fence with top bar must be constructed by the Applicant and/or its contractor before issuance of residential occupancy permits. The fence must extend along the entire eastern portion of the property boundary along Haun Creek beginning in the northern property boundary and extending south to State Route 126. Deviations to this route due to terrain or other potential limitations must first be approved by the City's Planning Director.</p>	City of Santa Paula	Before City issues residential occupancy permits	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
MINERAL RESOURCES					
No mitigation is required	None required.	None required.	None required	None required	None required
TRANSPORTATION AND CIRCULATION					
<p>Measure T-1 SR-126 and Hallock Drive (Intersection 1) – The applicant must pay its pro rata costs to widen and reconfigure the intersection on all four approaches. The northbound approach on Hallock Drive may require additional right-of-way to accommodate the proposed lane configurations. SR-126 would be widened on both approaches to accommodate an additional through lane at the intersection.</p> <p>The southbound approach would provide two left-turn lanes, one through lane, one shared through/right-turn lane, and one right-turn lane. The westbound approach would provide one left-turn lane, three through lanes and one right-turn lane.</p>	City of Santa Paula	Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy	Public Works Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>The northbound approach would provide one left-turn lane, one through lane and one right-turn lane. The eastbound approach would provide two left-turn lanes, three through lanes and one right-turn lane. These recommended mitigation measures would require coordination with and approval by Caltrans. The design and construction of Mitigation Measures T-1 and T-2 should be closely coordinated because of their proximity to one another.</p>	<p>City of Santa Paula</p>		<p>Public Works Director</p>		
<p>Measure T-2 <u>Telegraph Road and Hallock Drive (Intersection 2)</u> - The applicant must pay its pro rata cost to install a traffic signal and to reconfigure the intersection on all four approaches as follows: (1) the southbound approach must provide one left-turn lane, two through lanes and one right-turn lane; (2) the westbound approach must provide one left-turn lane and one shared through/right-turn lane; (3) the northbound approach must provide one left-turn lane, one through lane and one shared through/right-turn lane; and (4) the eastbound approach must provide one left-turn lane, one through lane and one right-turn lane. The design and construction of Mitigation Measures T-1 and T-2 should be closely coordinated because of their proximity to one another.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-3 <u>12th Street and Santa Paula Street (Intersection 4)</u> - The applicant must pay its pro rata cost to install a traffic signal, to reconfigure the intersection on three approaches, and to widen the west leg. The westbound approach must provide one left-turn lane and one shared through/right-turn lane. The northbound approach must provide one shared through/left-turn lane and one right-turn lane. The eastbound approach must provide one left-turn lane, one through lane and one right-turn lane. The west</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map,</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA I SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>leg of the intersection must be widened to provide 50 feet from curb to curb as recommended in the Circulation Element.</p> <p>Measure T-4 Ojai Road (SR-150) and Richmond Road (Intersection 9) – The applicant must pay its pro rata cost to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period, to restrict the westbound left-turn movement during both peak periods, and to widen Ojai Road. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. Ojai Road must be widened to provide 50 feet from curb to curb as recommended in the Circulation Element. These recommended mitigation measures would require coordination with and approval by Caltrans.</p>	<p>City of Santa Paula</p>	<p>payable before issuance of each certificate of occupancy</p> <p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-5 Ojai Road (SR-150) and Orchard Road (Intersection 10) – The applicant must pay its pro rata cost to install a traffic signal and to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. These recommended mitigation measures require coordination with and approval by Caltrans.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure T-6 Ojai Road (SR-150) and Saticoy Street (Intersection 11) – The applicant must pay its pro rata cost to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period and to restrict the westbound left-turn movements during both peak periods. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. These recommended mitigation measures require coordination with and approval by Caltrans.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-7 Ojai Road (SR-150)/10th Street and Santa Paula Street (Intersection 12) – The applicant must pay its pro rata cost to restrict southbound on-street parking during the A.M. peak period and northbound on-street parking during the P.M. peak period, to reconfigure the intersection and to widen Ojai Road/10th Street. The parking restrictions must provide one additional southbound through lane during the A.M. peak period and one additional northbound through lane during the P.M. peak period. The five-legged intersections must be reconfigured to a typical four-legged intersection. The southbound and northbound approaches must provide one left-turn lane and one shared through/right-turn lane during the off-peak periods. The eastbound and westbound approaches must provide one left-turn lane, one through lane and one right-turn lane. The fifth leg of the intersection, 10th Street north of Santa Paula Street, must be restricted to right turn only to and from Ojai Road. Ojai Road must be widened to provide 50 feet from curb to curb as recommended in the Circulation Element.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>These recommended mitigation measures require coordination with and approval by Caltrans.</p> <p>Measure T-8 <u>10th Street and Harvard Boulevard (Intersection 15)</u> – The applicant must pay its pro rata cost to restrict the southbound on-street parking during both peak periods and to reconfigure the northbound approach. The parking restriction must provide one additional southbound lane during both peak hours. The northbound approach must provide one left-turn lane, one through lane and one right-turn lane.</p>	City of Santa Paula	Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy	Public Works Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure T-9 <u>8th Street and Santa Paula Street (Intersection 18)</u> – The applicant must pay all costs to widen and reconfigure the northbound approach. The northbound approach must provide one shared through/left-turn lane and one right-turn lane.</p>	City of Santa Paula	Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy	Public Works Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	SIGNATURE
<p>Measure T-10 Palm Avenue and Santa Paula Street (Intersection 22) – The applicant must pay all costs to reconfigure the northbound and westbound approaches. The northbound approach must provide one shared through/left-turn lane and one right-turn lane. The westbound approach must provide one left-turn lane and one shared through/right-turn lane.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-11 Steckel Drive and Santa Paula Street (Intersection 28) – The applicant must pay all costs to reconfigure the westbound approach. The westbound approach must provide one left-turn lane and one shared through/right-turn lane.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>Measure T-12 Peck Road and Main Street and Harvard Boulevard (Intersection 32) – The applicant must pay its pro rata cost to reconfigure the northbound and southbound approaches to provide one additional through lane. The northbound approach must provide one left-turn lane, two through lanes and one right-turn lane. The southbound approach must provide one left-turn lane, one through lane and one shared through/right-turn lane.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-13 Peck Road and SR-126 Eastbound Ramps (Intersection 34) – The applicant must pay its pro rata cost to install a traffic signal. This mitigation measure requires coordination with and approval by Caltrans.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>Measure T-14 Faulkner Road and SR-126 Westbound Ramps (Intersection 35) – The applicant must pay its pro rata cost to reconfigure the westbound approach by converting one through lane to one left-turn lane. The westbound approach must provide two left-turn lanes and one shared through/right-turn lane. This mitigation measure requires coordination with and approval by Caltrans.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-15 SR-126 between Peck Road and Briggs Road – The applicant must pay its pro rata cost to widen SR-126 to provide three travel lanes in each direction for a total of six lanes. The freeway widening can be completed within the existing right-of-way. This mitigation measure requires coordination with and approval by Caltrans.</p>	<p>City of Santa Paula</p>	<p>Pro-rata share of costs per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>Measure T-16 Restricted parking on Ojai Road/10th Street during the peak periods – The City must monitor the parking situation on Ojai Road from Richmond Road to Santa Paula Street and on 10th Street north of Harvard Boulevard during the A.M. and P.M. peak periods to determine if the implementation of the parking restrictions on Ojai Road and 10th Street will create an indirect significant adverse parking impact. If necessary, the City will construct additional parking and the applicant must pay its pro rata cost to provide additional parking spaces during the A.M. and P.M. peak periods near the vicinity of Ojai Road and 10th Street.</p>	City of Santa Paula	Ongoing verification during the development of each Tentative Tract Map. Measure to be imposed as a condition on each Tentative Tract Map.	Public Works Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure T-17 <u>Emergency Access Impacts</u> – The applicant must submit emergency access plans to the SPFD for review and approval. The applicant must comply with the recommendations provided by the SPFD.</p>	City of Santa Paula	As part of final project design before the City records each Tentative Tract Map	Public Works Director and Fire Chief and Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure T-18 <u>Parking Impacts</u> – The applicant will prepare a parking study if the proposed project does not provide parking spaces per the Santa Paula Municipal Code.</p>	City of Santa Paula	Ongoing verification during the development of each Tentative Tract Map. Measure to be imposed as a condition on each Tentative Tract Map	Public Works Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure T-19 Traffic Impact Mitigation Fee – The Applicant and/or its contractor must comply with the County's Traffic Impact Mitigation Fee (TIMF) and pay the required fee before the City issues any building permit. Based on the fee schedule established in accordance with the County TIMF Ordinance Code §§ 8601-0 <i>et seq.</i> for the Santa Paula Impact Fee District, the fee due is as follows and is based upon information contained in the DEIR as follows: 30,329 Average Daily Trips (ADT) multiplied by \$44.16/ADT which equals \$1,339,328.64 The fee is subject to adjustment at the time of deposit, due to provisions in the TIMF Ordinance allowing the fee to be adjusted for inflation based upon the Engineering News Record construction cost index.</p>	<p>City of Santa Paula</p>	<p>Costs will be paid per residential dwelling unit and per square foot of non-residential development to be determined before approval of the first Tentative Tract Map and imposed as a condition on every Tentative Tract Map, payable before issuance of each certificate of occupancy as required by the County's TIMP ordinance</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-20 Before start of construction, the Applicant and/or its contractor must prepare and submit a Traffic Management Plan (TMP) to the City, County Transportation Department and the State of California Department of Transportation (Caltrans). The TMP must provide mitigation measures acceptable to the City, County Transportation Department and Caltrans for any impacts the project may have on roadways and network systems under their jurisdiction and in particular, any impacts on Telegraph Road.</p>	<p>City of Santa Paula</p>	<p>As part of final project design, but before initiation of construction.</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	DOCUMENTATION OF COMPLIANCE SIGNATURE
<p>Measure T-21 The Applicant and/or its contractor must reconstruct any damaged or defaced asphalt concrete paving and driveway per City, City and/or Caltrans standards. Before commencing construction, the Applicant and/or its contractor must videotape the existing roadway impacted by this project. The videotape prepared and submitted by the Applicant and/or its contractor must be used in conjunction with an after hauling inspection to determine if any of the above existing surface improvements were damaged by trucks during hauling. The TMP must also identify the truck routes the project proposes to use. The traffic control plan for any lane closures/reductions within the County right-of-way must be also approved by the County Transportation Department.</p>	<p>City of Santa Paula</p>	<p>Before the City records each Tentative Tract Map.</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure T-22 The Applicant and/or its contractor must prepare a fencing plan (Plan) for the at-grade crossing planned at Telegraph Road/Hallock Drive and immediate vicinity. The Plan must be submitted for review by the City and must meet the design and construction requirements of the California Public Utilities Commission or other applicable jurisdiction with oversight over the existing railroad right-of-way.</p>	<p>City of Santa Paula</p>	<p>Before the City records each Tentative Tract Map.</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	SIGNATURE
<p>AIR QUALITY</p> <p>Measure AQ-1 During clearing, grading, earth-moving, or excavation operations, excessive fugitive dust emissions must be controlled by regular watering or other dust-preventive measures using the following procedures, as specified by the VCAPCD (including, without limitation, to VCAPCD Rule 50 (Opacity) and Rule 51 (Nuisance):</p> <ul style="list-style-type: none"> • On-site vehicle speed is not to exceed 15 miles per hour (the site will contain posted signs with the speed limit) • All on-site construction roads with vehicle traffic must be watered periodically; • Streets adjacent to the project reach must be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust; • All material excavated or graded must be sufficiently watered to prevent excessive amounts of dust. Watering will occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day; • All clearing, grading, earth moving, or excavation activities must cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust (contact the VCAPCD meteorologist for current information about average wind speeds); 	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<ul style="list-style-type: none"> All material transported off-site must be either sufficiently watered or securely covered to prevent excessive amounts of dust; and The area disturbed by clearing, grading, earth moving, or excavation operations must be minimized so as to prevent excessive amounts of dust. 	City of Santa Paula				
<p>Measure AQ-2 Project grading plans must show that for the duration of construction, ozone precursor emissions from construction equipment vehicles must be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Compliance with this measure will be subject to periodic inspections of construction equipment vehicles by the Public Works Department.</p>	City of Santa Paula	Ongoing verification during grading, excavation and construction	Public Works Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure AQ-3 All trucks that will haul excavated or graded material on-site must comply with California Vehicle Code § 23114, with special attention to subsections 23114(b)(F), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.</p>	City of Santa Paula	Ongoing verification during grading, excavation and construction	Public Works Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	SIGNATURE
<p>Measure AQ-4 A comprehensive Fugitive Dust Control Plan must be developed by the Applicant and approved by the VCAPCD before the applicant commences grading and excavation operations. The Plan must include all feasible, but environmentally safe, dust control methods. If a particular dust control method is determined or believed not to be feasible, or if it would conflict with other regulations, justification for not including the subject method must be provided at the time the Fugitive Dust Control Plan is submitted to the VCAPCD. The Plan must identify all fugitive dust sources, the means by which fugitive dust from each identified source will be minimized, and the schedule or frequency that each dust control method will be applied for each identified source.</p>	<p>City of Santa Paula</p>	<p>Before grading, excavation and construction activities</p>	<p>Public Works Director & VCAPCD</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-5 The construction contractor must adhere to VCAPCD Rule 74.2 (Architectural Coatings) for limiting volatile organic compounds from architectural coatings. This rule specifies architectural coatings storage, clean up and labeling requirements.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Public Works Director & VCAPCD</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-6 Use low emission water heaters for residential, retail, and commercial water heating (Emissions reduction of 11% for ROC and 9.5% for NOx).</p>	<p>City of Santa Paula</p>	<p>Verify on final plans and during construction inspections</p>	<p>Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	SIGNATURE
<p>Measure AQ-7 Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, and bikeways and or lanes. Sidewalks and bikeways should be landscaped with trees (an approximately 4 percent emissions reduction).</p>	<p>City of Santa Paula</p>	<p>As part of final project design</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-8 Provide shuttle/minibus service between Project residential and Project retail areas and the Santa Paula downtown area.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification throughout the life of the project beginning with development of Phase I</p>	<p>Public Works Director and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-9 Provide shuttle/minibus service between the Project commercial and industrial land uses and the Project retail land uses and the Santa Paula downtown area during the lunchtime period (11:00 A.M. to 2:00 P.M.).</p>	<p>City of Santa Paula</p>	<p>Ongoing verification throughout the life of the project beginning with development of Phase I</p>	<p>Public Works Director and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-10 To the extent feasible, construction employees will be hired from local populations, since it is more likely that they have been previously exposed to the fungus and are therefore immune. An individual is quite likely to be affected by valley fever if he or she lives in an area where the fungus is prevalent. A person (or animal) with a positive skin test has had a valley fever infection and has developed immunity to the fungus and therefore will never contract valley fever again. (Valley Fever Vaccine Project of America, http://www.valleyfever.com/primer.htm, June 8, 2005.)</p>	<p>City of Santa Paula</p>	<p>Before construction</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	SIGNATURE
<p>Measure AQ-11 During periods of high dust in the grading phase, crews must use respirators in accordance with California Division of Occupational Safety and Health regulations.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-12 The operator cab of area grading and construction equipment must be enclosed and air-conditioned.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-13 The Applicant and/or its contractor must plant and maintain shade trees to reduce heat build-up on structures.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification throughout the life of the Project. Semi-annual evaluation to be performed at the discretion of the Public Works and Planning Director</p>	<p>Public Works Director and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure AQ-14 The Applicant and/or its contractor must prepare a Transportation Demand Management Program (TDM) for review and approval by the City and VCAPCD, before the City issues building permits. The plan must incorporate reasonable and feasible measures to reduce project-related traffic and vehicle miles traveled. At minimum, the TDM Program must include the following measures:</p> <ul style="list-style-type: none"> • Provision of connections to identified adjacent City or regional trails; 	<p>City of Santa Paula</p>	<p>Before City issues building permits</p>	<p>Director of Planning, Building & Safety, Director of Public Works, and VCAPCD</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<ul style="list-style-type: none"> • Provision of adequate way-finding features to direct pedestrians and bicyclists to nearby project and City destinations, such as school, retail, and civic facilities; • Provision of homeowner information packets before close of escrow, identifying local and regional non-vehicular transportation options, and providing homeowners with basic information regarding telecommuting options; and • Providing adequate setbacks and design features such that the proposed future enhancement of commuter rail opportunities is not hindered by project design. • Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeway or lanes. Sidewalks and bikeways should be landscaped with trees; and • Perform a traffic light synchronization study on streets impacted by project development to reduce vehicle queuing time. <p>The project will be required to offset the increase in daily emission over the 25 pounds of reactive organic compounds and nitrogen oxides per day either through the purchase of emission offsets or through the in-lieu fees must be paid to fund off-site Transportation Demand Management (TDM) facilities or services, if such a program has been established at that time. These fees can reduce emissions from non-project generated motor vehicle</p>					

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trips by funding programs to promote ridesharing, public transit and bicycling. The amount of this financial contribution should be calculated on a pro-rate basis as determined to be equitable by the APCD, and in accordance with the VCAPCD Guidelines. These fees should be paid before the issuance of building permits by the County. The applicant must demonstrate the availability of the offsets or contribution to fund off-site TDM services to the Ventura County APCD through a contract or other agreement with the offset source(s), which binds the reduction to the project, before finalizing the environmental review process.	City of Santa Paula	As part of final project design and before City issues building permits	Director of Building & Safety		(Signature/Date of Compliance)
Measure AQ-15 The Applicant and/or its contractor are required to install EPA-certified wood-burning stoves or fireplace inserts. If this is not feasible, then the installation of a ceramic coating on the honeycomb inside a catalytic combustor must be utilized or the use of natural gas fireplaces may be used as a feasible alternative.	City of Santa Paula	Ongoing verification during grading, excavation and construction	Director of Public Works		(Signature/Date of Compliance)
NOISE Measure N-1 Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible during all phases of project construction.	City of Santa Paula				

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<p>Measure N-2 All construction equipment must be equipped with appropriate mufflers in good working condition.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure N-3 Before any site activity, the contractor will be required to submit a material haul route plan to the City of Santa Paula and Ventura County for review and approval. The contractor must ensure that the approved haul routes are used for all materials hauling, to minimize exposure of sensitive receivers to potential adverse noise levels from hauling operations.</p>	<p>City of Santa Paula</p>	<p>Before construction activity</p>	<p>Director of Public Works and Ventura County (Public Works Department)</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure N-4 Notification must be provided to all occupied residences within 200 feet of an area where construction activities are anticipated to result in ground-borne vibration of more than 80 VdB at least 10 days in advance of such activities.</p>	<p>City of Santa Paula</p>	<p>Before construction activities</p>	<p>Director of Building & Safety, Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure N-5 During all site preparation, grading and construction, the construction contractor must ensure that all stockpiling and vehicle staging areas are located away from existing residences to the extent feasible.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during site preparation, grading, excavation and construction activities</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	DOCUMENTATION OF COMPLIANCE
<p>Measure N-6 Where feasible and consistent with City standards, any paving or repaving of Santa Paula Street between 12th Street and 10th Street that must be conducted in conjunction with implementation of the proposed project should utilize asphalt rubber paving material consisting of 20 percent or more recycled rubber and 80 percent paving grade asphalt.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during construction</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure N-7 Where feasible and consistent with City standards, speed limits on arterials experiencing significant noise impacts such as Santa Paula Street between 12th Street and 10th Street should be reduced. Each 5 mile per hour reduction in speed limits can decrease the CNEL level by about 1 dB(A).</p>	<p>City of Santa Paula</p>	<p>Ongoing verification of noise levels throughout the life of the project, but performed once yearly. Timing to occur based upon the discretion of the Director of Public Works</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure N-8 Noise sensitive work/live and residential units proposed within Specific Plan Planning Area E must be designed so that interior noise levels attributable to exterior sources exceeding 60 dB(A) CNEL do not exceed City interior noise standard (45 dB(A) CNEL). An acoustical analysis of the effectiveness of noise insulation of proposed construction must be required and documented during permit review, showing that the building materials and construction specifications are adequate to meet the interior noise standard (45 dB(A) CNEL). Examples of building materials and construction specifications that may be used to meet the interior noise standard include the following:</p> <ul style="list-style-type: none"> • Exterior livable space, such as balconies, must be oriented northward; 	<p>City of Santa Paula</p>	<p>Before City issues certificates of occupancy for Phase IV</p>	<p>Director of Building & Safety and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<ul style="list-style-type: none"> • South-facing windows and sliding glass doors must be double-paned, mounted in frames with low rates of air filtration (0.5 cubic foot per minute or less, per American National Standard Institute specifications) and a sound transmission coefficient rating of 30 or greater; • Solid-core exterior doors must be constructed with perimeter weather stripping and threshold seals; and • South-facing roof or attic vents must be baffled. 	City of Santa Paula	Before occupant purchasing or leasing of residential units	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure N-9 Written disclosure of maximum exterior and interior noise levels expected at work/live and residential units and at light industrial, office, and retail uses within Planning Area E must be provided to those purchasing or leasing such uses.</p>	City of Santa Paula	As part of final project design	Director of Building & Safety	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure N-10 Work/live and residential units, light industrial, office, and retail uses within Planning Area E must be located a minimum of 66 feet from the railroad tracks.</p>	City of Santa Paula			(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>BIOLOGICAL RESOURCES</p> <p>Measure BR-1a Before the City issues a grading permit for areas that require state or federal permits, the applicant and/or its contractor must coordinate with the CDFG to verify the impact to state-protected waters and associated vegetation on the project site. A Streambed Alteration Agreement (SAA) must be obtained and mitigation measures recommended by the CDFG as part of the SAA must be implemented. The SAA must be provided to the City before it issues a grading permit.</p> <p>The applicant and/or its contractor must mitigate for temporary and permanent impacts to jurisdictional waters as administered by the CDFG jurisdiction by restoring habitats within those jurisdictions acceptable to the resource agency for permanent impacts and temporary impacts. The applicant must prepare a Conceptual Streambed Restoration Plan (CSRP) to document the mitigation program. Habitat must be mitigated on-site or within the same watershed, if feasible. The goal of the CSRP will be to recreate the functions and values of the habitat being affected. These mitigation requirements will be outlined in the CSRP prepared for this project, with monitoring requirements and specific criteria to measure the success of the restoration. Guidelines for the CSRP must include:</p> <ul style="list-style-type: none"> • The mitigation site(s) must have been evaluated and selected on the basis of their suitability for use as riparian mitigation areas. • The mitigation area must provide procedures to prepare soils in the mitigation area, provide detailed 	<p>City of Santa Paula</p>	<p>Before City issues grading permits</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN FEIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
seeding/planting mixtures, provide seeding/planting methods, and other procedures that will be used for successful re-vegetation. <ul style="list-style-type: none"> • Impacts to jurisdictional waters must be avoided to the extent feasible in the design phase of the project. • Maintenance and monitoring requirements must be established, including quarterly and annual monitoring reports to CDFG. 					
Measure BR-1b Where Southern Riparian Scrub, a sensitive natural community, will be impacted as part of project implementation, mitigation for acreage impacted must be implemented at a minimum of a one to one (1:1) ratio and/or as determined appropriate by the CDFG. Acceptable mitigation will replace or enhance the existing Southern Riparian Scrub vegetation. This will be a part of the mitigation resulting from impacts to jurisdictional resources and will be the responsibility of the project applicant and/or its contractor.	City of Santa Paula	Implementation to be based upon CDFG guidance, but prior to completion of Phase I and issuance of certificates of occupancy	Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
Measure BR-1c The project applicant and/or its contractor must mitigate for the loss of the on-site Southern Riparian Scrub plant community. This must include the removal and elimination of false bamboo (giant reed) (<i>Arundo donax</i>) from Haun Creek. False bamboo (giant reed) must be eradicated and controlled before the enhancement or replacement of the current vegetation, as in the implementation of Mitigation Measures B-1a, and B-1b.	City of Santa Paula	Before City issues grading permits	Director of Public Works and Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>Measure BR-1d Before the City issues a grading permit, for areas that require state or federal permits, the applicant and/or its contractor must coordinate with the ACOE to verify the impact to federally-regulated waters on the project site. A Section 7 Biological Consultation will be required, as Santa Paula Creek is designated critical steelhead habitat. A NWP must be obtained and mitigation measures recommended by the ACOE, and National Marine Fisheries, as part of the NWP must be implemented. The NWP must be provided to the City before initiating construction of the bridge crossing Santa Paula Creek.</p> <p>Areas determined to be federally regulated by the ACOE will also fall under the jurisdiction of the RWQCB, and a Clean Water Act Section 401 Water Quality Certification (401 Certification) will be required from the RWQCB for impacts to those areas. A Biological Assessment to support a Section 7 Biological Consultation will be required, as the area is within designated steelhead habitat.</p>	<p>City of Santa Paula</p>	<p>Before City issues grading permits</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure BR-2a To avoid impacts to native nesting birds, the applicant and/or its contractors must retain a qualified biologist (with selection to be reviewed by the City) to conduct nest surveys in potential nesting habitat within the project site before construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist must conduct weekly surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. Surveys for special-status bird species can be conducted concurrently with general nesting bird surveys. Because many birds known to use the project area (including Cooper's hawk and loggerhead shrike) nest during the late winter, breeding bird surveys must be carried out both during the typical nesting/breeding season (mid-March through September) and in January and February. The surveys must continue on a weekly basis, with the last survey being conducted no more than 3 days before initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys will be conducted such that no more than three days will have elapsed between the last survey and the commencement of ground disturbance activities. Surveys must include examination of trees, shrubs, and the ground within grassland for nesting birds, as several bird species known to occur in the area and the project site are shrub or ground nesters, including burrowing owl, California horned lark, and mourning dove.</p>	<p>City of Santa Paula</p>	<p>Before site preparation or construction activities & ongoing verification during grading, excavation and construction</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure BR-2b If active nests are found, clearing and construction activities within 300 feet of the nest (500 feet for raptors) must be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the qualified biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest must be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel must be instructed on the sensitivity of nest areas. The biologist must serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts to these nests will occur. The results of the survey, and any avoidance measures taken, must be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure BR-3a Before the applicant commences construction of a bridge across Santa Paula Creek, all creek bed areas within 300 feet of the construction site and access road must be inspected by a qualified biologist for the presence of Southern California steelhead, Santa Ana sucker, and arroyo chub. The ACOE, USFWS, and the CDFG must be notified of the inspection and must have the option of attending. If any of the above agencies is not represented, the biologist must file a written report of the inspection with the agency not in attendance within 14 days of the survey and no sooner than 30 days before any construction work in the riverbed.</p> <p>Construction work areas must be determined to be absent of Southern California steelhead, Santa Ana sucker, and arroyo chub immediately before the prescribed work is to be carried out, immediately before any equipment is moved into or through the stream or habitat areas, and immediately before diverting any stream water. The removal of such species must be conducted by a qualified biologist using procedures approved by the ACOE, USFWS, and CDFG, and with the appropriate collection and handling permits. Species must be relocated to nearby suitable habitat areas. A plan to relocate these species must be submitted to the ACOE, USFWS, and CDFG for review and approval no later than 30 days before construction. Under no circumstances must the Southern California steelhead be collected or relocated, unless USFWS personnel or their agents implement this measure.</p> <p>A qualified biologist must be present when any stream/river diversion takes place, or when blocking nets and seines are used and must patrol the areas</p>	<p>City of Santa Paula</p>	<p>Before construction of bridge across Santa Paula Creek</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>both within, upstream and downstream of the work area to rescue any species stranded by the diversion of the stream water or trapped by the nets/seines. Species that are collected must be relocated to suitable locations downstream of the work area. Under no circumstances must the Southern California steelhead be collected or relocated, unless USFWS personnel or their agents implement this measure.</p> <p>Blocking nets, or fences with 0.125-inch-square mesh, 18 inches high and buried 6 inches, must be placed downstream of the work area to assure that none of the species move into the construction area.</p> <p>Installation of the bridge structures must not impair movement of fish and aquatic life, and must occur during the time of year when the Southern California steelheads are not actively moving upstream (December 1 through March 30).</p>					

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure BR-3b The applicant and/or its contractor must retain a qualified biologist to conduct pre-construction burrowing owl surveys (following CDFG protocols) within the fallow agricultural field located on-site before construction or site preparation activities occurring during the non-nesting season of burrowing owl (typically September 1 through January 31) or the nesting season (typically April 15 through July 15). The survey must be conducted no more than 20 days before construction activities commence and may be conducted concurrently with general nesting bird surveys. If burrowing owls are observed using burrows during these surveys, protective fencing must be constructed around any nest burrows (if during the breeding season) until the young have fledged. Once the young have fledged, or if grading will occur during the non-breeding season, owls must be excluded from all active burrows through the use of exclusion devices placed in occupied burrows in accordance with CDFG protocols (CDFG 1995). Specifically, exclusion devices utilizing one-way doors must be installed in the entrances of all active burrows. The devices must be left in the burrows for at least 48 hours to ensure that all owls have been excluded from the burrows. Each of the burrows must then be excavated by hand and refilled to prevent reoccupation. Exclusion must continue until the owls have been successfully excluded from the Specific Plan area, as determined by a qualified biologist. Consultation with the City and CDFG may also need to occur to determine if mitigation is needed to offset the loss of active burrowing owl nest habitat.</p>	<p>City of Santa Paula</p>	<p>No more than 20 days before site preparation or construction activities occurring during the non nesting season (Sep. 1 – Jan. 31) or the nesting season (Apr. 15 – July 15) of the burrowing owl</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure BR-3c To avoid impacts to the western red bat the applicant and/or its contractor must retain a qualified biologist (with selection to be reviewed by the City) to conduct roosting bat surveys within the Specific Plan area before construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist must conduct weekly surveys to determine if roosting western red bats are present in the construction zone or within 300 feet of the construction zone. Because the western red bat is known to migrate south to Arizona and Mexico in early fall and winter, roosting bat surveys must be carried out from March through September. Surveys for special-status bat species may be conducted concurrently with nesting bird surveys. The surveys must continue on a weekly basis, with the last survey being conducted no more than three (3) days before initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys will be conducted such that no more than three days will have elapsed between the last survey and the commencement of ground disturbance activities. Surveys must include examination of trees and large shrubs, particularly the lemon, cottonwood, and oak trees planned for removal, in which this species is known to roost. Any bats found outside of the breeding season (May through August) should be relocated by having a qualified biologist remove the bat from the roost. If roosting female bats are found with young during the breeding season (May through August) clearing and construction activities within 300 feet of the roost must be postponed or halted until the roost is vacated and juveniles have</p>	<p>City of Santa Paula</p>	<p>30-days before ground disturbance activities</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE	
				SOURCE	SIGNATURE
<p>been weaned, as determined by the biologist. Limits of construction to avoid an active roost site must be established in the field with flagging, fencing, or other appropriate barriers and construction personnel must be instructed on the sensitivity of nest areas. The biologist must serve as a construction monitor during those periods when construction activities will occur near active roost areas to ensure that no inadvertent impacts on these roosts will occur. The results of the survey, and any avoidance measures taken, must be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of this bat species.</p>					
<p>Measure BR-3d The applicant and/or its contractor must retain a qualified biologist (approved by the City of Santa Paula) to survey the project site for the presence of the American badger no earlier than 1 day before any grading activity. In particular, the survey must include an examination of the fallow agricultural field in the eastern portion of the site that will be impacted during project implementation. If American badger is located on-site, potential loss of individual animals must be mitigated through one of the following: (1) an on-site passive relocation program, through which badgers are excluded from occupied burrows by installation of a one-way door in burrow entrances, monitoring of the burrow for one week to confirm badger usage has been discontinued, and hand-excavation and collapse of the burrow to prevent reoccupation; or (2) active trapping and relocation of badgers to suitable off-site habitat by a qualified biologist and in coordination with the CDFG, as approved by the</p>	<p>City of Santa Paula</p>	<p>1-day before any grading activity</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>City and CDFG.</p> <p>Measure BR-4 Before the applicant can remove on-site jurisdictional trees (i.e. trees protected by City ordinance), the applicant must submit a current tree survey report consistent with SPMC regulations detailing the species, health, and condition of all protected trees within the development area. This report will also contain a site plan showing the locations of the trees on-site and their driplines. The report must contain enough information to evaluate the potential impact of any construction, and to assess whether replacement on-site is appropriate, or an in-lieu fee should be assessed. If it is determined that a protected tree will be impacted, the value of that tree will be assessed in order to provide accurate mitigation; mitigation in the form of replacement trees or an in-lieu fee is required for all impacted or removed trees. The applicant will coordinate specific mitigation with the City before any removal activities.</p>	<p>City of Santa Paula</p>	<p>Before on-site tree removal</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure BR-5 The landscaping plan, prepared by the Applicant and/or its contractor must include the planting of trees along the eastern development (Haun Creek area)/open space (natural areas located to the north interface, where practicable, to minimize nighttime lighting and glare. The landscaping plan must be prepared by a qualified landscape architect, must use native plant and tree species, and must be approved by the City.</p>	<p>City of Santa Paula</p>	<p>As part of final project design</p>	<p>Director of Public Works and Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure BR-6a A public awareness program must be developed to restrict public access in open space areas on the project site to designated trails and to prevent unleashed domestic animals from entering these areas. This program must include, among other things, posting signs identifying ecologically sensitive areas, using temporary fencing around sensitive areas that appear to be receiving a high level of disturbance, and promoting public education and awareness of the local biological resources and their sensitivity. The applicant and/or its contractor must be responsible for the initial development of the public awareness program and installation of interpretive signs and fencing. The homeowners association (HOA), or an acceptable land manager/agency, as approved by the City of Santa Paula, must be responsible for maintaining this program, including signs and fencing.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification throughout the life of the Project, but at least once annually</p>	<p>Director of Public Works & Home Owners Association (HOA)</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure BR-6b The project applicant or its contractor must install, throughout the project site, waste and recycling receptacles that discourage foraging by wildlife species that are adapted to more urban environments, such as raccoons and skunks.</p>	<p>City of Santa Paula</p>	<p>As part of final project design</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure BR-6c All dogs must be required to be leashed while in the designated open space areas. The HOA, or an acceptable land manager/agency, as approved by the City of Santa Paula, must add a prohibition to the covenants, conditions, and restrictions (CC&Rs) for the community against unleashed dogs in open space areas. To limit impacts associated with domestic cats, the CC&Rs must require that bells hanging from collars must be placed on all cats owned by residents of the project.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification throughout the life of the Project, but at least once annually</p>	<p>Director of Public Works & Home Owners Association (HOA)</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure BR-6d The HOA, or an acceptable land manager/agency must supply educational information to future residents of the project site regarding the importance of not feeding wildlife, ensuring that trash (containing food) is not accessible to wildlife, keeping the ground free of fallen fruit from trees, and not leaving pets or pet food outside.</p>	<p>City of Santa Paula</p>	<p>During 1st month of residential occupancy and a yearly reminder thereafter</p>	<p>Director of Public Works & Home Owners Association (HOA)</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure BR-7 Certain ornamental plants are known to escape from planted areas and invade into native plant communities. In order to protect native plant communities established within the Specific Plan area and located in the adjacent Haun Creek, the plants listed in Table 4.7-4 (See Section 4.7, Biological Resources), must not be planted within the common landscaped areas of the proposed site plan. This list must also be distributed to new homeowners and included within the CC&Rs. The landscaping plans within common areas of the project must be reviewed by a qualified botanist who must recommend appropriate provisions to prevent other invasive plant species from colonizing remaining natural areas. These provisions may include the following: (a) review and screening of proposed plant palette and planting plans to identify</p>	<p>City of Santa Paula</p>	<p>During planting/landscaping and as part of the CC&Rs</p>	<p>Director of Public Works & Home Owners Association (HOA) Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	SIGNATURE
<p>and avoid the use of invasive species; (b) weed removal during the initial planting of landscaped areas; and (c) the monitoring for and removal of weeds and other invasive plant species as part of ongoing landscape maintenance activities. The frequency and method of monitoring for invasive species must be determined by a qualified botanist.</p> <p>Measure BR-8 Before widening of State Route 126 between Briggs and Peck Roads, a habitat evaluation and preliminary jurisdictional analysis must be undertaken to determine if sensitive plant or animals could be affected by the proposed action. In the event suitable habitat for sensitive species is present on-site, focused surveys for these species will be undertaken. Provided these species are present, applicable avoidance/minimization measures will be undertaken, per resource agency requirements and applicable permits will be obtained. Similarly, provided the on-site drainages are determined to be jurisdictional, applicable permits from the affected resource agencies will be required.</p>	<p>City of Santa Paula</p>	<p>Before widening of State Route 126</p>	<p>Public Works Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>GEOLOGY AND SOILS</p>					
<p>Measure G-1 Additional explorations must be performed at the tentative tract map and grading plan review stages of the development planning. The purpose of the explorations would be to establish required removal depths and delineate the transition from the finer-grained soils in the eastern portion of the project site deemed susceptible to seismically-induced settlement to the rocky soils of the western part where the soils are not deemed vulnerable to seismically-induced settlement.</p>	<p>City of Santa Paula</p>	<p>Before grading and final geotechnical recommendations</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	DOCUMENTATION OF COMPLIANCE SIGNATURE
<p>Measure G-2 Additional explorations (deep bucket auger borings or continuous core drilling) of the slope and ridgelines above the planned Santa Paula Creek neighborhood (Unit A) should be performed at the tentative tract map stage in order to verify their susceptibility to landslides, mudflows, and seismically-induced instability.</p>	<p>City of Santa Paula</p>	<p>Before grading and final geotechnical recommendations</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-3 To the greatest extent possible, equipment that can penetrate very boulder-rich strata should be used for the exploratory drilling.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-4 To aid in planning and to provide data for use in analyses, water level monitoring wells should be installed at the project site. At least four monitoring wells, one well in each quadrant of the project site, should be installed. The wells should extend to at least 60 feet bgs and should be protected with vaults. The wells should be installed as soon as possible and monitored at least monthly until the basic water level patterns have been determined and at least quarterly thereafter for assessment of yearly trends.</p>	<p>City of Santa Paula</p>	<p>At the earliest feasible date and before implementation of each Phase (I, II, III, IV). Wells to be monitored at least monthly until basic water level pattern is determined, and at least quarterly thereafter.</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	SIGNATURE
<p>Measure G-5 Within the northwest corner of the project site, below the slope that faces west toward Santa Paula Creek, habitable or essential service structures should not be planned within the "Preliminary Setback" zone depicted on Plate 1 of the Preliminary Geotechnical Investigation Report or the adjacent slopes. The setback line is based on the location of the toe of an imaginary slope composed of same materials as the existing slope and having a static factor of safety of at least 1.5 and a pseudo-static factor of safety of at least 1.1.</p>	<p>City of Santa Paula</p>	<p>As part of final project design</p>	<p>Director of Building & Safety and Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-6 Water should not be allowed to pond or accumulate anywhere on the project site except in designated detention or debris basins. Pad drainage should be designed to collect and direct surface water away from structures to approved drainage facilities.</p>	<p>City of Santa Paula</p>	<p>As part of final project design</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-7 Detention basins or debris basins should be incorporated into the project design below canyon areas.</p>	<p>City of Santa Paula</p>	<p>As part of final project design</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-8 Grading at the project site should consist of removal and replacement of the upper on-site soils and placement of compacted fill. Over excavation of the upper soils should be performed to provide support for foundations, floor slabs, and paving. Backfills will be required for utilities, walls, and foundations.</p>	<p>City of Santa Paula</p>	<p>During grading and construction activities</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	DOCUMENTATION OF COMPLIANCE SIGNATURE
<p>Measure G-9 Field investigations indicate that a significant amount of oversized material (boulders) would be encountered during grading. Oversize materials (generally greater than 8 inches; refer to "Material for Fill" below) can cause problems with utility trenching and foundations for structures. The presence of the oversize materials may make it prudent to over excavate areas where utilities and other subsurface construction will occur. The need for processing and special handling of oversized materials (i.e., screening, crushing, or disposal of) should be considered.</p>	<p>City of Santa Paula</p>	<p>During grading, excavation and construction activities</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-10 Project site preparation should include the following:</p> <ul style="list-style-type: none"> • Removal of existing vegetation and debris from the project site. • Over excavation of the upper soils to remove soils disturbed by past site uses and demolition activities. • Additional over excavation to allow placement of compacted fill beneath the proposed building foundations. For preliminary planning purposes, the over excavation should be expected to extend at least 5 feet below the existing grade or as required to allow placement of at least 3 feet of compacted fill beneath the proposed building foundations. The over excavation should extend beyond the building footings in plan view at least a distance equal to the thickness of the fill underlying the footings, but no less than 5 feet. Deeper removals should be made where obviously unsuitable materials are 	<p>City of Santa Paula</p>	<p>During site preparation</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>encountered.</p> <ul style="list-style-type: none"> Generally, to provide suitable soils for support of the proposed paving, at least the upper 2 feet of the soils in those areas should be excavated. The over excavation should extend at least 2 feet beyond the paved areas in plan. However, for roads under the jurisdiction of the California Department of Transportation (Caltrans), the over excavation should comply with the Caltrans requirements. Deeper removals should be made where obviously unsuitable materials are encountered. To facilitate installation of utilities, including storm drains, the on-site materials should be over excavated to at least one-half of the diameter/width of the utility or 1-foot, whichever is deeper, below the proposed invert of the utilities. The excavated materials should be replaced with soils containing materials less than 3 inches in size with no more than 25 percent larger than 1½ inches in size. The over excavation should extend in plan view 1 foot beyond the utility or one-half the depth of the over excavation, whichever is greater. 	<p>City of Santa Paula</p>	<p>During site preparation, grading, excavation and construction activities</p>	<p>Director of Public Works and Director of Building & Safety</p>		
<p>Measure G-11 Required fill soils should be placed in accordance with the following recommendations:</p> <ul style="list-style-type: none"> The fill soils should be placed in loose layers that do not exceed 8 inches in thickness per layer. Each layer should be spread evenly and thoroughly mixed during spreading to promote uniformity of the materials and moisture content. 				<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<ul style="list-style-type: none"> • The moisture content of the fill soils at the time of compaction should be brought to approximately 110 percent to 120 percent of optimum moisture content. The moisture content should be uniform throughout the soils. • Fill soils should be mechanically compacted to at least 90 percent of their maximum dry density as determined by the ASTM Designation D1557 Method of Soil Compaction. • Flooding should not be permitted. For Caltrans roads, the upper 2~ feet of the sub grade soils should be compacted to at least 95 percent. • The placement and compaction of fill materials should be under the continuous observation of the Geotechnical Consultant. 	<p>City of Santa Paula</p>	<p>During site preparation, grading, excavation and construction activities</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-12 The on-site soils, less debris or organic matter, may be used in required fills and backfills. Soils with an expansion index of 30 or higher should not be used within 5 feet of the sub grade beneath floor slabs. The expansion index of the upper fill soils should be checked before and at the completion of grading. Some of the on-site clay soils are expansive and their placement in fills beneath buildings, flatwork, pools, and other structures should be avoided.</p>					

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<p>Measure G-13 Generally, rocks larger than 8 inches in greatest dimension should not be placed in fills. However, in deeper (approximately 15- foot deep) fills, rocks up to 12 inches in size may be placed in the deeper portions of the fills in accordance with specific recommendations. Rocks larger than 4 inches in greatest dimension should not be placed in utility backfills. Gravel and cobbles incorporated into fills should be thoroughly mixed into the soil, and should not be clumped or segregated in heaps. Observations of the materials at the project site indicate a significant amount of oversize material should be expected to require processing for use in compacted fills.</p>	<p>City of Santa Paula</p>	<p>During site preparation, grading, excavation and construction activities</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-14 Approximately 15 percent to 20 percent shrinkage of the upper, approximately 5 feet, soils should be expected when they are over excavated and replaced as compacted fill. Crushing of oversize materials will cause apparent bulking that is not considered in the quoted shrinkage value. Shrinkage value should be revised to accommodate the crushing of oversize material.</p>	<p>City of Santa Paula</p>	<p>During site preparation, grading, excavation and construction activities</p>	<p>Director of Building & Safety and Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-15 Manufactured permanent slopes should be inclined at 2: 1 or flatter.</p>	<p>City of Santa Paula</p>	<p>During site preparation, grading, excavation and construction activities</p>	<p>Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>Measure G-16 The reworking of the upper soils and the compaction of all required fill and backfill should be observed and tested during placement by the Geotechnical Consultant of Record.</p>	<p>City of Santa Paula</p>	<p>During placement by the Geotechnical Consultant of Record</p>	<p>Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-17 The governmental agencies having jurisdiction over the project should be notified before commencement of grading so that the necessary grading permits can be obtained and arrangements made for the required inspection or inspections.</p>	<p>City of Santa Paula</p>	<p>Before grading activities</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-18 Provided that the soils loosened by clearing of the project site, together with over excavation and recompacted of the upper soils, it is expected that low- to relatively light mid-rise buildings in the western portion of the project site may be supported on conventional shallow footings underlain by compacted fill. In the eastern portion of the project site, the low-rise buildings may be supported on post-tensioned slabs or mat-type foundations. More detailed recommendations should be developed at the completion of additional explorations and testing.</p>	<p>City of Santa Paula</p>	<p>During site preparation, grading, excavation and construction activities</p>	<p>Director of Building & Safety and Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>Measure G-19 It is expected that taller or relatively heavy buildings or structures in the western portion of the project site can be supported on conventional shallow footings. In the eastern portion of the project site, building specific investigations should be performed and project specific recommendations developed.</p>	<p>City of Santa Paula</p>	<p>Before construction</p>	<p>Director of Building & Safety and Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-20 As with foundations, provided that the soils loosened by clearing of the project site, together with over excavation and recompacted of the upper soils, it is expected that floor slabs in the western portions of the project site may be supported on-grade. If desired, post-tensioned floor slabs may be used for these structures. Floor slabs beneath indoor living spaces, as opposed to garages or patios, in all areas of the project site should be underlain by a vapor retarder or barrier.</p>	<p>City of Santa Paula</p>	<p>Before construction</p>	<p>Director of Building & Safety and Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure G-21 Under the Earthquake Design regulations of Chapter 16, Divisions IV and V of the 2007 edition of the California Building Code (CBC) and ASCE7-05, the following coefficients and factors apply to lateral-force design for structures at the project site: <i>(For the coefficients and factors table, refer to Section 4.8 (Geology and Soils) of the DEIR.)</i></p>	<p>City of Santa Paula</p>	<p>Before approval and City issues building permits</p>	<p>Director of Building & Safety and Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>HYDROLOGY AND WATER QUALITY</p> <p>Measure H-1 Grading may occur during the rainy season from October 15th to April 15th only in compliance with the Draft Ventura County Municipal Separate Storm Sewer System Order (National Pollutant Discharge Elimination System (NPDES) (NPDES No. CAS004002), as it may be adopted or amended.</p>	<p>City of Santa Paula</p>	<p>From October 15th to April 15th</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure H-2 Temporary irrigation, hydroseeding, and erosion control/sedimentation control measures must be implemented on all temporary grading. Temporary grading is defined to be any grading partially completed and any disturbance of existing natural conditions due to construction activity. These measures will apply to temporary grading activity that remains or is anticipated to remain unfinished or undisturbed in its altered condition for a period of time greater than 30 days or until the beginning of the rainy season whichever comes first.</p>	<p>City of Santa Paula</p>	<p>Before the beginning of the rainy season or 30-days following any temporary grading</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure H-3 During site preparation and construction, the Applicant and/or its contractor must minimize disturbance of natural groundcover on the project site until such activity is required for grading and construction purposes. During grading operations, the Applicant and/or its contractor must employ a full-time superintendent for NPDES compliance. If determined necessary by the City Engineer, the NPDES superintendent must be present on the project site not only during normal working hours, (e.g., Monday through Friday), but also on all other days when the probability of rain is 40 percent or higher, as well as before the start of and during all</p>	<p>City of Santa Paula</p>	<p>During site preparation, grading and construction activities & before forecasted storm events</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>grading or clearing operations until the release of grading bonds.</p> <p>The NPDES superintendent must perform site inspections before a forecast storm, during an extended storm, and after storms. The NPDES superintendent must have full authority to hire personnel, bind the Applicant and/or its contractor in contracts, rent equipment, and purchase materials to the extent needed to effectuate BMPs. The NPDES superintendent must have certifications and training as per the Storm Water Practitioner requirements of the 2007 General Construction Permit, and must provide proof to the City Engineer of satisfactory completion of courses and certifications to meet permit requirements and any requirements imposed by the City. Proof of such attendance and completion must be provided to the City Engineer before employment of the NPDES superintendent. The project must follow requirements specified in the City of Santa Paula Municipal Code related to Stormwater Quality Management.</p>					

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<p>Measure H-4 Before the City issues an initial grading permit, the Applicant and/or its contractor must have prepared a Stormwater Quality Urban Impact Mitigation Plan (SQUIMP), including Non-Structural, Source Control, and Structural BMPs. A Certified Erosion and Sediment Control Professional or qualified Civil Engineer must prepare the SQUIMP. The SQUIMP must be reviewed and approved as per the requirements of Ventura County and/or the City Engineer. The development of the SQUIMP must conform to the Ventura County NPDES permit, the SQUIMP standards, and the Technical Guidance Manual for Storm Water Quality Control Measures.</p>	<p>City of Santa Paula</p>	<p>Before City issues grading permits</p>	<p>Director of Public Works and Director of Building & Safety</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure H-5 The SQUIMP must include structural and/or treatment BMPs. The structural BMPs must focus on meeting potential TMDL and pollutant standards for residential developments. The treatment BMPs must conform to the <i>Technical Guidance Manual for Storm Water Control Measures</i>. The SQUIMP guidelines contained in the <i>National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements</i> for Ventura County.</p>	<p>City of Santa Paula</p>	<p>Before City issues grading permits</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>Measure H-6 The Applicant and/or its contractor must coordinate in advance with the Ventura County Watershed Protection District (VCWPD) before on-site construction activities. In particular, the Applicant and/or its contractor must ensure that proposed facilities, including the upper and lower Haun Creek/Orcutt Canyon detention basins and Santa Paula Creek Bridge meet VCWPD life safety standards. In addition, all necessary permits for these facilities must be obtained in advance and meet VCWPD standards, including no increase in peak runoff rates in any storm frequency.</p>	<p>City of Santa Paula</p>	<p>Before City issues grading permits</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>HAZARDS AND HAZARDOUS MATERIALS</p>					
<p>Measure HM-1 The project applicant and/or its contractor must ensure that material deliveries associated with construction of the proposed project do not contain hazardous materials that would be transported along Padre Lane or within one-quarter mile of a school.</p>	<p>City of Santa Paula</p>	<p>On-going during construction activities</p>	<p>Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure HM-2 The applicant and/or its contractor must coordinate in advance of construction with the Santa Paula Fire Department to ensure that road closures (temporary or permanent) are identified and that alternate access and evacuation routes are determined in the event of an emergency and/or natural disaster.</p>	<p>City of Santa Paula</p>	<p>Before construction activities</p>	<p>Director of Public Works, Fire Chief & Police Chief</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>Measure HM-3 The applicant and/or its contractor must coordinate in advance of construction with the Santa Paula Fire Department to ensure that a Health Safety Plan or procedures are in place to address potential incidences of wildfires occurring on-site or originating off-site.</p>	<p>City of Santa Paula</p>	<p>Before construction activities</p>	<p>Director of Public Works and Fire Chief</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure HM-4 Procedures to minimize the generation of sparks, open flames, and other potential ignition sources, and the release of hazardous or flammable substances such as gasoline or diesel, must be instituted during operational and maintenance activities associated with the Agriculture Preserve and be contained within a Health and Safety Plan located on-site and provided to all employees working within this area. In addition, the Health and Safety Plan must be developed in advance of project approvals and in coordination with the Santa Paula Fire Department.</p>	<p>City of Santa Paula</p>	<p>Development of Safety Plan before project approvals Ongoing verification of Safety Plan implementation during operational and maintenance activities within the Agricultural Preserve</p>	<p>Director of Public Works and Fire Chief</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure HM-5 A Fire Protection Plan (FPP) must be prepared in advance of construction of all phases of development of the proposed project and submitted for review and approval by the Santa Paula Fire Department. The FPP at a minimum will be required to address the following:</p> <ul style="list-style-type: none"> • Fuel Management Program incorporating fuel modification at the community edge and irrigated landscaping and maintenance of the community landscape • Landscape palettes approved by the Santa Paula Fire Department in the fuel modification zones • Design and building construction fire 	<p>City of Santa Paula</p>	<p>Before construction activities</p>	<p>Director of Public Works, Director of Building & Safety and Fire Chief</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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safety features including: 1. Automatic fire sprinkler systems (per state requirements) in all enclosed, occupied structures, community wide 2. Class A roofs community wide 3. Additional building construction features, including boxed in eaves, on sides of structures adjacent to fuel modification zones	City of Santa Paula	Before construction activities	Director of Public Works, Director of Building & Safety and Fire Chief	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
Measure HM-6 A Fuel Modification Plan (FMP) must be prepared in advance of construction of all phases of development of the proposed project and submitted for review and approval by the Santa Paula Fire Department (Please refer to Section 10.0, Hazards and Hazardous Materials, for additional requirements that must be adhered to in the FMP).	City of Santa Paula	During high fire potential days	Director of Public Works, Director of Building & Safety and Fire Chief	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
Measure HM-7 If deemed necessary, the Santa Paula Fire Department may at its discretion require exclusionary fencing around the Agriculture Preserve and/or limit access to this area by local residents during high fire potential days (e.g., "Red Flag Days").	City of Santa Paula	As part of final project design	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
Measure HM-8 A 300 foot setback will be required for all residential and parkland uses located adjacent to the Agricultural Preserve.	City of Santa Paula				

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AESTHETICS					
Measure A-1 Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula, Planning Director for approval that identifies the types of shielding that will be used for outside lighting. Shielding will eliminate uplighting and ensure that light generated on the site does not spill over onto adjacent off-site properties.	City of Santa Paula	Before the City issues grading permits	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
CULTURAL AND SCIENTIFIC RESOURCES					
Measure C-1 Before the initiation of earthmoving activities associated with the development of the project site, the services of a qualified paleontologist approved by the City and LACM will be retained.	City of Santa Paula	Before commencement of grading activities	Paleontological Monitor in coordination with the Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
Measure C-2 Before the initiation of earthmoving activities associated with the development of the project site, the paleontologist or another mitigation program staff member will conduct a field survey of that portion of the project site underlain by older alluvium to locate and recover any larger fossil remains that might occur at currently unrecorded fossil sites, and to document the presence of strata suitable for containing larger fossil remains or for the collection and processing of sediment or rock samples to allow for the recovery of smaller fossil remains.	City of Santa Paula	Before grading activities	Paleontological Monitor in coordination with the Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

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<p>Measure C-3 The paleontologist will develop a formal agreement with a recognized museum repository, such as the LACM, regarding final disposition and permanent storage and maintenance of any fossil remains that might be recovered as a result of the mitigation program, the archiving of associated specimen data and corresponding geologic and geographic site data, and the level of treatment (preparation, identification, curation, cataloging) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Paleontological Monitor in coordination with the Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure C-4 The paleontologist or another mitigation program staff member will coordinate with appropriate construction contractor personnel to provide information regarding City and County requirements concerning the protection of paleontologic resources. Contractor personnel, particularly heavy-equipment operators, also will be briefed on procedures to be followed in the event that fossil remains and a currently unrecorded fossil site are encountered by earthmoving activities, particularly when the monitor is not on-site. The briefing will be presented to new contractor personnel as necessary. Names and telephone numbers of the monitor and other appropriate mitigation program personnel will be provided to appropriate contractor personnel.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Paleontological Monitor in coordination with the Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>Measure C-5 Earthmoving activities will be monitored by the paleontologist only in those areas of the project site where these activities will disturb previously undisturbed strata. Monitoring will be conducted on a full-time basis in areas underlain by the Saugus Formation, on a half-time basis in areas underlain by older alluvium and, at depths greater than 5 feet below current grade, the younger alluvium. If fossil remains are encountered by earthmoving activities in an area underlain by older or younger alluvium and following approval from the City, monitoring will be increased to full time, at least in the vicinity of the fossil site. On the other hand, if no fossil remains are found once 50 percent of earthmoving activities have been completed in an area underlain by a particular rock unit, monitoring can be reduced to half time in the remainder of the area underlain by the Saugus Formation, and to quarter time in an area underlain by older or younger alluvium following approval from the City.</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Paleontological Monitor in coordination with the Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure C-6 If any paleontological resources are encountered during construction in this area, activities in the immediate area of the find will be halted and the discovery assessed. The paleontologist will recommend appropriate mitigation measures pursuant to guidelines developed by the Society of Vertebrate Paleontologists (SVP).</p>	<p>City of Santa Paula</p>	<p>Ongoing verification during grading, excavation and construction</p>	<p>Paleontological Monitor in coordination with the Director of Public Works</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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<p>Measure C-7 All fossil specimens recovered from the project site as a result of the mitigation program, including those recovered as the result of processing fossiliferous rock samples, will be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock or sediment samples from the older and younger alluvium will be submitted to commercial laboratories for microfossil, pollen, radiometric dating, or other analysis, as appropriate.</p>	City of Santa Paula	Ongoing verification during grading, excavation and construction	Paleontological Monitor in coordination with the Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure C-8 The paleontologist will maintain daily monitoring logs that include the particular tasks accomplished, the earthmoving activity monitored, the location where monitoring was conducted, the rock unit encountered, the fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data. A final technical report of results and findings will be prepared by the paleontologist, in accordance with any City requirement.</p>	City of Santa Paula	Ongoing verification during grading, excavation and construction	Paleontological Monitor in coordination with the Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure C-9 An archaeologist monitor must be present during topsoil grading of any of the historical archaeological sites L-2 through L-5.</p>	City of Santa Paula	Ongoing verification during grading, excavation and construction	Archaeological Monitor in coordination with the Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

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MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	DOCUMENTATION OF COMPLIANCE SOURCE	SIGNATURE
<p>Measure C-10 The following mitigation measures were developed to avoid or minimize the potential impacts of the proposed project related to historic resources.</p> <p>Impact A:</p> <p>Interpretative Plan. The applicant is required to produce an historical interpretation plan for the property. This plan includes a permanent, on-site display within a public area which will provide historic information about the founding and history of the Teague-McKevett Ranch. Historic and/or contemporary photographs and other artifacts and materials should be included within the display. Other indoor or outdoor interpretive displays must be produced, as appropriate. The precise content, format, and location and design must be determined by a qualified historic preservation professional, and subject to the approval by the City of Santa Paula. The Teague-McKevett Ranch archives must be used in preparing the exhibit and will include without limitation journals, annual reports, financial records, shipping records, ledgers, correspondence, maps, photographs, and architectural plans. In addition, interviews with former employees must be undertaken by an historian qualified to document oral history.</p>	<p>City of Santa Paula</p>	<p>As part of final project design</p>	<p>Planning Director</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA I SPECIFIC PLAN EIR**

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<p>Documentation. In consultation with a qualified historic preservation professional, the applicant must produce a Documentation Report consisting of archival quality photographs and a measured site plan of the buildings, structures and landscape features to be demolished or relocated. As a part of the Documentation Report, the applicant must compile a comprehensive inventory of historic features on the property, including without limitation buildings, structures, objects, irrigation and drainage features, and landscape materials. Copies of the Documentation Report must be submitted to appropriate local archives.</p>					
<p>The Teague-McKevev Company archives must be located and a comprehensive inventory completed by a qualified archivist. The archive must be donated to an appropriate public library or museum repository. Possible repositories include the Ventura County Museum library and/or the Huntington Library.</p> <p>Rehabilitation/Adaptive Reuse Plan. A rehabilitation and adaptive reuse plan for all eligible buildings, structures and objects which will be preserved must be developed. The plan must conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties and be prepared by a qualified historic preservation professional and be based to the greatest extent feasible on historical data. To the greatest extent feasible, the preservation and rehabilitation of historic features on the property must be incorporated into the development plan.</p>					

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<p>Impact B:</p> <p>Design. The new construction must be screened from the historic district in such a manner as to minimize its visual impact upon the district. Screening methods may include historic landscape materials (e.g., citrus trees) planted along perimeter fences or walls, and/or tall skyline trees planted within the site to simulate wind rows, or other such materials as may be effective and appropriate for the purposes of integrating the new construction into the agricultural landscape to the greatest extent feasible.</p>					
PUBLIC SERVICES					
<p>Measure PS-1 The project applicant and/or its contractor must dedicate one acre of land (at no cost to the City) within the proposed Santa Paula Creek Civic District or Railroad District, the location of which is to be determined in consultation with the SPFD. The facility must include office and living features necessary to serve assigned employees. The location must not be within a flood zone or seismic zone of concern, protected from wildfire, and have good road access unhindered from potential collapse threats such as bridges or power lines. In addition, the land must meet all facility standards within adopted code.</p>	City of Santa Paula	Before the City records the first Tentative Tract Map	Fire Chief	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure PS-2 The project applicant and/or its contractor must provide a new type one fire apparatus (pumper) to meet fire suppression, medical emergency and response time requirements for the proposed project.</p>	City of Santa Paula	Before City issues certificates of occupancy for Phase I	Fire Chief	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

**MITIGATION MONITORING AND REPORTING PROGRAM
EAST AREA 1 SPECIFIC PLAN EIR**

MITIGATION MEASURE	AGENCY RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	COMPLIANCE MONITOR	SOURCE	DOCUMENTATION OF COMPLIANCE SIGNATURE
<p>Measure PS-3 The project applicant and/or its contractor must contribute its fare share portion for the following:</p> <ul style="list-style-type: none"> • Fire Personnel <ul style="list-style-type: none"> ➢ 12 full time fire personnel comprised of the following: <ul style="list-style-type: none"> • Three Battalion Chiefs • Three Captains • Three Engineers • Three Fire fighters • Civilian Staff <ul style="list-style-type: none"> ➢ One Fire Prevention Officer ➢ One Office Secretary 	<p>City of Santa Paula</p>	<p>Before City issues certificates of occupancy for Phase I</p>	<p>Fire Chief</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>
<p>Measure PS-4 Automatic fire sprinkler systems must be installed in all new construction within the project site (as required by State law). The design and installation of this automatic fire sprinkler system must follow the applicable NFPA 13, 13-D, or 13-R requirements. Before installation, plans must be submitted for approval to the City of Santa Paula Fire Department. In addition, all underground and overhead portions of fire sprinkler systems and their water supplies must be inspected, tested, and accepted as witnessed by the SPFD before occupancy.</p>	<p>City of Santa Paula</p>	<p>Before City issues certificates of occupancy for new buildings</p>	<p>Director of Building & Safety and Fire Chief</p>	<p>(Title of Monitoring Report or Recording Document (if applicable))</p>	<p>(Signature/Date of Compliance)</p>

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EAST AREA I SPECIFIC PLAN EIR**

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<p>Measure PS-5 The project applicant and/or its contractor must dedicate office space totaling 2,142 square feet (at no cost to the City) within the proposed Civic District, the location of which is to be determined in consultation with the SPPD. The facility must include office and facilities necessary to serve sworn officers and civilian staff. The location must not be within a flood zone or seismic zone of concern, protected from wildfire, and have good road access unhindered from potential collapse threats such as bridges or power lines.</p>	City of Santa Paula	Before completion of Phase II	Police Chief	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
RECREATION					
<p>Measure R-1 As a project design feature, the applicant and/or its contractor must provide at least 26.4 acres of parkland within the Specific Plan project site, as identified within Section 3.0 (Project Description) (shown on Figure 3-5) and Table 4.14-3 of this EIR (see Section 4.14 (Recreation) of this EIR).</p>	City of Santa Paula	Before completion of Phase II	Community Service Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure R-2 As a project design feature, the applicant and/or its contractor must preserve at least 134.4 acres of Open Space (79.4 acres) and Agricultural Preserve (55 acres), as identified within Section 3.0 (Project Description) (shown on Figure 3-4).</p>	City of Santa Paula	Before the City records the first Tentative Tract Map	Planning Director	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure R-3 The applicant and/or its contractor must pay the impact fees to the City of Santa Paula. If agreed to by the City, the applicant's provision of the amenities described in mitigation measures R-1 and R-2 above can be in lieu of all or a portion of the development fees payable to the City. To ensure that the City of Santa Paula has adequate funds to finance park and recreation improvements, the</p>	City of Santa Paula	Before completion of Phase II	Director of Public Works?	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

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<p>applicant and/or its contractor must either pay the City's related impact fees or provide certain additional project amenities in lieu of all or a portion of such development fees, as negotiated with and agreed to by the City. If agreed to by the City, the amenities in mitigation measures R-1 and R-2 may satisfy the in-lieu-of-fees condition of this mitigation measure (i.e., R-3). The applicant will not be required to provide park or open space amenities and pay related impact fees, unless otherwise agreed to with the City.</p>					
UTILITIES AND SERVICES					
<p>Measure U-1 Before construction, the applicant is responsible for the preparation of an assessment of landfill capacities at Toland Road Sanitary Landfill and Chiquita Canyon Sanitary Landfill. The applicant must coordinate with the both landfill operators to determine whether or not these landfills have adequate capacity to serve the proposed project.</p>	City of Santa Paula	Before construction activities	Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure U-2 The applicant must implement waste reduction and recycling programs to divert construction and operations solid waste from the area landfill. A construction recycling plan must be submitted and approved by the Director of Public Works. A final report as to the amount recycled must be provided to the Director of Public Works.</p>	City of Santa Paula	Before City issues certificates of occupancy	Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure U-3 Solid waste generated during construction and operation of the proposed project must comply with all federal, state and local statutes and regulations to reduce and recycle solid waste.</p>	City of Santa Paula	Ongoing verification during grading, excavation and construction	Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)

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<p>Measure U-4 Before construction, the applicant must coordinate with SCE to determine the electricity consumption related to the proposed project. The applicant must provide detailed site plans which will assist SCE determine the load calculations and the location and amount of new equipment (electrical lines, conduits, transmission mains) needed. SCE will then make the determination of whether the proposed project's electricity consumption is within the parameters of SCE's projected load growth.</p>	City of Santa Paula	Before construction activities	Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
<p>Measure U-5 Before construction, the applicant must coordinate with the cable and telephone/internet providers to determine the amount of new equipment and/or infrastructure and facilities needed to provide adequate service to customers within the project site.</p>	City of Santa Paula	Before construction activities	Director of Public Works	(Title of Monitoring Report or Recording Document (if applicable))	(Signature/Date of Compliance)
POPULATION AND HOUSING					
No mitigation is required	None required.	None required.	None required	None required	None required