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OJAI RANGER DISTRICT
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OJAI, CA 93023

Superintendent
Santa Paula Elem. Sch. Dist.
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Santa Paula, CA 93060

Santa Paula Historical Society
118 S. 8th Street
Santa Paula, CA 93060

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**Mexican American Chamber of
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Santa Paula, CA 93061

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Voters**
P.O. Box 1957
Thousand Oaks, CA 91358

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660 Randy Drive
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**Department of Toxic Substances
Control**
1011 N. Grandview Avenue
Glendale, CA 91201-2205

**CA Dept. of Conservation
Division of Oil and Gas**
1000 S. Hill Road, Suite 116
Ventura, CA 93003-4458

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OXNARD, CA 93030

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Caltrans District 7
Regional Transportation Planning Office
100 South Main Street
Los Angeles, CA 90012

Planning Director
Janna Minsk

ARCHAEOLOGICAL INFORM. CTR
UCLA INSTITUTE OF ARCH.
8163 FOWLER MUSEUM C.H.
LOS ANGELES, CA 90095

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Santa Paula, CA 93060

Santa Paula Airport
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Santa Paula

City Manager
Wally Bobkiewicz

City Attorney
Karl Berger

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119 North 8th Street
Santa Paula, CA 93060

City Council Member
Dr. Gabino Aguirre

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950 COUNTY SQUARE DR #207
VENTURA, CA 93003

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Community Services Director
Brian A. Yanez
530 W. Main Street
Santa Paula, CA 93060

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Ralph J. Fernandez

Council Member
Robert S. Gonzales

Vice Mayor
John T. Procter

Josie Herrera
City Clerk
970 Ventura Street
Santa Paula, CA 93061

City of Filmore
Kevin McSweeney
Community Development Director
250 Central Avenue
Filmore, CA 93015

Public Work Director/
City Engineer
Cliff Finley

Planning Commission
Gary Nasalroad, Chair
L. Steven Brown
Jesse Ornelas
Paul Skeels

Steve Mackinnon
Police Chief
214 S. 10th Street
Santa Paula, CA 93060

Rosa Muñoz
Public Utilities Commission
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Santa Ynez Band of Mission Indians
Tribal Elders Council
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Santa Ynez, CA 93460

Fire Chief
Richard C. Araiza
970 Ventura Street
Santa Paula, CA 93060

Mr. Vincent Armenta, Chairperson
Santa Ynez Band of Mission Indians
P.O. Box 517
Santa Ynez, CA 93460



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA

G11
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

Notice of Preparation

July 28, 2006

To: Reviewing Agencies

Re: East Area 1 Specific Plan
SCH# 2006071134

CITY OF SANTA PAULA
AUG 07 2006
RECEIVED

Attached for your review and comment is the Notice of Preparation (NOP) for the East Area 1 Specific Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Janna Minsk
City of Santa Paula
970 Ventura Street
Santa Paula, CA 93060

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

for
Scott Morgan
Senior Planner, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2006071134
Project Title East Area 1 Specific Plan
Lead Agency Santa Paula, City of

Type NOP Notice of Preparation
Description The East Area 1 Specific Plan consists of approximately 508 acres (ac) located within unincorporated Ventura County, immediately east of the City of Santa Paula. Portions of the site are currently in active production. The following uses are proposed: (1) 1,077 to 1,500 residential dwelling units (du); (2) up to a total of 156,000 square feet (sq ft) of retail commercial space, 113,000 sq ft of office space, and up to 170,000 sq ft of light industrial and research and development space; and (3) approximately 75 ac identified for civic uses (e.g. high school, community college, etc.) and some 170 ac for open space, active parks and agriculture. Discretionary permits include: General Plan, Greenbelt Agreement, Sphere of Influence and City Urban Restriction Boundary amendments, Pre-zoning and Pre-annexation, etc..

Lead Agency Contact

Name Janna Minsk
Agency City of Santa Paula
Phone 805-933-4244
email
Address 970 Ventura Street
City Santa Paula
Fax
State CA **Zip** 93060

Project Location

County Ventura
City Santa Paula
Region
Cross Streets Telegraph Road and Padre Lane
Parcel No. Various
Township 3N **Range** 21W **Section** 1,2,11 **Base** St Paula

Proximity to:

Highways SR-126
Airports Santa Paula Airport
Railways Ventura Co. Tr. Comm.
Waterways Santa Clara River and Santa Paula and Haun Creeks
Schools Various
Land Use County of Ventura: Agriculture, City of Santa Paula: Expansion area including residential, civic, commercial and open space/park

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Cumulative Effects; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Department of Health Services; Native American Heritage Commission; California Highway Patrol; Department of Housing and Community Development; Caltrans, District 7; State Water Resources Control Board, Division of Loans and Grants; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Document Details Report
State Clearinghouse Data Bas

Date Received 07/28/2006 *Start of Review* 07/28/2006 *End of Review* 08/28/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

Resources Agency

Resources Agency
Nadell Gayou

Dept. of Boating & Waterways
David Johnson

California Coastal Commission
Elizabeth A. Fuchs

Colorado River Board
Gerald R. Zimmerman

Dept. of Conservation
Roseanne Taylor

California Energy Commission
Paul Richins

Dept. of Forestry & Fire Protection
Allen Robertson

Office of Historic Preservation
Wayne Donaldson

Dept. of Parks & Recreation
Environmental Stewardship Section

Reclamation Board
DeeDee Jones

S.F. Bay Conservation & Dev't. Comm.
Steve McAdam

Dept. of Water Resources
Resources Agency
Nadell Gayou

Fish and Game

Conservancy

Dept. of Fish & Game
Scott Flint

Environmental Services Division

Fish & Game Region 1
Donald Koch

Fish & Game Region 2
Banky Curtis

Fish & Game Region 3
Robert Floerke

Fish & Game Region 4
Julie Vance

Fish & Game Region 5
Don Chadwick
Habitat Conservation Program

Fish & Game Region 6
Gabrina Gatchel

Habitat Conservation Program
Fish & Game Region 6 I/M
Tammy Allen

Inyo/Mono. Habitat Conservation Program

Dept. of Fish & Game M
George Isaac
Marine Region

Other Departments

Food & Agriculture
Steve Shaffer
Dept. of Food and Agriculture

Dept. of General Services
Public School Construction

Dept. of General Services
Robert Sleppy
Environmental Services Section

Dept. of Health Services
Veronica Malloy
Dept. of Health/Drinking Water

Independent Commissions, Boards

Delta Protection Commission
Debby Eddy

Office of Emergency Services
Dennis Castillo

Governor's Office of Planning & Research
State Clearinghouse

Native American Heritage Comm.
Debbie Treadway

Public Utilities Commission
Ken Lewis

State Lands Commission
Jean Sarino

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans. & Housing

Caltrans - Division of Aeronautics
Sandy Hesnard

Caltrans - Planning
Terri Pencovic

California Highway Patrol
Shirley Kelly
Office of Special Projects

Housing & Community Development
Lisa Nichols
Housing Policy Division

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Jeff Pulverman

Caltrans, District 4
Tim Sable

Caltrans, District 5
David Murray

Caltrans, District 6
Marc Blimbaum

Caltrans, District 7
Cheryl J. Powell

Caltrans, District 8
Dan Kopulsky

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Mario Orso

Caltrans, District 12
Bob Joseph

Cal EPA

Air Resources Board
Airport Projects
Jim Lerner

Transportation Projects
Ravi Ramalingam

Industrial Projects
Mike Tollstrup

California Integrated Waste Management Board
Sue O'Leary

State Water Resources Control Board
Jim Hockenberry
Division of Financial Assistance

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

State Water Resources Control Board
Steven Herrera
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation

Regional Water Quality Control Board (RWQCB)

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

Memorandum

Date: August 25, 2006
To: All Reviewing Agencies
From: Scott Morgan, Senior Planner
Re: SCH # 2006071134
East Area I Specific Plan

CITY OF SANTA PAULA
AUG 30 2006
RECEIVED

Pursuant to the attached letter, the Lead Agency has extended the review period for the above referenced project to September 22, 2006 to accommodate the review process. All other project information remains the same.

cc: Janna Minsk
City of Santa Paula
970 Ventura Street
Santa Paula, CA 93060

VUP DISTRICTION LIST

VN

County: VENTURA

SC# 4 V V V V I L J Q 4

<input type="checkbox"/> Resources Agency Nadeil Gayou	<input type="checkbox"/> Fish & Game Region 3 Robert Fieberke	<input type="checkbox"/> Public Utilities Commission Ken Lewis	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Resources Agency Nadeil Gayou	<input type="checkbox"/> Fish & Game Region 4 Julie Vance	<input type="checkbox"/> State Lands Commission Jean Sarino	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> RWQCB 1 Calileen Hudson North Coast Region (1)
<input type="checkbox"/> Dept. of Boating & Waterways David Johnson	<input checked="" type="checkbox"/> Fish & Game Region 5 Don Chadwick Habitat Conservation Program	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs	<input type="checkbox"/> Fish & Game Region 6 Gabrina Gatchel Habitat Conservation Program	<u>Business, Trans & Housing</u>	<input type="checkbox"/> Caltrans, District 11 Marlo Orso	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Colorado River Board Gerald R. Zimmerman	<input type="checkbox"/> Fish & Game Region 6 UM Tammy Allen Info/Mono, Habitat Conservation Program	<input type="checkbox"/> Caltrans - Division of Aeronautics Sandy Hesnard	<input type="checkbox"/> Caltrans, District 12 Bob Joseph	<input checked="" type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input checked="" type="checkbox"/> Dept. of Conservation Roseanne Taylor	<input type="checkbox"/> Dept. of Fish & Game M George Isaac Marine Region	<input type="checkbox"/> Caltrans - Planning Terri Pencovic	<u>Cal EPA</u>	<input type="checkbox"/> RWQCB 5S Central Valley Region (5)
<input type="checkbox"/> California Energy Commission Paul Richins	<input type="checkbox"/> Dept. of Forestry & Fire Protection Allen Robertson	<input checked="" type="checkbox"/> California Highway Patrol Shirley Kelly Office of Special Projects	<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> Dept. of Forestry & Fire Protection Allen Robertson	<input type="checkbox"/> Food & Agriculture Steve Shaffer Dept. of Food and Agriculture	<input checked="" type="checkbox"/> Housing & Community Development Lise Nichols Housing Policy Division	<input type="checkbox"/> Airport Projects Jim Lerner	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office
<input checked="" type="checkbox"/> Office of Historic Preservation Wayne Donaldson	<input type="checkbox"/> Dept. of General Services Robert Steppy Environmental Services Section	<u>Dept. of Transportation</u>	<input type="checkbox"/> Transportation Projects Ravi Ramalingam	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input type="checkbox"/> Dept. of Parks & Recreation Environmental Stewardship Section	<input type="checkbox"/> Dept. of General Services Robert Steppy Environmental Services Section	<input type="checkbox"/> Caltrans, District 1 Rex Jackman	<input type="checkbox"/> Industrial Projects Mike Tolstrup	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> Reclamation Board DeeDae Jones	<input checked="" type="checkbox"/> Dept. of Health Services Veronica Malloy Dept. of Health/Drinking Water	<input type="checkbox"/> Caltrans, District 2 Marcelino Gonzalez	<input type="checkbox"/> California Integrated Waste Management Board Sue O'Leary	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve McAdam	<input type="checkbox"/> Dept. of Health Services Veronica Malloy Dept. of Health/Drinking Water	<input type="checkbox"/> Caltrans, District 3 Jeff Pulverman	<input type="checkbox"/> State Water Resources Control Board Jim Hockenhaym Division of Financial Assistance	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
<input checked="" type="checkbox"/> Dept. of Water Resources Resources Agency Nadell Gayou	<input type="checkbox"/> Independent Commissions Boards	<input type="checkbox"/> Caltrans, District 4 Tim Sable	<input type="checkbox"/> State Water Resources Control Board Steven Herrera Division of Water Quality	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> Consensancy	<input type="checkbox"/> Delta Protection Commission Debbie Eddy	<input type="checkbox"/> Caltrans, District 5 David Murray	<input type="checkbox"/> State Water Resources Control Board Steven Herrera Division of Water Rights	<input type="checkbox"/> Other
<input type="checkbox"/> Fish and Game	<input type="checkbox"/> Office of Emergency Services Dennis Castillo	<input type="checkbox"/> Caltrans, District 6 Mark Birnbaum	<input checked="" type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center	
<input type="checkbox"/> Dept. of Fish & Game Scott Flint Environmental Services Division	<input type="checkbox"/> Governor's Office of Planning & Research State Clearinghouse	<input checked="" type="checkbox"/> Caltrans, District 7 Cheryl J. Powell	<input type="checkbox"/> Department of Pesticide Regulation	
<input type="checkbox"/> Fish & Game Region 1 Donald Koch	<input checked="" type="checkbox"/> Native American Heritage Comm. Debbie Treadway			
<input type="checkbox"/> Fish & Game Region 2 Banky Curtis				

FROM : MARTIN POTTER CDFG

FAX NO. : 805-640-3677

Aug. 28 2006 12:21PM P1

ARNOLD SCHWARZENEGGER, Governor

State of California - The Resources Agency



DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov
 4949 Viewridge Avenue
 San Diego, CA 92123
 (858) 467-4201



CITY OF SANTA PAULA

AUG 28 2006

RECEIVED

August 28, 2006

Janna Minsk, Planning Director
 City of Santa Paula
 970 Ventura Street
 Santa Paula CA 93060
 Fax No.: (805) 525-8860

**Notice of Preparation of a Draft Environmental Impact Report
 for the East Area 1 Specific Plan Project
 SCH #200571134**

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. The proposed project involves the annexation of 508 acres located east of the City of Santa Paula and north of Highway 126. Proposed land uses include construction of up to 1,500 residences, up to 439,000 ft.² of commercial, office, light industrial and research and development space, 75 acres of civic uses, and 170 acres of open space.

To enable Department staff to adequately review and comment on the proposed project we recommend the following information, where applicable, be included in the Draft Environmental Impact Report:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
 - a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (attachment).
 - b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.
 - c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).

FROM : MARTIN POTTER CDFG

FAX NO. : 805-640-3577

Aug. 28 2006 12:21PM P2

Ms. Janna Minsk
August 28, 2006
Page 2 of 34

- d. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 324-3812 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs), Significant Natural Areas (SNAs), or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction located in or adjacent to the project area must be addressed.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.
 - a. CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic and outdoor artificial night lighting.
 - c. A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
 - d. Impacts to migratory wildlife affected by the project should be fully evaluated. This can include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
 - e. Impacts to all habitats from City or County required Fuel Modification Zones (FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
 - f. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (February 1- August 15) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided

FROM : MARTIN POTTER CDFG

FAX NO. : 805-640-3677

Aug. 28 2006 12:22PM P3

Ms. Janna Minsk
August 28, 2006
Page 3 of 84

and provided with a minimum buffer as determined by a biological monitor (the Department recommends a minimum 500 foot buffer for all active raptor nests).

3. An EIR shall describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines §15126.4(a)(1)). Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed.
 - a. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts. The List of California Terrestrial Natural Communities is available on request or may be viewed and downloaded online by visiting the Department's website at http://www.dfg.ca.gov/whdab/html/natural_communities.html.
 - b. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, native woodlands, etc. should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
5. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:
 - a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
 - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

FROM : MARTIN POTTER CDFG

FAX NO. : 805-640-3677

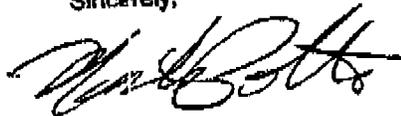
Aug. 28 2006 12:22PM P4

Ms. Janna Minsk
August 28, 2006
Page 4 of 54

6. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.
 - a. The Department requires a streambed alteration agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a stream bed alteration agreement may be a project that is subject to CEQA. To facilitate our issuance of the agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

The Department suggests a pre-project or early consultation planning meeting for all projects. To make an appointment, please call Martin Potter, Wildlife Biologist, at (805) 640-3677. Thank you for this opportunity to provide comment.

Sincerely,


For Larry L. Eng, Ph.D.
Regional Manager
South Coast Region

attachment

cc: Ms. Morgan Wehtje
Department of Fish and Game
Camarillo, California

Mr. Martin Potter
Department of Fish and Game
Ojai, California

Mr. Scott Morgan
State Clearinghouse
Sacramento, California

FROM : MARTIN POTTER CDFG

FAX NO. : 805-648-3677

Aug. 28 2006 12:23PM P5

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted, and what information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:
 - a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
 - b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.
3. Botanical consultants should possess the following qualifications:
 - a. Experience conducting floristic field surveys;
 - b. Knowledge of plant taxonomy and plant community ecology;
 - c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
 - d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
 - e. Experience with analyzing impacts of development on native plant species and communities.
4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:
 - a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

FROM : MARTIN POTTER CDFG

FAX NO. : 805-640-3677

Aug. 28 2006 12:24PM P6

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

- b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.
 - c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.
 - d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.
 - e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.
5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:
- a. Project description, including a detailed map of the project location and study area.
 - b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
 - c. Detailed description of survey methodology.
 - d. Dates of field surveys and total person-hours spent on field surveys.
 - e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
 - f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
 - g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
 - h. Recommended measures to avoid impacts.
 - i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
 - j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
 - k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
 - l. Name of field investigator(s).
 - j. References cited, persons contacted, herbaria visited, and the location of voucher specimens.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 SO. MAIN ST.
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
E-Mail: NersesYerjanian@dot.ca.gov



CITY OF SANTA PAULA
AUG 09 2006
RECEIVED

*Flex your power!
Be energy efficient!*

Ms. Janna Minsk
Department of Community Development
City of Santa Paula
970 Ventura St.
Santa Paula, CA. 93060

IGR/CEQA# 060805/NY
NOP/ East Area Specific Plan
1,500 Residential, 156,000 SF
Commercial, 113,000 SF Office, 170,000
Light Industrial
LA/126/13.14

August 8, 2006

Dear Ms. Minsk:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the East Area Specific Plan.

Based on the information received, and to assist us in our efforts to completely evaluate and assess the impacts of this project on the State transportation system, a traffic study in advance of the DEIR should be prepared to analyze the following information:

Please reference the Department's **Traffic Impact Study Guideline** on the Internet at <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 126.
2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.
3. Analysis of ADT, AM, and PM peak-hour volumes for both existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be

specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
 - ❑ description of transportation infrastructure improvements
 - ❑ financial costs, funding sources and financing
 - ❑ sequence and scheduling considerations
 - ❑ implementation responsibilities, controls and monitoringAny mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.
6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: Additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the project equitable share responsibility.

We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-zone travel forecast modeling might be used.

The Department as a commenting agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestion Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. Therefore State Route(s) mentioned in item #1 and it's facilities must be analyzed per the Department's **Traffic Impact Study Guidelines**.

Ms. Minsk

August 8, 2006

We look forward to reviewing the DEIR. We expect to receive a copy from the State Clearinghouse. However, to expedite the review process, you may send two copies in advance to the undersigned at the following address:

Cheryl J. Powell
IGR/CEQA Branch Chief
Caltrans District 07
Regional Transportation Planning Office
100 S. Main St., Los Angeles, CA 90012

If you have any questions regarding this response, please call the Project Engineer/Coordinator Mr. Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 060805/NY.

Sincerely,



Cheryl J. Powell
IGR/CEQA Branch Chief
Regional Transportation Planning

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



August 24, 2006

Janna Minsk
City of Santa Paula
970 Ventura Street
Santa Paula, CA 93060

CITY OF SANTA PAULA

AUG 28 2006

RECEIVED

Dear Ms. Minsk:

Re: SCH# 2006071134; East Area 1 Specific Plan

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the Fillmore & Western Railway Company right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the City.

Please advise us on the status of the project. If you have any questions in this matter, please contact me at (213) 576-7078 or at rxm@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosa Muñoz".

Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Dave Wilkinson, Fillmore & Western Railroad

Aug-28-2006 14:29

From-DIVISION OF LAND RESOURCE PROTECTION

18153173430

T-798 P.001/005 F-058

STATE OF CALIFORNIA, RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, GOVERNOR



DEPARTMENT OF CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2658 • WEBSITE conservation.ca.gov

CITY OF SANTA PAULA

August 28, 2006

AUG 28 2006

VIA FACSIMILE (305) 525-6660

Ms. Janna Minsk, Planning Director
 City of Santa Paula
 970 Ventura Street
 Santa Paula, CA 93060

RECEIVED

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report
 (DEIR) for the East Area 1 Specific Plan SCH# 2006071134

Dear Ms. Minsk:

The Department of Conservation's Division of Land Resource Protection (Division) monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. The Division has reviewed the above NOP and offers the following recommendations for the DEIR with respect to the project's potential impacts on agricultural land.

The proposed project involves development of a specific plan for a 608-acre area northeast of Santa Paula. Proposed land uses include residential (up to 1500 dwelling units), commercial, office, light industrial/research and development, schools, open space, and agriculture. Approvals would be needed for general plan, greenbelt, and city urban restriction boundary amendments; pre-zoning; sphere of influence amendment; and annexation. The NOP indicates that portions of the site are in active agricultural production and that agricultural resources could be affected by the proposed project. Therefore, the Division recommends that, at a minimum, the following items be specifically addressed to document and treat project impacts on agricultural land and land use.

Agricultural Setting of the Project

The DEIR should describe the project setting in terms of the actual and potential agricultural productivity of the land. The Division's Ventura County Important Farmland Map, which defines farmland according to soil attributes and land use, can be used for this purpose. In addition, we recommend including the following information to characterize the agricultural land resource setting of the project area.

*The Department of Conservation's mission is to protect Californians and their environment by:
 Protecting lives and property from earthquakes and landslides; Ensuring safe mining and oil and gas drilling;
 Conserving California's farmland; and Saving energy and resources through recycling.*

Aug-28-2006 14:29

From-DIVISION OF LAND RESOURCE PROTECTION

10169:73430

T-739 P.002/005 F-069

Ms. Janna Minsk, Planning Director
 August 28, 2006
 Page 2 of 5

- Current and past agricultural use of the project area. Include data on the types of crops grown, and crop yields and farmgate sales values.
- To help describe the full agricultural resource value of the soils on the site, we recommend the use of economic multipliers to assess the total contribution of the site's potential or actual agricultural production to the local, regional and state economies. State and Federal agencies such as the UC Cooperative Extension Service and USDA are sources of economic multipliers.

Project Impacts on Agricultural Land

- Type, amount, and location of farmland conversion resulting directly and indirectly (growth-inducement) from project implementation.
- Impacts on current and future agricultural operations; e.g., land-use conflicts, increases in land values and taxes, vandalism, etc.
- Incremental project impacts leading to cumulatively considerable impacts on agricultural land. This would include impacts from the proposed project as well as impacts from past, current and probable future projects.

Impacts on agricultural resources may also be quantified and qualified by use of established thresholds of significance (California Code of Regulations Section 15064.7). The Division has developed a California version of the USDA Land Evaluation and Site Assessment (LESA) Model, a semi-quantitative rating system for establishing the environmental significance of project-specific impacts on farmland. The model may also be used to rate the relative value of alternative project sites. The LESA Model is available on the Division's website noted later in this letter.

Williamson Act Lands

A project is deemed to be of statewide, regional or area-wide significance if it will result in cancellation of a Williamson Act contract for a parcel of 100 or more acres [California Code of Regulations Section 15206(b)(3)]. Since lands under Williamson Act contract exist within the project area, the Department recommends that the following information be provided in the DEIR:

- A map detailing the location of agricultural preserves and contracted land within each preserve. The DEIR should also tabulate the number of Williamson Act acres, according to land type (e.g., prime or non-prime agricultural land), which could be impacted directly or indirectly by the project.
- A discussion of Williamson Act contracts that may be terminated in order to accommodate the project. The DEIR should discuss the impacts that termination of Williamson Act contracts would have on nearby properties also under contract; i.e., growth-inducing impacts (in the sense that the removal of contract protection

Aug-28-2006 14:28

From-DIVISION OF LAND RESOURCE PROTECTION

18183273490

T-798 P.008/008 P-008

Ms. Janna Minsk, Planning Director
 August 28, 2006
 Page 3 of 5

not only lift a barrier to development, but results in higher property taxes, and thus, an incentive to shift to a more intensive land use, such as urban development.)

As a general rule, land can be withdrawn from Williamson Act contract only through the nine-year nonrenewal process. Immediate termination via cancellation is reserved for "extraordinary", unforeseen situations (See Sierra Club v. City of Hayward (1981) 28 Cal.3d 840, 852-855). The City or County of jurisdiction must approve a request for contract cancellation, and base that approval on specific findings that are supported by substantial evidence (Government Code Section 51282). If Williamson Act contract cancellation is proposed, we recommend that a discussion of the findings be included in the DEIR. Finally, the notice of the hearing to approve the tentative cancellation, and a copy of the landowner's petition, must be mailed to the Director of the Department of Conservation ten (10) working days prior to the hearing. (The notice should be mailed to Bridgett Luther, Director, Department of Conservation, c/o Division of Land Resource Protection, 801 K Street MS 18-01, Sacramento, CA 95814-3528.)

- If there are lands to remain under Williamson Act contract in the project area after project completion, the DEIR should discuss the proposed uses for those lands. Uses of contracted land must meet compatibility standards identified in Government Code Sections 51238 - 51238.3. Otherwise, contract termination (see paragraph above) must occur prior to the initiation of the land use.
- An agricultural preserve is a zone authorized by the Williamson Act, and established by the local government, to designate land qualified to be placed under the Act's 10-year contracts. Preserves are also intended to create a setting for contract-protected lands that is conducive to continuing agricultural use. Therefore, the uses of agricultural preserve land must be restricted by zoning or other means so as not to be incompatible with the agricultural use of contracted land within the preserve (Government Code Section 51230). Therefore, we recommend that the DEIR also discuss any proposed general plan designation or zoning within agricultural preserves affected by the project.
- Pursuant to Government Code §51243, if a city annexes land under Williamson Act contract, the city must succeed to all rights, duties and powers of the county under the contract unless conditions in §51243.5 apply to give the city the option to not succeed to the contract. Although a city may have protested a contract and although LAFCO may have upheld the protest, conditions in §51243.5 may not have been met to give the city the option to not succeed to the contract. A LAFCO must notify the Department within 10 days of a city's proposal to annex land under contract (Government Code §56753.5). A LAFCO must not approve

Aug-28-2006 14:30

From-DIVISION OF LAND RESOURCE PROTECTION

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T-738 P.004/005 P-000

Ms. Janna Minsk, Planning Director

August 28, 2006

Page 4 of 5

a change to a sphere of influence or annexation of contracted land to a city unless specified conditions apply (Government Code §§51295.3, 56426, 56426.5, 56749 and 56856.5).

Mitigation Measures and Alternatives

Feasible alternatives to the project's location or configuration that would lessen or avoid farmland conversion impacts should be considered in the DEIR. Similarly, while the direct conversion of agricultural land is often deemed to be an unavoidable impact by California Environmental Quality Act (CEQA) analyses, mitigation measures must nevertheless be considered.

The Division recommends the purchase of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. We highlight this measure because of its growing acceptance and use by lead agencies as mitigation under CEQA.

Mitigation using conservation easements can be implemented by at least two alternative approaches: the outright purchase of conservation easements tied to the project, or via the donation of mitigation fees to a local, regional or statewide organization or agency, including land trusts and conservancies, whose purpose includes the purchase, holding and maintenance of agricultural conservation easements. For example, the Division's California Farmland Conservancy Program is authorized to accept donations of funds if the Department of Conservation is the designated beneficiary and it agrees to use the funds for purposes of the program in a county specified by the donor. Whatever the approach, the conversion of agricultural land should be deemed an impact of at least regional significance and the search for mitigation lands conducted regionally, and not limited strictly to lands within the Santa Paula area.

Information about conservation easements is available on the Division's website, or by contacting the Division at the address and phone number listed below. The Division's website address is:

<http://www.conservation.ca.gov/DLRP/>

Of course, the use of conservation easements is only one form of mitigation that should be considered. The following mitigation measures could also be considered:

- Increasing home density or clustering residential units to allow a greater portion of the development site to remain in agricultural production.

Aug-28-2006 14:30

From-DIVISION OF LAND RESOURCE PROTECTION

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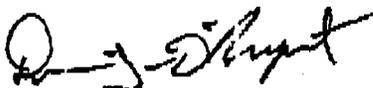
Ms. Janna Minsk, Planning Director
August 28, 2006
Page 5 of 5

- Protecting nearby farmland from *premature* conversion through the use of less than permanent long-term restrictions on use such as 20-year Farmland Security Zone contracts (Government Code Section 51296) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.).
- Establishing buffers such as setbacks, berms, greenbelts, and open space areas to separate farmland from incompatible urban uses.
- Investing in the commercial viability of the remaining agricultural land in the project area through a mitigation bank which invests in agricultural infrastructure, water supplies and marketing.

The Department believes that the most effective approach to farmland conservation and impact mitigation is one that is integrated with general plan policies. For example, the measures suggested above could be most effectively applied as part of a comprehensive agricultural land conservation element in the City's general plan. Mitigation policies could then be applied systematically toward large goals of sustaining an agricultural land resource base and economy. Within the context of a general plan mitigation strategy, other measures could be considered, such as the use of transfer of development credits, mitigation banking, and economic incentives for continuing agricultural uses.

Thank you for the opportunity to comment on the NOP. If you have questions on our comments, or require technical assistance or information on agricultural land conservation, please contact the Division at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 324-0850.

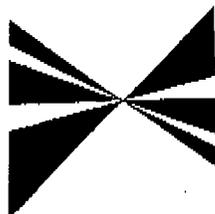
Sincerely,



Dennis J. O'Bryan
Program Manager

cc: Ventura County RCD
P.O. Box 147
Somis, CA 93066

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

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www.scag.ca.gov

Officers: President: Yvonne B. Burke, Los Angeles County • First Vice President: Gary Ovitt, San Bernardino County • Second Vice President: Richard Dixon, Lake Forest • Immediate Past President: Toni Young, Port Hueneme

Imperial County: Victor Carrillo, Imperial County • Ian Edney, El Centro

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Orange County: Chris Norby, Orange County • Christine Barnes, La Palma • John Braunman, Brea • Lou Bona, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Leslie Dugile, Newport Beach • Richard Dixon, Lake Forest • Paul Glaab, Laguna Niguel • Marilyn Poe, Los Alamitos

Riverside County: Jodi Stone, Riverside County • Thomas Burkley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Lovridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Lenny McCallon, Highland • Deborah Robertson, Rialto • Alan Wagner, Ontario

Ventura County: Judy Mikels, Ventura County • Glen Beretta, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Lou Correa, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

August 10, 2006

Ms. Janna Minsk, Planning Director
City of Santa Paula
P. O. Box 569/93061-0569
200 South Tenth Street
Santa Paula, CA 93060

CITY OF SANTA PAULA
AUG 16 2006
RECEIVED

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the East Area Specific Plan
SCAG No. I 20060528

Dear Ms. Minsk:

Thank you for submitting a Notice of Preparation of a Draft Environmental Impact Report for the above-mentioned project to the Southern California Association of Governments (SCAG) for review and comment. SCAG's responsibility as the region's clearinghouse per Executive Order 12372 includes the implementation of California Environmental Quality Act (CEQA) §15125 [d]. This legislation requires the review of local plans, projects and programs for consistency with regional plans.

We have determined that the proposed Project is regionally significant per California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed project consists of up to 1,500 residential units, 156,000 sq. ft. of retail commercial space, 113,000 sq. ft. of office space, up to 170,000 sq. ft. of light industrial and research and development space, 75 acres for civic uses and 170 acres of open space. SCAG bases review of such projects on its adopted regional plans:

Destination 2030: 2004 Regional Transportation Plan (RTP)
Regional Comprehensive Plan and Guide (RCPG) --1996 Version
Compass Growth Vision

CEQA requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and regional plans (Section 15125 [d]). Please state separately how the proposed plan will or will not support each regional plan. Please cite specific policies in the regional plans that the proposed project supports. If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. Visit www.scag.ca.gov for downloadable versions of these documents.

Please provide a minimum of 45 days for SCAG to review the EIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1858. Thank you.

Sincerely,

April Grayson
Associate Regional Planner
Intergovernmental Review

DOCS # 125623v1

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division
Christopher Stephens
Director

August 25, 2006

Janna Minsk, Planning Director
City of Santa Paula
Planning Department
200 South 10th Street
Santa Paula, CA 93060

CITY OF SANTA PAULA
SEP 27 2006
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FAX #: 805-525-6660

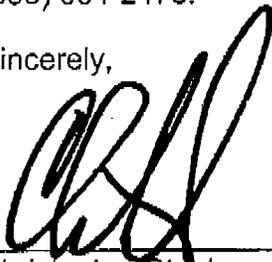
Subject: East Area 1 Specific Plan; Notice of Intent to Prepare a Draft EIR

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document.

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

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Carl Morehouse at (805) 654-2476.

Sincerely,



Christopher Stephens
County Planning Director

G:\Planning Division\Outside Environmental Documents\Response Letters\SantaPaula 06-039

Attachment

County RMA Reference Number 06-039





Office of
AGRICULTURAL COMMISSIONER

P.O. Box 889, Santa Paula, CA 93061
815 East Santa Barbara Street
Telephone: (805) 933-3165, (805) 647-5931
FAX: (805) 525-8922

Agricultural Commissioner
W. Earl McPhail

Chief Deputy
David Buetner

CITY OF SANTA PAULA
SEP 27 2006
RECEIVED

DATE: August 24, 2006
TO: Carl Morehouse, County of Ventura, Planning Division
FROM: Rita Graham, Office of Agricultural Commissioner *RG*
SUBJECT: RMA Reference No. 06-039, Outside Environmental Document Review
City of Santa Paula, Notice of Preparation for Environmental Impact Report;
East Area One Specific Plan

Thank you for the opportunity to comment on the scope and content for the City of Santa Paula East Area One Specific Plan Draft EIR (RMA Ref # 06-039). Comment deadline is August 25, 2006.

Project Description: Development of 508 acres located immediately east of the City of Santa Paula within unincorporated Ventura County on parcels currently in active agricultural production. The proposed project includes developing this area for the following uses:

- (1) 1,077 to 1,500 residential dwelling units, of which 50 – 100 may be commercial assisted-living units and up to 70 may be work/live units
- (2) Up to a total of 156,000 square feet of retail commercial space, 113,00 square feet of office space, and up to 170,000 square feet of light industrial and research and development space; and
- (3) Approximately 75 acres identified for civic uses (e.g. high school, community college, etc.) and some 170 acres for open space, active parks and agriculture.

Associated discretionary approvals would include amending the city's General Plan, the Santa Paula-Fillmore Greenbelt Agreement, tentative parcel or tract map approvals, and growth management allocations.

In additional, a number of actions will be undertaken jointly by the city and Ventura County Local Agency Formation Commission (LAFCO) including approval of a sphere of influence amendment and annexation.

Project Location: The project is a 508 ± acre site located east of Santa Paula Creek and north of the existing railroad right-of-way. The site is not within the City of Santa Paula Sphere of Influence or City Urban Restriction Boundary (CURB).

Comments: The Ventura County Initial Study Assessment Guidelines for Agricultural Resources contain four sections: 7a Soils, 7b Water, 7c Air Quality/Microclimate, 7d Pests/Diseases and 7e Land Use Incompatibility.

RMA Ref # 06-039 City of Santa Paula East Area One Specific Plan
Response to NOP by the Ventura County Agricultural Commissioner's Office
August 24, 2006 Page 2

For Agricultural Resources – Soils, Item 7a, the Ventura County guidelines state thresholds for the permanent conversion of farmland classes based on soil types and related characteristics when they are situated in the General Plan "Agricultural" land use designation. The four classes are: Prime, Statewide Importance, Unique, and Local Importance farmlands.

The Ventura County threshold of significance for permanent conversion of any combination of Prime or Statewide Importance farmland is 5 acres. For Unique farmland, the threshold is 10 acres. For Local Importance farmland the threshold is 15 acres. (For farmland located in the "Open Space" land use designation of the General Plan, the thresholds are 10, 15 and 20 acres, respectively.) According to the Department of Conservation Ventura County Important Farmland (2004) map, the East Area One site appears to have Prime and Unique farmland in the General Plan "Agricultural" land use designation.

The building density of the proposed project is such that the local CEQA thresholds for the permanent conversion of agricultural soils will be exceeded. Ventura County holds that conversion of farmland soil cannot be fully mitigated and requires a Statement of Overriding Considerations in addition to any less-than-full mitigation measures that the jurisdiction may employ.

The Draft EIR should address and mitigate the drainage or runoff from the proposed site onto adjacent County agricultural lands.

For Agricultural Resources – Water, Item 7b, the Ventura County guidelines state that any non-agricultural project that is proposed to use the same water resources as agriculture is presumed to have some impact. The threshold of significance for groundwater quantity is: A use that will cause a net decrease in the availability of water for agriculture is considered to have a significant impact – any use that may increase the net utilization of ground water in an over drafted basin or in a basin in hydrological continuity with an over drafted basin. Currently, neither the Ventura County Agricultural Commissioner nor the Agricultural Policy Advisory Committee (APAC) has any specific policies to limit the use of groundwater for urban uses. However, the Santa Paula basin is considered to be in hydrologic continuity with the over drafted basins to the southwest, and the subject requires specific analysis. The threshold of significance for groundwater quality is: A use that will decrease the quality of surface water available for agriculture to a level greater than 1200 mg/L Total Dissolved Solids (TDS). The Ventura County Watershed Protection Division is best qualified to analyze both the specific water quantity and water quality topics.

The Draft EIR should identify the water source to be used for the proposed project, identify contractual agreements that lessen the availability of agricultural water to surrounding County agricultural properties (if any), and address and mitigate the drainage or runoff from the proposed site onto adjacent County agricultural lands that would affect Total Dissolved Solids measurements in the groundwater.

For Agricultural Resources – Air Quality / Microclimate, Item 7c, the Ventura County guidelines state that any non-agricultural project within one-half mile of land currently in or suitable for agriculture is presumed to have some impact. Specific thresholds of significance

RMA Ref # 06-039 City of Santa Paula East Area One Specific Plan
Response to NOP by the Ventura County Agricultural Commissioner's Office
August 24, 2006 Page 3

are: A 10 percent increase in dust, 10 percent decrease in solar access (shading), removal of any tree row that protects a microclimate, or other substantial adverse change. Any project located within one-half mile of agricultural areas is presumed to have some impact. The Ventura County Air Pollution Control District is best qualified to analyze specific air quality impacts. Solar access for adjacent crops is unlikely to be affected unless structures are of untypical height or setback distances. The report should also review any proposed removal of a tree row that may currently benefit off-site agriculture.

The Draft EIR should disclose that the proposed site is within the threshold distance and is presumed to have some impacts to County agricultural lands. The Draft EIR should identify and mitigate impacts from known or allowable uses on the proposed site that would create dust or other emissions to County agriculture within one-half mile; disclose and mitigate through setbacks the heights of proposed structures that could decrease access to sunlight on adjacent County agricultural properties; disclose and mitigate any proposal to remove a tree row currently protecting adjacent County agriculture; and disclose and mitigate any other use that may cause a substantial adverse change in the air quality or micro climate of a County agricultural property within one-half mile.

For Agricultural Resources – Pests/Diseases, Item 7d, the Ventura County guidelines state that any non-agricultural project within one-half mile of land currently in or suitable for agriculture is presumed to have some impact. There are no specific thresholds. Currently, neither the Ventura County Agricultural Commissioner nor the Agricultural Policy Advisory Committee (APAC) has any policies to limit local urban development on the basis of the control of biological organism pests or diseases.

For Agricultural Resources – Land Use Incompatibility, Item 7e, the issue relates to effects upon the farmland adjacent to the proposed development, farmland that will not be developed. Effects on on-site farmland are discussed in Item 7a above. The Ventura County guidelines state that any proposed non-agricultural project within one-half mile of land currently in or suitable for agriculture is presume to have some impact related to Land Use Incompatibility. Determinations are made on a case-by-case basis, but for residential and urban uses such as dwellings, schools, care facilities, churches, libraries and outdoor recreation, a significant impact is assumed where development is within: (1) 300 feet of irrigated agriculture, (2) 200 feet of dry farming, (3) 100 feet of grazing land or where there is no perimeter fence to keep humans and livestock from crossing property lines.

Section 8109-0.4 of the Ventura County Non-coastal Zoning Ordinance states that permit conditions related to adverse effects on agricultural resources shall be considered and may include buffer zones to minimize effects.

In July 2006, the Ventura County Agricultural Policy Advisory Committee (APAC) approved the Agricultural/Urban Buffer Policy ("Buffer Policy") (attached). The policy recommends setbacks of 300 feet (or 150 feet with a vegetative shelter belt) between non-farming development such as houses and playgrounds and the property boundary lines adjacent to farmland, but only where the off-site adjacent farmland to be protected is outside a city sphere of influence. The purpose of the Buffer Policy is to lessen public exposure to agricultural chemicals, dust, noise and odors and protect agricultural operations from vandalism, pilferage, trespassing and complaints against lawful farming practices.

RMA Ref # 06-039 City of Santa Paula East Area One Specific Plan
Response to NOP by the Ventura County Agricultural Commissioner's Office
August 24, 2006 Page 4

The Ventura County Planning Division has been tasked to develop ordinance language consistent with the APAC Buffer Policy for consideration by the Board of Supervisors. That effort is in process.

The Ventura County Right to Farm Ordinance (Ordinance No. 4151) provides that: *No agricultural activity, operation, or facility that is consistent with [] the General Plan, and is conducted or maintained for commercial purposes in a manner consistent with proper and accepted customs and standards as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after it has been in operation for more than one year if it was not a nuisance at the time it began.*

In summary, the Ventura County Initial Study Assessment Guidelines provide information related to CEQA analysis of Agricultural Resources. The Ventura County Agricultural Policy Advisory Committee (APAC) "Agricultural/Urban Buffer Policy" is a new set of policy recommendations for projects to be located at the agricultural and urban interface. The Ventura County Right to Farm Ordinance provides a basis for rejecting nuisance claims against commercial farms that have been in operation for more than one year. These documents are recommended for consideration.

Sources: The Ventura County Initial Study Assessment Guidelines are viewable at www.ventura.org/planning. The Agricultural/Urban Buffer Policy is attached. The Ventura County Right to Farm Ordinance (No. 4151) protects the County agricultural resources and is viewable at [www.ventura.org/agcommissioner/land use](http://www.ventura.org/agcommissioner/land%20use). The California Department of Conservation publishes "Ventura County Important Farmland (2004).

If you have questions concerning these comments, please contact Rita Graham, Agricultural Land Use Planner, at the Ventura County Agricultural Commissioner's Office, (805) 933-8415 or rita.graham@ventura.org.

RMA Ref # 06-039 City of Santa Paula East Area One Specific Plan
 Response to NOP by the Ventura County Agricultural Commissioner's Office
 August 24, 2006 Page 5

County of Ventura Agricultural/Urban Buffer Policy – Revised 7/19/06

The purpose of this policy is to protect the public health, safety and welfare of the citizens of Ventura County *and* protect the economic viability and long-term sustainability of the Ventura County agricultural industry.

New urban developments (and non-farming activities) should be required to lessen public and animal exposure to agricultural chemicals, dust, noise and odors *and* protect agricultural operations and land from vandalism, pilferage, trespassing and complaints against standard legal agricultural practices.

This Policy provides guidelines to prevent and/or mitigate conflicts that may arise at the agricultural/urban interface. It applies where urban structures or ongoing non-farming activities are permitted adjacent to land 1) in crop or orchard production; or 2) classified by the California Department of Conservation Important Farmland Inventory as Prime, Statewide Importance, Unique or Local Importance farmland. These guidelines apply to projects requiring discretionary approval by the county or a city where the proposed non-farming activity is abutting or on land zoned AE, OS or RA, and the farming activity is located outside a Sphere of Influence, as adopted by LAFCO. The Agricultural Policy Advisory Committee (APAC) or the Agricultural Commissioner may grant an exemption to these policies on a case-by-case basis, where physical factors prevent or alleviate the need for compliance.

Where applicable, urban developments or non-agricultural uses shall be conditioned to provide and maintain a 300-foot setback and chain-link fence on the non-agricultural property between the urban use and the agriculture, or a 150-foot buffer/setback if a vegetative screen as described below is used.

APPLYING THE POLICY TO NEW DEVELOPMENT

New dwellings, non-agricultural work sites and ongoing outdoor public activities potentially conflict with agricultural operations. A buffer/setback and fencing are therefore needed on these sites when they are developed adjacent to the qualifying agricultural land. *A 300-foot setback to new structures and sensitive uses is required on the non-agricultural property unless a vegetative screen is installed. With a vegetative screen the buffer/setback is a minimum of 150-feet.*

Fencing requirements:

A reinforced 8-foot chain link fence with top bar is required on applicable urban developments to deter pilferage and vandalism of crops. Placement is nearest the agricultural side. If the agricultural field has a fence, the requirement may be satisfied.

Minimum standards for vegetative screen (shelter belt):

- Two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown
- Trees and shrubs should be vigorous, drought tolerant and at least 6 feet in height at the time of installation
- Plants should have 50% to 75% porosity (i.e., approximately 50% to 75% of the plant is air space)
- Plant height should vary in order to capture drift within 4 feet of ground applications
- A mature height of 15 feet or more is required for trees

RMA Ref # 06-039 City of Santa Paula East Area One Specific Plan
Response to NOP by the Ventura County Agricultural Commissioner's Office
August 24, 2006 Page 6

- To ensure adequate coverage, 2 staggered rows should be located 5 feet apart and consist of minimum 5 gallon plants at least 6 feet tall planted 10 feet on center
- Recommended plants include: Toyon (*Heteromeles arbutifolia*), Sugarbush (*Rhus ovata*), Laurel sumac (*Malosma laurina*) and Italian cypress (*Cupressus sempervirens*)
- A long-term plan shall be in place for maintaining the vegetative shelter belt

The following uses are acceptable within 300 feet of agriculture:

- Parking lots and garages
- Landscaping/hardscape
- Storage sheds or open storage
- Greenhouse structures with venting away from the non-agricultural area
- Wooden or chain link fencing
- Some types of livestock such as range cattle or sheep (other livestock only as approved by APAC)
- Roads and drainage facilities
- Farmworker dwellings where notification between farmer and occupants can easily occur prior to spraying
- Low human-intensity uses as approved by APAC

The following uses are acceptable within 150 feet of agriculture with a vegetative screen (shelter belt):

- All uses acceptable within 300 feet
- Front yard setbacks
- Hiking, bike or bridle paths
- Single-use facilities for government, institutional or educational use where agreements and notification between parties can easily occur prior to spraying
- Farm and produce stands where notification between farmers and occupants can easily occur prior to spraying
- Agricultural Tourism in accordance with a Condition Use Permit (CUP)

APPLYING THE POLICY TO MODIFICATIONS OF EXISTING USES/ACTIVITIES

- All Policy guidelines apply where feasible

The following apply where existing structures do not allow a 300-foot or 150-foot setback:

- Installation of a reduced vegetative screen
- Reinforced 8-foot chain link fence (minimum requirement)
- Information exchange for agricultural spraying notification
- Posting of Right-to-Farm Ordinance at the site of existing uses/activities
- Agreement to modify existing cooperative practices, if needed

The following apply where a school is located directly within 300 feet of agriculture:

- All K-12 school construction within 300 feet of agriculture requires a public meeting by APAC – and is strongly discouraged within ¼-mile of agriculture
- When a school is located directly within 300 feet of agriculture, the recommendations in *Farming Near Schools, A Community Guide for Protecting Children* (available from the Agricultural

RMA Ref # 06-039 City of Santa Paula East Area One Specific Plan
Response to NOP by the Ventura County Agricultural Commissioner's Office
August 24, 2006 Page 7

Commissioner's Office or www.agfuturesalliance.net) shall be followed by both the farmer and the school

*These Guidelines were developed in part from data from *Spray Drift Task Force (1997)*, established in response to EPA spray drift data requirements.*



**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division**

MEMORANDUM

DATE: August 21, 2006

TO: Resource Management Agency, Planning Division
Attention: Carl Morehouse

FROM: Nazir Lalani, Deputy Director *NL*

SUBJECT: Review of Document 06-039
Notice of Preparation of a DEIR for the City of Santa Paula East Area I Specific Plan for 508 acres located east of the City of Santa Paula within the unincorporated area of Ventura County. The project also includes approval of a sphere of influence amendment and annexation.
Applicant: Limoneira Company
Lead Agency: City of Santa Paula

AUG 23 2006
CITY OF SANTA PAULA
SEP 27 2006
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The Public Works Agency -- Transportation Department has reviewed the Notice of Preparation of a DEIR for the subject project. The project will involve the development of up to 1,500 residential units, 156,000 SF retail commercial spaces, 113,000 SF of offices, and up to 170,000 SF of light industrial and research development space. Seventy-five acres are identified for civic uses - high school, community college, etc., and 170 acres for open space, parks, and agriculture. The project site is 508 acres located east of the City of Santa Paula within the unincorporated area of Ventura County. The following comments should be addressed in the DEIR:

1. The DEIR should include the project specific impact and mitigation measures for the impacts of additional traffic due to this project on Ventura County local roads and intersections, in particular, South Mountain Road.
2. The DEIR should also address and mitigate the cumulative impact of this project to the Regional Road Network. The project should be conditioned to pay a Traffic Impact Mitigation Fee (TIMF) to the County, which was specifically developed to provide a methodology for mitigation of cumulative traffic impacts.
3. The Traffic Study for DEIR should identify if the project trip generation demands additional transit service and include mitigation measures where necessary. The DEIR should also propose mitigation measures to minimize traffic impacts by incorporating transit improvements (bus turnouts, shelters, benches) for the employees and residents of the proposed development.

4. The DEIR should incorporate the Transportation Vision adopted by the Board on January 24, 2006, in particular, the Bicycle Vision, which includes the following:
 - Establish a system of bicycle lanes/trails linking all county cities
 - Establish bicycle trail connections to CSUCI
 - Establish adequate bicycle lanes on well-used bicycle routes
 - Provide adequate bicycle-carrying capacity on public transit vehicles
 - Encourage provision of adequate bicycle racks and lockers.

5. Truck routes for the construction of this project should also be identified in the DEIR.

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

Please call me at 654-2080 if you have any questions.

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**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**

Memorandum

CITY OF SANTA PAULA
SEP 27 2006
RECEIVED

TO: Carl Morehouse, RMA Planning

DATE: August 17, 2006

FROM: Chuck Thomas 

SUBJECT: Request for Review of Notice of Preparation of a Draft Environmental Impact Report for the East Area 1 Specific Plan, City of Santa Paula (Reference No 06-039)

Air Pollution Control District staff has reviewed the subject notice of preparation and concurs with the City of Santa Paula's determination to address air quality in the draft EIR.

Air Quality Assessment Guidelines

District staff recommends that the air quality section of the draft EIR be prepared in accordance with the *Ventura County Air Quality Assessment Guidelines* (2003 Guidelines). A copy of the 2003 Guidelines can be accessed from the downloadable materials section of the APCD website at www.vcapcd.org.

Regional Air Pollutant Emissions

Ventura County is a state and federal nonattainment area for ozone. Therefore, District staff recommends the draft EIR evaluate the projects potential to impact regional ozone levels. Specifically, the air quality assessment should consider reactive organic compound and nitrogen oxide emissions from all project-related motor vehicles and construction equipment. Reactive organic compounds and nitrogen oxides are precursors to atmospheric ozone. The District recommends that the most up-to-date version of the URBEMIS model be used to generate emission estimates for this project. The latest version of the "URBEMIS 2002 For Windows" computer model is "Version 8.7.0." A downloadable copy of this model is available on the South Coast Air Quality Management District's website at <http://www.aqmd.gov/ceqa/urbemis.html>.

Particulate Matter

Construction activities for this project will involve a large amount of grading of soil. Such activities may generate significant amount of particulate matter, including fugitive dust. Such fugitive dust may adversely impact nearby areas and cause elevated ambient particulate levels in that portion of Santa Clara River Valley. District staff, therefore, recommends that potential particulate matter, including fugitive dust, impacts associated with project construction activities, especially grading operations, be

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Carl Morehouse - RMA Planning
NOP for East Area 1 Specific Plan - City of Santa Paula
Page 2

assessed both qualitatively and quantitatively. The qualitative assessment should use an appropriate air dispersion model.

Carbon Monoxide Emissions

A carbon monoxide (CO) screening analysis should be conducted for any project-impacted roadway intersection that are currently operating, or that are expected to operate at, Levels of Service D, E, or F, or at any project-impacted roadway intersection that may be a CO hotspot. If a potential hotspot is identified, the District recommends that a complete CALINE3 or CALINE4 carbon monoxide analysis be conducted for that intersection.

Air Toxics

Construction activities for this project will involve a large amount of grading of soil. The California Air Resources Board (CARB) has identified diesel exhaust particulate matter as a Toxic Air Contaminant (TAC). Diesel exhaust includes hundreds of different gaseous and particulate components, many of which are toxic. The earthmoving equipment has the potential to expose sensitive populations in the vicinity to elevated levels of diesel exhaust.

The District recommends that a formal health risk assessment be conducted for the project. Mitigation measures should also be identified and discussed if the assessment indicates a potential significant risk. Additional information on TACs can be obtained from the District's website at http://www.vcapcd.org/air_toxics.htm. If you have any general questions regarding air toxics, please contact Terri Thomas of the APCD at (805) 645-1405 or by email at terri@vcapcd.org.

Mitigation Measures

Pursuant to CEQA mitigation requirements, if the project is determined to have a significant impact on regional and/or local air quality, the draft EIR should include all feasible mitigation measures. Moreover, any project design features that mitigate air quality impacts should also be described in the document. Additionally, to the extent feasible, the document should assess and the air quality benefit of all feasible mitigation measures and project design elements.

Chapter 7 of the District's 2003 Guidelines discusses a number of mitigation measures that may be appropriate for this project. The District encourages other appropriate mitigation measures not included in the 2003 Guidelines be considered to help mitigate the projects air quality impacts.

If you have any questions, please contact Alicia Stratton at 645-1426 or by email me at alicia@vcapcd.org.

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VENTURA COUNTY
WATERSHED PROTECTION DISTRICT
PLANNING AND REGULATORY DIVISION
800 South Victoria Avenue, Ventura, California 93009
PAUL CALLAWAY, Permit Manager - 805 654-2011

CITY OF SANTA PAULA
SEP 27 2006
RECEIVED

DATE: August 17, 2006
TO: Carl Morehouse, Resource Management
FROM: Paul Callaway, Permit Manager *[Signature]*
SUBJECT: RMA 06-039.EAST AREA 1 SPECIFIC PLAN
SANTA PAULA

The Watershed Protection District comments are as follows:

The EIR should address the following:

The EIR should address the increase in the peak runoff rate and total volume, if there is any, due to the increase in impervious area produced by construction of this proposed development per Watershed Protection District standard, which is that there must be no increase in peak runoff rate and/or total volume in any storm frequency. The EIR should also provide recommendations for mitigation of the increase in peak runoff rate and/or total volume, if there is any.

We are also requesting two copies of the EIR for review.

End of Text

September 22, 2006

Janna Minsk, Planning Director
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061- 0569

RE: Notice of Preparation – East Area 1 Specific Plan

Dear Ms. Minsk:

Thank you for the opportunity to respond to the Notice of Preparation (NOP) for the environmental impact report (EIR) for the proposed East Area 1 Specific Plan. To the extent the City will rely on this EIR as a basis for initiating a future sphere of influence amendment and annexation prior to the development of the Specific Plan area, the Ventura LAFCO will serve as a responsible agency under CEQA. Please consider the following comments as the EIR is prepared.

1. The actions to be taken by LAFCO should be described in the EIR as 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 Ventura County Fire Protection District.
2. Based on the project area map included with the NOP and based on communications between LAFCO staff and Gilberto Ruiz, project consultant for the City, it appears that annexation of the project area would result in the creation of islands of unincorporated territory within the City of Santa Paula boundaries. Pursuant to Government Code Section 56744, 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. The attached map shows the location of the territory in question. We encourage the City to revise the project description to include a reorganization boundary that encompasses the areas depicted in red on the map.

If there are other parcels outside of the annexation boundary shown on the NOP map to which the City is currently providing services, or will be providing services as a result of extension of services associated with development of the East Area 1 Specific Plan area, LAFCO recommends that these areas be incorporated into the EIR project description and the sphere amendment/reorganization proposal. For example, we recommend that the City review whether it is currently providing

services to the parcels highlighted in blue on the attached map to determine whether it would be appropriate to adjust the sphere of influence amendment/reorganization proposal boundaries accordingly.

3. In acting on any governmental boundary reorganization proposal LAFCO must consider the factors identified in Government Code Section 56668. Each of these factors should be fully discussed in the appropriate sections of the EIR. Note that these factors include a reference to Government Code Section 56377 concerning open space conversion and that LAFCO uses the definition of open space contained in Section 65560 of the Public Resources Code.
4. Although the City of Santa Paula may use the State Important Farmland Maps as a threshold for significance for their initial study checklist, LAFCO must comply with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 definition of prime agriculture to determine agricultural impacts. The definition is as follows:

(Government Code (G.C.) Section 56064)

“...an area of land whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as class I or II in the USDA Natural Resource Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.*
- (b) Land that qualifies for rating 80 and 100 Storie Index Rating.*
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre...*
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during commercial bearing period on an annual basis...of not less than \$400 per acre.*
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than \$400 per acre for three of the previous five years.”*

For LAFCO purposes, the USDA rating and storie class of the site should be addressed in the EIR or at the time of the reorganization application.

5. In addition to the factors contained in the Government Code, the Ventura LAFCO has adopted local polices that will also be considered as a part of any LAFCO review of the project. All of these polices are contained in the Ventura LAFCO

Commissioner's Handbook. A complete copy of the Commissioner's Handbook is available from the Ventura LAFCO and on-line at the Ventura LAFCO web site.

Specific applicable LAFCO policies include:

- a. Conformance with local plans and policies (policy 2.5.1), especially in relation to any changes that may be necessary to the City's CURB.
- b. Agriculture and open space conversion (policy 3.1.5 in its entirety). Note that policy 3.1.5 requires a detailed alternative site analysis of non-prime agricultural or vacant lands as well as an analysis of the impacts on adjoining prime agricultural or open space lands. Also note that this policy refers to phasing annexation for very large developments that may involve time horizons over 5 years.
- c. School capacity (policy 3.1.6)

A discussion about consistency with these Ventura LAFCO policies and any resulting environmental impacts should be included in the EIR.

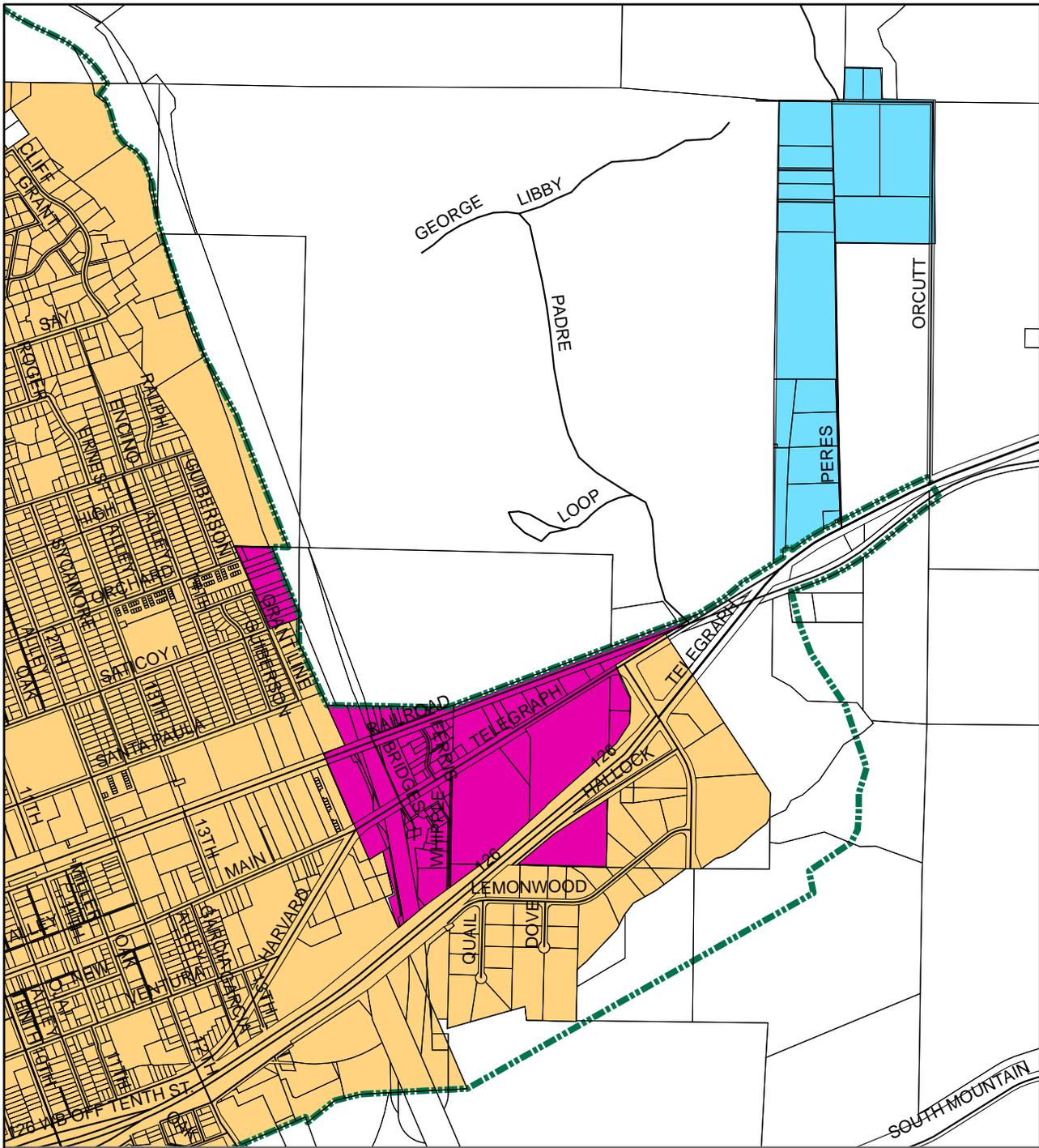
6. Please note that LAFCO will consider adoption of draft agricultural mitigation policies as early as December of this year. The purpose of the policies is to ensure that LAFCO expectations regarding lead agency compliance with the California Environmental Quality Act are clear with respect to disclosure of potentially feasible mitigation measures for boundary change proposals that involve conversion of prime agricultural land to urban uses. A copy of these policies will be provided to the City for review and comment under separate cover.

Again, thank you for the opportunity to comment. If there are questions regarding our comments or you wish to schedule a meeting to discuss any of the points raised in this letter, please feel free to contact Kim Uhlich, Deputy Executive Officer, (805-654-2866), or me (805-654-2575).

Sincerely,



Everett Millais
Executive Officer



Legend

-  Santa Paula Sphere of Influence Boundary
-  Santa Paula City Boundary
-  LAFCO Recommended Addition to East Area 1 Reorganization
-  Additional Territory to Consider as Part of East Area 1 Sphere Amendment/Reorganization



Ventura
Local Agency Formation Commission

Ruiz, Gilberto

From: Janna Minsk [JMinsk@ci.santa-paula.ca.us]
Sent: Wednesday, August 16, 2006 4:23 PM
To: Ruiz, Gilberto
Subject: FW: Scoping Meeting

fyi

[I will draft a brief resposne](#)

-----Original Message-----

From: Jennifer Dumas [mailto:jtdumas@dock.net]
Sent: Wednesday, August 16, 2006 3:31 PM
To: Janna Minsk
Subject: Scoping Meeting

Dear Janna,

After reading the article in today's paper concerning the public's lack of interest in the Limoniera Scoping Meeting, I needed to let you know that I know of not a single person who was aware of the meeting. In the last 2-3 weeks I have met with a number key community members over various issues and no one knew anything about the scheduled meeting. Was it posted on the City website? I don't believe Wally mentioned it on the blog. I am sure there are many interested parties who would have attended. Perhaps it is not an issue of public disinterest but rather lack of notification. The scoping meetings would have been competing for attention with the City's own 'charettes'. If you and P & D are interested in public feedback, you may wish to re-schedule a meeting after Sept 5th.

Kind Regards,
Jennifer Dumas

Dora P. Crouch * 739 Yale St. Apt. 6B * Santa Paula, CA 93060
Sept. 10, 2006

Planning Dept.
City of Santa Paula
City Hall
970 Ventura Street
Santa Paula, CA 93060

CITY OF SANTA PAULA
SEP 11 2006
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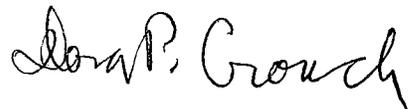
Mesdames:

I attach a series of comments on the Specific Plan for East Area One. These comments come out of my long history as an urban and architectural historian and of reading many proposals for Santa Paula.

In general, I find the plan well thought through and thorough. There is a separate sheet listing minor corrections and typos. The writer has a few awkward uses of language, but in general seems to think clearly.

If you would like to discuss this, I am at your service, but I will be out of town from October 11 to November 3.

Yours truly,



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Comments on Specific Plan for E. Area One
from Dora P. Crouch, Ph.D., architectural and urban historian
Sept. 10, 2006

p. 1-2 3rd paragraph "a range of neighborhoods"

p.1-5 Is "Historic Main Street" fig. 1-6? The number is missing.

p. 1-6 beginning of second column: . . . "was founded for and continues to be sustained by"

Table 2-1

plans: fig. 2-1 to 2-6 would be greatly improved by having the NAMES of the streets or perhaps a separate map to include the street names, with cannot be read on the neighborhood plans. For instance, on p. 2-13 many references to Hallock in all its variations really requires a map. Which you supply at Fig 3-2. Better to place it earlier.

Fig. 2-2 when you describe the Haun Creek Neighborhood, it would be more believable is you discussed danger of flooding and what you will do about it.

p. 2-13 under policies 13-d, how do you propose to "minimize energy consumption"? Be specific.

p. 3-1 Fig. 3-1 the Hospital seems to be on the wrong side of the highway. Or is it possible that circle refers to Glen City School?

Figs. 3-2 and 3-4: POC not defined.

Fig. 3-3 "city water softening plant" hitherto not mentioned or described

Figs. 3-2 and 3-3 are detention basins the same as debris basins?

p. 3-9 is duplicated in this copy.

p. 3-10 #12: "mitigate undue risks from floods" especially along Haun Creek.

#19 define the term "estate pad"

Notes under Table 4-1 are garbled
and in 4.7 the 4th line is garbled

p. 5-8 Central Park "primary building walls building" seems confused

p. 5-10. How were the styles arrived at and why these particular ones?

p. 5-10 B 1: second paragraph: the second unit is always a carriage unit or is that one of the possibilities?

p. 5-35 and 36 The terms live-work and work-live should be defined when first used.

p. 5-6.3 and 5-6.5 Why with the great shortage of land, are you confining yourselves to a maximum 3 stories?

p. 5-43 D.2 Why is the text split in this awkward manner?

p. 5-6.7 B.3 and 5-50 B.3 vague and unclear " row houses shall be between . . . "
Do you mean consist of or be situated?

p. 5-46 B6 Why is attic space not counted as a story?
also on 5-48 B.5.

p. 5-47 F4 unclear

5-49 F3 What is your definition of "yard"? Yiy seem to apply the term in several situations, not consistently.

P. 5-52 C3 Facade again

5-57 F2 It may be enclosed,

p. 5-64 C5 "joints shall be struck." WHAT DOES THIS MEAN?

5-65 and 66 B2 "shed roofs shall only be attached to the principal building walls"
HOW?

p. 5-66 B1 and C2 what is "hopper configuration"?

p.5-68 "The brick mould"--I think you mean MOULDING.

p. 5-69 Monterey Style. Wall surfaces always in stucco in Calif. If later the style was imitated in wood, you could say that.

Balcony extension along MOST of the main facade--not the majority.

Area under the balcony NOT a patio. You could call it a sheltered area.

p. 5-74 F.1 Windows are vertical rectangles.

p. 5-90 Note that E is called wide two story on the figure but "centerhall" in the description.

p. 5-96 In New York and especially in New England, the style used much more adventurous colors,

5-116 H colors of trim and railings--almost never white but rather dark colors to match the natural and weathered walls.

Illustration page here is strange and confused. It lacks an example of single family and of large single family.

5-134 needs illustration of "sunbreaks"

5-136 I have never seen white trim on this style or building type. White is typically domestic.

5-142 After many references to the Santa Paula St. bridge, at last we have a notion of its placement on the Santa Paula creek. At least put a reference to this diagram when you first talk about it.

I can understand your sentimental desire to perpetuate the names of Palm Ave. and Teague-McKevett Blvd., but think of the endless confusion between these new names and the time-tested versions in the old part of the city!

"Santa Paula branchline trail" is not self explanatory.

5-144 If you are distinguishing between the three parts of Hallock, why not indicate this in the legend of Fig. 5-1?

p. 143, 144, 145, 146 and 147 are involved in this confusion.

5-161 paragraph 4 ends with "; and" --Is this intended or just a typo?

B "streets and alleys will collect rainwater in using pervious" ?? not clear.

5=162 C1 first sentence omits the space after the period.

in second sentence, why capitalize Moderate, Low and Very Low? We are not writing German!

Fig. 5-171 is a very easy to read, and probably should be used again earlier, for instance with the names of the streets added.

5-182 Water towers 12 inches or 12 feet? 12 inches does not seem like a tower.

5-191 Why prohibit boarding houses? I think boarding houses for seniors, for instance, are AS OF RIGHT by state law.

A-3 Carriage units are granny flats on large lots, at least 100 feet wide. Definition should appear when the term is first used.

A-6 Goal 4.5 "The specific Plan property is not considered prime agricultural land" and yet I remember seeing a state map on which it was classified as PRIME. Be careful what you claim.

A-10 "preserve . . . wild life corridors" --and yet the comment below ignores this point.

A- 21 Possibility of reducing noise by use of rubberized asphalt paving.
Sounds good!

A-23 No Geology analysis as yet. Note that Centex found to its surprise that one neighborhood at the south end of their project had to be moved NW when they found out that the geology was too friable and unsteady to support what they had planned to put there.

I hope you will be looking for data about containing flood flow in or with detention basins. Does this actually work as you need it to?

Typos and language problems in East Area One Specific Plan

In several places, such as 3-9 and 5-69. "the majority" is used when what is meant is "most"; "the majority" must refer to an entity such as voters that is composed of individual people.

p. 4-2 under table 4-1, the words under the figure are not understandable.
Similarly p. 4-76.

5-10 B4 the last sentence has "up to ten eight feet"

5-42 C3 Facade is capitalized, as it is in several other places such as 5-66.

5-65 B2 "buildings's"--why 2 S's?

5-161 "streets and alleys will collect rainwater in using pervious"
garbled, therefore unclear

5-162 why capitalize Moderate, Low and Very Low?

5-173 because of so many periods in this sentence after abbreviations, it is hard to understand that "The Greenway flares out" is part of the same sentence.