

## CLARIFICATIONS AND REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT

This Section consists of clarifications and revisions to the Draft Environmental Impact Report (DEIR) for the East Area 1 Specific Plan that have resulted from responses to comments received from agencies and the public on the DEIR. The DEIR was released for a 53-day public review period (November 16, 2007 through January 7, 2008). Those parts of the text that are underlined/crossed out indicate revisions by reference to the text of the DEIR.

### UNIVERSAL CHANGE

The following universal changes apply to the DEIR and include:

The number of jobs created by the East Area 1 project is 1,305, not 1,035.

### GLOSSARY

The acronym SPECD on page G-5 of the DEIR is changed to SPESD.

## 1.0 EXECUTIVE SUMMARY

### 3.8.5.6 Schools and Post-Secondary Educational Facilities

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

- Community park, High School/shared athletic fields and structures (24 acres)
- Community College buildings, High School/shared athletic fields and structures (14.1 acres)
- High School building and parking (8.3 acres)
- Community College buildings, shared community facilities (such as library or meeting hall), and parking (5.6 acres)
- Community College buildings and parking (8.3 acres)
- Elementary School building and parking (10.8 acres)

## 3.0 PROJECT DESCRIPTION

### 3.8.5 INFRASTRUCTURE PLAN

The following text contained within this section of the FEIR is revised to provide clarifying text.

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

### 3.8.5.1 Water Supply & Conveyance

#### Domestic Water Supply

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

### 3.8.5.3 Stormwater Conveyance and Detention

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

Existing conditions for Haun Creek include extreme flow velocities during rain events that are created north of the project site. As noted in Section 4.9 (Hydrology & Water Quality) of this FEIR, flows in excess of 7000 cubic feet per second are experienced within Haun Creek. In order to control these flows and decrease velocities, on-site weirs and detention basins ~~have been~~ were designed and incorporated into the project (see Figure 3-4 of this FEIR) and include:

### 3.8.5.5 Police & Fire

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

## **4.1 LAND USE & PLANNING**

### 4.1.4 POTENTIAL IMPACTS

#### 4.1.4.1 Ventura County

The following text on page 4.1-9 of the DEIR is revised to clarify the proposed Ventura Local Agency Formation Commission (LAFCO) action associated with the proposed project. This information is based upon correspondence received on the DEIR from LAFCO.

Consistency with General Plan and Non-Coastal Zoning Ordinance

The project site is proposed for a Sphere of Influence amendment and reorganization which will entail annexation of territory to the City of Santa Paula and detachment of the same territory from the Ventura County Resource Conservation District and from the Fire Protection District, ~~including, without limitation, detachment from Ventura County and annexation to the City of Santa Paula.~~ Provided LAFCO approves such reorganization, the project site would no longer be subject to Ventura County land use and zoning controls, as contained within Ventura County’s General Plan and Non-Coastal Zoning Ordinance. Consequently, if LAFCO approves a reorganization application, implementing the proposed project would not conflict with the Ventura County General Plan or Non-Coastal Zoning Ordinance.

The following text contained within this section of the FEIR is revised to provide clarifying text.

3.8.5.6 Schools and Post-Secondary Educational Facilities

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

- Community park, High School/shared athletic fields and structures (24 acres)
- Community College buildings, High School/shared athletic fields and structures (14.1 acres)
- High School building and parking (8.3 acres)
- Community College buildings, shared community facilities (such as library or meeting hall), and parking (5.6 acres)
- Community College buildings and parking (8.3 acres)
- Elementary School building and parking (10.8 acres)

4.1.4.2 City of Santa Paula

Consistency with General Plan Goals, Policies, and Objectives

The analysis provided in Table 4.1-3 (Proposed Specific Plan Consistency with City of Santa Paula General Plan) is revised as follows to reflect the proposed project’s General Plan Amendment and reorganization (annexation):

**TABLE 4.1-3  
PROPOSED SPECIFIC PLAN CONSISTENCY WITH CITY OF SANTA PAULA GENERAL PLAN**

<b>GENERAL PLAN GOAL, OBJECTIVE OR POLICY NUMBER</b>	<b>APPLICABLE GOAL, OBJECTIVE OR POLICY</b>	<b>CONSISTENCY ANALYSIS</b>
<b>LAND USE ELEMENT</b>		
Objective 3(f)	Appropriate density standards should be established for each residential designation, including mixed-use zones.	<del>NOT CONSISTENT – Table LU 5 and Figure LU 5 of the City’s General Plan are inconsistent relative to the provision of neighborhood commercial land uses within the East Area 1 Expansion Area. For instance,</del>

**TABLE 4.1-3  
PROPOSED SPECIFIC PLAN CONSISTENCY WITH CITY OF SANTA PAULA GENERAL PLAN**

GENERAL PLAN GOAL, OBJECTIVE OR POLICY NUMBER	APPLICABLE GOAL, OBJECTIVE OR POLICY	CONSISTENCY ANALYSIS
		<p>Figure LU-5 indicates that a total of 76,230 square feet neighborhood commercial are permitted for this area, while Table LU-5 omits this information. Similarly, there are no acreage totals of floor area ratio (FAR) maximums noted within either Table LU-5 or Figure LU-5. However, Table LU-5 of the General Plan indicates that the minimum and maximum FAR for the Expansion Areas is 0.25 and 0.35, respectively. The proposed Specific Plan would include FARs ranging from 0.1 to 0.5 which would exceed the current range noted in the City's General Plan for the Expansion Areas.</p> <p><u>NOT CONSISTENT - The Specific Plan would include neighborhood commercial densities (of 225,000 square feet) and residential densities (of 2.2 to 15 du per acre) greater than those designated by the GP for the East Area 1 Expansion Area. A General Plan Amendment is required which, if ratified by the electorate, would cause the project to be consistent with the General Plan. Otherwise, the project is inconsistent.</u></p>
Goal 4.5	Urban expansion should be directed away from the most productive agricultural areas.	<p><del>NOT CONSISTENT</del> – The proposed project is located within the East Area 1 Expansion Area, an area identified in the General Plan for conversion from agricultural uses. <del>While the proposed project includes an Agricultural Preserve, the Project will convert 297 acres of productive agricultural areas to urban uses. This cannot be mitigated.</del> <u>While, 55 acres of the project site will be protected in an Agricultural Preserve, the Project will convert to urban uses 297 acres of the less productive agricultural land in the City's Area of Interest, which will be mitigated by an agricultural conservation easement on 34 acres of the more productive agricultural land in the City's Area of Interest. See Section 4.2 (Agricultural Resources) of this EIR for more detail.</u></p>

**TABLE 4.1-3  
PROPOSED SPECIFIC PLAN CONSISTENCY WITH CITY OF SANTA PAULA GENERAL PLAN**

<b>GENERAL PLAN GOAL, OBJECTIVE OR POLICY NUMBER</b>	<b>APPLICABLE GOAL, OBJECTIVE OR POLICY</b>	<b>CONSISTENCY ANALYSIS</b>
Policy 4.c.c.	Limit annexations to the City’s amended Sphere of Influence, as recommended in this element.	<del>NOT CONSISTENT</del> — <u>CONSISTENT</u> - The Project site lies outside of the City’s Sphere of Influence. LAFCO must approve any amendment of the Sphere of Influence boundary, <u>which would cause the project to be consistent with the General Plan. Otherwise, the project would be inconsistent.</u>
Policy 4.f.f.	Limit annual build-out of annexed land to the annual number of units available under the Growth Management Ordinance, including a portion of any carry-over allocation that may be available.	<del>NOT CONSISTENT</del> – The proposed Specific Plan establishes a growth management program which generally limits annual construction of dwelling units to 500. <del>However, this procedure is not entirely consistent with existing growth management regulations set forth in the SPMC, in excess of the base 124 du allowed under the SPMC but well below the City’s current unallocated available du of 1,911. Moreover, the East Area 1 Specific Plan and Development Agreement ordinances would preempt the SPMC Chapter 16.06.</del>
Policy 4.p.p.	Establish a plan for land development in the Santa Clara River Valley between Santa Paula Creek and Haun Creek (East Area 1 and East Area 2). The land use designations and densities established for these lands shall be as provided in Table LU-5 of the Land Use Element.	<del>NOT CONSISTENT</del> — <u>NOT CONSISTENT</u> - The proposed project includes land uses that are not exactly consistent with those identified within the General Plan. As noted above, the Specific Plan proposes a mixture of land uses that while urban in nature, are more intense than those envisioned by the General Plan. <u>Therefore, the proposed project would require a General Plan Amendment, which if ratified by the electorate would cause the project to be consistent with the General Plan. Otherwise, the project would be inconsistent.</u>
Policy 9.f.f.	Improve the visual appearance of lands and development in the railroad corridor as viewed from trains on the railroad tracks and as viewed from adjacent city streets. (IM118, 120, 121)	<del>NOT CONSISTENT</del> – <u>The existing views, vistas and visual character of the project site along this portion of the railroad corridor are agricultural in nature. The proposed project would include the construction of light industrial and 70 work/live units adjacent to the railroad. As noted in Section 4.11 (Aesthetic Resources) of this EIR, Implementation of the proposed project would result in significant impacts to scenic views, vistas and the visual character of this area since it would be converted existing views along this portion of the railroad corridor from agricultural to urban uses. However, the project is consistent with Implementation Measure 121: “New development and remodels on Railroad</u>

**TABLE 4.1-3  
PROPOSED SPECIFIC PLAN CONSISTENCY WITH CITY OF SANTA PAULA GENERAL PLAN**

GENERAL PLAN GOAL, OBJECTIVE OR POLICY NUMBER	APPLICABLE GOAL, OBJECTIVE OR POLICY	CONSISTENCY ANALYSIS
		<p><u>Corridor lands that are outside the Downtown Design Development/Improvement Plan area shall be reviewed for consistency with the following design principles:</u></p> <ul style="list-style-type: none"> <li><u>• Buildings should provide a backdrop of railroad-related architecture reflecting an early 20th Century civic industrial style.</u></li> <li><u>• Buildings should reflect the simple forms of citrus industry packing houses and railroad support buildings.</u></li> <li><u>• Buildings should incorporate larger one- and two-story masses with pitched roofs, overhangs, and heavy rustic detailing.</u></li> <li><u>• Building design should highlight rather than hide structural elements such as rafter ends, trusses and attic vents.</u></li> <li><u>• Design elements can be massive and exaggerated in scale to highlight their obvious functions.</u></li> <li><u>• Utility areas, storage yards, and equipment must be screened from view of the street and the railroad right-of-way by walls, fences or landscaping.</u></li> <li><u>• Building masses should be simple, broken by occasional changes in wall plane.</u></li> <li><u>• Buildings need not front on the public street or the railroad right-of-way.</u></li> <li><u>• Highly prominent architectural features are encouraged to provide landmarks along the railroad line.</u></li> <li><u>• Residential buildings should reflect traditional craftsman style and scale.</u></li> <li><u>• Each individual dwelling should be expressed as a single identifiable unit through pronounced roof forms, changes in building mass, pronounced entryways or front porches.</u></li> <li><u>• Garages and auto access shall be used to separate residential units from the railroad tracks to minimize noise impacts.</u></li> </ul>

In addition, the following text on page 4.1-25 of the DEIR is revised as follows:

As noted above, the proposed project is inconsistent with two (i.e., Objective 3(f) and Policy 4.p.p.) of the 92 General Plan’s goals, policies and objectives. However, provided a General Plan Amendment is ratified by the electorate, the proposed project would be consistent with these goals and policies; otherwise, the project is inconsistent with the General Plan. Also, LAFCO’s approval of an amendment to the Sphere of Influence will be necessary in order for the project to be consistent with General Plan

Policy 4.c.c.; otherwise, the project would be inconsistent with the General Plan. Therefore, the proposed project would result in a less than significant impact related to General Plan consistency.

The following text on page 4.1-40 of the DEIR is revised to reflect revisions contained within Table 4.1-3.

4.1.6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The mitigation measures identified above would reduce impacts to less than significant impacts related to General Plan consistency.

~~Although the mitigation measures identified above would assist in reducing impacts associated with implementation of the proposed project, they would not entirely reduce impacts to below a level of significance. As noted in Table 4.1-3, the proposed project would be inconsistent with a number of goals, policies and objectives (briefly summarized below) including:~~

- ~~• Exceed land use density standards~~
- ~~• Urban development would not be directed away from the most productive agricultural areas~~
- ~~• Development would be proposed outside of the City’s existing Sphere of Influence~~
- ~~• The Specific Plan would include a Growth Management Ordinance which is not entirely consistent with that contained within the SPMC~~
- ~~• The proposed Specific Plan differs from the original land uses proposed for the East Area 1 Expansion Area, as defined in the General Plan~~
- ~~• The visual appearance along the existing rail corridor (located immediately south of the proposed project) would be negatively affected by the introduction of urban uses in lieu of the existing agricultural uses which are considered scenic.~~

~~Therefore, implementation of the proposed project would continue to result in significant impacts~~

4.1.4.3 Southern California Association of Governments

The analysis provided in Table 4.1-4 of the DEIR and which evaluates the proposed project’s consistency with SCAG’s RCPG and GVR is revised as follows:

**TABLE 4.1-4**  
**PROPOSED SPECIFIC PLAN CONSISTENCY WITH SCAG POLICY DOCUMENTS**

<b><u>REGIONAL TRANSPORTATION PLAN</u></b>		
<b><u>GOAL NUMBER</u></b>	<b><u>APPLICABLE GOAL</u></b>	<b><u>CONSISTENCY ANALYSIS</u></b>
G1	Maximize mobility and accessibility for all people and goods in the region.	Consistent- The proposed project would be located immediately south of and adjacent to the existing Fillmore & Western Railway (F&WR). SCAG RTP’s unconstrained projects list identifies a project upgrade to the Santa Paula Branch Line (i.e., F&WR) from State Route 101 to the Los Angeles County Line. This project would bring the track to class 4 standards and reconstruct track between Piru and the Los Angeles County Line.

**TABLE 4.1-4  
PROPOSED SPECIFIC PLAN CONSISTENCY WITH SCAG POLICY DOCUMENTS**

<b>REGIONAL TRANSPORTATION PLAN</b>		
<b>GOAL NUMBER</b>	<b>APPLICABLE GOAL</b>	<b>CONSISTENCY ANALYSIS</b>
		Implementation of this future RTP project would allow residents of the proposed East Area 1 project site to access alternative transportation modes in the event that commuter rail services was implemented for this area of Ventura and Los Angeles Counties. Similarly, both local and regional goods movements could be further served provided commercial and light industrial uses are able to directly and/or indirectly access the benefits of the rail line. The City would note that the project site is part of the historic Teague/McKevitt Ranch property which actively utilized the existing rail line for transport of agricultural goods for many decades.
<u>G2</u>	<u>Ensure travel safety and reliability for all people and goods in the region.</u>	Consistent- The proposed project would require improvements to local roadways, including State route (widening between Peck and Briggs Roads). These improvements would be constructed in full compliance of local and state roadway requirements. In addition, as noted in G1 above, the implementation of rail service between Ventura and Los Angeles Counties would directly benefit both local residents and goods movement in the region.
<u>G3</u>	<u>Preserve and ensure a sustainable regional transportation system.</u>	Consistent- The proposed project has been designed to reduce reliance on the automobile and includes a mixture of land uses (see Section 3.0 (Project Description) of this FEIR) which promotes and encourages walking to local services and amenities. This includes the inclusion of parks, schools, and civic, commercial and light industrial land uses within close proximity to one another. The resulting affect is a reduced impact on both the local and regional transportation system.

**TABLE 4.1-4  
PROPOSED SPECIFIC PLAN CONSISTENCY WITH SCAG POLICY DOCUMENTS**

<b>REGIONAL TRANSPORTATION PLAN</b>		
<b>GOAL NUMBER</b>	<b>APPLICABLE GOAL</b>	<b>CONSISTENCY ANALYSIS</b>
<u>G4</u>	<u>Maximize the productivity of our transportation system.</u>	<u>Consistent- See responses G1 through G3 above.</u>
<u>G5</u>	<u>Protect the environment, improve air quality and promote energy efficiency.</u>	<u>Consistent- See responses G1 through G3 above. In addition, the reduction of automobile use due to the proximity of mixed land uses available to East Area 1 and city residents would have the net effect of reducing travel patterns and distances. In turn, this would be expected to reduce overall air pollution emissions from vehicles. Moreover, the East Area 1 Specific Plan includes energy conservation related design standards to reduce electric energy consumption. Building design would include the use of energy efficient materials and design (e.g., wall massing).</u>
<u>G6</u>	<u>Encourage land use and growth patterns that complement our transportation investments.</u>	<u>Consistent- See response to G3 above.</u>

4.1.4.4 Ventura LAFCO

The legend contained within Figure 4.1-3 (LAFCO Recommended Reorganization Areas for East Area 1) of the DEIR which currently reads “LAFCO Recommended Addition to East Area 1 Reorganization” is revised to read as follows:

“Islands of unincorporated territory which would result due to implementation of the East Area 1 project”

4.1.5 MITIGATION MEASURES

To provide clarifying text based upon comments received by LAFCO, Mitigation Measures LU-3 is revised and LU-4 has been deleted.

LU-3 The City must prepare and process a Sphere of Influence Amendment and a reorganization request with Ventura LAFCO.

**4.2 AGRICULTURAL RESOURCES**

4.2.5.4 County of Ventura

Air Quality/Micro Climate

The following text on page 4.2-26 is revised and added to reflect additional technical information provided by the Limoneira Company.

The introduction of urban uses, including impervious surfaces (roadways, roofing material, etc.), light reflective sources and other heat radiating materials ~~would increase~~ may result in changes to the micro climate that may affect agricultural activities in the area. This could include increases in the existing day and night-time ambient temperatures (i.e., “heat island”) although the extent to which this would occur is unclear for the project site. However, the United States Environmental Protection Agency (USEPA) indicates that “heat islands” can result in temperature increases ranging from one to ten degrees Fahrenheit. Further review of the EPA documentation indicates that suburban residential development, as would be the case for the proposed project, has been found to result in increases in ambient temperatures of 3 degrees or less. The East Area 1 project as proposed includes substantial areas of open space (approximately 200 of the 501 acres). As a result, increases in ambient temperature would be less than significant.

In addition, onsite wind patterns may also be affected by implementation of the proposed project (due to the construction of buildings and landscape trees), although the extent of this change is unclear. These impacts would be minor in that building heights will be low (primarily one and two stories) and will not result in any substantial changes in wind patterns. Moreover, Localized air quality could be affected by the introduction of automobiles and other urban pollution sources associated with the proposed project, including increased levels of carbon monoxide (although these would be ameliorated to some extent due to atmospheric mixing). The air quality analysis in the Draft EIR concluded that traffic from the proposed project would not result in the creation of any substantial concentrations of carbon monoxide (CO); the analysis notes that CO concentrations from the proposed project would be well below EPA and state standards. Therefore, implementation of the proposed project ~~could~~ would result in ~~potentially~~ less than significant impacts related to micro climates.

#### 4.2.6 MITIGATION MEASURES

The following new mitigation measure is added to address potential impacts associated with land use compatibility, as it relates to potential incidences of trespass, pilferage, and vandalism which could occur to adjacent agricultural areas located east of the proposed project across Haun Creek:

A-3 A reinforced 8-foot chain link fence with top bar must be constructed by the Applicant and/or its contractor before issuance of residential occupancy permits. The fence must extend along the entire eastern portion of the property boundary along Haun Creek beginning in the northern property boundary and extending south to State Route 126. Deviations to this route due to terrain or other potential limitations must first be approved by the City’s Planning Director.

### 4.4 TRANSPORTATION & CIRCULATION

#### 4.4.5 MITIGATION MEASURES

The following new mitigation measures are added to address comments provided by Ventura County.

T-19 Traffic Impact Mitigation Fee – The Applicant and/or its contractor must comply with the County’s Traffic Impact Mitigation Fee (TIMF) and pay the required fee before the City issues any building permit. Based on the fee schedule established in accordance with the County TIMF Ordinance Code §§ 8601-0 *et seq.* for the Santa Paula Impact Fee District, the fee due is as follows and is based upon information contained in the DEIR as follows:

30,329 Average Daily Trips (ADT) multiplied by \$44.16/ADT which equals \$1,339,328.64

The fee is subject to adjustment at the time of deposit, due to provisions in the TIMF Ordinance allowing the fee to be adjusted for inflation based upon the Engineering News Record construction cost index.

T-20 Before start of construction, the Applicant and/or its contractor must prepare and submit a Traffic Management Plan (TMP) to the City, County Transportation Department and the State of California Department of Transportation (Caltrans). The TMP must provide mitigation measures acceptable to the City, County Transportation Department and Caltrans for any impacts the project may have on roadways and network systems under their jurisdiction and in particular, any impacts on Telegraph Road.

T-21 The Applicant and/or its contractor must reconstruct any damaged or defaced asphalt concrete paving and driveway per City, City and/or Caltrans standards. Before commencing construction, the Applicant and/or its contractor must videotape the existing roadway impacted by this project. The videotape prepared and submitted by the Applicant and/or its contractor must be used in conjunction with an after hauling inspection to determine if any of the above existing surface improvements were damaged by trucks during hauling. The TMP must also identify the truck routes the project proposes to use. The traffic control plan for any lane closures/reductions within the County right-of-way must be also approved by the County Transportation Department.

The following new mitigation measure is added to address comments provided by California Public Utilities Commission.

T-22 The Applicant and/or its contractor must prepare a fencing plan (Plan) for the at-grade crossing planned at Telegraph Road/Hallock Drive and immediate vicinity. The Plan must be submitted for review by the City and must meet the design and construction requirements of the California Public Utilities Commission or other applicable jurisdiction with oversight over the existing railroad right-of-way.

## **4.5 AIR QUALITY**

### **4.5.1 EXISTING CONDITIONS**

#### **4.5.1.8 Local Area Conditions**

##### Sensitive Receptors

Page 4.5-12 of the DEIR is revised as follows to address comments made by the Santa Paula Elementary School District:

##### *Schools*

1. Renaissance High School, 404 N 6th St, Santa Paula 0.75 miles
2. Thelma B Bedell Elementary School, 1305 Laurel Rd, Santa Paula, CA 0.81 miles
3. Mupu Elementary School, 4410 Santa Paula Ojai Rd, Santa Paula, CA 1.06 miles
4. Barbara Webster Elementary School, 1150 Saticoy St, Santa Paula, CA 0.93 miles
5. Santa Paula Union High School District, 500 E Santa Barbara St, Santa Paula, CA 0.93 miles
6. Mc Kevett Elementary School, 955 E Pleasant St, Santa Paula, CA 0.87 miles
7. Grace Thille Elementary School, 1144 E. Ventura St., Santa Paula, CA 0.67 miles

Figure 4.5-2 (Sensitive Receptor Locations Nearest to the Project Site) of the DEIR is revised to reflect the location of the Grace Thille Elementary School.

## 4.7 BIOLOGICAL RESOURCES

### 4.7.5 MITIGATION MEASURES

The following mitigation measure is revised to provide clarification to the term “jurisdictional trees”.

BR-4 Before the applicant can remove on-site jurisdictional trees (i.e. trees protected by City ordinance), the applicant must submit a current tree survey report consistent with SPMC regulations detailing the species, health, and condition of all protected trees within the development area. This report will also contain a site plan showing the locations of the trees on-site and their driplines. The report must contain enough information to evaluate the potential impact of any construction, and to assess whether replacement on-site is appropriate, or an in-lieu fee should be assessed. If it is determined that a protected tree will be impacted, the value of that tree will be assessed in order to provide accurate mitigation; mitigation in the form of replacement trees or an in-lieu fee is required for all impacted or removed trees. The applicant will coordinate specific mitigation with the City before any removal activities.

The following mitigation measure has been revised based upon comments received by the City’s Director of Public Works.

BR-5 The landscaping plan, prepared by the Applicant and/or its contractor must include the planting of trees along the eastern development (Haun Creek area)/open space (natural areas located to the north) interface, where practicable, to minimize nighttime lighting and glare. The landscaping plan must be prepared by a qualified landscape architect, must use native plant and tree species, and must be approved by the City.

The following additional mitigation measure is included within the DEIR to reduce to less than significant potential impacts to biological resources which could result due to road widening associated with the segment of State Route 126 between Briggs and Peck Roads:

BR-8 Before widening of State Route 126 between Briggs and Peck Roads, a habitat evaluation and preliminary jurisdictional analysis must be undertaken to determine if sensitive plant or animals could be affected by the proposed action. In the event suitable habitat for sensitive species is present on-site, focused surveys for these species will be undertaken. Provided these species are present, applicable avoidance/minimization measures will be undertaken, per resource agency requirements and applicable permits will be obtained. Similarly, provided the on-site drainages are determined to be jurisdictional, applicable permits from the affected resource agencies will be required.

## 4.8 GEOLOGY & SOILS

The following mitigation measure is revised to reflect comments from the City’s Director of Building & Safety.

G-21 Under the Earthquake Design regulations of Chapter 16, Divisions IV and V of the 2007 edition of the California Building Code (CBC) and ASCE7-05, the following coefficients and factors apply to lateral-force design for structures at the project site:

## 4.9 HYDROLOGY & WATER QUALITY

The following mitigation measure is revised based upon comments received by the Ventura County Watershed Protection District, Planning and Regulatory Division:

H-1 ~~Grading may occur during the rainy season from October 15th to April 15<sup>th</sup> only in compliance with the Draft Ventura County Municipal Separate Storm Sewer System Order (National Pollutant Discharge Elimination System (NPDES) (NPDES No. CAS004002), as it may be adopted or amended, subject to approval by the City Engineer and installation of erosion control facilities. Erosion control measures must be in place and functional between October 15th and April 15th. In order to comply with the October 15 date, revised erosion control plans must be submitted to the City Engineer no later than September 15th of each year from the start of grading or clearing operations to the time of grading bond release.~~

The following new mitigation measure is included within the DEIR based upon comments received by the Ventura County Watershed Protection District, Planning and Regulatory Division:

H-6 The Applicant and/or its contractor must coordinate in advance with the Ventura County Watershed Protection District (VCWPD) before on-site construction activities. In particular, the Applicant and/or its contractor must ensure that proposed facilities, including the upper and lower Haun Creek/Orcutt Canyon detention basins and Santa Paula Creek Bridge meet VCWPD life safety standards. In addition, all necessary permits for these facilities must be obtained in advance and meet VCWPD standards, including no increase in peak runoff rates in any storm frequency.

## 4.13 PUBLIC SERVICES

### 4.13.1 EXISTING CONDITIONS

#### 4.13.1.3 Schools

Table 4.13-2 (Santa Paula School Characteristics) of the DEIR is revised to reflect comments received from the Santa Paula Union High School District.

**TABLE 4.13-2  
SANTA PAULA SCHOOL CHARACTERISTICS**

School	Current Capacity	Enrollment 2004-2005	Remaining Capacity	Site Acreage	CDE Recommended Acreage	CDE Recommended Capacity
<b>Elementary (K-5)</b>						
Thelma Bedell	474	338	136	6.85	10	350
Blanchard	432	484	-52	9.96	7.3	450
Glen City	644	647	-3	10.43	11.9	600
McKevett	385	337	48	3.49	7.3	150
Grace S. Thille	320	344	-24	3.5	7.3	150
Barbara Webster	535	482	53	8.95	10	450
<b>Middle (6-8)</b>						
Isbell	824	1,277	-453	12.77	19.9	750
<b>High (9-12)</b>						
Santa Paula	<del>1,377</del> <u>1,727</u>	1,639	<del>262</del> <u>88</u>	<del>18</del> <u>13.54</u>	40.8	N/A

**TABLE 4.13-2  
SANTA PAULA SCHOOL CHARACTERISTICS**

School	Current Capacity	Enrollment 2004-2005	Remaining Capacity	Site Acreage	CDE Recommended Acreage	CDE Recommended Capacity
Union (9-12)						
Renaissance High (Alternative)	75	121	-46	*	3.6	N/A

1 CBED (California Basic Educational Data System) Actual School Enrollment as of October 2005 (Source: Francine Torrigiani, SPUHSD, May 2, 2006)

\* Renaissance High School is located in six portable classrooms on the Santa Paula Union High School campus.

According to the SPUHSDs Long-Term Facilities Master Plan (February 2005), the number of elementary school students has been declining in recent years. However, data provided by the District indicates that over the next five years school enrollment is anticipated to increase slightly, is not and is expected to continue to decline. ~~By the 2009-2010 school year, these declines will affect high school enrollment, which is anticipated to begin declining at a rate of 150 students per year; in the four years to 2015, the high school population is projected to decline by about 600 students.~~

4.13.4.3 School Impacts

The following text contained within the DEIR relative to school impacts is revised as follows:

Table 4.13-3 shows the student generation factors for residential developments. The proposed project proposes 1,500 dwelling units (du), 1,430 du<sup>1</sup> of which would generate approximately a combined total of 1,032~~64~~ K-8 and high school students.

**TABLE 4.13-3  
STUDENT GENERATION**

Type of Housing Unit	Number of Housing Units	K-8		9-12		Total
		Generation Rate <sup>2</sup>	Student Generation	Generation Rate <sup>3</sup>	Student Generation	
Multi-family residential	557	0.677	377	<u>0.254</u>	<u>111.4</u> <del>142</del>	<u>488.45</u> <del>49</del>
Single-family residential	873	0.423	369	<u>0.204</u>	<u>174.6</u> <del>176</del>	<u>543.65</u> <del>45</del>
<b>Total</b>	1,430		746		<u>286</u> <del>318</del>	<u>1,032</u> <del>1,064</del>

Source: HDR Town Planning. *East Area One Specific Plan, Santa Paula, California.* June 2006.

Based upon the student generation rate factors shown in Table 4.13-3, the 1,430 housing units which may be developed under the maximum build-out of the proposed project would be expected to generate approximately 746 K-8 students and 286~~318~~ high school students.

<sup>1</sup> The remaining 70 dwelling units are planned for work/live housing units. There are no student generation rates available at this time for work/live housing units and thus were not included as part of the student generation analysis.

<sup>2</sup> Electronic correspondence from Catherine Bojorquez of SPESD dated February 5, 2007.

<sup>3</sup> Student Generation Factors provided by SPHUSD, May 2006.

As discussed previously, currently three elementary schools, the middle school, high school and continuation high school are over capacity. ~~Even though the number of elementary and high school students is anticipated to decrease in the next few years, these schools and~~ would not be able to support the increase in students generated by the proposed project. Moreover, there are a total of 133 residential units currently approved by the City. According to the SPUHD, the student demand projects for five years indicate that a facility capable of accommodating approximately 1,800 students is needed.

The proposed project therefore includes three school sites to accommodate the students generated by the proposed project. Specifically, the proposed project includes development of a new K-5 Elementary School on 10.8 acres which could accommodate approximately 500-600 elementary school students. The proposed Elementary School would be centrally located within the project site so that it would be easily accessible and enable it to function as an integral part of the urban core. In addition, a new High School and Community College (or private college, university learning center, or similar facility) is proposed within the project site. The high school is anticipated to accommodate approximately 1,200 students. Shared use facilities, such as a library and auditorium, would also be provided in the common area between the High School and college/learning center facility. The provision of these on-site facilities would result in less than significant impacts to schools. In addition, it should be noted that the additional student demand from the 133 residential units would be provided for via the City's developer fee program which requires that fees be collected prior to the issuance of construction permits.

#### 4.13.4.4 Library Services Impacts

The following text contained within the DEIR relative to library impacts is revised as follows:

According to the Blanchard/Santa Paula Public Library, the current library facilities would be inadequate to serve the proposed project as the library is currently pressed to provide services to City residents. The City has also estimated that this library facility is in need of \$800,000 worth of maintenance repairs and upgrades. At this time, there are no new library facilities proposed or planned in the City.

However, the proposed project includes a 5.6 acre site within the Santa Paula Creek Civic District, set aside for Civic – Shared Facilities, potentially including a library. The Santa Paula Creek Civic District would be able to serve both the greater Santa Paula community as well as the residents of the East Area 1 neighborhoods.

In addition, the future development within the project site would be required to pay library developer fees. ~~Specifically, for new development within the project site, a per parcel tax of \$40 would be required, which would go directly to the library and is tied in with the County tax collector.~~

Therefore, the proposed project would result in less than significant impacts on library services.

## 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

Table 5-1 (Land Uses Proposed for Alternative 1: No Project) is revised as follows to reflect that nine (9) residential units are currently contained within the East Area 1 project site:

**TABLE 5-1  
LAND USES PROPOSED FOR ALTERNATIVE 1: NO PROJECT**

<b>Lands Use</b>	<b>Unit Counts/Size</b>
Residential Dwelling Units	90 units
Workplace Buildings	0 sf
Retail/Office	0 sf
Assisted Living	0 sf
Elementary School	0 ac
High School/Post Secondary School	0 ac
Shared Athletic Fields	0 ac
Parks and Greenways	0 ac
Agriculture	501 ac

Source: P&D Consultants, 2007

### **TECHNICAL APPENDICES**

Appendix Q (Water Supply Assessment & Verification Report) of the DEIR is revised in its entirety to reflect comments made from various agencies and/or interested parties.