

4.0 EXISTING CONDITIONS, IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

This section describes the existing land uses on-site within the East Area 1 Specific Plan area (project site), potential environmental impacts, recommended mitigation measures to help reduce or avoid identified impacts, and the level of significance of adverse impacts after mitigation. Information presented in this section is primarily derived from the City of Santa Paula *General Plan* (GP) (April 13, 1998 and *General Plan Final Environmental Impact Report (FEIR)* (February 1998), Santa Paula Municipal Code (SPMC), County of Ventura *General Plan* (November 15, 2005) and *Non-Coastal Zoning Ordinance* (2005) and the proposed *East Area 1 Specific Plan* (September 2007).

The following plans, policies, and agreements are discussed within additional sections of this EIR and include:

- City of Santa Paula Greenbelt Agreements - Section 4.2 (Agricultural Resources)
- Ventura County Air Quality Management Plan - Section 4.5 (Air Quality)
- Habitat Conservation Plans (HCPs) and Natural Community Conservation Plan (NCCP) - Section 4.7 (Biological Resources)
- Southern California Association of Government's Regional Transportation Plan – Section 4.4 (Transportation & Circulation)

4.1 LAND USE AND PLANNING

4.1.1 EXISTING CONDITIONS

As noted in Section 3.0 (Project Description), the project site is currently located within unincorporated Ventura County, immediately east of the City of Santa Paula. The project site is also located outside of the City's Sphere of Influence and City Urban Restriction Boundary (see discussion below), but within its Area of Interest.

4.1.1.1 Existing On-Site and Surrounding Land Uses

The project site is comprised of 501 acres. At present, a total of 405 acres are in active agricultural production (lemons, avocados and row crops), while the remainder (86 acres) is comprised of natural lands. Limited housing is contained on-site (along Padre Lane) and is reserved for ranch employees.

Existing land uses to the north of the project site include natural lands and agriculture, while uses to the south are comprised of light industrial, highway commercial and residential. Land use located to the west (across Santa Paula Creek) include residential, while those to the east (across Haun Creek) are agricultural in nature (orchards and row crops).

4.1.1.2 General Plan & Zoning Designations

Ventura County

Table 4-1 shows the project site's current land use and zoning designations based on the County of Ventura General Plan (2005) and Non-Coastal Zoning Ordinance (July 2005). Figure 4.1-1 shows the location of these designations for all on-site parcels.

**TABLE 4.1-1
VENTURA COUNTY GENERAL PLAN AND NON-COASTAL ZONING ORDINANCE
LAND USE & ZONING DESIGNATIONS**

APN	GENERAL PLAN LAND USE DESIGNATION	NON-COASTAL ZONING ORDINANCE ZONE DESIGNATION (MINIMUM LOT AREA)¹
040-0-180-565	Agriculture (A) (40 acre minimum)	Agricultural Exclusive (A-E), 40 acre minimum
040-0-180-435	A (40 acre minimum)	A-E, 40 acre minimum
107-0-200-115	A (40 acre minimum)	A-E, 40 acre minimum
107-0-045-015	Urban	Limited Industrial (M2)-10,000 square feet

Source: County of Ventura General Plan, November 15, 2005 and <http://maps.countyofventura.org/website/zoninglookup.htm>, accessed June 17, 2007.

¹ Note: Information derived from Ventura County Non-Coastal Zoning Ordinance (2005), page 31.

The Ventura County General Plan identifies six basic land use designations: Urban, Existing Community, Rural, Agricultural, Open Space, and State/Federal Facilities. As shown in Figure 4.1-1, the majority of the project site is designated Agriculture by the Ventura County General Plan. The Agricultural land use designation is applied to irrigated lands which are suitable for the cultivation of crops and the raising of livestock.

According to the Ventura County Non-Coastal Zoning Ordinance, the purpose of the A-E zone is to preserve and protect commercial agricultural lands as a limited and irreplaceable resource, to preserve and maintain agriculture as a major industry in Ventura County and to protect these areas from the encroachment of non-related issues which, by their nature, would have detrimental effects upon the agriculture industry.

In addition, the Ventura County Non-Coastal Zoning Ordinance states that the purpose of the M-2 zone is to provide suitable areas for the development of a broad range of industrial and quasi-industrial activities of a light manufacturing, processing or fabrication nature, while providing appropriate safeguards for adjoining industrial sites, nearby non-industrial properties and the surrounding community.

City of Santa Paula

In 1998, the City updated its General Plan, a long term planning document which established the community's vision for development to 2020. An important feature of the General Plan Update was a designation of six expansion areas located outside the City's jurisdiction with a variety of land uses. These expansion areas are:

- Adams Canyon (5,413 acres)
- Fagan Canyon (2,173 acres)
- East Area 1 (541 acres)
- East Area 2 (26 acres)
- West Area 2 (125 acres)
- South Mountain (1,292 acres)



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

Figure 4.1-1
Existing Ventura County General Plan and Zoning Designations

The General Plan proposes urbanization and development within these six expansion areas, with the exception of the South Mountain, which is planned for open space and recreational land uses.

The General Plan designates the project site as a part of the East Area 1 Expansion Area. The General Plan designations for this Expansion Area are shown in Figure 4.1-2.

As noted in Table 4.1-2, the General Plan envisions a number of non-agricultural uses for this area including residential, schools, hotel and golf facilities.

**TABLE 4.1-2
CITY OF SANTA PAULA GENERAL PLAN LAND USE AND BUILDOUT SCENARIO
FOR EAST AREA 1**

ACREAGE/USE	BUILDOUT	GROSS DENSITY
342 acres/Single Family Residence (SFR)	742	2.2 dwelling units (du) per acre
20 acres/Multi-Family Residence (MFR)	90	5 du per acre
Neighborhood commercial*	76,230 square feet*	Not Stated in General Plan**
5 acres/MFR	68	15 du per acre
10 acres/school	One school	10 acres per school
13.5 acres active park	Park and recreation	Not Applicable (N/A)
145 to 150 acres/hotel and golf	Hotel and golf	N/A

Source: City of Santa Paula General Plan (1998), Table LU-5 and Figure L-5.

*Note: Table LU-5 and Figure LU-5 of the City’s General Plan are unclear regarding neighborhood commercial land uses within the East Area 1 Expansion Area. For instance, 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.

**Note: Although there are no acreage totals or floor area ratio (FAR) maximums for East Area 1 noted within either Table LU-5 or Figure LU-5, 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 East Area 1 Expansion Area is proposed to be designated as SP-3 in SPMC Chapter 16.25. The SPMC would be pre-zoned SP-3 East Area 1.¹

4.1.1.3 Ordinances and Measures

Growth Management Regulations

SPMC Chapter 16.106 generally regulates the number of residential units that can be built within the City. Ordinarily, SPMC Chapter 16.106 allows annual construction of 124 total residential dwelling units. However, in the event that the allocated number of units per year is not utilized, they are accumulated (i.e., rolled over) and combined with the City’s overall total. As of June 2007, the total available residential units (i.e., unallocated) within the City is 1,911.²

¹ Note: The SPMC establishes Specific Plan zones that facilitate the logical, coordinated planning of large areas for a variety of land uses and types of development. When a specific plan is adopted, its regulations may supersede any conflicting provisions of the SPMC. On issues where the adopted specific plan is silent, development must be implemented in accordance with the SPMC.

² Source: City of Santa Paula Planning Department, July 19, 2007.



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

Figure 4.1-2
City of Santa Paula General Plan and Zoning Designations

To further promote implementation of the East Area 1 Specific Plan in a manner that encourages a rate of residential growth within East Area 1 consistent with applicable local and regional growth management and resource protection plans and agreements, the City will limit the number of residential building permits issued for residential construction within the Specific Plan boundary per calendar year.

Residential building permits within the East Area 1 Specific Plan area are limited to a maximum of five hundred (500) per calendar year. If any part of the annual five hundred (500) residential building permit allocations is not issued for any calendar year, then such unissued residential building permits will carry over to the subsequent calendar year and be added to such subsequent calendar year's five hundred (500) residential building permit allocation. By way of example, if three hundred (300) residential building permits are issued for the first calendar year following City's approval of the East Area 1 Specific Plan, then seven hundred (700) residential building permits may be issued for the second calendar year following City's approval of the East Area 1 Specific Plan. If, in such second calendar year, the City issues only four hundred (400) residential building permits, then eight hundred (800) residential building permits may be issued for the third calendar year following City's approval of the East Area 1 Specific Plan. Residential building permits for public benefit and income-restricted housing units do not count against the residential building permit limits established within the Specific Plan. No limit is to be placed on the City issuing non-residential building permits for construction within the East Area 1 Specific Plan area.

The East Area 1 Specific Plan and its provisions take precedence over and preempt any and all provisions of the SPMC which may be inconsistent with the Specific Plan, including, without limitation, SPMC Chapter 16.106.

Measure I – Save Open-Space and Agricultural Resources

The Save Open-space and Agricultural Resources Santa Paula City Urban Restriction Boundary Initiative ("SOAR") amended the GP in 2000 (adding Section III to the Land Use Element of the GP) by, among other things, creating a City Urban Restriction Boundary ("CURB"). When SOAR was implemented, the CURB line was established to be "coterminous with and in the same location as the [City's] Sphere of Influence line..."³ Property located within the CURB may be developed in accordance with the GP and SPMC; any proposed extension of urban services or urbanized use to property located outside of the CURB generally requires voter approval.⁴ East Area 1 lies outside of the CURB.

Of the six expansion areas identified in the General Plan, only Fagan Canyon, East Area 2, portions of West Area 2, and Adams Canyon are currently located within the CURB.

Measure L6

Voters in 2006 amended the GP with Measure L6. That Measure, as explained by the City Attorney's Impartial Analysis, shows it generally requires voter approval for existing developments; proposed developments; or "land use designations"⁵ under the following circumstances:

- (1) if the Land Use Element of the Santa Paula General Plan is amended to either (a) increase the residential or commercial *density*; or (b) to intensify land use; and (2) when a development or land use designation is on land that either (a) constitutes 81 or more contiguous acres; or (b) is contiguous to other land for which the City Council amended

³ Section 3(a) of Exhibit "A" to Resolution No. 5372, approved June 19, 2000 ("SOAR"), p.5.

⁴ *Ibid.* at Section 3(b-c).

⁵ L6, p.1, Section 3(A); p.2, Section 3(B); p.2, subsection (A) under "Amendment Procedures."

the Land Use Element as described above at any time during the preceding five (5) consecutive calendar years where the cumulative acreage of all the property comprises 81 or more acres.

SOAR and Measure L6 require voter approval for the proposed General Plan Amendment for the Project because (1) the General Plan Amendment proposes to amend General Plan Figure LU-4a by changing the City Urban Restriction Boundary (“CURB”) to incorporate East Area 1; and (2) the General Plan Amendment proposes to increase the density and land use intensity set forth in General Plan Figure LU-5 and Table LU-7 as they affect East Area 1 and, more specifically, the Project Site.

4.1.1.4 Southern California Association of Governments (SCAG) Regional Plans and Policies

In addition to locally adopted plans, ordinances, and regulations, a number of regional plans also influence land use planning in the City of Santa Paula. Regional planning agencies, such as SCAG, recognize that planning issues extend beyond the boundaries of individual cities. Efforts to address regional planning issues such as affordable housing, transportation, and air pollution have resulted in the adoption of regional plans that affect the City of Santa Paula and the County of Ventura.

SCAG has evolved as the largest council of governments in the United States, functioning as the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial, and including 184 cities. The region encompasses a population exceeding 15 million persons in an area of more than 38,000 square miles.

As the designated MPO, SCAG prepares plans for transportation, growth management, hazardous waste management, and air quality. Accordingly, SCAG prepared comprehensive regional plans to address these concerns.

SCAG Regional Comprehensive Plan and Guide

SCAG’s Regional Comprehensive Plan and Guide (RCPG) serves as a policy document that sets broad goals for the southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision-making with respect to significant issues and changes, including growth management. The RCPG contains policies on Strategy, the Economy, Growth Management, Mobility (transportation), Air Quality, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Water Quality, Energy, Hazardous Waste Management, Integrated Solid Waste Management and Plan Implementation.

SCAG Southern California Compass Growth Visioning Program

In an effort to maintain the region’s prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting as a whole, SCAG has brought together the goals and ideas of interdependent sub-regions, counties, cities, communities, and neighborhoods. This process is called Southern California Compass (Compass), and the result is a shared “Growth Vision” for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG began Compass in 2002, spearheaded by the Growth Visioning Subcommittee, which consists of civic leaders from throughout the region. Creating a shared regional vision is an effective way to begin addressing issues, such as congestion and housing availability, which may threaten the region’s livability.

In the short term, SCAG's growth visioning process has found common ground in a preferred vision for growth and has incorporated it into immediate housing allocation and transportation planning decisions. In the long term, the growth vision is a framework that will help local jurisdictions address growth management cooperatively and will help coordinate regional land use and transportation planning. The result of this growth visioning effort is *SCAG's Growth Vision Report (GVR)*.

The GVR presents the comprehensive growth vision for the six-county SCAG region as well as the achievements of the Compass process. It details the evolution of the draft vision, from the study of emerging growth trends to the effects of different growth patterns on transportation systems, land consumption, and other factors. The GVR concludes with a series of implementation steps including tools for each guiding principle and overarching implementation strategies that will guide southern California toward its envisioned future.

4.1.1.5 Ventura Local Agency Formation Commission

The Ventura Local Agency Formation Commission (LAFCO) is responsible for establishing jurisdictional boundaries of public agencies in accordance with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code §§ 56000, *et seq.*). One of LAFCO's duties is to encourage the orderly formation and expansion of local government agencies.

All LAFCOs have the following general objectives and authorities:

Objectives

- Encourage the orderly formation and expansion of local government agencies
- Preserve agricultural land resources
- Discourage urban sprawl

Authorities

- Regulate boundary changes
- Establish spheres of influence - the probable physical boundaries and service area of a city or special district
- Conduct reviews of public services and special studies
- Initiate special district consolidations or dissolutions
- Review and act upon extraterritorial service agreements between a public agency and other public agencies or private parties.⁶

⁶ Source: Ventura County LAFCO, <http://www.ventura.lafco.ca.gov/html/aboutus.htm>, accessed August 25, 2007 and personal communication with Kim Uhlich Deputy Executive Director, LAFCO, November 6, 2007.

4.1.2 THRESHOLDS OF SIGNIFICANCE⁷

Based upon the thresholds contained in Appendix G of the CEQA Guidelines, the proposed project would have a significant impact on the environment if it would:

- Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, Specific Plan, Local Coastal Program or Zoning Ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Physically divide an established community.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

4.1.3 METHODOLOGY RELATED TO LAND USE AND PLANNING

The assessment of impacts to land use utilized and evaluated maps, data and other resources available from the *County of Ventura General Plan and Non-Coastal Zoning Ordinance* and the *Santa Paula General Plan and SPMC*. In conjunction with the thresholds of significance identified above, project-related impacts to land use were determined.

4.1.4 POTENTIAL IMPACTS

4.1.4.1 Ventura County

Consistency with General Plan and Non-Coastal Zoning Ordinance

The project site is proposed for reorganization, 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.

⁷ California Code of Regulations, Title 14, Chapter 3, §§ 15064.7 states the following:

(a) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.

(b) Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence.

The City of Santa Paula has not adopted thresholds of significance for CEQA review. However, the thresholds of significance contained within the County of Ventura's *Initial Study Assessment Guidelines* (February 2006) are sometimes utilized by the City. To assess the project's potential to result in a significant impact on the environment, Appendix G of the CEQA Guidelines and/or the thresholds of significance contained within the County's *Initial Study Assessment Guidelines* were utilized.

4.1.4.2 City of Santa Paula

Consistency with General Plan and SPMC

As previously noted, the General Plan identifies urban uses as a preferred land use for the East Area 1 Expansion Area. While the proposed project implements this policy, a General Plan Amendment is required to accommodate the uses contemplated by the Specific Plan. What follows are the existing General Plan land use categories and densities, and how these must be amended to reconcile the Specific Plan with the General Plan:

- Residential (single-family/multi-family) uses: A total of 900 residential dwelling units (DU) listed in General Plan. Specific Plan would increase this number by 600 DU for a total of 1,500 DU.
- Work/Live Units: None anticipated in General Plan. Specific Plan would include a total of 70 units.
- Commercial (retail/office) uses: 76,230 square feet of neighborhood commercial and hotel designated in General Plan.⁸ Specific Plan would include a total of 285,000 square feet of neighborhood commercial.
- Light Industrial: None designated in General Plan. Specific Plan proposes 150,000 square feet.
- Open Space (parks, natural areas, agricultural preserve, and shared athletic fields): A total of 13.5 acres (active park) and golf course designated in General Plan.⁹ Specific Plan proposes a total of 201.2 acres.
- Civic (schools, shared facilities, community college): One school designated in General Plan (10 acres). Specific Plan would provide a total of 36.3 acres. Two schools (elementary and high school) and a community college could be constructed.
- Roads and medians – No acreage totals identified in General Plan, but specific improvements noted and which include; (1) improvements to State Route (SR) 126/Hallock Drive intersection; (2) closure of Loop Lane (located on-site); (3) secondary inbound connection from westbound SR-126; (4) easterly extension of Santa Paula Street; and (5) improvements to Harvard Boulevard, Main Street, and Telegraph Road. Specific Plan would include a total of 83.9 acres.

Because the land uses proposed under the Specific Plan are inconsistent with those designated by the General Plan for the East Area 1 Expansion Area, a General Plan Amendment¹⁰ is required to approve the Project. A General Plan Amendment, if ratified by the electorate in accordance with Section III and Measure L6, would cause the project to be consistent with the General Plan. Absent such an amendment, the Project is inconsistent.

While the SPMC does not currently apply to the Project Site (adopting the Specific Plan (designated as SP-3 East Area 1) as rezoning would allow the City to establish its proposed designation in advance of its annexation approval requests with LAFCO), once it is annexed to the City, the zoning would be consistent with the SPMC. Thus, with mitigation consisting of rezoning and annexation, the project would result in less than significant impacts as to zoning regulations.

⁸ Note: The City of Santa Paula General Plan does not specify the number of rooms or the square footage of the hotel.

⁹ Note: The City of Santa Paula General Plan does not specify the number of holes or acres of this facility.

¹⁰ Note: Provided an Amendment is approved, the Specific Plan would serve as the regulating land use and zoning document utilized for all development within the East Area 1 Expansion Area.

Consistency with General Plan Goals, Policies, and Objectives

The analysis provided in Table 4.1-3 evaluates the proposed project’s consistency with and objectives.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
LAND USE ELEMENT		
Goal 3.1	A healthy balance of land uses and adequate land for all community needs should be provided.	<u>Consistent</u> - The proposed project would include the development of residential, commercial, light industrial, civic, and open space land uses. These uses would provide City residents with a balanced land use mix and in sufficient amount to meet the needs of area residents and the City’s population as a whole.
Goal 3.2	The amenities needed to enrich the quality of life, including parks, open spaces, cultural facilities and natural and historic places, should be provided.	<u>Consistent</u> – A total of 201.2 acres of Open Space (including parks, greenways, trails, natural lands and agricultural preserve) would be provided on-site and would be available to City residents. In addition, elements of the historic Teague-McKevitt Ranch would also be preserved and incorporated into the overall design of the proposed project and which would continue to promote the history of Santa Paula and its importance to the citrus and agricultural industry of the region.
Goal 3.3	Population densities and land use intensities should be consistent with the needs and desires of the community.	<u>Consistent</u> – The proposed project reflects land use densities that reflect public input provided during a series of public meetings designed to identify the types of uses, intensities, and densities for the East Area 1 Expansion Area.
Goal 3.4	The historic, cultural and archaeological resources of the community should be preserved.	<u>Consistent</u> – See to response 3.2 above.
Goal 3.5	All housing should be safe and sanitary.	<u>Consistent</u> – All on-site housing would be constructed in strict compliance with the SPMC and applicable law.
Goal 3.6	The housing supply should be balanced to meet the needs of all economic, social and ethnic groups, all family sizes, and the disabled.	<u>Consistent</u> – See response 3.5 above. In addition, the housing stock provided by the proposed project would be priced for a variety of income needs. Moreover, the project must comply with the SPMC and prepare an Inclusionary Housing Plan.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Goal 3.7	Individual home ownership should be promoted.	<u>Consistent</u> –A mix of residential units is proposed and would include privately owed homes; condominiums; townhomes; and multi-family apartments (rental units).
Goal 3.8	New and existing housing affordability should be promoted and preserved.	<u>Consistent</u> –See responses 3.5 and 3.6 above.
Goal 3.9	The City should promote upper income housing as a means to improve community resources.	<u>Consistent</u> –See response 3.5 and 3.6 above. In addition, the proposed project would construct high-end homes located within the northern portions of the project site and situated within the Foothill and Santa Paula Creek Neighborhoods.
Objective 3(a)	Adequate land should be provided for all needs and a healthy balance of land uses.	<u>Consistent</u> – See response 3.1 above.
Objective 3(b)	The City should establish commercial and industrial jobs-to-housing that are appropriate to meet all General Plan goals.	<u>Consistent</u> – The proposed project would construct 150,000 square feet of light industrial; 285,000 square feet of commercial; and civic uses (available for schools and community college). It is estimated that the proposed project would generate approximately 1,305 employees from these new land uses. ¹¹
Objective 3(c)	Compatible mixed uses should be allowed when appropriate.	<u>Consistent</u> – The proposed project would include mixed use and a total of 70 work/live units.
Objective 3(d)	Space should be provided for amenities to enrich the lives of citizens, such as parks and open space, cultural facilities such as theaters and museums, and preservation of natural and historic places.	<u>Consistent</u> – See response 3.2 above.
Objective 3(e)	Active parkland should be provided consistent with national standards based on population at a rate of 5 acres per 1,000 people.	<u>Consistent</u> – The proposed project would include the development of 66.8 acres of parkland or a net excess of 40.4 acres (i.e., 65% greater than required).

¹¹ Source: *East Area 1 Specific Plan Fiscal Analysis of Annexation City of Santa Paula*, Stanley R. Hoffman Associates, Inc., August 20, 2007.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Objective 3(f)	Appropriate density standards should be established for each residential designation, including mixed-use zones.	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, 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 or 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.
Objective 3(g)	Standards for building intensity, such as allowable floor area ratio, should be developed for each non-residential land use designation.	<u>Consistent</u> – See response 3(f) above. In addition, Section 5.0 (Development Standards) of the Specific Plan contains specific information relative to building intensity (including floor area ratios) for non-residential land uses.
Objective 3(n)	The City should develop a housing mix policy for new development to provide adequate choices for all segments of the community.	<u>Consistent</u> – See responses 3.5 and 3.6 above.
Objective 3(o)	Priority should be given to develop homes for individual ownership.	<u>Consistent</u> – See response 3.7 above.
Objective 3(s)	A portion of new housing sites should be designated for upper income housing.	<u>Consistent</u> – See response 3.9 above.
Policy 3.c.c.	Provide for the construction of new housing units to meet the City’s regional fair share, pursuant to the Housing Element, including in areas newly designated for Mixed-Use.	<u>Consistent</u> – The proposed project would construct 1,500 residential dwelling units, including mixed use and live/work units.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Policy 3.f.f.	Encourage the development of high quality estate subdivisions, incorporating consistent fencing and signage, equestrian and pedestrian trails, interconnecting greenbelts, and community amenities such as clubhouses, swimming pools, tennis courts and health clubs.	<u>Consistent</u> – See response 3.9 above.
Policy 3.h.h.	Assure that development in the city’s hillside areas occurs in a manner that protects the hillside’s natural and topographic character and identity, environmental sensitivities, aesthetic qualities and the public health, safety and welfare.	<u>Consistent</u> – The proposed project would not include the construction of hillside residences. Hillside areas are proposed for preservation and would include natural areas.
Policy 3.i.i.	Ensure that hillside development does not lead to soil erosion, mass grading, severe cutting or scarring and/or large removals of vegetation.	<u>Consistent</u> – See response 3.h.h. above.
Policy 3.j.j.	Protect those portions of parcels, where possible, with slope areas of greater than 30% from grading and development. (Reso. 6189, Adopted June 6, 2005)	<u>Consistent</u> – See response 3.h.h. above.
Policy 3.l.l.	Require that neighborhood commercial development be designed to reflect and be compatible with the surrounding neighborhood character.	<u>Consistent</u> – See response 3.1 above.
Policy 3m.m.	Promote commercial development along arterial roads in areas that provide adequate access and parking.	<u>Consistent</u> – The Specific Plan would include the development of commercial land uses located along arterial roads with adequate access and parking. All land uses proposed within the Specific Plan would be subject to its Development Standards and the SPMC.
Policy 3.n.n	Require that all commercial development provide buffers with adjacent residential uses or residentially zoned property, including: decorative walls, landscaped setbacks, restricted vehicular access, proper siting and screening of trash and service areas and control of lighting.	<u>Consistent</u> – See response 3m.m. above. In addition, the Specific Plan Development Standards address the need to buffer residences from commercial land uses and provide a number of requirements for screening, vehicle access, etc.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Policy 3.o.o.	Promote mixed use for the downtown commercial area and for the expansion lands of East Area 1.	<u>Consistent</u> – See responses 3(b) and 3(c) above.
Policy 3.q.q.	Promote artist live-work studios as a viable mixed use in commercial areas.	<u>Consistent</u> – See responses 3(b) and 3(c) above.
Policy 3.y.y.	Provide for parks and recreation and open space at the ratios of 5 acres per 1,000 people, and a minimum of 10% of the land area of those expansion areas involving canyons or greenbelts.	<u>Consistent</u> – See response 3(e) above.
Policy 3.z.z.	Accommodate unmet recreational demand for uses such as soccer fields, skating rinks, teen centers, performing arts, basketball, tennis, and trail systems. Also, special uses such as the rodeo, horse performance arena, carnival and circus spaces should be explored.	<u>Consistent</u> – See response 3(e) above.
Policy 3ccc.	Provide for the development of new school facilities to serve new development in the expansion areas. It is recommended that a facility be provided in Fagan Canyon in addition to the planned school uses in the other expansion areas.	<u>Consistent</u> – The proposed project includes sufficient acreage to accommodate one elementary, one high school and a community college facility.
Policy 3ddd.	Provide for the development of congregate care and senior facilities within proximity to public transportation, neighborhood commercial and health and social services.	<u>Consistent</u> – The proposed project includes the development of 75,000 square feet of commercial which would accommodate 100 assisted living units. These units would be constructed within the Haun Creek Neighborhood and would be located within the immediate proximity of retail serving commercial and park and recreation uses.
Policy 3eee.	Permit the continuation and expansion of existing public facilities: police, fire, City Hall and the Community Center. Also, address a facility for public social services and workforce development.	<u>Consistent</u> – The proposed project would include construction of a new on-site fire station. In addition, the developer would construct a police sub-station.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Goal 4.1	Development and expansion should be self-supporting of the costs of its public service and infrastructure needs.	<u>Consistent</u> – The General Plan requires that all Specific Plans include a fiscal and market analysis in order to ensure that the project is feasible and would not be an economic or fiscal burden to the City. The analyses prepared for the Specific Plan indicated that the revenue generated by the proposed project over both the short- and long-term would be sufficient to support the project and generate revenue (e.g., property taxes, business license, franchise fees, etc.) for the City. In addition, the market analysis indicates that the residential housing mix and commercial/light industrial uses are viable. The Developer is required to pay the City for any short-fall in revenue identified by the analyses.
Goal 4.2	Development should help support the costs of public services needed by the existing community.	<u>Consistent</u> – See response 4.1 above. In addition, the proposed project would be required to pay impact fees to address the cost of public services needed by the existing community and generated by its implementation. These impact fees would be required to cover public infrastructure improvements and maintenance costs.
Goal 4.3	Development should be designed so that it can be efficiently and economically served by City services.	<u>Consistent</u> – The proposed project would be clustered to ensure that infrastructure and resources are not improperly or unnecessarily utilized. The current phasing plan has been designed to ensure that each phase is independent, but can be linked as progressive phase are brought on-line. In addition, all on-site infrastructure would be properly sized and located in compliance with City requirements.
Goal 4.4	Urban expansion should not be dependent upon a single area, project, or individual.	<u>Consistent</u> – See response 4.3 above.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Goal 4.5	Urban expansion should be directed away from the most productive agricultural areas.	<u>NOT CONSISTENT</u> – The proposed project is located within the East Area 1 Expansion Area, an area identified in the General Plan for conversion from agricultural uses. 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. See Section 4.2 (Agricultural Resources) of this EIR for more detail.
Goal 4.6	Development should preserve and enhance the quality of life within the community.	<u>Consistent</u> – See response 3.1 and 3.2 above.
Goal 4.7	Development should sustain and enhance the economic health of the community.	<u>Consistent</u> – See response 3(b) above.
Goal 4.8	Development should meet the diverse needs of all economic groups within the community.	<u>Consistent</u> – See responses 3(b) and 3.6 above.
Goal 4.9	Development should be compatible with and have minimal adverse impacts upon the environment, agriculture and natural resources and should not be wasteful of scarce land.	<u>Consistent</u> – See responses 3.h.h., 4.3 and 4.5 above.
Goal 4.10	Development should provide for orderly urban expansion.	<u>Consistent</u> – See response 4.5 above.
Objective 4(a)	The City should continue to plan for urban land development within the existing City limits and the amended Sphere of Influence, as described in the element, subject to the restrictions of the CURB.	<u>Consistent</u> – The General Plan indicates the City’s intent to amend the Sphere of Influence for the East Area 1 Expansion Area in which the proposed project is located.
Policy 4.b.b.	Emphasize infill before annexations.	<u>Consistent</u> – There are no contiguous parcels contained within the City that could accommodate the proposed project. In addition, the proposed project is located within the East Area 1 Expansion Area, an area identified in the General Plan for urban expansion and annexation.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Policy 4.c.c.	Limit annexations to the City's amended Sphere of Influence, as recommended in this element.	<u>NOT 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.
Policy 4.d.d.	Annex and develop the contiguous lands first.	<u>Consistent</u> – The proposed project is located immediately adjacent (east side) to the City's existing corporate boundary and is comprised of 501 acres of contiguous land.
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.	<u>NOT CONSISTENT</u> – The proposed Specific Plan establishes a growth management program which generally limits annual construction of dwelling units to 500. However, this procedure is not entirely consistent with existing growth management regulations set forth in the SPMC.
Policy 4.g.g.	Minimize public expenditures for services and infrastructure needed by new land development projects through the use of owners associations, private facilities, and project designs that minimize costs.	<u>Consistent</u> – See response 4.3 above.
Policy 4.h.h.	Give priority to land development that provides municipal revenues that meet or exceed municipal costs, except as needed to meet housing goals.	<u>Consistent</u> – See response 4.1 above.
Policy 4.i.i.	Require comprehensive planning and cost analysis for public services, utilities, and infrastructure needed to serve major land development projects.	<u>Consistent</u> – See response 4.1 above.
Policy 4.j.j.	Require reports that address City-wide fiscal and market issues before considering annexations.	<u>Consistent</u> – See response 4.1 above.
Policy 4.k.k.	Require the preparation of Specific Plan(s) for any proposed annexations.	<u>Consistent</u> – The proposed project includes the preparation of a Specific Plan.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Policy 4.n.n.	Add new lands into the greenbelt to compensate for lands that may be removed from the greenbelt for Sphere of Influence amendments.	<u>Consistent</u> – In order to mitigate impacts associated with the conversion of land within an existing City Greenbelt area, the Project Applicant intends to record an agricultural conservation covenant on 34 acres of land located approximately seven (7) miles southwest of the project site within the Santa Paula-San Buenaventura Greenbelt. This area is located within the City’s Area of Interest. In addition, the agricultural productivity of this land is equal in economic value to that produced by the 297 acres contained within the project site and would be converted to urban uses under the proposed project. ¹² See Section 4.2 (Agricultural Resources) of this EIR for more detail.
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.	<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.
Policy 4.s.s.	Provide adequate linkages and transitions from expansion areas to the existing City.	<u>Consistent</u> – The proposed project includes the construction of a bridge across Santa Paula Creek (at Santa Paula Street) and a series of trails that would connect with the City’s proposed Santa Paula Branch Line Trail.
Policy 4t.t.	Require new development to bear the operating cost of providing prompt and adequate fire protection and emergency medical service to the new areas.	<u>Consistent</u> – See responses 3eee and 4.1 above.
Policy 4u.u.	Require new development adding a significant amount of area to the city to provide any needed land, buildings, fire engines, and equipment needed to serve the area.	<u>Consistent</u> – See responses 3eee and 4.1 above.

¹² Note: The 34-acre mitigation site is in strawberry production. The net annual production revenue for the mitigation site was more than \$306,000 for the period from 2003 to 2007. By comparison, during the same period the portion of the East Area 1 project site (297 acres) in avocado, lemon and row crop production has averaged net revenue of approximately \$303,000. Source: Information derived from the *Agricultural Resources Study for the East Area 1 Specific Plan Project, Santa Paula, California*, Impact Sciences, May 2007.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Goal 5.1	The small town atmosphere of Santa Paula and the quality of life in the community should be preserved and enhanced.	<u>Consistent</u> – See response 3.5 above.
Goal 5.3	Scenic views and vistas, tree-lined streets, open spaces, natural areas, ridgelines, viewsheds, and landforms should be preserved.	<u>Consistent</u> – The proposed project would not require mass grading which would extend into the adjacent hillsides. Urban uses would be clustered within the lower elevation areas of the project site and would be screened by existing and enhanced vegetation (located along Haun Creek). On-site thoroughfares would be landscaped with suitable tree species identified within the SPMC and Specific Plan. In addition, the project site would contain some 201.2 acres of Open Space (including parks, greenways, natural areas and an agricultural preserve). See Section 4.11 (Aesthetics) of this EIR for a more detailed discussion.
Objective 5(c)	Neighborhood parks should be developed to serve all new residential development of significant size.	<u>Consistent</u> – See response 3(e) above.
Objective 5(e)	The City should encourage neighborhood designs whose appearance is not dominated by the automobile, where people know one another and where there is a strong sense of community.	<u>Consistent</u> – The proposed project has been designed with principles that encourage land uses which promote pedestrian activities and limit the dependence on the automobile. Consequently, residential land uses are located within close proximity of residential serving commercial and open space uses and are interconnected by walkways and trails.
Objective 5(j)	The City should encourage Historic Preservation as a valuable tool to retain the City's heritage.	<u>Consistent</u> – See response 3.2 above.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Policy 5.b.b.	Preserve important natural features, such as barrancas, tree rows, wetlands, ridgelines, and wildlife movement corridors.	<u>Consistent</u> – See response 5.3 above. In addition, the proposed project would include the restoration and enhancement of the portion of Haun Creek contained on-site which would provide nesting and foraging opportunities for wildlife species and would also serve as a travel corridor. In addition, the northern portions of the project site (134.4 acres) would remain in their current state and would not be modified. These areas currently provide refugia, cover and other habitat components necessary for local wildlife.
Policy 5.c.c.	Provide for distinctive and compatible residential neighborhoods and commercial and industrial districts.	<u>Consistent</u> – See response 5.b.b. above.
Policy 5.e.e.	Promote the development of new high-quality multi-family townhouses that convey a distinctive residential neighborhood character and are integrated with their setting.	<u>Consistent</u> – See responses 3.2 and 5(e) above. In addition, planned multi-family units would be constructed in a manner consistent with the architectural intensity and history of the City of Santa Paula.
Policy 5.f.f.	Require that techniques be used to avoid “box-like” commercial structures, including: differentiation of facades and elevations, articulation of building details (roof, columns, beams, balconies, arcades, trellises, recessed windows, etc.).	<u>Consistent</u> – See responses 3.2 and 5(e) above. In addition, the Specific Plan SPMC contains specific requirements for building and architectural detail to avoid/prohibit the construction of “box-like” structures.
Policy 5.g.g.	Require that street-facing building facades have usable occupiable space and entries.	<u>Consistent</u> – See responses 3.2, 5(e) and 5.f.f. above.
Policy 5.h.h.	Require that non-residential development be designed to orient outward to pedestrian sidewalks, parking lots and public streets.	<u>Consistent</u> – See responses 3.2, 5(e) and 5.f.f. above.
Policy 5.i.i.	Require that non-residential development be designed to a “human scale” at the street/sidewalk/parking elevations.	<u>Consistent</u> – See responses 3.2, 5(e) and 5.f.f. above.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Goal 7.1	The creation of jobs should be promoted within the community.	<u>Consistent</u> – See response 3(b) above.
Objective 7(b)	The City should encourage the attraction and expansion of businesses and residential uses that will diversify and sustain the community economically.	<u>Consistent</u> – See response 3(b) above.
Objective 7(k)	Provide new attractions and commercial draws for tourists and residents.	<u>Consistent</u> – See response 3(b) above.
Policy 7.f.f.	Promote the location of educational facilities, such as junior college and private secondary schools, within the city.	<u>Consistent</u> – See response 3ccc above.
Policy 7.k.k.	Support retirement housing and retirement communities in Santa Paula.	<u>Consistent</u> – See response 3ddd above.
Policy 7.l.l.	Provide additional opportunities for industrial, commercial and residential development to support the City's economic health on lands within the expanded Sphere of Influence.	<u>Consistent</u> – See response 3(b) above.
Goal 8.1	New infrastructure should be sized to support the projected population growth of the community	<u>Consistent</u> – See response 4.3 above.
Goal 8.3	The railroad right-of-way should be used as a multi-purpose, publicly owned corridor for utilities, business, transportation, and recreation.	<u>Consistent</u> – The proposed project includes the provision of an easterly extension of the Santa Paula Branch Line Trail across Santa Paula Creek and continuing to Haun Creek. The extension would be located adjacent to the existing railroad right-of-way.
Objective 8(c)	Public expenditures for services and infrastructure needed by new land development projects should be minimized through the use of owners associations, private facilities, and project designs that minimize costs.	<u>Consistent</u> – See response 4.3 above.
Objective 8(h)	Where feasible, new and existing utility systems should be undergrounded.	<u>Consistent</u> – All utilities would be constructed underground in compliance with the SPMC.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Objective 8(i)	The City should require installation of all utility systems as part of land development projects.	<u>Consistent</u> – All utilities needed to support the proposed project and which would be required to ensure the safe operation of existing City utilities would be constructed.
Policy 8.a.a.	Size new infrastructure to support the projected population growth of the community.	<u>Consistent</u> – See response 4.3 above.
Policy 8.b.b.	Have development pay the costs of needed utility services.	<u>Consistent</u> – See response 8(i) above.
Policy 8.c.c.	Encourage the continued improvement of flood control areas and projects.	<u>Consistent</u> – The proposed project would include the construction of debris basins to control and slow flows originating both on- and off-site. In particular, a series of weir structures would be constructed along Haun Creek to reduce flow velocities during storm events.
Policy 8.d.d.	Review all new development and annexation proposals to ensure that the City can provide sufficient water production, treatment, and storage capacity to meet acceptable standards.	<u>Consistent</u> – The SPMC requires the developer to dedicate water rights to the City upon the Project Site being annexed. Based upon this requirement, a Water Supply Assessment that identifies adequate water for the proposed project, and the requirement that the developer construct infrastructure for potable, recycled, and wastewater delivery, the Project is consistent with the General Plan.
Policy 8.e.e.	Review all new development and annexation proposals to ensure that the City can provide sufficient wastewater treatment capacity to meet acceptable standards.	<u>Consistent</u> – The City's Public Works Department indicates that both the existing Wastewater Treatment Facility (WTP) and proposed new Water Recycling Facility (WRF) planned to be constructed in 2010 would be capable of meeting the treatment needs of on-site land uses.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Policy 8.f.f.	Expand the circulation system in coordination with development to avoid deficiencies.	<u>Consistent</u> – The proposed project would include the provision of an on-site thoroughfare system to support the planned land uses. In addition, a bridge would be constructed across Santa Paula Creek (at Santa Paula Street) and Hallock Drive would be extended north into the East Area 1 Expansion Area. Moreover, a number of off-site roadway improvements would be required to be constructed (e.g., roadway widening, signalization, roadway re-striping) as part of project approvals and which would directly benefit the City's existing roadway network.
Policy 8.g.g.	Flood control projects should be carried out in a manner that leaves streams and barrancas as natural as possible.	<u>Consistent</u> – See responses 8.c.c and 5.b.b. above.
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.	NOT CONSISTENT – 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 corridor. 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 from agricultural to urban uses.
Policy 9.g.g.	Require the dedication and development of pedestrian/bicycle trail linkages to and along the railroad corridor, consistent with any VCTC plans.	<u>Consistent</u> – See response 8.3 above.

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

GENERAL PLAN GOAL, POLICY OR OBJECTIVE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
Policy 9.h.h.	Require that new development be compatible with and sensitive to the railroad.	<u>Consistent</u> – See response 9.f.f. above. In addition, the proposed project would include land uses that are compatible with and sensitive to existing and future uses of the railroad right-of-way. The light industrial land use and live work units would be constructed to ensure that they do not restrict and/or inhibit the use of this right-of-way and would include building materials that reduce vibration and noise generated by passing trains.

Source: City of Santa Paula General Plan 1998 & P& D Consultants 2007.

As noted above six of the 92 General Plan’s goals, policies and objectives are inconsistent with the proposed project. To achieve consistency, the proposed project must seek (and the City Council or, as applicable, voters) must grant a General Plan Amendment. In addition, LAFCO must approve annexation of the project area to the City’s jurisdictional boundaries in order to achieve consistency with General Plan policy 4.c.c.

Therefore, the proposed project would result in an adverse significant impact related to General Plan consistency.

Consistency with Ordinances and Measures

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

The proposed project would include the construction of a maximum of 435,000 square feet of commercial/light industrial land uses. The current phasing plan indicates that an average of 62,143 square feet of these uses would be constructed annually.¹⁴ Since neither the City’s growth management regulations nor the Specific Plan regulate commercial/light industrial land uses, the proposed construction commercial land uses would not be restricted.

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

¹⁴ Note: A minimum of 50,000 square feet to a maximum of 115,000 square feet per year could be constructed, depending on market conditions.

Measure I – Save Open-Space and Agricultural Resources

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

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

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

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

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

4.1.4.3 Southern California Association of Governments

The analysis provided in Table 4.1-4 evaluates the proposed project’s consistency with SCAG’s RCPG and GVR.

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

POLICY OR PRINCIPLE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
REGIONAL COMPREHENSIVE PLAN AND GUIDE		
1.	Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.	<u>Consistent</u> - The project site is identified as an Expansion Area and is located immediately adjacent to existing development. Extension of infrastructure for the project will also provide improved service to existing land uses within the City. Therefore, the proposed project would make use of existing facilities.

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

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

POLICY OR PRINCIPLE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
2.	Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.	<u>Consistent</u> - The project proposes local-serving shopping, schools, recreation and housing opportunities in proximity to each other. In addition, the project proposes sidewalks, an on-street bicycle lane and off-street multi-purpose trails to provide for pedestrian and bicycle access throughout the project site, connecting to existing trails and downtown Santa Paula. The types of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity, limiting the need for vehicle travel. In addition, the project's Circulation Plan includes locations for transit stops within the proposed project.
3.	Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	<u>Consistent</u> - The proposed project is located within an identified Expansion Area of Santa Paula, adjacent to existing residential uses, and accessed via existing roads planned for extension into East Area 1. The proposed project would result in development of local-serving retail/office, recreation, civic (Fire Station/schools/police) and residential uses as an extension of the existing community. Development of the project as proposed would provide access to civic and public facility uses including a new active community parks, a new fire station, two new school sites and a potential community college facility. These uses would be developed in proximity to retail, recreation and residential uses, minimizing the need for vehicle travel for East Area 1 residents, and along potential transit routes and multi-purpose trails, minimizing the need for vehicular travel for residents of greater Santa Paula.
4.	Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.	<u>Consistent</u> - The project proposes the development of local serving retail, office, residential, civic center and recreational uses accessible from SR-126 and SR-150. The proposed project would construct civic and public facility uses including a new active community park, a new fire station, two new school sites and potential community college. The roadways providing primary access to the site are master planned roadways connecting major City transportation corridors.

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

POLICY OR PRINCIPLE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
5.	Encourage planned development in locations least likely to cause environmental impact.	<u>Consistent</u> - See responses 1 through 4.
6.	Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.	<u>Consistent</u> - The Specific Plan would preserve a total of 134.4 acres of Open Space. In addition, the portion of Haun Creek contained on-site would be restored, providing nesting, foraging, refugia and a travel corridor for local wildlife. See Section 4.7 (Biological Resources) of this EIR for more detail.
7.	Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.	<u>Consistent</u> - The proposed project would include mitigation measures designed to protect cultural resources including archaeological sites. See Section 4.12 (Cultural Resources) of this EIR for more detail.
8.	Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.	<u>Consistent</u> - The proposed project would not require hillside modification which would require slope modifications. In addition, mitigation measures designed to address impacts associated with wildland fires, flooding and seismic hazards have been included as part of project design features and or requirements of project approvals. See Sections 4.8 (Geology & Soils), 4.9 (Hydrology & Water Quality) and 4.10 (Hazards & Hazardous Materials) of this EIR for more detail.
9.	Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.	<u>Consistent</u> - See response 8 above. In addition, mitigation measures contained within Section 4.6 (Noise) of this EIR would reduce project-related impacts to less than significant levels.
10.	Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.	<u>Consistent</u> - The Specific Plan includes a wide range of housing types and densities and includes multi-family units, thereby increasing potential for affordable housing development.

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

POLICY OR PRINCIPLE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
11.	Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.	<u>Consistent</u> - The Specific Plan proposes local serving retail commercial, residential, open space, commercial and light industrial uses. The Specific Plan would also include the construction of two schools and a potential community college. In addition, a fire station and office space sufficient to meet law enforcement needs would also be provided. These uses would be equally available to all members of the community.
12.	Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles traveled/emission fees) so that options to command and control regulations can be assessed.	<u>Consistent</u> - Section 4.5 (Air Quality) of this EIR addresses air quality impacts of the proposed project and provides mitigation measures where feasible to reduce significant environmental impacts to a less than significant level. The project proposes employment, local-serving retail, recreation, light industrial and housing opportunities in proximity to each other. In addition, the project proposes an interconnected thoroughfare system comprised of sidewalks, bicycle lane and off-street multi-purpose trail. The types of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity, limiting the need for vehicle travel. In addition, the City and the applicant will coordinate with transit providers regarding the provision of bus shelters within the proposed project.
13.	Through the environmental review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.	<u>Consistent</u> - Section 4.1 (Land Use & Planning), Section 4.4 (Transportation & Circulation) and Section 4.5 (Air Quality) of this EIR address land use, traffic and air quality impacts of the proposed project and provide mitigation measures where feasible to reduce significant environmental impacts to a less than significant level.
14.	Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.	<u>Consistent</u> - The project proposes a combined total of 201.2 acres of Open Space. These uses would include active and passive parks, greenways, trails, natural areas and an agricultural preserve. See Section 4.14 (Recreation) of this EIR for more detail.
15.	Increase the accessibility to open space lands for outdoor recreation.	<u>Consistent</u> - See response 14 above.

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

POLICY OR PRINCIPLE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
16.	Promote self-sustaining regional recreation resources and facilities.	<u>Consistent</u> - See response 14 above.
17.	Maintain open space for adequate protection of lives and properties against natural and man-made hazards.	<u>Consistent</u> - See response 8 above.
18.	Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.	<u>Consistent</u> - See response 8 above.
19.	Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.	<u>Consistent</u> - See responses 1 and 8 above.
20.	Maintain adequate viable resource production lands, particularly lands devoted to commercial agriculture and mining operations.	<u>Consistent</u> - In order to mitigate impacts associated with the conversion of land within an existing City Greenbelt area, as a condition of approval, the Project Applicant will record an agricultural conservation covenant on 34 acres of land located approximately seven (7) miles southwest of the project site within the Santa Paula-San Buenaventura Greenbelt. This area is located within the City's Area of Interest. In addition, the agricultural productivity of this land is equal in economic value to that produced by the 297 acres contained within the project site and would be converted to urban uses under the proposed project. ¹⁶ See Section 4.2 (Agricultural Resources) of this EIR for more detail.
21.	Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.	<u>Consistent</u> - See response 6 above.

¹⁶ Note: The 34-acre mitigation site is in strawberry production. The net annual production revenue for the mitigation site was more than \$306,000 for the period from 2003 to 2007. By comparison, during the same period the portion of the East Area 1 project site (297 acres) in avocado, lemon and row crop production has averaged net revenue of approximately \$303,000. Source: Information derived from the *Agricultural Resources Study for the East Area 1 Specific Plan Project, Santa Paula, California*, Impact Sciences, May 2007.

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

POLICY OR PRINCIPLE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
22.	Encourage water reclamation throughout the region where it is cost effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.	<u>Consistent</u> - The proposed project would utilize reclaimed water for landscaping purposes, and construct reclaimed water conveyance infrastructure.
GROWTH VISIONING		
Principle 1	<ul style="list-style-type: none"> • Improve mobility for all residents • Encourage transportation investments and land use decisions that are mutually supportive • Locate new housing near existing jobs and new jobs near existing housing • Encourage transit-oriented development • Promote a variety of travel choices 	<u>Consistent</u> - The project proposes local serving retail, schools, recreation, light industrial and housing opportunities in proximity to each other. In addition, the project proposes a thoroughfare system which encourages walking, bicycle use and public transit and discourages use of the automobile. Moreover, an estimated 1,305 jobs would be created by the on-site land uses and would likely be filled by City residents. ¹⁷
Principle 2	<ul style="list-style-type: none"> • Foster livability in all communities • Promote infill development and redevelopment to revitalize existing communities • Promote developments, which provide a mix of uses • Promote “people scaled”, walkable communities • Support the preservation of stable, single-family neighborhoods 	<u>Consistent</u> - The Specific Plan provides a mixed-use development of local-serving retail, office, civic and public facility and residential uses. The proposed land use mix and trail network would be included to encourage walkability between proposed uses. The land use plan includes neighborhood parks central to each neighborhood and a central community park, providing development of residential and recreational uses adjacent to one another. The project includes a mixture of home types and densities, with the majority being single family detached.
Principle 3	<ul style="list-style-type: none"> • Enable prosperity for all people • Provide, in each community, a variety of housing types to meet the housing needs of all income levels • Support educational opportunities that promote balanced growth • Ensure environmental justice regardless of race, ethnicity or income class • Support local and state fiscal policies that encourage balanced growth • Encourage civic engagement 	<u>Consistent</u> - Implementation of the Specific Plan would result in the development of a variety of housing types and densities including multi-family units, adjacent to an existing urbanized area. Local serving retail commercial, residential, civic (fire station, police commercial space, two schools and a potential community college) and recreational development. The proposed project is subject to the City’s inclusionary housing regulations which require that affordable housing units be provided as part of project approval. An

¹⁷ Source: *East Area 1 Specific Plan Fiscal Analysis of Annexation City of Santa Paula*, Stanley R. Hoffman Associates, Inc., August 20, 2007.

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

POLICY OR PRINCIPLE NUMBER	APPLICABLE GOAL	CONSISTENCY ANALYSIS
		amphitheater as well as community meeting space would be constructed as part of the proposed project and which could be used for civic engagements. All on-site land uses would be equally available to all members of the society.
Principle 4	<ul style="list-style-type: none"> • Promote sustainability for future generations • Preserve rural, agricultural, recreational and environmentally sensitive areas • Focus development in urban centers and existing cities • Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste • Utilize “green” development techniques 	<p><u>Consistent</u> – See response to Principle 2. In addition, the proposed project includes the preservation of 134.4 acres of open space comprised of an agricultural preserve and natural lands. In order to mitigate impacts associated with the conversion of land within an existing City Greenbelt area, as a condition of approval, the Project Applicant will record an agricultural conservation covenant on 34 acres of land located approximately seven (7) miles southwest of the project site within the Santa Paula-San Buenaventura Greenbelt. This area is located within the City’s Area of Interest. In addition, the agricultural productivity of this land is equal in economic value to that produced by the 297 acres contained within the project site and would be converted to urban uses under the proposed project. See Section 4.2 (Agricultural Resources) of this EIR for more detail. Approximately 89 acres of active and passive parks, greenways and trails and would also be constructed on-site. Restoration of the portion of Haun Creek contained on-site would also be implemented. Moreover, the proposed project is contained within an Expansion Area planned for urbanization, as identified in the General Plan. Land uses proposed under the Specific Plan would be subject to the City’s source reduction requirements. The mix of land uses would also promote walking, bicycle riding and the use of public transit, thus reducing City resident pollution emissions. The Specific Plan Development Standards require use of green materials and development techniques.</p>

Source: P&D Consultants, 2007.

Of the 22 policies evaluated above, the proposed project would be consistent with all of these. In addition, of the four (4) principles evaluated above, the proposed project would be consistent with all of these. Therefore, impacts related to consistency with SCAG’s RCPG and Growth Visioning would be less than significant.

4.1.4.4 Ventura LAFCO

The proposed project is currently located outside of the City's Sphere of Influence ("SOI") boundary. Accordingly, a number of actions are required to implement the Urban Expansion goals of the Land Use Element including amending the City's current SOI to include the East Area 1 project site.

As noted in Section 3.0 (Project Description), LAFCO is responsible for a number of actions related to the proposed project including consideration and approval of a SOI amendment and reorganization.¹⁸ As shown in Figure 4.1-3, annexation of the project site would result in the creation of islands of unincorporated territory within the City's boundaries. Pursuant to Government Code § 56744, LAFCOs are generally prohibited from annexing territory to a City if, as a result of that annexation, unincorporated territory is completely surrounded by that City.¹⁹ Therefore, implementation of the proposed project would result in an adverse significant impact related to LAFCO reorganization policy.

It should be noted that providing annexation of the project is approved by Ventura LAFCO, the City intends to address the islands of unincorporated territory created by the East Area 1 Specific Plan. The City will submit a separate annexation/reorganization application associated with the East Area 2 Expansion Area.

The analysis contained within Table 4.1-5 provides an evaluation of the proposed project's consistency with Government Code § 56668 which LAFCO is required to consider in its decision to approve a boundary reorganization request.

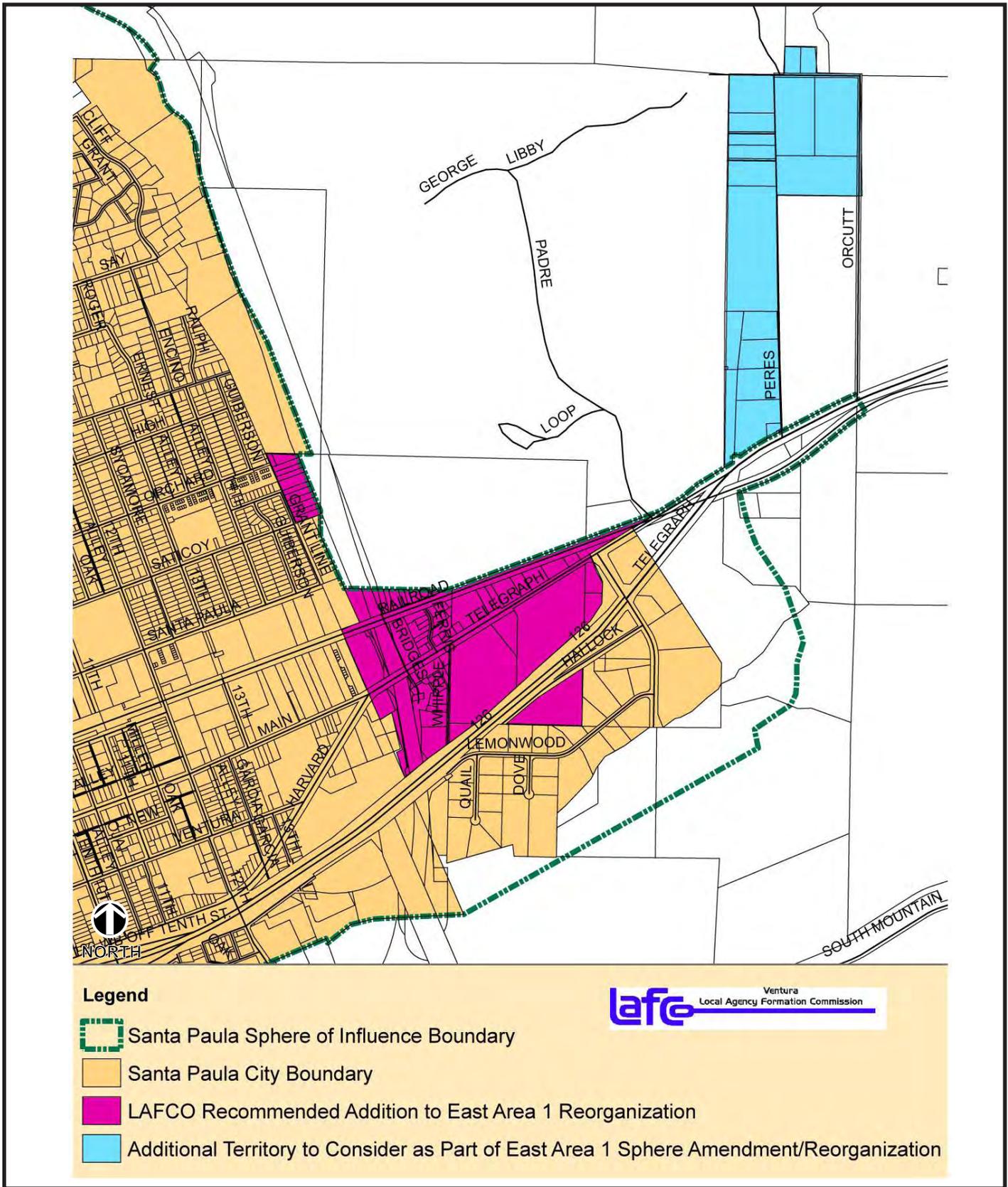
Although the analysis provided above determined that annexation of the project site would be consistent with 14 of 16 factors identified in Government Code §56668, annexation of the Project would create islands of unincorporated territory to the west and south. Therefore, annexation of the project site would be inconsistent with LAFCO reorganization criteria and this inconsistency is considered a significant impact.

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

Impacts to HCPs and NCCPs are discussed in Section 4.7 (Biological Resources) of this EIR, as previously noted.

¹⁸ Note: Reorganization will include annexation of a total of 501 acres comprising the project site to the City of Santa Paula and detachment of the same territory from the Ventura County Resource Conservation District and Ventura County Fire Protection District.

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



Source: Ventura LAFCO (2006) & P&D Consultants, Inc. (2007)

Figure 4.1-3
LAFCO Recommended Reorganization Areas for East Area 1

**TABLE 4.1-5
PROPOSED SPECIFIC PLAN CONSISTENCY WITH
SECTION 56668 OF THE CALIFORNIA GOVERNMENT CODE**

SECTION OR SUBSECTION	REQUIREMENT	CONSISTENCY ANALYSIS
SECTION 56668		
(a)	Population and population density; land area and land use; per capita assessed valuation; topography, natural boundaries, and drainage basins; proximity to other populated areas; the likelihood of significant growth in the area, and in adjacent incorporated and unincorporated areas, during the next 10 years.	<u>Consistent</u> – Implementation of the proposed project would add 1,500 dwelling units or net increase in the City’s population of approximately 5,275 ²⁰ new residents. In addition, commercial, light industrial and civic institutional uses are also proposed which would increase the daytime population of this area and the City as a whole. Based upon the current non-residential land use mix proposed for the project, a daytime population of 1,305 ²¹ persons is anticipated to be generated. The project site is comprised of 501 acres of land uses, the majority of which are designated for agricultural uses. A portion of the site is currently designated as limited industrial by the Ventura County Non-Coastal Zoning Ordinance. The proposed project is located immediately adjacent (east side) to the City of Santa Paula within an area identified by the General Plan as the East Area 1 Expansion Area. This Expansion Area is identified by the Specific Plan for urbanization by 2020.
(b)	Need for organized community services; the present cost and adequacy of governmental services and controls in the area; probable future needs for those services and controls; probable effect of the proposed incorporation, formation, annexation, or exclusion and of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas. "Services," as used in this subdivision, refers to governmental services whether or not the services are services which would be provided by local agencies subject to this division, and includes the public facilities necessary to provide those services.	<u>Consistent</u> – The General Plan requires that a Fiscal Analysis Report (FAR) be prepared for all Expansion Area in order to evaluate the fiscal implications of annexation. The analysis contained within the FAR indicates that annexation of the project site would not be a fiscal burden to the City and revenues generated by the project would be sufficient to finance and maintain necessary public services, including fire suppression and prevention, law enforcement, parks and recreation and public services. ²²

²⁰ Note: Population total is based upon the following assumptions: 1,430 dwelling units times 3.52 persons per unit, 70 work/live units times 2.00 persons per unit, and 100 assisted living units times 1.0 persons per unit.

²¹ East Area One Specific Plan Fiscal Analysis of Annexation City of Santa Paula, June 5, 2007, page 6.

²² Source: East Area 1 Specific Plan Fiscal Analysis of Annexation City of Santa Paula, Stan Hoffman Associates, July 2007.

**TABLE 4.1-5
PROPOSED SPECIFIC PLAN CONSISTENCY WITH
SECTION 56668 OF THE CALIFORNIA GOVERNMENT CODE**

SECTION OR SUBSECTION	REQUIREMENT	CONSISTENCY ANALYSIS
(c)	The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on the local governmental structure of the county.	<u>Consistent</u> – See response (a) above. In addition, the project site is located within the City’s LAFCO-approved Area of Interest and is identified within the City’s General Plan as a planned Expansion Area. Annexation of the project site would not adversely affect the mutual social or economic interest or local governmental structure of the County. Implementation of the proposed project represents a planned, long-term action contemplated by the City, as manifested in its General Plan. In addition, County residents and agencies have been afforded the opportunity to provide in put relative to these planning actions.
(d)	The conformity of both the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies and priorities set forth in Section 56377.	<u>Consistent</u> – See responses (a) and (c) above.
(e)	The effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by Section 56016.	<u>Consistent</u> – The proposed project would include an Agricultural Preserve completely within the northern portion of the Specific Plan. In order to mitigate impacts associated with the conversion of land within an existing City Greenbelt area, as a condition of approval, the Project Applicant will record an agricultural conservation covenant on 34 acres of land located approximately seven (7) miles southwest of the project site within the Santa Paula-San Buenaventura Greenbelt. This area is located within the City’s Area of Interest. In addition, the agricultural productivity of this land is equal in economic value to that produced by the 297 acres contained within the project site and would be converted to urban uses under the proposed project. See Section 4.2 (Agricultural Resources) of this EIR for more detail.

**TABLE 4.1-5
PROPOSED SPECIFIC PLAN CONSISTENCY WITH
SECTION 56668 OF THE CALIFORNIA GOVERNMENT CODE**

SECTION OR SUBSECTION	REQUIREMENT	CONSISTENCY ANALYSIS
(f)	The definiteness and certainty of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment or ownership, the creation of islands or corridors of unincorporated territory, and other similar matters affecting the proposed boundaries.	<u>Inconsistent</u> – The proposed project is comprised of four (4) contiguous APNs and which are generally bounded by Santa Paula Creek to the west, Haun Creek to the east, Telegraph Road to the south and open space (natural areas) to the north. These APNs follow lines of assessment and ownership. However, as noted above (and previously shown in Figure 4.1-3), annexation of the project site would create islands of unincorporated areas located to the west and south.
(g)	Consistency with city or county general and specific plans.	Inconsistent – See Table 4.1-3, response 4.p.p above.
(h)	The sphere of influence of any local agency which may be applicable to the proposal being reviewed.	<u>Consistent</u> – The proposed project is located adjacent to, but outside of the City of Santa Paula’s Sphere of Influence. The General Plan indicates that it is the City’s intention to amend the current Sphere of Influence to include the East Area 1 Expansion Area in which the proposed project is located.
(i)	The comments of any affected local agency or other public agency.	<u>Consistent</u> – The EIR and Specific Plan will be available for public review and comment per the requirements of CEQA. In addition, responses to all comments received on these documents will be prepared and available for LAFCO review and consideration.
(j)	The ability of the newly formed or receiving entity to provide the services which are the subject of the application to the area, including the sufficiency of revenues for those services following the proposed boundary change.	<u>Consistent</u> – See response (b) above.
(k)	Timely availability of water supplies adequate for projected needs as specified in Section 65352.5.	<u>Consistent</u> – The preliminary Water Supply Assessment determined that on-site groundwater supplies are sufficient to meet project demand. ²³ However, it should be noted that the City Council must review and approve the findings and conclusions contained within the Assessment.

²³ Source: Water Supply Assessment & Verification for the East Area 1 Specific Plan Project, City of Santa Paula, Department of Public Works, May 2007. Refer to Appendix Q of this EIR.

**TABLE 4.1-5
PROPOSED SPECIFIC PLAN CONSISTENCY WITH
SECTION 56668 OF THE CALIFORNIA GOVERNMENT CODE**

SECTION OR SUBSECTION	REQUIREMENT	CONSISTENCY ANALYSIS
(l)	The extent to which the proposal will affect a city or cities and the county in achieving their respective fair shares of the regional housing needs as determined by the appropriate council of governments consistent with Article 10.6 (commencing with Section 65580) of Chapter 3 of Division 1 of Title 7.	<u>Consistent</u> – The proposed project would provide a total of 1,500 dwelling units (including single-family, multi-family and live-work). In addition, the project is subject to the City’s inclusionary housing regulations which requires that the affordable housing units be included within the Specific Plan housing composition. See Section 4.16 (Housing & Population) of this EIR for more detailed information.
(m)	Any information or comments from the landowner or owners.	<u>Consistent</u> – See response (i) above.
(n)	Any information relating to existing land use designations.	<u>Consistent</u> – See response (a) above and information provided previously in this Section 4.1 (Land Use & Planning) of the EIR.
SECTION 56668.3		
(a)	<p>If the proposed change of organization or reorganization includes a city detachment or district annexation, except a special reorganization, and the proceeding has not been terminated based upon receipt of a resolution requesting termination pursuant to either Section 56751 or Section 56857, factors to be considered by the commission shall include all of the following:</p> <ol style="list-style-type: none"> 1. In the case of district annexation, whether the proposed annexation will be for the interest of landowners or present or future inhabitants within the district and within the territory proposed to be annexed to the district. 2. In the case of a city detachment, whether the proposed detachment will be for the interest of the landowners or present or future inhabitants within the city and within the territory proposed to be detached from the city. 3. Any factors which may be considered by the commission as provided in Section 56668. 	<u>Consistent</u> - Section 56668.3 is not applicable to the proposed project.

**TABLE 4.1-5
PROPOSED SPECIFIC PLAN CONSISTENCY WITH
SECTION 56668 OF THE CALIFORNIA GOVERNMENT CODE**

SECTION OR SUBSECTION	REQUIREMENT	CONSISTENCY ANALYSIS
	4. Any resolution raising objections to the action that may be filed by an affected agency. 5. Any other matters which the commission deems material. 6. The commission shall give great weight to any resolution raising objections to the action that is filed by a city or a district. The commission's consideration shall be based only on financial or service related concerns expressed in the protest. Except for findings regarding the value of written protests, the commission is not required to make any express findings concerning any of the factors considered by the commission.	
SECTION 56668.5		
Not Applicable	The commission may, but is not required to, consider the regional growth goals and policies established by a collaboration of elected officials only, formally representing their local jurisdictions in an official capacity on a regional or subregional basis. This section does not grant any new powers or authority to the commission or any other body to establish regional growth goals and policies independent of the powers granted by other laws.	<u>Consistent</u> - Section 56668.5 is not applicable to the proposed project.

Source: P&D Consultants, 2007.

4.1.5 MITIGATION MEASURES

LU-1 Before approval of the East Area 1 Specific Plan (SP3), an amendment to the General Plan Land Use Element must be approved by the City Council and ratified by a majority of registered voters within the City of Santa Paula.

LU-2 The General Plan must be amended to change the CURB boundaries (Figure LU-4a) in accordance with Section III(G) of the General Plan Land Use Element to include the 501 acres comprising the East Area 1 Specific Plan (SP3) project site.

- LU-3 The City must prepare and process a Sphere of Influence Amendment request with Ventura LAFCO.
- LU-4 To mitigate the impact from creating islands of unincorporated territory that would result from annexing the East Area 1 project site to the City, the City must submit an East Area 2 reorganization request to LAFCO to seek annexation of any remainder island parcels resulting from an East Area 1 annexation.

4.1.6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

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.