

9.0 UNAVOIDABLE ADVERSE IMPACTS

This section summarizes the unavoidable adverse impacts associated with proposed project. Specifically, Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR):

“Describe any significant impacts, including those which can be mitigated, but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.”

Section 4.0 (Existing Conditions, Impacts, Mitigation Measures and Level of Significance) of this EIR documents the analysis of the potentially significant adverse impacts associated with the Specific Plan. The proposed Specific Plan would result in unavoidable adverse impacts related to land use and planning, agricultural resources, air quality, aesthetics and cultural and scientific resources even after mitigation, as noted in the analyses contained within Section 4.0 of this EIR.

9.1 LAND USE AND PLANNING

As described in Section 4.1 (Land Use and Planning) of this EIR, the proposed Specific Plan would be inconsistent with a number of goals, policies and objectives (briefly summarized below) which include:

- 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 growth management regulations which are not entirely consistent with those contained within the Santa Paula Municipal Code
- The proposed Specific Plan increases the density and land use from those identified in the General Plan for the East Area 1 Expansion Area
- 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.

Although identified mitigation measures LU-1 through LU-4 (see Section 4.1 of this EIR) would assist in reducing impacts associated with implementation of the proposed project, they would not entirely reduce impacts to below a level of significance. Therefore, implementation of the proposed project would continue to result in significant unavoidable adverse impacts.

9.2 AGRICULTURAL RESOURCES

As described in Section 4.2 (Agricultural Resources) of this EIR, the proposed Specific Plan would result in the loss of agricultural resources and impacts to adjacent agricultural operations. In particular, it would result in the loss of 352 acres of land designated by the California Department of Conservation as Prime and/or Unique Farmland. In addition, 350 acres of land in active agricultural production would be permanently removed from these activities. Implementation of the proposed project would also permanently alter the Santa Paula-Fillmore Greenbelt. Additional impacts would include incompatibility with adjacent agricultural resources, due to the introduction of urban uses and inconsistency with City of Santa Paula, County of Ventura and Ventura Local Agency Formation Commission policies concerning the loss of agricultural lands. As noted in Section 4.2 of this EIR, these impacts would be considered a significant unavoidable adverse impact despite the provision of mitigation measures.

9.3 AIR QUALITY

As described in Section 4.5 (Air Quality) of this EIR, implementation of the proposed Specific Plan would result in significant and unavoidable regional air quality impacts. The analysis shows that the project would generate long-term operational (regional) emissions of criteria air pollutants and precursors and that the generation of ROC and NO_x would be significant during building construction on a project level and on a cumulative basis, which includes significant emissions of NO_x during mass grading. Implementation of mitigation measures AQ-1 through AQ-12 would reduce regional emissions of criteria pollutants by approximately 15 percent, as well as reduce fugitive PM₁₀ dust emissions by over 50 percent attributable to the dust control BMP as part of the project. However, even with implementation of the proposed mitigation measures, regional emissions of ROC and NO_x emissions would still exceed the VCAPCD threshold of 25 pounds per day and therefore this impact would be considered a significant unavoidable adverse impact.

9.4 AESTHETICS

As described in Section 4.11 (Aesthetics) of this EIR, implementation of the proposed Specific Plan would result in a number of unavoidable adverse impacts:

Although the views of construction of the proposed project would not be permanent, they would persist for approximately 10 years as the various phases of the project are constructed. These visual impacts from construction of the proposed project would be significant and adverse.

Existing views of the project site are of orchards and agricultural land with a backdrop of mountains beyond the site. The General Plan identifies these kinds of views as scenic. Implementation of the proposed project would result in the loss of scenic views of orchards and row crops, as these elements would be replaced with views of structures, parks, and open spaces (detention basins and landscaping). Therefore, implementation of the proposed project would result in a significant adverse impact to scenic vistas. There are no mitigation measures that would reduce this impact to below a level of significance.

Although the hillsides and bluff in the north part of the project site would be preserved, along with many of the mature trees on the site, orchards and agricultural lands would be removed. These scenic resources would be replaced with urban/suburban uses, which would result in a significant impact related to scenic resources. There are no mitigation measures that would reduce this impact to below a level of significance.

Implementation of the proposed project would permanently change the views of the project site from agricultural lands to developed suburban and urban uses. Although the higher elevations of hills on the north part of the project site would remain undeveloped, and the proposed project includes Development Standards for frontage, building types, architecture, thoroughfares, and landscape, the change in the visual character of the project site would be substantial. The fundamental character of the site would be permanently altered from agricultural to a suburban/urban character. There are no mitigation measures that would reduce this impact to below a level of significance. This change would be considered a significant unavoidable adverse impact.

9.5 CULTURAL AND HISTORIC RESOURCES

As described in Section 4.12 (Cultural and Historic Resources), implementation of the proposed Specific Plan would impact historic resources. The proposed Specific Plan will result in the demolition of buildings and the removal of agricultural features which contribute towards the eligibility of the

Teague-McKevett Ranch property for individual listing on the NRHP and CRHR, and towards its eligibility for designation as a City of Santa Paula Landmark. Even with the implementation of mitigation identified in Section 4.12, the loss of eligible historic resources would be considered a significant unavoidable adverse impact.