

EXECUTIVE SUMMARY

INTRODUCTION AND OVERVIEW

The CEQA Guidelines require the executive summary to identify each of the project's significant effect on the environment with proposed mitigation measure(s) and alternatives that would minimize or avoid that effect. The summary is also required to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

This Draft Environmental Impact Report (EIR) has been prepared to evaluate specific environmental impacts associated with the proposed East Gateway Project (the "Project"). The City of Santa Paula (the "City") is the Lead Agency for the environmental review and, after the comment/response process, is the certifying agency for the Final EIR.

The Project proposes a series of related action including an application for reorganization with the Ventura County Local Agency Formation Commission ("LAFCo"). In addition, the Project proposes a General Plan Amendment (to the Land Use Element) and pre-zoning of the Project area including adoption the East Gateway Specific Plan affecting a portion of the Project site.

The proposed jurisdictional reorganization (annexation) would eliminate one existing island of unincorporated territory located south of State Route 126 (SR126) and to avoid creation of a second larger island of unincorporated territory when the East Area 1 Specific Plan Area is recorded in accordance with LAFCo approvals from March 2011.

On July 22, 2011, the City of Santa Paula circulated a Notice of Preparation (NOP #1; State Clearinghouse Number [SCH] 2011071068) of an environmental impact report (EIR) for review and comment by the public, responsible, and reviewing agencies. The 30-day NOP review period ended on August 22, 2011.

On August 29, 2011, the City circulated a revised NOP (NOP #2) for review and comment. The NOP was revised to reflect minor changes in the proposed pre-zoning of portions of the annexation project area made by the City of Santa Paula in response to comments from LAFCo. The 30-day review period for the revised NOP extended ended on September 29, 2011.

The purpose of public and agency review of the NOP is to assist in identifying potential environmental effects of the project as proposed to assist the lead agency in:

1. focusing the EIR on the effects determined to be potentially significant;

2. identifying the effects determined not to be significant;
3. explaining the reasons for determining that potentially significant effects would not be significant; and
4. identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

During the 30-day NOP comment periods, written comments were received from 13 different agencies, organizations, and individuals. Due to these potential effects that could result from implementation of the proposed project, an EIR is required to more fully evaluate potential adverse environmental impacts that may result from development of the proposed project.

This Draft EIR was prepared in accordance with the California Environmental Quality Act (Public Resources Code §§ 21000, *et seq.*, "CEQA"), the regulations promulgated there under (14 California Code of Regulations §§15000, *et seq.*, the "CEQA Guidelines"), and the City's Environmental Guidelines ("Santa Paula Guidelines").

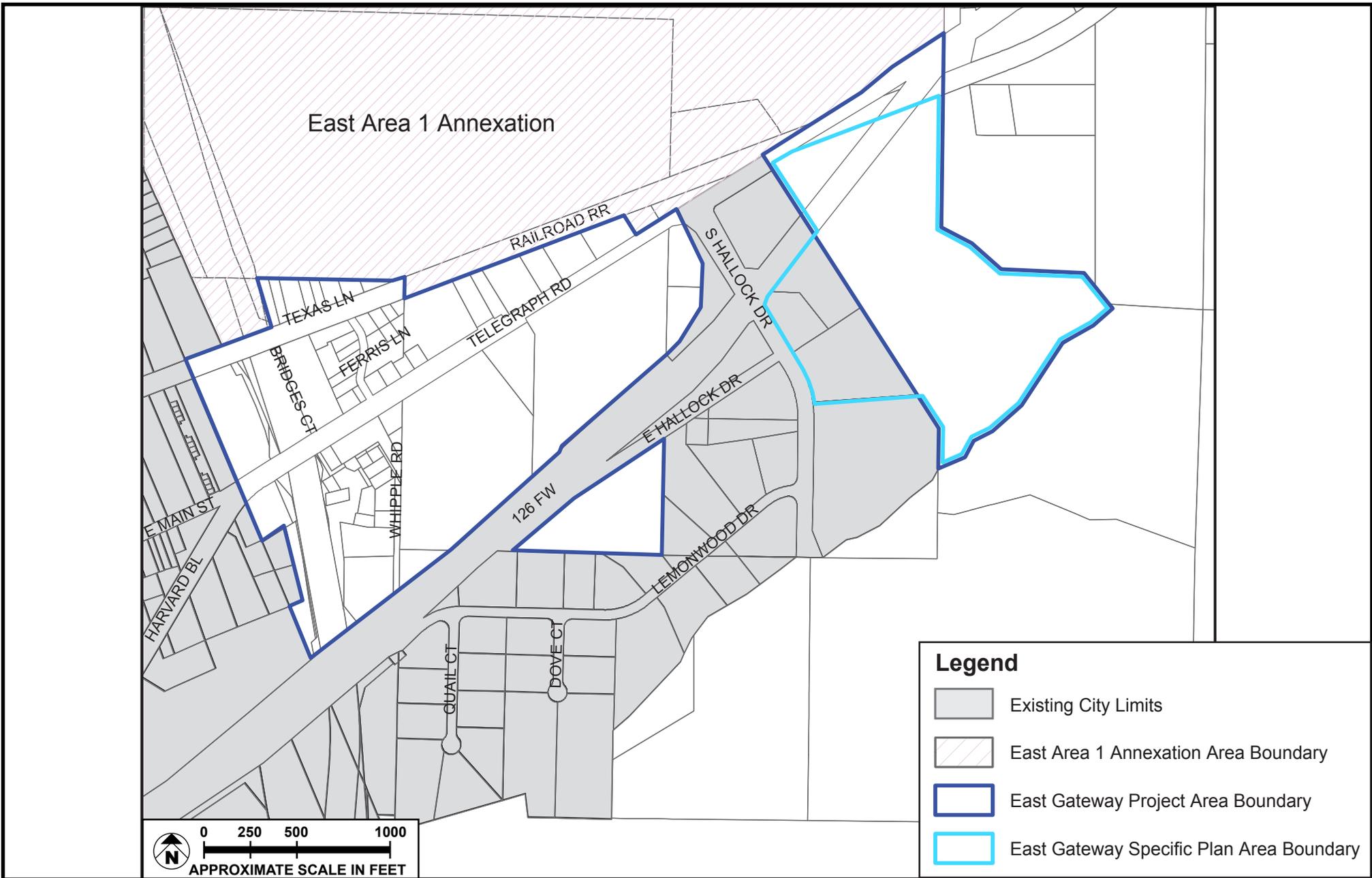
The purpose of this Draft EIR is to inform decision makers and the general public of any significant environmental impacts that may be associated with the planning, construction, and operation of the proposed project. It is also intended to identify appropriate feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts.

PROJECT LOCATION AND SETTING

The East Gateway Project is located within the East Area 2 Planning Area as designated by the Santa Paula General Plan on the eastern edge of the City of Santa Paula. The proposed East Gateway Project areas include approximately 94.5 acres of land consisting of:

- 1) A single parcel of unincorporated land located south of SR 126 and north of Lemonwood Drive;
- 2) A number of parcels located north of SR 126, south of the East Area 1 Specific Plan area, and west of South Hallock Drive proposed for annexation; and
- 3) The proposed East Gateway Specific Plan Area.

The 36.4-acre East Gateway Specific Plan portion of the Project area includes a parcel (to be annexed) just outside of the eastern limit of the City's current boundary and three adjacent vacant parcels already within the City. **Figure ES-1, East Gateway Project Area**, shows the areas proposed for jurisdictional reorganization (annexation) and the proposed East Gateway Specific Plan



SOURCE: Meridian Consultants, LLC - June 2012

FIGURE ES-1

The areas proposed for annexation are located within the Ventura County LAFCo Sphere of Influence for the City of Santa Paula. In addition, the East Gateway Project area is entirely located within the Santa Paula City Urban Restriction Boundary (“CURB”) as currently depicted on the City’s General Plan Land Use Map and Figure LU-4a of the Land Use Element. Due to a mapping error, the CURB as shown on the General Plan Land Use Map does not follow Haun Creek as intended by the voters. In an abundance of caution, the proposed East Gateway Project includes a General Plan Amendment to make various adjustments to the General Plan Land Use Map, including correcting the location of the CURB. As the East Gateway Project Area does not include any land east of Haun Creek, it is located within the CURB. The Project Area includes existing residential, commercial and light industrial development, vacant land, and agricultural land.

PROJECT OBJECTIVES

Pursuant to the CEQA Guidelines,¹ the following objectives are identified for the East Gateway Project, based on the Santa Paula General Plan and the existing physical, environmental, demographic and market conditions:

- Help improve the existing built environment and economic climate of the City by permitting new investment and development in the East Gateway Project Area that reflects and complements the existing pattern and scale of development in Santa Paula;
- Eliminate unincorporated island areas within the City to improve the efficiency of providing public services to existing and future development;
- Provide for retail and other commercial uses that complement the residential, public facility, and small amount of commercial uses in the approved East Area 1 community;
- Provide suitable sites for large commercial centers meeting the needs of the community not presently available in the City of Santa Paula; and
- Provide a suitable site for a major new retail commercial center providing goods and services not presently available in the City of Santa Paula to reduce the length of trips by residents of Santa Paula to more distant commercial areas.

¹ 14 California Code of Regulations § 15124(b).

PROJECT CHARACTERISTICS

The East Gateway Project (the “Project”) would implement the City’s plans for the East Area 2 Planning Area as set forth in the Santa Paula General Plan. It would also fulfill Condition No. 22 of LAFCo Resolution No. 10-12 (adopted March 16, 2011) approving the East Area 1 reorganization (“East Area 1 Project”). As proposed, the East Gateway Project involves a series of related actions including jurisdictional reorganization (annexation); a General Plan Amendment (to the Land Use Element); and adopting a Specific Plan for pre-zoning the project area.

Jurisdictional reorganization (annexation), as approved by LAFCo, would remove an existing island of unincorporated territory located south of SR 126 and avoid creation of a second larger island of unincorporated territory when the East Area 1 Project is recorded.

East Gateway Project Reorganization

The current Ventura County General Plan land use designations for the East Gateway Project area are Existing Community, Open Space and Agricultural with an Urban Reserve overlay designation. The Urban Reserve overlay is applied in the Ventura County General Plan to all unincorporated land within a city’s Sphere of Influence as adopted by the Ventura LAFCo. The County zoning designations for the East Gateway Project area include Rural Exclusive for the existing residential area at the northwest edge of the annexation area, Limited Industrial for the developed areas north and south of Telegraph Road, Open Space for a few parcels, and Agricultural Exclusive for vacant land and land currently in agricultural use.

The City’s General Plan Land Use Element currently designates the majority of the annexation area as Mixed Use Commercial/Light Industrial, with Santa Paula Creek and the Santa Paula Branch Rail Line designated as Passive Open Space.

The majority of the East Gateway Project area would be designated Mixed Use Commercial/Light Industrial consistent with the current Santa Paula General Plan. The area located east of Santa Paula Creek and north of the rail line, currently developed with residential uses, would be designated Single Family Residential, consistent with the current use of this area. This area is currently designated Mixed Use Commercial/Light Industrial by the Santa Paula General Plan. The existing rail line would be designated Open Space – Passive, consistent with the designation applied to this rail line throughout the City.

The existing island of territory located south of SR 126 would be designated Industrial Park, consistent with the land use designation for the surrounding area to the south. This area is also currently designated Mixed Use Commercial/Light Industrial by the City's General Plan.

This proposed East Gateway Specific Plan area includes five parcels and the adjacent portion of SR 126. Three of these parcels located immediately south of SR 126 and east of South Hallock Drive are currently surrounded by the City's jurisdictional boundaries, but are not part of the City. They are still part of the County's unincorporated jurisdiction. The other two parcels are located immediately to the east of the current Santa Paula jurisdictional limits and to the north and south of SR 126. The East Gateway Specific Plan is proposed to master plan access and utility services to support development with the retail commercial and light industrial uses permitted by the City's Mixed Use Commercial/Light Industrial land use designation. The e East Gateway Specific Plan is also proposed to provide appropriate development standards and uniform design standards to ensure high quality development at the eastern entry to the City of Santa Paula on SR 126. The East Gateway Specific Plan area would be designated Specific Plan (SP-) on the City's General Plan Land Use Plan.

Pre-zoning is proposed with zoning designations consistent with the proposed General Plan Land Use designations for the majority of the East Gateway Project areas proposed for annexation. The East Gateway Specific Plan Area would be zoned Specific Plan No. 4 (SP-4) as designated by the Santa Paula Municipal Code.² . The portion of the Project area located west of Hallock Drive between SR 126 and the rail line to the north would be designated Highway Commercial (C-H), with the exception of two parcels that would be zoned Agricultural (A-1) consistent with the existing Ventura County zoning designation of Agricultural – Urban Reserve for these parcels. The area designated Single Family Residential would be zoned Single Family Residential (R-1) and the area designated Industrial Park would be zoned Industrial (I) with an Industrial Park Overlay. The portion of Santa Paula Creek designated Open Space – Passive would also be zoned Open Space – Passive (OS). Parcels containing

² Santa Paula Municipal Code § 16.25.020, Specific Plan Zones Established.

the existing rail line would be zoned Open Space – Parks & Recreation, consistent with the zoning applied to this rail line throughout the City of Santa Paula.

Future development for the East Gateway Project areas to be annexed, with the exception of the East Gateway Specific Plan area, will be determined as applications are submitted to the City. Future development will be subject to the proposed land use and zoning designations. However, to provide a basis for completing environmental review for the lands to be annexed, a set of development assumptions based on allowable Floor Area Ratios (FAR) and uses for each of the Project areas was drafted.

East Gateway Specific Plan

The East Gateway Specific Plan is proposed to master plan the eastern entry into the City on SR 126. The location and configuration of the parcels included in the Specific Plan Area require coordinated planning of access and utilities and uniform development and design standards to implement the Santa Paula General Plan. The East Gateway Specific Plan Area provides for a mix of retail, service and light industrial and office uses, designed and scaled for compatibility with Santa Paula's small town image and identity. This Specific Plan includes comprehensive development standards, guidelines and implementation measures to ensure the creation of a well-organized, flexible and attractive highway-oriented district at the East Gateway to Santa Paula.

The East Gateway Specific Plan's planning framework consists of a clear urban design vision and related standards for traffic circulation and for the four edges of the Specific Plan area, each of which has a distinct in its design character. The Specific Plan's design character responds to the direction in the General Plan's design as follows:

- The north and primary face of the Specific Plan area is towards SR 126, and unique and specific design standards are provided for this important "east gateway" to the City of Santa Paula.
- The west edge of the Specific Plan area abuts active agricultural lands and the Santa Paula/Fillmore Greenbelt and the south edge abuts the Santa Clara River. As directed by best practices and the General Plan, appropriate transitions and landscaped buffers are defined.
- A portion of the western edge of the Specific Plan area faces Hallock Drive, also an important entry to the City from SR 126, and standards similar to those for the north frontage are provided. The balance of the west boundary abuts existing industrial facility and appropriate standards for screening and service are provided.

The traffic circulation plan for the East Gateway Specific Plan area and design standards for each of these frontages would ensure that a unified and flexible mix of commercial and industrial businesses is served by appropriate access and parking, and that it appropriately connects to and contributes to the quality of adjacent areas and environments.

Based on the unique location of the East Gateway Specific Plan area - at the City's eastern gateway and the only large site in Santa Paula with direct access to SR 126 - and based on the General Plan's designation of this area for Highway Commercial use, the primary land use alternative for the site is a regional scale retail and commercial center. Given the site's approximate 36.4-acre size and the General Plan's anticipation of a floor area ratio (FAR) of up to 0.25 for such uses, a retail center (Regional Retail Alternative) of up to 360,000 square feet (sf) would be acceptable. Such a center would provide a range of economic, fiscal and quality of life benefits to the City of Santa Paula.

The General Plan also anticipates the possibility of light industrial and research and development (R&D) uses up to a FAR of 0.30 in this area. That alternative could yield an employment center (Mixed Use/Business Park Alternative) of up to 360,000 sf. Such a center could provide significant economic development, employment and fiscal benefits to the City. Another scenario, defined as the "Mixed-Use Alternative," includes more retail and service commercial uses near the SR 126 frontage and more industrial uses toward the south edge of the East Gateway Specific Plan area.

Accordingly, the East Gateway Specific Plan provides a framework of infrastructure and urban design that would accommodate any of these development programs in an "edge-of-town" setting consistent with Santa Paula's small-town character.

A combination of factors - the irregular shape of the site, the Caltrans setback areas from SR 126 and the open space resources to the east and south, and the parking ratios necessary to support the intended program - reduce the achievable building area for the Regional Retail alternative to approximately 310,000 sf. The achievable building area for the Mixed-Use/Business Park program is estimated to be 360,000 sf. (See **Table ES-1, East Gateway Specific Plan Buildout.**)

SUMMARY OF PROPOSED PROJECT IMPACTS

This EIR is focused on those environmental impact categories identified by the City as having potentially significant impacts during the notice of preparation, and public review period for the initial study. Environmental factors are listed by the level of significance of their impacts, both project-specific and cumulative in **Table ES-2, Significance of Environmental Issues for the Proposed East Gateway Project**, as determined in the initial study and analyzed in the EIR.

**Table ES-1
East Gateway Specific Plan Buildout**

Block	Acres	Regional Retail Center			Mixed-use Employment Center		
		Use	Building Area FAR	FAR	Use	Building Area	FAR
1	4.2	Retail	25,000	0.14	Retail/Service	25,000	0.14
2	5.9	Retail	31,000	0.12	Retail/Service	30,000	0.12
3	6.0	Retail	60,000	0.23	R&D	75,000	0.29
4	3.2	Retail	20,000	0.14	R&D	45,000	0.32
5	5.7	Retail	64,000	0.26	R&D	80,000	0.32
6	7.5	Retail	100,000	0.31	R&D	95,000	0.29
7	2.1	Retail	10,000	0.09	Retail	10,000	0.09
SR 126	1.8	State Highway	NA	NA	NA	NA	NA
Totals	36.4		310,000	0.18		360,000	0.22

**Table ES-1
Significance of Environmental Issues for the Proposed East Gateway Project**

Significant and Unavoidable Impact	Less than Significant Impact With Mitigation	Less than Significant Impact/ No Impact
Agricultural Resources	Aesthetics	Mineral Resources
Transportation and Traffic	Air Quality	Population and Housing
	Biological Resources	Public Service
	Cultural Resources	Recreation
	Geology and Soils	
	Greenhouse Gas	
	Hazards/Hazardous Materials	
	Hydrology, Water Supply and Water Quality	
	Land Use	
	Noise	
	Utilities & Service Systems	

MITIGATION MEASURES

A summary of the impacts, mitigation measures, and residual impacts for the proposed project and alternatives is provided in **Table ES-3, Summary of Project Impacts, Mitigation Measures, and Residual Impacts.**

**Table ES-3
Summary of Project Impacts, Mitigation Measures, and Residual Impacts**

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Aesthetics		
Have a substantial adverse effect on a scenic vista?	5.1-1 Before issuance of an occupancy permit for property developed within the proposed East Gateway Specific Plan Area, a property management association shall be created to provide for maintenance and trimming of the landscape edge along SR 126. Such maintenance efforts shall ensure that the landscape screening does not exceed 35 feet (proposed building height limit) so as to not obstruct views of the South Mountains for eastbound or westbound highway travelers along SR 126.	Residual impacts from the Project will be less than significant.
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No mitigation is required.	Impacts will be less than significant.
Substantially degrade the existing visual character or quality of the site and its surroundings?	No mitigation is required.	Impacts will be less than significant.
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No mitigation is required.	Impacts will be less than significant.
Cumulative Impacts	No mitigation is required.	Impacts will be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Agricultural & Forestry Resources		
Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<p>5.2-1 Before approval of a grading permits that will convert prime farmland as designated on the Department of Conservation's most recent State Important Farmland Map, the applicant must record an agricultural conservation covenant, in a form approved by the City of Santa Paula, on other prime farmland currently under agricultural production within the City of Santa Paula's Area of Interest.</p> <p>The area of the conservation covenant shall be based on the production value of the prime farmland being taken out of production. The production value shall be determined as the annual average of the total crop value for the four (4) year period prior to the issuance of a grading permit. The conservation covenant shall provide for an equivalent amount of acreage to provide for the same production value on the prime farmland being lost (e.g., if one acre of prime farmland being converted produces \$500,000 of crops per year, then an agricultural covenant shall be placed on one-half [$\frac{1}{2}$] acre of land producing \$1,000,000 per year.)</p>	While the application of a conservation easement will protect future agriculture resources, it will not fully mitigate the loss of existing prime farmland. As such, impacts will be significant and unavoidable.
Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No mitigation is required.	Impacts will be less than significant.
Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?	No mitigation is required.	Impacts will be less than significant.
Result in the loss of forestland or conversion of forestland to non-forest use?	No mitigation is required.	Impacts will be less than significant.
Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?	Mitigation Measure 5.2-1 has been identified to mitigate the identified impacts.	Impacts would be significant and unavoidable.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Cumulative impacts	5.2-2 Development in Adams and Fagan Canyons must incorporate design standards to provide for clustering of development to protect agriculture land.	The loss of prime farmland would be considered cumulatively considerable, and significant and unavoidable.
Air Quality		
Conflict with or obstruct implementation of the applicable air quality plan?	No mitigation is required.	Impacts will be less than significant.
Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<p>5.3-1 All developers of new buildings within the East Gateway Project area must implement fugitive dust control measures consistent with VCAPCD Rule 50, Rule 51, and Rule 55 throughout all phases of construction. The project developers must include in construction contracts the control measures required and recommended by the VCAPCD at the time of development. Examples of the types of measures currently required and recommended include the following:</p> <ul style="list-style-type: none"> • Apply water every 4 hours to the area within 100 feet of a structure being demolished to reduce vehicle trackout • Apply water to disturbed soils after demolition is completed or at the end of each day of cleanup. • Prohibit demolition activities when wind speeds exceed 25 mph. • Minimize the area disturbed on a daily basis by clearing, grading, earthmoving, and/or excavation operations. 	Impacts will be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<ul style="list-style-type: none"> • Pre-grading/excavation activities include watering the area to be graded or excavated before the commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during these activities. • All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, must be treated to prevent fugitive dust. Treatments must include, without limitation, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering must be done as often as necessary. • Material stockpiles must be enclosed, covered, stabilized, or otherwise treated, to prevent blowing fugitive dust offsite. • Graded and/or excavated inactive areas of the construction site must be monitored by a city-designated monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe control materials, must be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust. • Signs must be posted on-site limiting on-site traffic to 15 miles per hour or less. • During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations must be stopped to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor must use his/her discretion in conjunction with the VCAPCD in determining when winds are excessive. • 	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<ul style="list-style-type: none"> • Adjacent streets and roads must be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. • Personnel involved in grading operations, including contractors and subcontractors should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations. <p>5.3-2 Before issuance of a grading permit for projects within the reorganization (annexation) areas and the East Gateway Specific Plan area, the contractor must implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project site throughout the project construction phases. All construction contracts must include control measures required and recommended by the VCAPCD at the time of development. Copies of the construction contracts must be submitted to the City prior to issuance of a grading permit to verify these conditions. Examples of the types of measures include the following:</p> <ul style="list-style-type: none"> • Maintain all construction equipment in good condition and in proper tune in accordance with the manufacturer’s specifications. • Limit truck and equipment idling time to five minutes or less. • Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October). • Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, to the extent feasible. 	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.3-3 Before occupancy of new structures within the reorganization (annexation) areas, and the East Gateway Specific Plan area, the project applicant must provide to the City evidence of the following:</p> <ul style="list-style-type: none"> • Use of low-emission technology water heaters including solar, air-source heat pump, natural gas or gas-boosted solar; and • For commercial and light industrial buildings, provide for the owner or a building maintenance association to include provisions for landscaping contractors/personnel to use electric or battery-powered equipment, or other internal combustion equipment that is certified by the California Air Resources Board, or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Ventura County (meaning that the equipment can be easily purchased at stores in Ventura County and the cost of the equipment is not more than 20 percent greater than the cost of standard equipment). <p>5.3-4 Prior to building occupancy, the applicant for projects within the reorganization (annexation) areas and East Gateway Specific Plan, must pay TDM fees as required and calculated by the City pursuant to page 7-15 of the Ventura County Air Quality Assessment Guidelines or the methodology that is in effect at the time of development.</p> <p>Based on the current Ventura County Air Quality Assessment Guidelines methodology, the total TDM fund contribution that would be required to mitigate the emissions of the completed project in 2015 would be \$619,785 under the Regional Retail Center scenario and \$100,485 under the Mixed-Use Employment Center scenario (see Appendix 5.3 to this EIR). Development in years later than 2015 may result in lower emissions and lower TDM fees.</p> <p>The applicant within the East Gateway Specific Plan area must pay the \$619,785 under the Regional Retail Center scenario or \$100,485 under the Mixed-Use Employment Center scenario to the City TDM fund or the fees calculated under the methodology that is in effect at the time of development. The applicants of tentative maps submitted for approval after 2015 may request that the City of Santa Paula recalculate the applicable emissions projections and associated mitigation fee.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Mitigation Measures 5.3-3 and 5.3-4 have been identified to mitigate the identified impacts.	Impacts will be less than significant.
Expose sensitive receptors to substantial pollutant concentrations?	No mitigation is required.	Impacts will be less than significant.
Create objectionable odors affecting a substantial number of people?	No mitigation is required.	Impacts will be less than significant.
Cumulative impacts.	Mitigation Measures 5.3-3 and 5.3-4 have been identified to mitigate the identified impacts.	Impacts will be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Biological Resources		
<p>Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	<p>5.4-1 Before issuance of a grading permit within either the reorganization (annexation) areas or East Gateway Specific Plan area, focused surveys for southern tarplant, umbrella larkspur, Coulter's goldfields, white rabbit-tobacco, chaparral ragwort, and vernal barley must be conducted for any proposed development within both the reorganization (annexation) and East Gateway Specific Plan areas.</p> <p>In the event that southern tarplant, Coulter's goldfields, white rabbit-tobacco, chaparral ragwort, or vernal barley are detected during the course of focused surveys, populations must be avoided or equivalent off-site populations must be identified and protected by a conservation easement or protective covenant prior to development approvals.</p> <p>In the event that umbrella larkspur is detected within proposed impact areas, umbrella larkspur plants must be salvaged at the appropriate time of the year (late summer into fall) prior to any ground disturbance. Plants must be immediately transplanted to appropriate on-site areas, matching the habitat characteristics from which they were collected in terms of slope, aspect, hydrology, soil, and vegetative composition. Salvaged seeds of these plants shall also be scattered in the planting sites prior to winter rains. Monitoring of the mitigation areas must be conducted quarterly through the first year and annually thereafter for a total period of five years. Monitoring must address issues of plant establishment and vigor, herbivory, and competition by non-native weedy plants.</p> <p>If sufficient adequate habitat is not available for on-site mitigation, off-site mitigation must be accomplished through the preservation of equivalent habitat by a conservation easement or protective covenant supporting roughly equal numbers (1:1 ration) and densities of the affected plants in the project region (western Santa Clara River Valley).</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-2 Before issuance of a grading permit within the East Gateway Specific Plan area for any construction within Haun Creek or Drainage A, all creek bed areas within 300 feet of the construction site and access road must be inspected by a qualified biologist for the presence of arroyo chub (<i>G. orcuttii</i>).</p> <p>Construction work areas must be determined to be absent of arroyo chub immediately before the prescribed work is to be carried out, immediately before any equipment is moved into or through the drainage or habitat areas, and immediately before diverting any stream water. The removal of arroyo chub must be conducted by a qualified biologist using procedures approved by the USACE, USFWS, and/or CDFG, as appropriate, and with the proper collection and handling permits. Species must be relocated to nearby suitable habitat areas, and a plan to relocate these species must be submitted to the CDFG for review and approval no later than 30 days prior to construction.</p> <p>A qualified biologist must be present when any stream/river diversion takes place, or when block nets and seines are used and must patrol the areas both within, upstream and downstream of the work area to rescue any species stranded by the diversion of the stream water or trapped by the nets/seines. Species that are collected must be relocated to suitable locations downstream of the work area.</p> <p>Block nets, or fences with 0.125-in-square mesh, 18 inches high and buried 6 inches, must be placed downstream of the work area to assure that arroyo chub does not move into the construction area.</p>	
	<p>5.4-3 Before issuance of a grading permit within either the reorganization (annexation) areas or East Gateway Specific Plan area, focused surveys must be conducted by a qualified biologist to determine the presence or absence within suitable habitat on the site for silvery legless lizard, coastal whiptail, coast horned lizard, two-striped garter snake, or south coast garter snake. If any of these species are detected during the survey, they must be relocated to appropriate habitat areas away from the development area.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-4 Before issuance of a grading permit for construction activities within either the reorganization (annexation) areas or East Gateway Specific Plan area, that will occur during the bird nesting/breeding season, from January through March for early nesting birds (e.g., Coopers hawks or hummingbirds) and from mid-March through September for most bird species, a qualified biologist must conduct surveys for active nests. To determine the presence/absence of active nests, pre-construction nesting bird surveys must be conducted weekly beginning 30 days prior to initiation of ground-disturbing activities, with the last survey conducted no more than three days prior to the start of clearance/construction work. If ground-disturbing activities are delayed, additional pre-construction surveys must be conducted so that no more than three days have elapsed between the survey and ground-disturbing activities.</p> <p>Surveys must include examination of trees, shrubs, and the ground for nesting birds. Several bird species such as killdeer and night hawks are known to nest on bare ground. Protected bird nests that are found within or adjacent to the construction zone must be protected by a buffer deemed suitable by a qualified biologist, and verified by the CDFG.</p> <p>A 300-ft buffer must be provided for all nesting bird species, and a 500-foot must be provided buffer for raptor species. Buffer areas must be delineated with orange construction fencing or other exclusionary material that would inhibit access within the buffer zone. Installation of the exclusionary material delineating the buffer zone must be verified by a qualified biologist prior to initiation of construction activities. The buffer zone must remain intact and maintained while the nest is active (<i>i.e.</i>: occupied or being constructed by the adult bird(s)) and until young birds have fledged and no continued use of the nest is observed, as determined by a qualified biologist.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-5 Thirty days prior to any ground disturbing and/or construction activities within the reorganization (annexation) areas and East Gateway Specific Plan area, a qualified biologist must conduct CDFG protocol surveys to determine whether burrowing owl is present on the site at the time of construction. The surveys must consist of three site visits and be conducted in areas dominated by field crops or fallow agricultural fields, or if such habitats occur within 500-feet of a construction zone.</p> <p>If located, occupied burrows must not be disturbed during the nesting (breeding) season (February 1 through August 31) unless a qualified biologist approved by CDFG verifies through non-invasive methods either that the birds have not begun egg-laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival.</p> <p>If burrowing owl is detected but nesting is not occurring, construction work can proceed after any owls have been evacuated from the site using CDFG-approved burrow closure procedures and after alternative nest sites have been provided in accordance with the CDFG Staff Report on Burrowing Owl Mitigation dated March 7, 2012 or any subsequent CDFG protocol.</p> <p>Unless otherwise authorized by CDFG, a 500-foot buffer, within which no activity will be permissible, will be maintained between construction activities and nesting burrowing owls during the nesting season. This protected area will remain in effect from February 1 until August 31 or at CDFG's discretion and based upon monitoring evidence.</p>	
	<p>5.4-6 Thirty days prior to any ground disturbing and/or construction activities within the reorganization (annexation) areas and East Gateway Specific Plan area, a qualified biologist must conduct focused surveys for least Bell's vireo within areas that are within 500 feet of riparian vegetation.</p> <p>If least Bell's vireo is detected during these surveys, consultation with CDFG and the US Fish and Wildlife Service (under Section 7 or Section 10 of the Clean Water Act, as applicable, and depending on a nexus with other federal permitting requirements), and project design features shall be incorporated to eliminate adverse impacts to the species.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-7 Within 30 days prior to the commencement of construction activities in the reorganization (annexation) areas or East Gateway Specific Plan area, a pre-construction survey must be conducted by a qualified biologist to determine if active roosts of special-status bats are present on or within 300-feet of the proposed disturbance area boundaries. Surveys must include structures and large trees (particularly trees 12-in in diameter or greater at 4-and-½ feet above grade with loose bark or other cavities) and must be conducted by a qualified bat biologist (<i>i.e.</i>, a biologist holding a CDFG collection permit and a Memorandum of Understanding with CDFG allowing the biologist to handle bats).</p> <p>Should an active maternity roost be identified during the breeding season of native bat species from April 1 through August 31), the roost must not be disturbed and no construction activities occur within 300-feet of the roost until the roost is vacated and juveniles have fledged. If active maternity roosts or hibernacula are found, the roost site must be avoided (<i>i.e.</i>, not removed). If disturbance of the maternity roost must occur, the bat biologist must survey (through the use of radio telemetry or other CDFG approved methods) for nearby alternative maternity colony sites. If the bat biologist determines, in consultation and approval of CDFG, that there are alternative roost sites used by the maternity colony and young are not present, then no further action is required.</p> <p>If a maternity roost will be impacted and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony of equivalent size must be provided on, or in close proximity to the East Gateway Project areas no less than three months prior to the eviction of the colony. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. CDFG must be notified of any hibernacula or active nurseries within the construction zone.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>If non-breeding bat hibernacula are found in trees scheduled to be removed, the individuals must be safely evicted, under the direction of a qualified bat biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week must pass after doors are installed and temperatures must be sufficiently warm for bats to exit the roost.</p> <p>Roosts that need to be removed in situations where the use of one-way doors is not necessary, if in the judgment of the qualified bat biologist in consultation with CDFG, must first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree must not be removed or the grading should occur the next day (i.e., there should be no less or more than one night between initial disturbance and the grading or tree removal).</p> <p>If an active maternity roost is located and alternative roosting habitat is available, the demolition of the roost site must commence before maternity colonies form (i.e., prior to March 1) or after young are flying (i.e., after July 31) using the exclusion techniques described above.</p> <p>Any special-status species bat day roost sites found by a qualified biologist during pre-construction surveys to be directly within project the disturbance footprint or indirectly (within 300-feet of project-related disturbance footprint) must be mitigated with creation of artificial roost sites. The applicant at time of the proposed development must establish an alternative roost site(s) within suitable preserved open space as determined by the project biologist in consultation with CDFG located at an adequate distance from sources of human disturbance.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-8 In areas where arroyo willow–mulefat thickets will be impacted as part of project implementation, mitigation for acreage impacted must be implemented at a minimum of a one to one (1:1) ratio or as determined appropriate by the CDFG.</p> <p>Acceptable mitigation may replace or enhance the existing arroyo willow – mulefat thicket vegetation, and may include the removal and elimination of fig-marigold (<i>Carpobrotus edulis</i>), Peruvian-pepper (<i>S. molle</i>), poison hemlock (<i>C. maculatum</i>), fennel (<i>Foeniculum vulgare</i>), kapok vine (<i>Araujia sericifera</i>), greater periwinkle (<i>Vinca major</i>), black mustard (<i>Brassica nigra</i>), Indian-fig (<i>Opuntia ficus-indica</i>), castor-bean (<i>Ricinus communis</i>), horehound (<i>Marrubium vulgare</i>), river red gum (<i>E. camaldulensis</i>), blue gum (<i>E. globulus</i>), tree tobacco (<i>Nicotiana glauca</i>), salt-cedar (<i>Tamarix ramosissima</i>), date palm (<i>P. dactylifera</i>), Mexican fan palm (<i>W. robusta</i>), giant reed (<i>A. donax</i>), and smilo grass (<i>Piptatherum miliaceum</i>) from on-site drainages and riparian areas. Woody invasive species must be eradicated and controlled prior to the enhancement or replacement of the current vegetation.</p>	
	<p>5.4-9 Before issuance of a grading permit for development within the reorganization (annexation) areas or East Gateway Specific Plan area, the applicant at the time of development and/or its contractor must coordinate with the USACE to verify the impact to federally-regulated waters that may exist within the project site. A Nationwide Permit (NWP) must be obtained and mitigation measures recommended by the USACE and National Oceanographic and Aeronautics Administration's (NOAA) as part of the NWP shall be implemented.</p> <p>Areas determined to be federally regulated by the USACE may also fall under the jurisdiction of the RWQCB, as such a Clean Water Act Section 401 Water Quality Certification (401 Certification) may be required from the RWQCB for impacts to those areas.</p> <p>The project biologist shall consult with the USACE to determine if a Section 7 Biological Consultation is required, as Santa Paula Creek is designated critical steelhead habitat.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-10 Before issuance of a grading permit for development within the reorganization (annexation) area or East Gateway Specific Plan area, a landscaping and irrigation plan must be prepared and must incorporate the planting of native vegetation and use of water conserving irrigation. The landscaping and irrigation plan must be prepared by a licensed landscape architect, and use native plant and tree species. The landscape and irrigation plan must be submitted to the City of Santa Paula Planning Department for review and approval.</p> <p>Non-native plants or vegetation must be avoided in future development areas. The landscaping plans within common areas of development areas must include appropriate provisions to prevent other invasive plant species from colonizing remaining natural areas. These provisions must include the following: (a) review and screening of proposed plant palette and planting plans to identify and avoid the use of invasive species; (b) weed removal during the initial planting of landscaped areas; and (c) the monitoring for and removal of weeds and other invasive plant species as part of ongoing landscape maintenance activities. The frequency and method of monitoring for invasive species must be determined by a qualified botanist.</p> <p>For areas adjacent to the Haun Creek and Santa Clara River riparian corridors, the plan must provide for adequate landscaping to reduce indirect impact including attenuation of noise and reduction of nighttime lighting and glare.</p> <p>To protect native vegetation types established within the East Gateway Specific Plan area, the plants listed in Table 5.4-4, Plant Species to be Avoided During Landscaping on the East Gateway Project Site, shall not be planted within the common landscaped areas of the proposed site plan.</p>	
	<p>5.4-11 Before issuance of a grading permit approval for development within either the reorganization (annexation) area or East Gateway Specific Plan area, the applicant at the time of development must obtain a Tree Removal Permit for any jurisdictional trees to be removed consistent with SPMC §§ 17.56.010 through 17.56.120.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-12 During construction, the construction contractor must install waste and recycling receptacles that discourage foraging by wildlife species that are adapted to more urban environments, such as crows, raccoons, and skunks. Waste and recycling receptacles must have lids and be emptied on a regular basis to prevent over flow.</p>	
<p>Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?</p>	<p>Mitigation measure MM-5.4-8 has been identified to mitigate potential impacts.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<p>5.4-13 Before issuance of a grading permit for development within the reorganization (annexation) areas or East Gateway Specific Plan area, the project biologist must coordinate with the CDFG to verify the impact to state-protected waters and associated vegetation in the proposed disturbance area(s). If state-protected waters and associated vegetation will be impacted, a Streambed Alteration Agreement (SAA) in accordance with Fish and Game Code §§ 1600 must be obtained, and mitigation measures approved by the CDFG as part of the SAA must be implemented.</p> <p>Before issuance of a grading permit, the project applicant at the time of development must mitigate for temporary and permanent impacts to jurisdictional waters as administered by the CDFG jurisdiction by restoring habitats within those jurisdictions acceptable to CDFG for permanent impacts and temporary impacts. The applicant must prepare a Conceptual Streambed Restoration Plan (CSRP) to document the mitigation program. Habitat must be mitigated on-site or within the same watershed at a ratio as determined by CDFG. These mitigation requirements must be outlined in the CSRP with monitoring requirements and specific criteria to measure the success of the restoration. Guidelines for the CSRP must include:</p> <ul style="list-style-type: none"> • an evaluation of the mitigation site(s), including substantiation of their selection on the basis of their suitability for use as riparian mitigation areas; • procedures for the preparation of soils in the mitigation area, detailed seeding or planting mixtures and methods, and other procedures that will be used for successful re-vegetation; • design recommendations for the avoidance of impacts to jurisdictional waters must be avoided to the extent feasible in the design phase of the project; • maintenance and monitoring requirements, including quarterly and annual monitoring reports to CDFG. 	<p>Impacts will be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.4-14 Before issuance of a grading permit for development within the reorganization (annexation) areas or East Gateway Specific Plan area, the project biologist must coordinate with the USACE to verify the impact to federally protected waters and associated vegetation in the proposed disturbance area(s). If federally protected waters and associated vegetation will be impacted, a Nationwide Permit (NWP) pursuant to the Clean Water Act Section 404 must be obtained.</p> <p>5.4-15 Before issuance of a grading permit for development within either the reorganization (annexation) areas or East Gateway Specific Plan area, the project biologist must coordinate with the USACE to verify areas determined to be federally protected by the USACE that fall under the jurisdiction of the RWQCB, and a Clean Water Act § 401 Water Quality Certification (401 Certification). Should any areas be subject to such requirements, the applicant shall obtain a Clean Water Act § 401 Water Quality Certification (401 Certification) from the RWQCB</p>	
Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Mitigation measures MM 5.4-4 and MM 5.4-10 have been identified to mitigate the identified impacts.	Impacts will be less than significant.
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No mitigation is required.	There would be no impact.
Cumulative Impacts	<p>No mitigation measures are available to effectively reduce the significant impact of losses to biologically sensitive communities and general habitat that currently exists in the expansion areas for Adams and Fagan Canyon.³ Specific mitigation measures must be developed at the time that development is proposed.</p> <p>No mitigation is required for other expansion areas including East Area 2 and West Area 2</p>	The East Gateway Project would not be considered cumulatively considerable and cumulative impacts would be less than significant.

3 Santa Paula General Plan Update EIR, February 1998, p.4.8-14.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Cultural Resources		
Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<p>5.5-1 Before approval of development in the annexation areas for the identified structures that would result in the demolition, destruction, relocation, or alteration to buildings or structures on those parcels identified in the Historic Resources Report for the East Gateway Project (San Buenaventura Ventura Research Associates, 2011) that are rated with a CHR Status Code prefix of five (5) or lower, the following must be implemented:</p> <ul style="list-style-type: none"> • Each property must be evaluated as part of a site-specific analysis to determine if the property is eligible for listing in the NRHP, CRHR or for City of Santa Paula Landmark designation. • If resources eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation are present, the applicant must modify the Plan of Development to avoid significant cultural resources. • If avoidance is not possible for any proposed building project that involves remodeling, alteration, or a potential physical effect on a structure that is eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation, conduct appropriate and feasible cultural resource recovery operations or alternative before issuance of a grading permit, the applicant must identify mitigations as determined in consultation with the State Historic Preservation Office (SHPO) as required under the National Historic Preservation Act, including the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) that will reduce or avoid adverse impacts. 	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?</p>	<p>5.5-2 Before any future development in previously undisturbed areas not previously surveyed as part of a Phase I cultural resources survey that involves ground disturbance in native soils, the project applicant must submit to the City a Phase I Cultural Resources Assessment by a qualified Cultural Resources Professional meeting Secretary of Interior (SOI) standards. The Phase I Cultural Resources Assessment must include the following information:</p> <ul style="list-style-type: none"> • An archaeological/historical/cultural resources records search must be conducted at the South Central Coastal Information Center (SCCIC), located at the California State University, Fullerton to identify known resources that may be impacted by the project. • A sacred lands search must be requested from the Native American Heritage Commission (NAHC) in Sacramento regarding the possibility of special Native American sites that may be located in the vicinity of any project components. Follow up consultation with all Native American tribes and individuals recommended by the NAHC will be conducted. • A field survey must be conducted by qualified archaeologists and will include intensive pedestrian inspection of the ground surface for evidence of prehistoric (Native American) or historic archaeological materials, and historic resources (e.g., structures, bridges, mines, or wells), in areas where ground disturbance is proposed in previously undisturbed native soils. • Any identified buildings or structures that may be over 45 years of age at the time the study is prepared that may be impacted by the project must be examined by a qualified Architectural Historian meeting SOI standards. The Historian's recommendations must be implemented before construction. • A technical report prepared according to Archaeological Resource Management Report (ARMR) guidelines and OHP standards. Reports must be filed with the South Central Coastal Information Center within 30 days of District acceptance. 	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>Should the Phase I cultural resource survey identifies any significant archaeological resource(s) to be present, the proposed development plan must be modified to avoid the resource(s). If avoidance is not possible, before issuance of a grading permit, the applicant must conduct appropriate cultural resource recovery operations or alternative mitigations as determined in consultation with the State Historic Preservation Offices (SHPO) and Native American tribes, as required under the National Historic Preservation Act.</p> <p>5.5-3 In the event that previously unidentified archaeological resources are discovered during building construction, the contractor must cease work in the immediate area and the City Planning Director shall be contacted. An independent qualified archaeologist, retained by the City at the expense of the applicant, must assess the significance of the find and make mitigation recommendations.</p> <p>5.5-4 Construction monitoring for archaeological resources must be conducted at any time ground-disturbing activities (greater than 12 inches in depth) are taking place in the immediate vicinity of cultural resources. If monitoring does not produce evidence of significant cultural resources within the project area, further mitigation must be limited to construction monitoring, unless additional testing or other specific mitigation measures are determined by a qualified archaeologist to be necessary to ensure avoidance of damage to significant archaeological resources. A technical report documenting monitoring activities must be prepared by a qualified archaeologist in accordance with professional standards and submitted to the City at the completion of construction monitoring. The archaeological monitoring program shall be implemented by an individual meeting the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61); individual field monitors must be qualified in the recognition of cultural resources and possess sufficient academic and field training as required to conduct the work effectively and without undue delay.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p>5.5-5 Before the initiation of earthmoving activities associated with the development of the project site, the services of a qualified paleontologist approved by the City and Los Angeles County Museum (LACM) must be retained.</p> <p>5.5-6 Before the initiation of earthmoving activities associated with the development of the project site, the paleontologist or another mitigation program staff member must conduct a field survey of that portion of the project site underlain by older alluvium to locate and recover any larger fossil remains that might occur at currently unrecorded fossil sites, and to document the presence of strata suitable for containing larger fossil remains or for the collection and processing of sediment or rock samples to allow for the recovery of smaller fossil remains.</p> <p>5.5-7 The paleontologist must develop a formal agreement with a recognized museum repository, such as the LACM, regarding final disposition and permanent storage and maintenance of any fossil remains that might be recovered as a result of the mitigation program, the archiving of associated specimen data and corresponding geologic and geographic site data, and the level of treatment (preparation, identification, curation, cataloguing) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage.</p> <p>5.5-8 The project paleontologist, or authorized mitigation monitor (construction program staff member), must coordinate with appropriate construction contractor personnel to provide information regarding City and County requirements concerning the protection of paleontological resources. Before the initiation of on-site construction activities, construction contractor personnel, particularly heavy-equipment operators, must be briefed on procedures to be followed in the event that fossil remains and a currently unrecorded fossil site are encountered by earthmoving activities, particularly when the monitor is not on site. The briefing will be presented to new contractor personnel as necessary. Names and telephone numbers of the paleontologist, or authorized mitigation monitor (construction program staff member, and other appropriate mitigation program personnel must be provided to appropriate contractor personnel.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.5-9 Earthmoving activities must be monitored by the paleontologist only in those areas of the project site where these activities would disturb previously undisturbed strata. Monitoring must be conducted on a full-time basis in areas underlain by the Saugus Formation, on a half-time basis in areas underlain by older alluvium and, at depths greater than 5 feet below current grade, the younger alluvium. If fossil remains are encountered by earthmoving activities in an area underlain by older or younger alluvium and following approval from the City, monitoring will be increased to full time, at least in the vicinity of the fossil site. On the other hand, if no fossil remains are found once 50 percent of earthmoving activities have been completed in an area underlain by a particular rock unit, monitoring can be reduced to half time in the remainder of the area underlain by the Saugus Formation, and to quarter time in an area underlain by older or younger alluvium following approval from the City.</p> <p>5.5-10 If any paleontological resources are encountered during construction in this area, activities in the immediate area of the find must be halted and the discovery assessed. The paleontologist will recommend appropriate mitigation measures pursuant to guidelines developed by the Society of Vertebrate Paleontologists (SVP).</p> <p>5.5-11 All fossil specimens recovered from the project site as a result of the mitigation program, including those recovered as the result of processing fossiliferous rock samples, must be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock or sediment samples from the older and younger alluvium will be submitted to commercial laboratories for microfossil, pollen, radiometric dating, or other analysis, as appropriate.</p> <p>5.5-12 The paleontologist must maintain daily monitoring logs that include the particular tasks accomplished, the earthmoving activity monitored, the location where monitoring was conducted, the rock unit encountered, the fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data. A final technical report of results and findings will be prepared by the paleontologist, in accordance with any City requirement.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Disturb any human remains, including those interred outside of formal cemeteries?	<p>5.5-13 In the event of a discovery of human bones, suspected human bones, or a burial, during ground-disturbing activities, all excavation in the vicinity must halt immediately and the area of the find protected until a qualified archaeologist determines whether the bone is human. If the qualified archaeologist determines the bones are human, the Ventura County Coroner must be notified before additional disturbance occurs. The construction contractor must ensure that the remains and vicinity of the find are protected against further disturbance until the Coroner has made a finding with regard to PRC 5097 procedures, in compliance with Health and Safety Code Section 7050.5(b). If it is determined that the find is of Native American origin, the City will comply with the provisions of PRC Section 5097.98 regarding identification and involvement of the Native American Most Likely Descendant (MLD).</p>	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Cumulative impacts</p>	<p>Mitigation Measures 5.5-2 through 5.5-13 must be implemented for all future projects within the City.</p> <p>In addition, the following measures have been identified to mitigate impacts for historic resources:</p> <p>5.5-14 All projects must complete a Phase 1 Cultural Resource Study, except where a prior cultural resource study has been performed, or where adequate information has been obtained from the Archaeological Information Center to confirm that no additional work is warranted within the project area.</p> <p>Before approval of development that would result in the demolition, destruction, relocation, or alteration to buildings or structures that are 45 years old or older, the following must be implemented:</p> <ul style="list-style-type: none"> • Each property must be evaluated as part of a site-specific analysis to determine if the property is eligible for listing in the NRHP, CRHR or for City of Santa Paula Landmark designation. • If resources eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation are present, the applicant must modify the Plan of Development to avoid significant cultural resources. <p>If avoidance is not possible for any proposed building project that involves remodeling, alteration, or a potential physical effect on a structure that is eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation, the applicant must conduct appropriate and feasible cultural resource recovery operations or alternative mitigations as determined in consultation with the <u>State Historic Preservation Office (SHPO)</u> as required under the <u>National Historic Preservation Act</u>, including the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), that would reduce or avoid adverse impacts.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Geology/Soils		
<p>Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</p> <p>a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of known fault? Refer to Division of Mines and Geology Special Publication 42.</p>	<p>5.6-1: Before approval of a tentative map and grading permit for the East Gateway Specific Plan or development within the reorganization (annexation) areas,, the location of any zones of deformation, setback zones, and fault locations for the Oak Ridge fault must be identified by a registered civil engineer or certified engineering geologist, having competence in the field of seismic hazard evaluation and mitigation. If the project engineer or geologist determines that a setback from the mapped zones of deformation is required, it must be plotted on the development plans, and maintained for the project development. Such maps and/or exhibits must be submitted to the City Public Works Director for review and approval.</p>	<p>Impacts would be less than significant.</p>
<p>b. Strong seismic groundshaking.</p>	<p>5.6-2: Before approval of a tentative map and grading permit for the East Gateway Specific Plan or development within the reorganization (annexation) areas, a site specific geotechnical report, consistent with the requirements of CGS Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, shall be prepared by a registered civil engineer or certified engineering geologist, having competence in the field of seismic hazard evaluation and mitigation. The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the project, and shall identify portions of the project site containing seismic hazards. The report shall also identify any known off-site seismic hazards that could adversely affect the site in the event of an earthquake. An earthquake engineering evaluation must be performed to determine if ground motions within the project site would be amplified to an extent where greater than CBC and SPMC design values are required. The report must be submitted to the City Public Works Director for review and approval.</p> <p>5.6-3 Structures within the East Gateway Specific Plan and development within the reorganization (annexation) areas must be designed in accordance with the 2010 California Building Code (CBC), as adopted by the SPMC, to ensure safety in the event of an earthquake.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>c. Seismic-related ground failure, including liquefaction.</p>	<p>5.6-4: Before the approval of tentative maps within the East Gateway Specific Plan and development within the reorganization (annexation) areas, a site specific evaluation must be performed to determine if shallow groundwater is present and if soil/alluvial conditions are conducive to liquefaction, lateral spreading and seismic settlement. Should the site be susceptible to liquefaction and lateral spreading, a registered civil engineer or certified engineering geologist must provide recommendations for reducing the potential for liquefaction, lateral spreading and seismic settlement. Suitable mitigation alternatives may include one or more of the following:</p> <ol style="list-style-type: none"> 1. Excavation and removal or recompaction of potentially liquefiable soils; 2. In-situ ground densification (e.g., compaction with vibratory probes, dynamic consolidation, compaction piles, blasting densification, compaction grouting); 3. Other types of ground improvement (e.g., permeation grouting, columnar jet grouting, deep mixing, gravel drains or other drains, surcharge pre-loading, structural fills, dewatering); 4. Deep foundations (e.g., piles, piers), that have been designed to accommodate liquefaction effects; 5. Reinforced shallow foundations (e.g., grade beams, combined footings, reinforced or post-tensioned slabs, rigid raft foundations); and 6. Design of the proposed structures or facilities to withstand predicted ground softening and/or predicted vertical and lateral ground displacements to an acceptable level of risk. <p>A report documenting the evaluation and design recommendations must be prepared and submitted to the City Public Works Director for review and approval.</p>	<p>Impacts would be less than significant.</p>
<p>d. Landslides</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Result in substantial soil erosion, or the loss of topsoil.</p>	<p>5.6-5 Temporary erosion control measures must be provided during construction. An erosion control plan must be prepared and submitted to the City Public Works Director for review and approval prior to the issuance of grading permits. Erosion control measures may include temporary catchment basins and/or sandbagging to control runoff and contain sediment transport on the Site.</p> <p>5.6.6 After construction, disturbed areas must be protected until healthy plant growth is established. Typically, protection may be able to be provided by the use of sprayed polymers, straw wattles, jute mesh or by other measures in accordance with the CBC and SPMC.</p> <p>5.6-7 The applicant at the time of development must comply with conditions under the National Pollutant Discharge Elimination System (NPDES) Permit imposed by the Regional Water Quality Control Board (RWQCB), and to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to be implemented during project construction (see Section 5.9, Hydrology and Water Quality). The SWPPP Best Management Practices (BMPs) ensure that erosion and sediment transport are minimized to assure that potential off-site runoff and erosion is minimized.</p> <p>5.6-8 Topsoil in the East Gateway Specific Plan area must be removed and stockpiled for future use as appropriate based on consultation with the City and/or County; specifications for stocking must be developed and noted on the project grading plans, and must be submitted to the City Public Works Director for review and approval prior to the issuance of a grading permit.</p> <p>5.6-9 Before issuance of a grading permit, site plans must be submitted to the City Public Works Director for review and approval to address long-term erosion control. Project designs must address the potential for erosion and include appropriate protection or paving of exposed ground surfaces, landscaping, providing terraces on slopes, placing berms or V-ditches at the tops of slopes, and installing adequate drainage improvements</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No mitigation is required.	Impacts would be less than significant.
Cumulative impacts.	No mitigation is required.	Impacts would be less than significant.
Greenhouse Gas		
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No mitigation is required. However, Mitigation Measures 5.3-3 and 5.3-4 from Section 5.3, Air Quality , have been identified that would reduce the operational air pollutant emissions associated with the proposed project.	Impacts would be less than significant.
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No mitigation is required.	Impacts would be less than significant.
Hazards & Hazardous Materials		
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No mitigation is required.	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>	<p>5.8-1 Before issuance of a grading permit for projects within the reorganization (annexation areas), all buildings to be demolished or refurbished as part of individual project must be surveyed and sampled for asbestos-containing building materials by a licensed asbestos abatement contractor. If asbestos-containing building materials are determined to be present in the structures to be demolished, all asbestos-containing materials must be removed under acceptable engineering methods and work practices by the licensed asbestos abatement contractor prior to demolition. These practices include, but are not limited to, containment of the area by plastic, negative air filtration, wet removal techniques and personal respiratory protection and decontamination. The process must be designed and monitored by a California Certified Asbestos Consultant. The abatement and monitoring plan must be developed and submitted for review and approval by the appropriate regulatory agencies (currently the City of Santa Paula Building Official and Ventura County Air Pollution Control District) and must include all on-site structures with ACBMs.</p> <p>5.8-2 Before issuance of a grading permit for projects within the reorganization (annexation areas), and demolition and/or refurbishment of buildings as part of individual projects, all loose and peeling paint must be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with local, state, and federal regulations.</p> <p>5.8-3 Before issuance of a grading permit for projects within the reorganization (annexation areas) and the East Gateway Specific Plan area on any individual project site that contains or are known to have historically contained commercial/industrial related uses, the site developer(s) must:</p> <ul style="list-style-type: none"> - Investigate the project site to determine whether it or immediately adjacent areas have a record of hazardous material contamination via the preparation of a preliminary environmental site assessment (ESA), which must be submitted to the City of Santa Paula for review. If contamination is found the report must characterize the site according to the nature and extent of contamination that is present before development activities precede at that site. 	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<ul style="list-style-type: none"> - If contamination is determined to be on site, the City of Santa Paula, in accordance with appropriate agency requirements, must require remediation of the soil and/groundwater conditions on the contaminated site. If further remediation is required, it must be the responsibility of the site developer(s) to complete such remediation prior to construction of the project. - If remediation is required as identified by the local oversight agency, it must be accomplished in a manner that reduces risk to below applicable standards and must be completed prior to issuance of any occupancy permits. Soil remediation methods that could be employed include, but are not limited to, one or more of the following: excavation and on-site treatment, such as above ground bioremediation, soil washing, soil stabilization, soil vapor extraction, or high-temperature soil thermal desorption. Groundwater remediation methods that could be employed include, but are not limited to, pumping water to surface, treating, and returning to aquifer; treating groundwater in place by injecting oxidizing agents; and placing membrane in aquifer and using natural flows to trap contaminants. - Closure reports or other reports acceptable to the City of Santa Paula Fire Department that document the successful completion of required remediation activities, if any, for contaminated soils, must be submitted and approved by the City of Santa Paula Fire Department prior to the issuance of grading permits for site development. No construction must occur in the affected area until reports have been accepted by the City of Santa Paula. 	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.8-4. In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction within the reorganization (annexation areas) and the East Gateway Specific Plan area, construction activities in the immediate vicinity of the contamination must cease immediately. If contamination is encountered, a Risk Management Plan must be prepared and implemented that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development and (2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures must include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Example soil remediation methods that may be employed include, but are not limited to, one or more of the following: excavation and on-site treatment, such as above ground bioremediation, soil washing, soil stabilization, soil vapor extraction, or high-temperature soil thermal desorption. Example groundwater remediation methods that may be employed include, but are not limited to, pumping water to surface, treating, and returning to aquifer; treating groundwater in place by injecting oxidizing agents; and placing membrane in aquifer and using natural flows to trap contaminants. Depending on the nature of contamination, if any, appropriate agencies must be notified (e.g., City of Santa Paula Fire Department and Ventura County Environmental Health Division). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration requirements must be prepared and in place prior to commencement of work in any contaminated area.</p>	
<p>Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>
<p>For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>
<p>For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>
<p>Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>	<p>5.8-5 Before issuance of a grading permit for projects within the reorganization (annexation areas) and the East Gateway Specific Plan area the construction contractor must prepare a construction traffic management plan (CTMP). The CTMP must focus on methods to optimize public safety and minimize traffic disruption along SR 126, 12th Street, South Mountain Road and SR 150 during project construction. The CTMP must include providing written notification to the City of Santa Paula Police and Fire Department of construction activities that would impede movement (such as a lane closures) along SR 126, 12th Street, South Mountain Road and SR 150 to allow emergency response teams to reroute traffic to an alternative route, if needed. The CTMP must be submitted to the City of Santa Public Works Department, the City of Santa Paula Fire Department, and City of Santa Paula Police Department for review and comment prior to initiation of construction activities.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	No mitigation is required.	Impacts would be less than significant.
Cumulative impacts	Implementation of Mitigation Measures 5.8-1 to 5.8-5 have been identified to mitigate the identified impacts on a project-by-project basis.	Impacts would be less than significant.
Hydrology/Water Quality		
Violate any water quality standards or waste discharge requirements?	<p>No mitigation is required. However, the following measures have been identified to mitigate the identified to assure water quality is maintained:</p> <p>5.9-1 Before the City issues an initial grading permit, the Applicant and/or its contractor must have prepared a Stormwater Quality Urban Impact Mitigation Plan (SQUIMP), including Non-Structural, Source Control, and Structural BMPs. A Certified Erosion and Sediment Control Professional or qualified Civil Engineer must prepare the SQUIMP. The SQUIMP must be reviewed and approved as per the requirements of Ventura County and/or the City Engineer. The development of the SQUIMP must conform to the Ventura County NPDES permit, the SQUIMP standards, and the Technical Guidance Manual for Storm Water Quality Control Measures.</p> <p>The SQUIMP must include structural and/or treatment BMPs. The structural BMPs must focus on meeting potential TMDL and pollutant standards for residential developments. The treatment BMPs must conform to the <i>Technical Guidance Manual for Storm Water Control Measures</i>. The SQUIMP guidelines are contained in the <i>National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements</i> for Ventura County.</p>	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	No mitigation is required.	Impacts would be less than significant.
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	No mitigation is required.	Impacts would be less than significant.
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	No mitigation is required.	Impacts would be less than significant.
Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	5.9-2 Grading may occur during the rainy season from October 15th to April 15th, subject to approval by the City Engineer and installation of erosion control facilities. Erosion control measures must be in place and functional between October 15th and April 15th. In order to comply with the October 15 date, revised erosion control plans must be submitted to the City Engineer not later than September 15th of each year from the start of grading or clearing operations to the time of grading bond release.	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.9-3 Temporary irrigation, hydroseeding, and erosion control/sedimentation control measures must be implemented on all temporary grading. Temporary grading is defined to be any grading partially completed and any disturbance of existing natural conditions due to construction activity. These measures will apply to temporary grading activity that remains or is anticipated to remain unfinished or undisturbed in its altered condition for a period of time greater than 30 days or until the beginning of the rainy season, whichever comes first.</p> <p>5.9-4 During site preparation and construction, the Applicant and/or its contractor must minimize disturbance of natural groundcover on the project site until such activity is required for grading and construction purposes. During grading operations, the Applicant and/or its contractor must employ a full-time superintendent for NPDES compliance. If determined necessary by the City Engineer, the NPDES superintendent must be present on the project site not only during normal working hours, (e.g., Monday through Friday), but also on all other days when the probability of rain is 40 percent or higher, as well as before the start of and during all grading or clearing operations until the release of grading bonds.</p> <p>The NPDES superintendent must perform site inspections before a forecast storm, during an extended storm, and after storms. The NPDES superintendent must have full authority to hire personnel, bind the Applicant and/or its contractor in contracts, rent equipment, and purchase materials to the extent needed to effectuate BMPs. The NPDES superintendent must have certifications and training as per the Storm Water Practitioner requirements of the 2007 General Construction Permit, and must provide proof to the City Engineer of satisfactory completion of courses and certifications to meet permit requirements, and any requirements imposed by the City. Proof of such attendance and completion must be provided to the City Engineer before employment of the NPDES superintendent. The project must follow requirements specified in the City of Santa Paula Municipal Code related to Stormwater Quality Management.</p>	
<p>Otherwise substantially degrade water quality?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	No mitigation is required.	Impacts would be less than significant.
Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<p>5.9-5 For areas within the reorganization (annexation areas) that are within the 100-year flood zone, before the construction of structures in areas designated as Flood Zone A (100-year flood plain), the areas must be raised to an elevation of at least 1-foot above the 100-year flood plain elevation. Project applicants at the time of development must design drainage and flood protection improvements to remove the portion of the annexation area from the FEMA-defined 100-year flood plain hazard area.</p> <p>Before the beginning of construction activities, the project applicant at the time of development must submit to FEMA an application for and obtain a Conditional Letter of Map Revision (CLOMR) and implement all conditions imposed by FEMA. Before occupancy of any structures, the project applicant must obtain a Letter of Map Revision (LOMR), and potentially a No Rise Certificate, indicating that construction and implementation of the designed improvements was completed in accordance with the CLOMR and FEMA requirements and that the proposed project has been effectively removed from the 100-year flood hazard area.</p>	Impacts would be less than significant.
Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	No mitigation is required.	Impacts would be less than significant.
Inundation by seiche, tsunami, or mudflow?	No mitigation is required.	Impacts would be less than significant.
Cumulative impacts.	No mitigation is required.	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Land/Planning		
Physically divide an established community?	No mitigation is required.	Impacts would be less than significant.
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?	No mitigation is required.	Impacts would be less than significant.
Conflict with any applicable habitat conservation plan or natural community conservation plan?	No mitigation is required.	There would be no impact.
Cumulative impacts.	No mitigation is required.	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Noise		
<p>Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p>	<p>5.11-1 Consistent with the City of Santa Paula Noise Element, any paving or repaving of the five off-site roadways segment (Hallock Drive south of SR 126, Hallock Drive between SR 126 and Telegraph Road, Telegraph Road north of SR- Main Street between 12th Street and Telegraph Road, Harvard Boulevard between 12th Street and Telegraph Road) that must be conducted in conjunction with implementation of the specific plan must utilize asphalt-rubber paving material consisting of 20 percent recycled rubber or more and 80 percent paving-grade asphalt. Studies have demonstrated that such paving material will reduce traffic noise by 3 to 5 dB(A).</p> <p>5.11-2 In combination with rubberized asphalt paving, the speed limits on the five roadway segment experiencing significant noise impacts off-site (Hallock Drive south of SR 126, Hallock Drive between SR 126 and Telegraph Road, Telegraph Road north of SR- Main Street between 12th Street and Telegraph Road, Harvard Boulevard between 12th Street and Telegraph Road) could be reduced from existing speed limits, when determined feasible. The feasibility would be determined by the City of Santa Paula Public Works Department, who is responsible for determining citywide, vehicle speeds based on engineering standards. In some cases, the reduction of speed limits may not be warranted. Each 5 mile per hour reduction in the speed limit can decrease the CNEL level by about 1 dB(A).</p> <p>5.11-3 Sound attenuation measures shall be incorporated into the design of individual projects to minimize noise from parking lots. These measures could include, but are not limited to, a noise barrier of sufficient size to break the line of sight, an open-space buffer, a setback, or a combination of methods shall be developed along locations between parking lot noise and exterior usable areas within on-site and adjacent residential uses where these uses interface. Acoustical analysis shall be performed to demonstrate that the parking lot does not result in noise levels that exceed City of Santa Paula 3 dB(A) standard. These components shall be incorporated into the plans to be submitted by the applicant to the City of Santa Paula for review and approval prior to the issuance of building permits.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.11-4 Sound attenuation measures must be incorporated into the design of individual projects to minimize noise from loading docks. These measures may include, but are not limited to, designing loading docks to have either a depressed (i.e., below grade) loading area, an internal bay, or a wall to break the line of sight between on-site and adjacent residential land uses and loading operations. Acoustical analysis must be performed to demonstrate that the parking lot does not result in noise levels that exceed the City of Santa Paula 3 dB(A) standard. These components must be incorporated into the plans to be submitted by the applicant to the City for review and approval before the City issues building permits.</p> <p>5.11-5 In order to reduce mechanical, electrical, or other commercial type noise, the individual projects must locate equipment away from receptor areas, install equipment with proper acoustical shielding, and incorporate the use of parapets into building design. Acoustical analysis must be performed to demonstrate that the mechanical, electrical, and other commercial type noise does not result in noise levels that exceed the City of Santa Paula 3 dB(A) standard. These components must be incorporated into the plans to be submitted by the applicant to the City for review and approval before the City issues building permits.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</p>	<p>5.11-6 The construction contractors must use best management practices (BMPs) to reduce vibration due to East Area Gateway construction activities by implementing the following:</p> <ul style="list-style-type: none"> • identifying all uses in the vicinity of individual development projects that may be adversely affected by the vibrations, including residences and non-residential land uses that may contain vibration-sensitive equipment; • installing seismographs at the aforementioned sensitive locations where construction activities would be occurring adjacent to these use, to ensure that vibration thresholds of 80 VdB are not exceeded, and/or that construction activities would not cause structural damage or adversely affect vibration-sensitive equipment; • adjusting vibration amplitudes of the construction equipment used on site to below 80 VdB at adjacent sensitive locations, such as limiting the number of pieces operating in one location at the same time in areas where conditions would impact sensitive structures, the sensitivity of vibration sensitive equipment, and/or human tolerance; • utilizing cast-in-drilled-hole (CIDH) piles in lieu of pile driving; • providing notification to the residential land uses directly adjacent to the project site, at least 10 days in advance, of construction activities that are anticipated to result in vibration levels above the thresholds; • conducting demolition, earthmoving, and ground-impacting operations sequentially, so as not to have two such operations occurring on the project site at the same time; • selecting a demolition method to minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers); and/or • operating earth-moving equipment on the construction site as far away as possible or practical from vibration-sensitive sites, using wheeled or rubber-tracked equipment, and using small pieces of equipment such as smaller bulldozers when possible. 	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	No mitigation is required.	Impacts would be less than significant.
A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<p>5.11-7 The project applicant must require by contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</p> <ul style="list-style-type: none"> • Two weeks before beginning construction, the applicant must notify all surrounding land uses within 200 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period. • Before any site activity, the contractor will be required to submit a material haul route plan to the City of Santa Paula and Ventura County for review and approval. The contractor must ensure that the approved haul routes are used for all materials hauling, to minimize exposure of sensitive receivers to potential adverse noise levels from hauling operations. • Ensure that construction equipment is properly muffled according to industry standards and in good working condition. • Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible. • Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible during all phases of project construction. • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources. 	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<ul style="list-style-type: none"> • Use electric air compressors and similar power tools rather than diesel equipment, where feasible. • Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes. • Construction hours, allowable workdays, and the phone number of the job superintendent must be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent must investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications must be included in the proposed project construction documents, which must be reviewed by the City before the City issues grading permits. 	
<p>For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>
<p>For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Cumulative impacts.	Implementation of Mitigation Measures 5.11-1 to 5.11-5 have been identified to mitigate the identified impacts.	Impacts would be less than significant.
Public Services		
Would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives.	No mitigation is required.	Impacts would be less than significant.
Cumulative impacts.	No mitigation is required.	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Transportation/Traffic		
<p>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</p>	<p>5.13-1 <u>SR 126 & Hallock Drive (Intersection 1)</u> – Improvements to this intersection are already required as mitigation for the approved East Area 1 Specific Plan Project. To mitigate the impacts of the East Gateway Project, the northbound approach shall be widened and reconfigured to consist of one right-turn lane, two through lanes, and two left-turn lanes. in addition to the required East Area 1 improvements. The northbound approach on Hallock Drive may require additional right-of-way to accommodate the proposed lane configuration. These improvements will require coordination with and approval by California Department of Transportation (Caltrans). Design of this intersection should be coordinated with the improvements proposed for the Telegraph Road and Hallock Drive intersection.</p> <p>5.13-2 <u>Telegraph Road & Hallock Drive (Intersection 2)</u> – Improvements to this intersection are already required as mitigation for the approved East Area 1 Specific Plan Project. To mitigate the impacts of the East Gateway Project, the northbound approach shall be modified to include one shared right/through lane, one through lane and two left-turn lanes on the northbound approach in addition to the required East Area 1 improvements. Improvements may require coordination with the improvements proposed for the SR 126 and Hallock Drive intersection.</p> <p>5.13-3 <u>10th Street & Harvard Boulevard (Intersection 15)</u> – A peak period parking restriction shall be implemented on the southbound approach and the northbound and westbound approaches reconfigured to provide one additional southbound lane in the AM and PM peak periods. The southbound lane configuration must be striped to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach shall be restriped to provide one right-turn lane, one through lane, and one left-turn lane. The westbound approach shall be restriped to provide one shared through/right-turn lane, one through lane, and one left-turn lane.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.13-4 <u>10th Street & SR 126 Eastbound Ramps (Intersection 17); Palm Avenue & SR 126 Eastbound Ramps (Intersection 27); Peck Road & SR 126 Eastbound Ramps (Intersection 34)</u> – A fair share contribution shall be made to the cost of installing traffic signals at these ramp intersections.</p>	
<p>Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>
<p>Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>
<p>Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p>	<p>If not implemented as part of the East Area 1 Project improvements prior to development of land within the East Gateway area, the following the following additional mitigation measure should be implemented as part of the improvements to Hallock Drive north of SR 126:</p> <p>5.13-5 New rail crossing arms and warning lights must be installed on northbound Hallock Drive north of Telegraph Road at the SPBL rail crossing. The signal at Hallock Drive and Telegraph Road must be synchronized with the rail crossing arms and warning lights to avoid conflicts during times when the rail crossing arms are in the gate-down position.</p>	<p>Impacts would be less than significant.</p>
<p>Result in inadequate emergency access?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
<p>Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</p>	<p>No mitigation is required.</p>	<p>Impacts would be less than significant.</p>
<p>Cumulative impacts</p>	<p>Mitigation Measures 5.13.1 and 5.13.2, identified for project traffic impacts, would also mitigate cumulative impacts at these intersections.</p> <p>The other feasible improvements identified below would mitigate projected cumulative traffic impacts in 2020 to the maximum extent feasible.</p> <p>5.13-6 <u>Ojai Road (SR 150) & Richmond Road (Intersection 9)</u> – The intersection must be mitigated to LOS C or better through the implementation of a prohibition of westbound left-turns at the intersection. The peak hour left-turn restriction must apply to the westbound approach of the intersection only, where left-turning vehicles would be expected to use nearby signalized intersections to make this movement. This improvement would require coordination with and approval by Caltrans.</p> <p>5.13-7 <u>10th Street & Harvard Boulevard (Intersection 15)</u> – The project impact at the intersection of 10th Street and Harvard Boulevard must be mitigated with the addition of a peak period parking restriction on the southbound approach and reconfiguration of the northbound and westbound approaches; however, these mitigation measures do not achieve LOS C or better to fully mitigate the intersection. The parking restriction must result in one additional southbound lane in the AM and PM peak periods. The southbound lane configuration must be striped to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach shall be restriped to provide one right-turn lane, one through lane, and one left-turn lane. The westbound approach shall be restriped to provide one shared through/right-turn lane, one through lane, and one left-turn lane.</p>	<p>The improvements identified above would mitigate projected cumulative impacts in 2020 at all intersections with the exception of the intersection of 10th Street and Harvard Boulevard, where LOS C cannot be achieved. The improvement identified above for this intersection will mitigate the contribution of traffic from the East Gateway Project at this intersection to a less than significant level. For this reason, the cumulative impact at this intersection from other projected growth would be significant and unavoidable.</p>

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.13-8 <u>10th Street & SR 126 Eastbound Ramps (Intersection 17)</u> – The project impact at the intersection of 10th Street and SR 126 eastbound ramps must be mitigated with modifications to the southbound approach. The southbound lane configuration would be striped to include one left-turn lane and one through lane. This mitigation measure results in a reduction in delay relative to existing, existing plus project, cumulative base and cumulative plus project conditions, thus mitigating the incremental delay attributable to project traffic.</p> <p>Alternatively, the intersection can be fully mitigated to achieve LOS C or better through signalization. Since the intersection is operating at unacceptable LOS in the without project scenario, the project would be responsible for its fair share contribution to the project impact. This improvement would require coordination with and approval by Caltrans.</p> <p>5.13-9 <u>Palm Avenue & SR 126 Eastbound Ramps (Intersection 27)</u> – This intersection must be mitigated to LOS C or better by installing a traffic signal. Since the intersection is operating at an unacceptable LOS in the without project scenario, the project would be responsible for its fair share contribution to the project impact. This improvement would require coordination with and approval by Caltrans.</p> <p>5.13-10 <u>Peck Road & Main Street and Harvard Boulevard (Intersection 32)</u> – This intersection must be mitigated to LOS C or better with the addition of one travel lane to both the northbound and southbound approaches on Peck Road. The northbound leg must be configured with one right-turn lane, two through lanes, and one left-turn lane and one shared through/right-turn lane, one through lane, and one left-turn lane on the southbound leg.</p> <p>5.13-11 <u>Peck Road & SR 126 Eastbound Ramps (Intersection 34)</u> – This intersection must be mitigated to LOS C or better by installing a traffic signal; the installation of a traffic signal is warranted under cumulative plus project conditions. Since the intersection is operating at unacceptable LOS in the without project scenario, the project would be responsible for its fair share contribution to the project impact. This improvement would require coordination with and approval by Caltrans.</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
	<p>5.13-12 <u>Telegraph Road & Hallock Drive (Intersection 2) (Scenario without Lemonwood drive only)</u> – The intersection of Telegraph Road and Hallock Drive must be mitigated to LOS C or better by implementing the changes discussed in Mitigation Measure 5.13-2 and a right-turn overlap on the eastbound right turn with the northbound protected left turn. Improvements may require coordination with the improvements proposed for the SR 126 and Hallock Drive intersection.</p> <p>5.13-13 <u>Telegraph Road/Main Street & Harvard Boulevard (Intersection 3) (Scenario without Lemonwood drive only)</u> – This intersection has three approaches. The eastbound approach on Main Street is controlled by stop signs and the eastbound left-turn movement from Harvard Boulevard on to Main Street must yield to westbound through traffic from Telegraph Road. The level of service at stop-controlled intersections is based on the delay at the most constrained approach, which in this case is the eastbound approach on Main Street. This movement is projected to increase from 13 to 54 seconds of average delay per vehicle in the PM peak hour with the development of the East Gateway project without the Lemonwood Drive extension. The threshold for LOS D is 25 seconds. To fully mitigate the impact (to LOS C or better) would require the installation of a traffic signal. A peak hour signal warrant analysis is provided in Appendix D and indicates that the installation of a traffic signal would be warranted under cumulative plus project conditions. This improvement would require coordination with and approval by Caltrans</p>	

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Utilities/Service Systems		
Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	No mitigation is required.	Impacts would be less than significant.
Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	No mitigation is required.	Impacts would be less than significant.
Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	No mitigation is required.	Impacts would be less than significant.
Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	No mitigation is required.	Impacts would be less than significant.
Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No mitigation is required.	Impacts would be less than significant.

Issue/ Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<p>5.14-1 Before construction, the applicant must be responsible for the preparation of an assessment of landfill capacities at Toland Road Sanitary Landfill and Chiquita Canyon Sanitary Landfill. The applicant must coordinate with the both landfill operators to determine whether these landfills have adequate capacity to serve the proposed project. If adequate landfill space is not available, then the applicant must identify alternative landfill sites to accept both construction and operation solid waste and debris.</p> <p>5.14-2 The applicant must implement waste reduction and recycling programs to divert construction solid waste from the area landfill. A construction recycling plan must be submitted and approved by the Director of Public Works. A final report as to the amount recycled must be provided to the Director of Public Works at the completion of construction activities documenting the waste reduction efforts conducted, including a listing of solid waste diversion amounts, and the amount of waste sent to landfills. The report must also document how the construction contractor complied with applicable state and local statutes and regulations to reduce and recycle solid waste generated during construction.</p>	Impacts would be less than significant.
Comply with federal, state, and local statutes and regulations related to solid waste?	No mitigation is required.	Impacts would be less than significant.
Cumulative impacts	No mitigation is required.	Impacts would be less than significant.

ALTERNATIVES TO THE PROJECT

An EIR is required to briefly describe the rationale for selection and rejection of alternatives and only evaluate in detail those alternatives that can feasibly meet the basic objectives of the project and avoid or substantially lessen the significant effects of the project:

The alternatives evaluated include the following:

Alternative 1: No Project Alternative – No development

Alternative 2: No Project – Buildout Under Existing General Plan Land Use

Alternative 3: Alternative Use – High Density Residential and East Gateway Specific Plan

Alternative 4: Alternative Use – M-2 Zoning and East Gateway Specific Plan.

The following alternatives were identified and initially considered by the City and eliminated from further consideration in this EIR because these alternatives would not feasibly attain the basic objectives of the East Gateway Project:

- **Not Annexing the Unincorporated Island Areas**

The proposed East Gateway Project includes the proposed annexation of one existing island of unincorporated property located south of SR 126 within the existing Lemonwood Industrial Park located within the City's jurisdiction and additional unincorporated territory site located north of SR 126 and west of S. Hallock Drive. The latter area will become an unincorporated island when the Ventura LAFCo approved annexation of the East Area 1 Specific Plan Area to the north is recorded. Recordation of the East Area 1 Specific Plan area is conditioned upon an application to annex these island areas being filed with LAFCo.

Eliminating these unincorporated islands is one of the basic objectives of the East Gateway Project and, for this reason; this alternative was eliminated from detailed evaluation in this EIR.

- **Alternative Site for East Gateway Specific Plan**

The proposed East Gateway Project also includes the proposed annexation of additional unincorporated territory located east of the current City jurisdictional boundaries and south of the East Area 1 Specific Plan Area. The proposed East Gateway Specific Plan Area would include this additional unincorporated territory and adjacent vacant land located within the City of Santa Paula. Annexation of this additional territory is proposed at this time as the property owners have indicated

the property included in the East Gateway Specific Plan Area will be developed in the next five years as a retail commercial center and business park.

Table ES-4, Comparison of Alternatives to the Proposed Project, provides a comparative analysis of the environmental impacts of the proposed project and alternatives identified in **Section 6.0**. No alternatives were identified that meet most of the project objectives and avoid or substantially minimize the significant impacts identified for the proposed project.

The *CEQA Guidelines* require that an environmentally superior alternative be identified among the selected alternatives.⁴ If the No Project Alternative is determined to be the environmentally superior alternative, an environmentally superior alternative must also be identified among the remaining alternatives.

The No Project Alternative (Alternative 1) would have the fewest impacts, would not result in any significant impacts, and is the environmentally superior alternative. However, the No Project Alternative would not meet the objectives of the proposed project. As noted above, if the No Project Alternative is determined to be environmentally superior, the *CEQA Guidelines* require an environmentally superior alternative must also be identified among the remaining alternatives.

The environmentally superior alternative among the remaining alternatives would be No Project – Existing Plans and Policies Alternative. This alternative would avoid the significant and unavoidable environmental impacts identified for the proposed project because the existing agricultural parcels in the project area would remain zoned for agricultural use and the amount of development, the traffic, and other impacts resulting from development would be reduced.

However, this alternative would not eliminate the unincorporated islands in the project area, would not be consistent with applicable land use policies, and would not achieve the basic objectives of the project as defined by the City of Santa Paula.

AREAS OF KNOWN CONTROVERSY

The *CEQA Guidelines*⁵ require that a Draft EIR summary identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. Some issues of concern were expressed at a public scoping meeting for the Draft EIR and through responses to the NOP. The following issues of concern have been identified by the City of Santa Paula:

4 CEQA Guidelines § 15126.6(e)(2).

5 CEQA Guidelines § 15123.

- Owners of existing developed properties expressed concern regarding the effect of the City's proposed zoning on existing uses. This issue is discussed in Section 5.10, Land Use;
- Owners of existing property also had questions on the availability of sewer service and if properties currently served by septic systems would be required to connect to City sewer service. This issue is discussed in Section 5.13, Utilities/Service Systems; and
- The potential for flooding from Santa Paula Creek. This issue is discussed in Section 5.9, Hydrology/Water Quality.

The *CEQA Guidelines*⁶ require that an EIR present issues to be resolved by the lead agency. These issues include the choice between alternatives and whether or how to mitigate potentially significant impacts. The major issues to be resolved by the City regarding the proposed project are whether:

- Recommended mitigation measures should be adopted or modified,
- Additional mitigation measures need to be applied to the proposed project, and
- The proposed project should or should not be approved or an alternative approved.

6 CEQA Guidelines § 15123(b)(3).

**Table ES-4
Comparison of Alternatives to the Proposed Project**

Environmental Topic	Proposed Project Impacts with Mitigation-	Alternative 1 – No Project Alternative	Alternative 2 - No Project Existing Plans & Policies	Alternative 3 – East Gateway Specific Plan and High Density Residential	Alternative 4 - East Gateway Specific Plan and Light Industrial (M-2)
Aesthetics	Less than Significant	Similar	Less	Greater	Similar
Agricultural Resources	Significant & Unavoidable	Less	Less	Similar	Similar
Air Quality	Less than Significant	Less	Less	Greater	Greater
Biological Resources	Less than Significant	Less	Less	Similar	Similar
Cultural Resources	Less than Significant	Less	Similar	Similar	Similar
Geology/Soils	Less than Significant	Less	Similar	Similar	Similar
Greenhouse Gas	Less than Significant	Less	Less	Greater	Greater
Hazards/Hazardous Waste	Less than Significant	Less	Similar	Similar	Similar
Hydrology/Water Quality	Less than Significant	Less	Similar	Similar	Similar
Land Use/Planning	Less than Significant	Less	Greater	Greater	Similar
Noise	Less than Significant	Less	Similar	Greater	Similar
Public Services	Less than Significant	Less	Greater	Greater	Similar
Transportation/Traffic	Project Impacts – Less than Significant Cumulative Impacts - Significant & Unavoidable at one intersection	Greater	Less	Similar	Similar
Utilities/Services Systems					
Water	Less than Significant	Similar	Less	Similar	Less
Wastewater	Less than Significant	Similar	Less	Greater	Less
Solid Waste	Less than Significant	Similar	Less	Similar	Less