ERRATA
RIVER ROCK / HARDISON HOUSE
1226 OJAI RD. / 2014-CDP-02

July 26, 2016
[Sent via email: jminsk@spcity.org]

Ms. Janna Minsk
City of Santa Paula Planning Department
200 S. Tenth Street
Santa Paula, CA 93060

RE: Errata to the River Rock Development Project (Vesting Tentative Tract Map No. 5928) Final Initial Study/Mitigated Negative Declaration

Dear Janna,

The following provides a supplemental environmental analysis of the pending revisions to the Revised River Rock Development Project (Revised Project), as well as a response to comments received pertaining to consultation with Native American Tribes and archaeological resources. Pursuant to the City of Santa Paula Planning Commission's motion on May 24, 2016, several modifications were recommended to the Proposed Project that would result in minor changes to the information presented in the environmental analysis contained in the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the River Rock Development Project (dated April 13, 2016). In response, the Applicant has voluntarily presented a revised Vesting Tentative Tract Map for the City's approval. As the Final IS/MND has yet to be adopted, the following supplemental analysis and information is being submitted as an Errata to the Final IS/MND for consideration by the City Council. It is recommended that this Errata be incorporated into the Final IS/MND when it is presented to the City Council for future deliberations. As discussed in further detail below, these changes do not warrant recirculation of the IS/MND.

Pursuant to Section 15073.5 of the State CEQA Guidelines, the recirculation of a mitigated negative declaration prior to adoption is required "when the document must be substantially revised after public notice of its availability has previously been given pursuant to Sections 15072, but prior to its adoption." As defined by Section 15073.5, a "substantial revision" means:

1. A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
2. The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

Moreover, Section 15073.5 of the State CEQA Guidelines provides that recirculation is not required under the following circumstances:

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1. Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.
2. New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.
3. Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
4. New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

With the guidance of Section 15073.5 and the analysis provided below, the proposed changes to the project would not result in any new environmental impacts or increase the severity of previously identified impacts upon the environment and would thus not constitute a substantial revision pursuant to Section 15073.5. As such, the findings and conclusions of the supplemental analysis contained herein do not warrant recirculation of the IS/MND.

In addition to the changes proposed to the Project, the attached Errata addresses new comments received after the Final IS/MND was published concerning the procedural requirements of AB 52 (Native American Indian Tribal Consultation) and the need for site specific archaeological monitoring prior to construction. As discussed in further detail in the attached analysis, the Project is in full compliance with the procedural requirements of AB 52 and no substantial evidence has been presented to indicate that a significant impact would occur to any known archaeological or Native American cultural resources. In response to these concerns a Phase I Archaeological records search was requested from the South Central Coastal Information Center (SCCIC), California State Fullerton, Department of Anthropology. The records search confirms that no known archaeological resources exist within the Project Site, with only one resource recorded within a one-half mile radius. The Final IS/MND stated that "[A]lthough no paleontological resources are known to exist on site, there is a possibility that paleontological resources exist at subsurface levels on the Project Site and may be uncovered during grading activities for the Proposed Project's building foundation. Implementation of [Mitigation Measure 5.3] will ensure that if any such resources are found during construction of the Proposed Project, they are handled according to the proper regulations and any potential impacts are reduced to less than significant levels." Thus, the SCCIC records search confirms that the finding presented in the IS/MND that the potential for discovery of archaeological resources is low, and the precautionary mitigation measures presented in the Final IS/MND are adequate and appropriate to ensure any impacts upon archaeological resources are mitigated to a less than significant level.

Section 15041 of the State CEQA Guidelines sets forth the authority for lead agencies to mitigate environmental impacts from a project. Within the limitations described in Section 15040(a) "[A] lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case

law *(Nollan v. California Coastal Commission (1987) 483 U.S. 825, Dolan v. City of Tigard, (1994) 512 U.S. 374, Ehrlich v. City of Culver City, (1996) 12 Cal. 4th 854.*). Based on this guidance, and the fact that no new evidence has been presented to indicate the presence or increased likelihood of discovering unknown archaeological resources within the Project Site, no further studies, investigation or monitoring was deemed to be warranted.

As the information contained in this Errata does not identify any new significant environmental impacts, this Errata to the Final IS/MND can be incorporated into the Final IS/MND and presented to the City Council for their consideration. Should you have any questions with the information presented herein, please feel free to contact me.

Sincerely,

PARKER ENVIRONMENTAL CONSULTANTS

Shane Parker, Principal

Enclosures: *1. Errata to the Final Initial Study/Mitigated Negative Declaration for the River Rock Development Project.*

2. South Central Coastal Information Center Cultural (SCCIC) Cultural Resources Records Search, California Historical Resources Information System (CHRIS), July 19, 2016.

REVISED PROJECT

On May 24, 2016, the City of Santa Paula Planning Commission ("Planning Commission") held a public hearing on the Proposed Project and voted 3-2 to recommend that the City Council approve the proposed River Rock residential project at 1226 Ojai Road (14-CDP-02, Vesting Tentative Subdivision Map, Planned Development Permit, and 48 Growth Allocations) with the following seven changes:

1. Remove 2 of 10 lots/units along the southern edge of the property and reconfigure and enlarge the remaining 8 lots so as to be more compatible with the existing immediately adjacent neighborhood.
2. Remove 2 of the 13 lots/units along the northern edge of the property and reconfigure and enlarge the remaining 11 lots so as to be more compatible with the existing immediately adjacent neighborhood.
3. Remove 1 of lot/unit adjacent to the Hardison House and reconfigure other lot layouts to increase the size of the Hardison House and common area lots and improve the view of the Hardison House from Ojai Road.
4. Remove the requirement to pay a recycling water fee of approximately $3,600 per unit from Condition of Approval No. 41.
5. Delete Condition of Approval No. 56 that would have required the 25 lots backing up against the hillside to join the Santa Paula Geologic Hazardous Abatement District, at the discretion of the Public Works Director.
6. Remove Condition of Approval No. 130 that would have changed the Fuchsia Lane connection to the project to emergency only, instead reverting to a regular public street connection consistent with 1971 plans that show the Fuchsia Lane cul-de-sac as an interim design pending development of the Hardison property.
7. The project recommendation included adding 13 additional conditions of approval related to renovation of the historic barn and protecting historic structures and artifacts and landscaping, completing archival documentation of the property, nomination of the house and barn to the National and State Registers of Historic Places, and apply for listing as a Santa Paula Historic Landmark.

Revised Project Description

In consideration of the City of Santa Paula Planning Commission's requests, the Project Applicant revised the Proposed Project and submitted an updated Vesting Tentative Tract Map 5928 in July 2016 proposing a total of 45 single-family homes, including 44 new single-family homes and the retention and rehabilitation of the Hardison House and barn. Similar to the Proposed Project, the Hardison House would be retained on site in its current location and the barn would be relocated and restored and utilized as a two-car garage for the Hardison House. Under the Revised Project, the Vesting Tentative Tract Map would be reduced by nine dwelling units resulting in slightly larger lot sizes for the new home sites. The amount of open space proposed for Lot B (the open space lot between the Hardison home and Ojai Road)

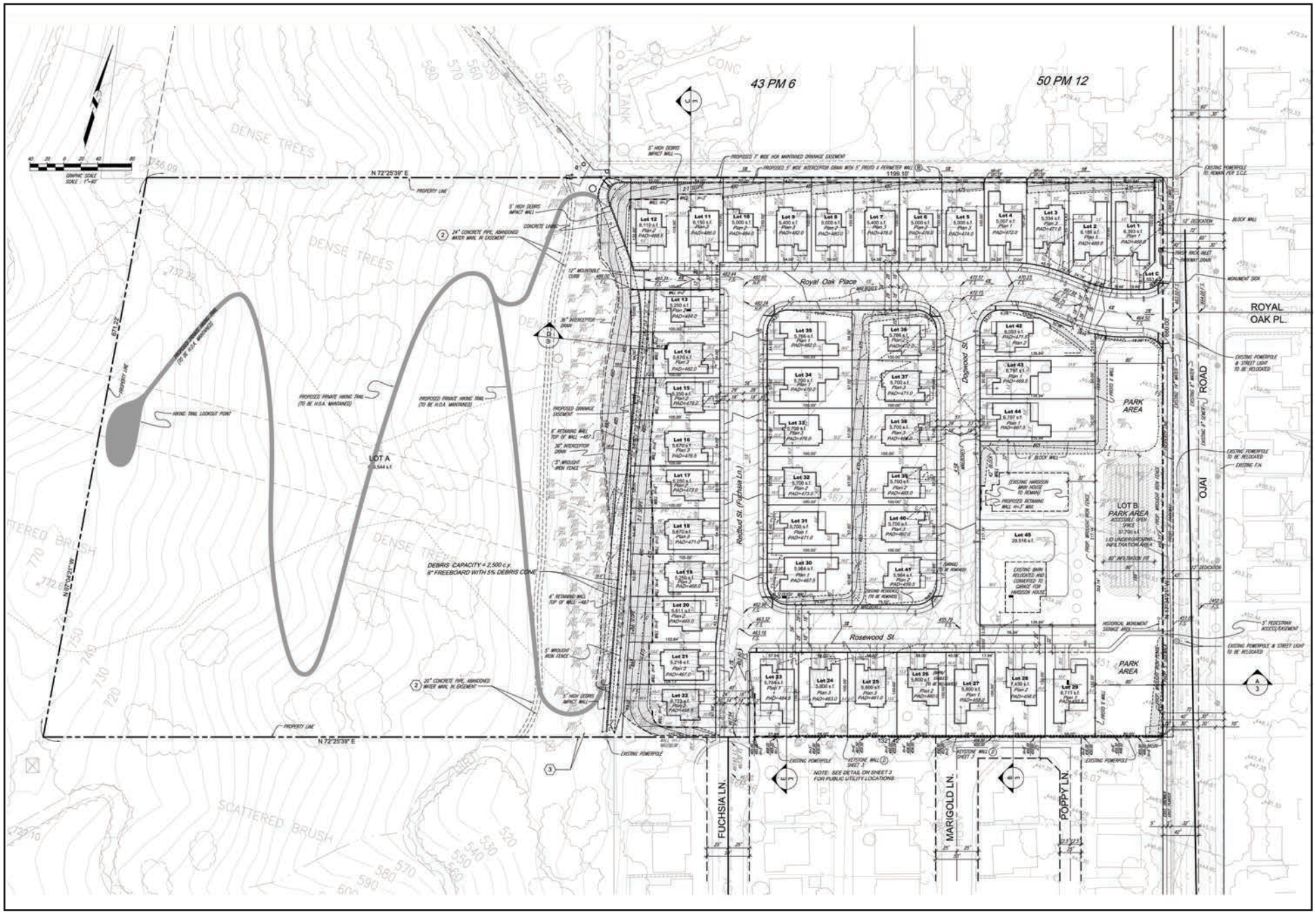
would be increased by 90 percent (from 19,830 square feet to 37,700 square feet). Access to the Project Site would be similar to what was proposed under the Proposed Project with one driveway extending Royal Oaks Place and one driveway extending Fuchsia Lane (proposed Redbud Street) onto the Project Site. Although the Fuschia Lane driveway was originally considered to be restricted for emergency access and pedestrian access, the Planning Commission ultimately requested that this road be connected through to the adjoin subdivision to be consistent with the City's circulation plans on file with the Public Works Department. Refer to Figure 1, below, for the Revised Vesting Tentative Tract Map.

A comparison between Revised Project and the Original Project metrics is provided in Table 1, below. As shown in Table 1, the amount of hardscape would be reduced and the amount of landscaped area would increase. The total lot coverage would decrease by 37,620 square feet (a reduction of approximately 30 percent).

Table 1
Comparison between Revised Project and Original Project Metrics

	Revised Project	Original Project	Net Change
Name of Area	**Size (square feet)**	**Size (square feet)**	**Size (square feet)** [a]
Hardscape			
Streets	65,000	70,000	(5,000)
Sidewalks and Driveways	34,500	37,860	(3,360)
Lot Coverage	89,700	127,320	(37,620)
Landscape			
Street Landscape	16,000	16,000	0
Private Landscape	178,680	150,570	28,110
Lot A – Open Space	416,544	416,544	0
Lot B	37,700	19,830	17,870
Lot C	1,553	1,553	0
Total Project area:	***839,677 sf (19.28 acres)***	***839,677 sf (19.28 acres)***	**--**

Note: sf = square feet.
[a] *Negative numbers are presented in parenthesis.*
Source: Southland Civil Engineering & Survey, LLP, July 2016.



Source: Southland Civil Engineering and Survey, LLP, July 2016.

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Figure 1
Revised Vesting Tentative Tract Map No. 5928

ANALYTICAL ASSUMPTIONS AND METHODOLOGY

The following analysis addresses the CEQA Checklist topics that would change with the development of the Revised Project. Topics not addressed in the discussion below, such as agricultural resources, hazards and hazardous materials, and mineral resources, were found to be less than significant in the Final IS/MND. Development of the Revised Project would result in similar conclusions and analyses presented in the Final IS/MND with respect to these issue areas and thus would not create any new environmental impacts or increase the severity of these CEQA Checklist topics. Accordingly, the following supplemental analysis focuses on issue areas that could be affected by the proposed modifications to the Proposed Project. The analysis below also presents new information that substantiates and supports the conclusions in the Final IS/MND with respect to potential impacts upon archaeological resources.

ENVIRONMENTAL ANALYSIS

Aesthetics

Views and Viewsheds

The Original Project was found to have no impact on scenic vistas. With respect to visual character of the Project Site and surroundings, the Original Project was found to have a potentially significant impact unless mitigation incorporated and incorporates Mitigation Measures 3.1.1 and 3.1.2. Implementation of changes one through three recommended by the City of Santa Paula Planning Commission (above), which would reduce the number of single-family homes on-site and provide greater view angles along Ojai Road would improve the visual character of the Project Site and make the proposed subdivision more visually consistent with the existing homes to the north and south of the Project Site. The same mitigation measures identified in the Section 1, Aesthetics, would also be applicable to the Revised Project. The Revised Project would alter views of the Project Site in a similar manner as the Original Project. However, as compared to the Original Project, the Revised Project would result in decreased impacts to views and viewsheds. The Revised Project would not increase the severity of impacts on views and viewshed.

Scenic Resources

The Original Project was found to have a less than significant impact to scenic resources within a state-designated scenic highway. Ojai Road (SR-150) is identified as an eligible state scenic highway and city scenic route. Similar to the Original Project, the Revised Project would focus residential development on the eastern side of the Project Site and preserve the natural undeveloped hillside to the west. With respect to views of the natural hillside, the Revised Project would result in similar impacts as the Original Project.

With regards to scenic historic buildings, the open space lot and implementation of the Planning Commission's recommendations (i.e. number 3 in the list above) provided under the Revised Project would provide wider street view angles of the Hardison House and barn along Ojai Road. The Revised Project also provides a slightly greater separation between the house and barn. Both elements under the Revised Project would improve visibility of the Hardison House and barn and would improve the visual

character as compared to the Original Project. Compared to the Original Project, the Revised Project would result in a slightly improved aesthetic impact on views of historic structures.

Both the Original Project and Revised Project are allowed under the currently zoning and land use designations on the Project Site. The Revised Project, similar to the Original Project, would result in a less than significant impact.

Light and Glare

The Original Project was found to result in a less than significant impact to light and glare. The Revised Project would develop the Project Site in a manner similar to the Original Project and would produce light and glare consistent with the existing community. Due to the reduced residential density under the Revised Project, the Revised Project would create a reduced impact when compared to the Original Project. The Revised Project would result in a less than significant impact.

Air Quality

Construction

The Original Project's impacts to local air quality resulting from construction activities were found to be potentially significant unless mitigation incorporated. With incorporation of Mitigation Measures 3.3.1 through 3.3.8, the Original Project would result in less than significant impacts to air quality during construction.

Construction activities for the Revised Project would require similar site excavation and grading earthwork activities to ensure the proper base and slope for the proposed residences. Similar to the Original Project, the Revised Project would require approximately 20,000 cubic feet of excavation and 20,000 cubic feet of fill, which would balance on-site. The Revised Project is expected to generate similar construction emissions as the Original Project. Similar to the Original Project, construction emissions would be temporary and vary depending on the construction activity and equipment in use. The Revised Project would be required to implement the same mitigation measures as the Original Project, as recommended by the Ventura County Air Pollution Control District. Therefore, with incorporation of Mitigation Measures 3.3.1 through 3.3.8, the Revised Project's construction air quality impacts would be similar to the Original Project and would be mitigated to less than significant levels.

Operation

The Original Project's impacts to local air quality resulting from the operation of the Original Project were found to be a less than significant impact. The Revised Project is expected to result in a net increase of 44 single-family homes, which is nine fewer units than the Original Project. As such, the Revised Project would generate fewer average daily trips, and the daily regional operational air quality emissions would be reduced as compared to the Original Project. The Revised Project would result in a less than

significant impact, and operational air quality impacts would be slightly improved as compared to the Original Project.

Biological Resources

The Original Project's effects on biological resources are discussed in Section 4, Biological Resources, of the Final IS/MND. Based on the findings of the biological impact assessment, the Original Project has the potential, albeit minimal, to result in significant impact upon species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Original Project would result in the removal of 0.21 acres of coastal sage scrub habitat, 0.26 acres of coast live oak woodland, 0.01 acres of ornamental landscape, 0.68 acres of ruderal pasture, and 0.05 of Peruvian peppertree. In consideration of the fact that the Original Project would provide approximately 9.56 contiguous acres of passive open space in perpetuity on the undeveloped hillside on the western portion of the Project Site to be maintained by the homeowners association, the incremental loss of a total of 1.21 acres of vegetation was determined to be less than significant. With incorporation of Mitigation Measures 4.1 through 4.8 impacts relating to biological resources would be less than significant.

Although the number of dwelling units would be reduced under the Revised Project, the overall grading footprint is nearly identical to that of the Original Project. Thus, impacts upon biological resources would be the same. The Revised Project would not increase the severity of impacts relating to biological resources, and impacts would be similarly mitigated to less than significant levels as compared to the Original Project.

Cultural Resources

Historic Resources

Similar to the Original Project, the Revised Project would demolish the ancillary buildings and relocate the barn closer to the Hardison House. The Revised Project includes an approximately 37,700 square foot park / open space lot along Ojai Road, between the Hardison House lot. The park / open space lot would extend from approximately Royal Oaks Place on its northern end to the property boundary on its southern end and would provide wider street view angles of the house and barn from Ojai Road, which is an aesthetic improvement as compared to the Original Project. From a technical evaluation standpoint, the impacts to historic resources are not reduced, but a more general argument could be made that this plan provides a qualitative improvement over the Original Project.

The project recommendation (number 7 from the City of Santa Paula Planning Commission recommendation list, above), which included adding 13 additional conditions of approval related to renovating the historic barn and protecting historic structures and artifacts and landscaping, completing the archival documentation of the property, nominating the house and barn to the National and State Registers of Historic Places, and applying for listing as a Santa Paula Historic Landmark, would result in

further preservation and documentation of the Hardison House and barn. However, the technical conclusion of the Final IS/MND would remain the same. A less than significant impact with mitigation would occur with respect to historic resources.

Archaeological, Paleontological Resources, and Human Remains

The Final IS/MND concluded the Original Project would result in a potentially significant impact unless mitigated with respect to archaeological resources. The Project Site and the immediate surrounding areas have been subject to prior grading and ground disturbing activities and do not contain any known archaeological sites, archaeological survey areas, paleontological resources, or human remains. The Proposed Project would involve the grading of the eastern half of the Project Site for construction of the proposed residences and roadways. The area proposed for development has been subject to cultivation and has historically been disked and surface graded without any record of archaeological resource discovery, paleontological resource discovery, or the discovery of human remains. Thus, there is relatively low potential for the accidental discovery of any unknown archaeological materials to occur. Nevertheless, because the presence or absence of such materials cannot be determined until the site is excavated, as a precautionary measure, the following mitigation measures were recommended in the IS/MND to ensure that impacts to archaeological resources, paleontological resources, and/or human remains, should any such materials be encountered, are mitigated to a less than significant level.

> **Mitigation Measure 5.3 (Archaeological Resources):** If any archaeological materials are encountered during the course of project development, all further development activity shall halt in the area of the discovery and the services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The archaeologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report to the satisfaction of the Planning Director. The archaeological survey, study or report shall be submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834.
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> **Mitigation Measure 5.4 (Paleontological Resources):** If any paleontological materials are encountered during the course of project development, all further development activities shall halt in the area of the discovery and the services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource.

The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report to the satisfaction of the Planning Director. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.

Mitigation Measure 5.4 (Human Remains): In the event that human remains are discovered during excavation activities, the contractors shall stop all activities in the immediate vicinity of the discovery and contact the County Coroner. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or; if the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

On July 14, 2016 the California Cultural Resources Preservation Alliance Inc., based out of Irvine, California, submitted a comment letter to the City of Santa Paula objecting to the CEQA documentation for the River Rock Project based on the assertion that the City has not conducted a literature and records search or an archaeological survey to determine whether the Proposed Project has the potential to impact significant archaeological resources. They also assert that the City is not in compliance with AB 52, which requires that lead agencies undertaking CEQA review to evaluate a project's potential impact to a tribal cultural resource. Shortly after the California Cultural Resources Preservation Alliance Inc.'s letter was received, Julie Tumamait-Stenslie contacted the Santa Paula Planning Department inquiring on the research that was conducted for the River Rock Project.

In response to these concerns, a California Historical Resources Information System (CHRIS) records search was requested through the South Central Coastal Information Center (SCCIC). The search includes a review of all recorded archaeological and built-environment resources, as well as a review of cultural resource reports on file (see attached SCCIC Records Search, dated July 19, 2016). In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), and the California State Historic Properties Directory (HPD) listings were reviewed for the Project Site. Based on the findings of the SCCIC's evaluation, no archaeological resources are known to have been recorded within the Project Site. One archaeological resource is recorded within ½ mile of the Project Site and 11 studies or reports have been filed within the ½ mile survey radius. Although the SCCIC recommends that an archaeologist should be retained to determine if the subject property is sensitive for cultural resources prior to the approval of project plans, this recommendation is based on the fact that the archaeological

sensitivity of the site has never been studied and not due to any evidence of archaeological resources being previously recorded on-site. Due to the extensive history of the site being developed as early as 1884 to circa 1920 and the cultivation and eventual removal of citrus groves across the entire development footprint, the probability for the discovery of undisturbed archaeological resources is relatively low. Notwithstanding this conclusion, the Final IS/MND recognizes that the development would result in deeper excavations and could unearth unknown archaeological resources. Accordingly, Mitigation Measure 5.3, above was prescribed as a precautionary measure to mitigate any impacts to archaeological resources to less than significant levels. Mitigation Measure 5.3 is consistent with the guidance provided under Section 21083.2(i), which states the following:

> *"As part of the objectives, criteria, and procedures required by Section 21082 or as part of conditions imposed for mitigation, a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place." (CEQA Guidelines Section 21083.2 (i).*

With respect to the Native American Tribal Consultation requirements under AB 52, Public Resources Code (P.R.C.) Section 21080.3.1(b) states that:

> *"Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project* ***if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe,*** *and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. (CEQA Guidelines Section 21080.3.1, emphasis added).*

The tribal notification requirements of AB 52 and P.R.C. Section 21080.3.1 became effective on July 1, 2015. The City of Santa Paula has not received any written requests for tribal notification pursuant to AB 52. Additionally, in accordance with the City's standard mailing list for CEQA documents, the Notice of Intent for the Draft IS/MND was mailed to the Santa Ynez Band of Mission Indians on November 12, 2015 and again for the Recirculated Draft IS/MND on February 4, 2016. No response was ever received from the Santa Ynez Band of Mission Indians. Furthermore, based on a review of the 11 comment letters received in response to the Draft IS/MND and the 44 comment letters received in response to the Recirculated Draft IS/MND, no issues pertaining to archaeological resources or Native American cultural resources were raised.

Based on the information that is contained within the Final IS/MND and this Errata, no substantial evidence has been provided to indicate the presence or likelihood of any archaeological materials within the Project Site. Pursuant to Public Resources Code Section 21082.2 a lead agency shall determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record. The existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence in light of the whole record before the lead agency that the project may have a significant effect on the environment. Thus, in the absence of any specific information or substantial evidence indicating a heightened probability of resources within the Project Site, Mitigation Measures 5.3, 5.4, and 5.5 are adequate and proportionate to mitigate the low-probability of a significant archaeological, paleontological, or cultural impacts associated with the unlikely discovery of human remains from occurring due to the Project's construction activities. Impacts upon archeological resources and humans remains would be less than significant with mitigation and similar to the Original Project.

Geology and Soils

The Planning Commission's recommendation number 4, which consists of deleting the Condition of Approval No. 56 that would have required the 25 lots backing up against the hillside to join the Santa Paula Geologic Hazardous Abatement District, would not impact the conclusions and level of significance relating to geology and soils. Because the Revised Project would occur on the same Project Site as the Original Project, the conclusions, identified regulatory compliance measures, and mitigation measures identified for fault rupture, ground shaking, liquefaction, landslides, unstable soil, and expansive soils would be the same. Similarly, the Revised Project would not include septic tanks or an alternative wastewater disposal system, and no impact would occur with respect to alternative wastewater systems. Similar to the Original Project, the Revised Project would be required to implement Mitigation Measures 6.1 and 6.2. The Revised Project would result in similar impacts as the Original Project.

The Revised Project would involve the development of the eastern side of the Project Site. Similar to the Original Project, the Revised Project would be required to implement erosion controls through grading and building permit regulations. Specifically, the Revised Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The SWPPP would identify best management practices for erosion control to meet the National Pollution Discharge Elimination System (NPDES) requirements for storm water quality. The Revised Project would result in a similar impact to soil erosion and loss of topsoil as compared to the Original Project. The Mitigation Measures 6.3 and 6.4, which pertain to a SWPPP and surface drainage, would also be required for the Revised Project, and the Revised Project would result in a less than significant impact. The Revised Project would not increase the severity of impacts relating to geology and soils.

Greenhouse Gas Emissions

Construction

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. The Original Project was anticipated to generate a total of 638.80 CO_2e MTY during the construction phase. Similar to the Original Project, the Revised Project includes the development of the eastern side of the Project Site. As compared to the Original Project, the Revised Project would require similar construction activity, including the use of construction equipment and vehicles, and would generate similar construction emissions associated with the grading of the Project Site to ensure the proper base and slope for the residential units. The Revised Project would result in similar greenhouse gas emission impacts as compared to the Original Project. The Revised Project would be required to comply with regulatory compliance measures and would result in a less than significant impact.

Operation

The Original Project's impacts to greenhouse gas emissions resulting from the operation of the Original Project were found to be a less than significant impact. The Original Project was anticipated to generate approximately 792.69 CO_2e MTY with mitigation. The Revised Project would operate a total of 45 single-family homes, which is nine dwelling units less than the Original Project. As such, the Revised Project would be expected to generate less residential greenhouse gas emissions as compared to the Original Project. As such, similar to the Original Project, the operation of the Revised Project would result in a less than significant impact, and impacts would be slightly decreased as compared to the Original Project.

Hydrology and Water Quality

With the incorporation of Mitigation Measure 9.1, which requires the Project Applicant to prepare a Stormwater Quality Urban Impact Mitigation Plan and implement best management practices, the Original Project would result in a less than significant impact to water quality standards, waste discharge, drainage patterns and runoff water. Implementation of Mitigation Measure 6.3 would further ensure that that sedimentation and surface water runoff would be less than significant following mitigation. Similar to the Original Project, the Revised Project would implement Mitigation Measure 6.3, which requires a stormwater pollution prevention plan during the construction phase, and Mitigation Measure 9.1, which requires a Stormwater Quality Urban Impact Mitigation Plan and implementation of best management practices. The Revised Project would result in an increase in open space across the Project Site and an approximate 90 percent increase to Lot B which serves as a drainage retention and recharge basin. Thus, the ability to retain and treat additional surface water runoff and improve groundwater recharge would be considered a beneficial impact. The Revised Project would create a less than significant impact with the

implementation of mitigation measures. The Revised Project would result in similar but reduced impacts as compared to the Original Project.

Land Use and Planning

Land use and planning impacts under the Original Project would be less than significant with the approval of the requested discretionary actions. To allow for the proposed development, the Original Project is seeking approvals for the Vesting Tentative Tract Map, a Planned Development Project Permit, and Growth Management Allocations. Similar to the Original Project, the Revised Project would require the same discretionary actions. The Project Site is zoned HR2-PD and has a corresponding land use designation of hillside residential. Under the existing zone, a maximum of 57 single-family dwelling units are allowed, and both the Original Project and Revised Project would be within the allowed development. Similar to the Original Project, with approval the discretionary requests, the Revised Project would be consistent with regional plans and local plans, including the City of Santa Paula General Plan and the Municipal Code. Land use and planning impacts would be less than significant under both the Original Project and Revised Project. The Revised Project would result in similar land use and planning impacts and would not increase the severity of land use and planning impacts.

Noise

Construction

Construction noise under the Revised Project would be the same with respect to the level of noise occurring on a daily basis during construction. The same construction noise mitigation measures and code compliance requirements identified in Section 12, Noise, would also be applicable to the Revised Project. Thus, construction noise impacts would be less than significant with mitigation. The Revised Project would not increase the severity of construction noise impacts.

Operation

Similar to the Original Project, the Revised Project would generate noise associated with typical residential activities. The Revised Project would result in the operation of 45 single-family homes and would generate approximately 158 new residents, which is nine fewer homes and 31 fewer residents than the anticipated population generated by the Original Project. With the decrease in homes and residents under the Revised Project, the Revised Project's operational noise levels from residential activity and traffic noise are expected to decrease as compared to the Original Project. The Revised Project would result in a less than significant impact.

Population and Housing

As discussed in the Final IS/MND, there are no persons currently living on the Project Site. Therefore, the development of the Original Project and Revised Project would not displace any persons necessitating the construction of housing elsewhere. Based on an average household size of 3.5 persons per unit, the Revised Project would generate approximately 158 new persons, which is 31 persons less than the anticipated population generated by the Original Project. The Original Project would not exceed the planned density allowed for the Project Site and would not induce substantial growth. Since the population generated by the Revised Project is less than the Original Project, population and housing impacts associated with the Revised Project would also be within the planned density allowed for the Project Site and would result in a less than significant impact. The Revised Project would reduce impacts upon population and housing.

Public Services

Fire

The Revised Project would result in the development of 45 single-family homes and would generate approximately 158 new residents. With the reduction of residents under the Revised Project, the Revised Project is anticipated to create a lower demand on fire services compared to the Original Project.

The Project Site is located within a Very High Fire Hazard area as indicated in Figure S-5 of the Safety Element of the Santa Paula General Plan. Similar to the Original Project, the Revised Project would be designed and built in accordance with all applicable Building and Fire Code requirements and implement adequate design and infrastructure to ensure adequate fire response and infrastructure on site. Additionally, as shown in Figure 1 and recommended by the City of Santa Paula Planning Commission (recommendation number 6 in the list above), the Revised Project's Redbud Street would link to the existing Fuchsia Lane, which presently terminates in a cul-de-sac. This internal connection would provide secondary access for both the Revised Project and the residential subdivision to the south and would improve access for emergency vehicles. The Revised Project would result in similar impacts to fire protection as compared to the Original Project. The Revised Project would result in a less than significant impact with respect to fire protection.

Police

The Revised Project would result in the development of 45 single-family homes and would generate approximately 158 new residents. With the reduction of residents under the Revised Project, the Revised Project is anticipated to create a reduced demand on police services compared to the Original Project. Additionally, as discussed above, the connection of Redbud Street to the existing Fuchsia Lane would provide improved access for emergency vehicles. The Revised Project would result in a less than significant impact to police services.

School

As discussed in Section 14, Public Services, the Original Project would be "Potentially Significant Unless Mitigation Incorporated." Based on the State's standard generate rate of 0.7 students per dwelling unit, the Original Project would generate approximately 38 new students. The Revised Project is anticipated to generate approximately 32 new students. Based on the lower student generation created by the Revised Project, the Revised Project is anticipated to create a lower demand on school facilities compared to the Original Project. Additionally, similar to the Original Project, the Revised Project would also be required to pay Developer Fees to the SPUSD to offset the demand upon local schools. With payment of applicable Developer Fees (Mitigation Measure 14.1), the Revised Project would be considered less than significant. Similar to the Original Project, the Revised Project would result in less than significant impacts upon school facilities with the implementation of Mitigation Measures 14.1 and 14.2.

Parks and Recreation

The Original Project includes 425,578 square feet of open space (9.76 acres), including approximately 9.56 acres of passive open space (with a hiking trail) that will be provided on the hillside to the west and three open space lots for common open space for the residents of the Project Site. These on-site recreational amenities together with the payment of all applicable fees assessed under the City's Park Fee Impact Ordinance, which are intended to increase the community's parkland resources, would help to offset the Original Project's demands for public parkland and recreational facilities within the City. With the incorporation of open space on-site and the payment of the City's Park Fee, the Original Project would result in a less than significant impact to parks and recreational facilities.

The Revised Project would include approximately of 455,797 square feet (10.5 acres) of open space, which would include approximately 416,544 square feet (9.56 acres) of passive open space similar to the Original Project; 37,700 square feet (0.87 acres) of park space on Lot B, along Ojai Road and the Hardison House; and 1,553 square feet of open space in Lot C, located on the northeast corner of the Project Site. The Revised Project would include 30,219 square feet more open space than the Original Project. Because the Revised Project would generate approximately 31 less residents than the Original Project and would provide more open space, the Revised Project would create a reduced demand on public parks and recreational facilities compared to the Original Project. Additionally, the Revised Project would be required to pay all applicable fees assessed under the City's Park Fee Impact Ordinance. Similar to the Original Project, with the incorporation of open space on-site and the payment of the City's Park Fee, the Revised Project would result in less than significant impacts to parks and recreational facilities.

Transportation

The Original Project is anticipated to generate 505 new daily trips, 40 new AM peak hour trips, and 53 new PM peak hour trips. The intersection Ojai Road (SR-150) and Orchard Street is expected to be significantly impacted by non-Project cumulative traffic growth in 2018, with operations projected to be LOS D during both peak hours under pre-Project conditions. The Original Project would contribute to a significant impact at this intersection by adding traffic and increasing minor street delays. For this reason, the Original Project would contribute its fair share contribution for improvements to Ojai Road and the intersection of Ojai Road and Orchard Street.

The Revised Project includes a total of 45 dwelling units. Similar to the Proposed Project, primary vehicular access to the Project Site would be provided by a full-access driveway that would intersect the west side of Ojai Road (SR-150) opposite Royal Oaks Place. Another access point would be provided via an internal connection between the Project Site and the residential subdivision located immediately to the south. As shown in Figure 1 and recommended by the City of Santa Paula Planning Commission (recommendation number 6 in list above), the Revised Project's Redbud Street would link to the existing Fuchsia Lane, which presently terminates in a cul-de-sac. This internal connection would provide secondary access for both the Revised Project and the residential subdivision to the south. The connection to Fuchsia Lane from the Project Site would be a regular public street connection, which is consistent with the City's 1971 plans for Fuchsia Lane.

The Revised Project includes a total of 45 dwelling units instead of the 54 dwelling units originally proposed. The reduction in dwelling units would lower the amount of Project daily trips, AM peak hour trips, and PM peak hour trips. Traffic impacts under the Revised Project would be lower than the Original Project. Under the Revised Project, the calculations determining the Project's fair share contribution to the intersection of Ojai Road and Orchard Street would need to be adjusted proportional to the Revised Project's reduced density. Similar mitigation measures and code compliance requirements identified in Section 16, Transportation/Circulation, would also be applicable to the Revised Project. Although, Mitigation Measure 16.1, which requires a fair share contribution of 16.8 percent towards physical improvements at the intersection of Ojai Road (State Route 150) and Orchard Street, would need to be recalculated based on the Project's final approval. Thus, similar to the Original Project, traffic impacts under the Revised Vesting Tentative Tract Map would be less than significant with mitigation.

Similar to the Original Project, the Revised Project would not involve aviation-related uses and would not influence changes to the existing flight paths. Thus, the Revised Project would have no impacts on air traffic and impacts would be similar to the Original Project.

Utilities and Service Systems

Water

Similar to the Original Project, the Revised Project includes the development of the eastern side of the Project Site as a cluster development. The Revised Project would include 45 single-family homes, which is nine homes less than the Original Project. With respect to water demand, the Revised Project is expected to have a lower water demand as compared to the Original Project, and a less than significant impact would occur.

Similar to the Original Project, the Revised Project would likely contain the same two points of connection as the Original Project – one connection is proposed at the end of the 6-inch line on Fuchsia Lane and another connection is proposed at the 8-inch main at the intersection of Ojai Road and Royal Oaks Place. The Revised Project would be within the allowable water usage demand per capita and a less than significant impact would occur.

Wastewater

As discussed above, the Revised Project would include a total of 45 single-family homes. Wastewater is expected to decrease in proportion with the reduced residents on-site and reduced water demand created by the Revised Project. As compared to the Original Project, the Revised Project would generate less wastewater.

With the recommendation of the City of Santa Paula's Planning Commission (recommendation number 4 in the list above), the Applicant would no longer be required to pay the recycling water fee of approximately $3,600 per unit. The proposed water recycling facility would not provide a nexus to the Project Site, and the Project Site would not be in an area that has the infrastructure to connect to the proposed water recycling facility. As such, the Revised Project would not connect to the proposed water recycling facility nor would the Revised Project consume recycled water from the water recycling facility. Eliminating this condition of approval would not change the Revised Project's impacts to wastewater. The Revised Project would generate less wastewater, as compared to the Original Project, due to the decrease in residential units.

The sewer network, discussed in Section 17, Utilities and Service Systems, that currently serves the Project area would also serve the Revised Project. Based on the allowable flow rates, the Revised Project would result in a less than significant impact.

Solid Waste

The Original Project would generate approximately 245 tons of construction debris, which includes the demolition of three ancillary structures and the construction of 53 residential units (135,000 sf). The

Original Project further includes the excavation and grading of approximately 20,000 cubic yards of soil to be cut and used for fill on-site, which would balance earthwork quantities on-site. The Original Project would not require the export of soil.

The Original Project and the Revised Project would include the demolition of the three ancillary structures and would result in similar amounts of demolition debris. The Revised Project's construction of 44 new residential units would produce less construction debris than the Original Project's proposed construction of 53 residential units. As such, the Revised Project would generate lower construction solid waste impacts as compared to the Original Project. The Revised Project would also be required to comply with federal, state, and local statutes and regulations pertaining to solid waste and would result in a less than significant impact in relation to construction solid waste.

As discussed in Section 17, Utilities and Service Systems, the operation of the Original Project's 54 residences would generate approximately 287 net pounds per day of solid waste. The amount of waste being disposed of in area landfills is approximately fifty percent of this estimate, or approximately 144 pounds per day. The Revised Project would include the operation of 45 single-family homes and would generate 120 pounds per day of solid waste (which takes into account the fifty percent recycling diversion rate), which is 24 pounds per day less than the Original Project. Similar to the Original Project, existing private haulers would manage the solid waste generated by the Revised Project. Thus, the Revised Project would result in a reduced impact compared to the Original Project, and its operational solid waste impacts would be less than significant.

CONCLUSION

The Revised Project includes a reduction in residential density as compared to the Original Project and incorporates the City of Santa Paula Planning Commission's changes and recommendations listed above. In consideration of the analysis above, the Revised Project was found to have similar or reduced environmental impacts as compared to the Original Project on all CEQA Checklist Questions discussed herein.

The Revised Project would not create or introduce any new, avoidable significant effects or increase the severity of environmental impacts that would require additional mitigation measures or project revisions. As such, in light of the analysis presented above and with the guidance of the CEQA Statutes and Guidelines Section 15073.5, the Revised Project would not warrant further analysis or require the recirculation of the environmental analysis.

Attachment 2

South Central Coastal Information Center Cultural (SCCIC) Cultural Resources Records Search, California Historical Resources Information System (CHRIS), July 19, 2016.

South Central Coastal Information Center
California State University, Fullerton
Department of Anthropology MH-426
800 North State College Boulevard
Fullerton, CA 92834-6846
657.278.5395
California Historical Resources Information System
Los Angeles, Orange, Ventura and San Bernardino Counties
sccic@fullerton.edu

7/19/2016 SCCIC File #: 16641.2709

Jennifer Kelley
Parker Environmental Consultants
23822 Valencia Blvd, Ste. 301
Valencia CA 91355

Re: River Rock Development Project

The South Central Coastal Information Center received your records search request for the project area referenced above, located on the Santa Paula, CA and Santa Paula Peak, CA USGS 7.5' quadrangles. The following summary reflects the results of the records search for the project area and a ½-mile radius. The search includes a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), and the California State Historic Properties Directory (HPD) listings were reviewed for the above referenced project site. Due to the sensitive nature of cultural resources, archaeological site locations are not released.

RECORDS SEARCH RESULTS SUMMARY

Archaeological Resources	Within project area: 0 Within project radius: 1
Built-Environment Resources	Within project area: 0 Within project radius: 0
Reports and Studies	Within project area: 0 Within project radius: 11
OHP Historic Properties Directory (HPD)	Within project area: 0 Within project radius: 0
California Points of Historical Interest (SPHI)	Within project area: 0 Within project radius: 0
California Historical Landmarks (SHL)	Within project area: 0 Within project radius: 0
California Register of Historical Resources (CAL REG)	Within project area: 0 Within project radius: 0
National Register of Historic Places (NRHP)	Within project area: 0 Within project radius: 0

Archaeological Determinations of Eligibility (ADOE):	Within project area: 0 Within project radius: 0

HISTORIC MAP REVIEW – Santa Paula, CA (1903, 1947) USGS 15': indicated that in 1903, there were two buildings within the project site. There were seven roads and eleven buildings within the vicinity of the project area. Santa Paula Creek ran to the east of the project site and Eagan Canyon was located to the west of the project site. Historic place names nearby included Santa Paula. In 1947, there appeared to still be two buildings within the project site. There were several more roads and buildings within the vicinity of the project area. Woodlands covered the western portion of the project site and extended beyond the project area. Historic place names nearby included Santa Paula.

ARCHAEOLOGICAL RECOMMENDATIONS - Based upon the results of the records search, it does not appear that the archaeological sensitivity of the project site has ever been studied. Therefore, it is recommended that an archaeologist should be retained to determine if the subject property is sensitive for cultural resources prior to the approval of project plans. Appropriate plans for the treatment of any cultural resources needs to be considered. Additionally, the Native American Heritage Commission should be consulted to identify if any additional traditional cultural properties or other sacred sites are known to be in the area.

BUILT-ENVIRONMENT RECOMMENDATIONS - Our files do not contain any studies that have recorded or evaluated any of the potentially historic structures that are within the subject property boundaries. There are no recordation forms on file for any of the structures on the property. Therefore, a qualified cultural resources consultant should be retained to record and evaluate the structures for local, state, and federal significance prior to the approval of project plans. The effect of the project's impact on potentially historic resources should be evaluated by a qualified cultural resources consultant prior to the approval of project plans.

For your convenience, you may find a professional consultant* at www.chrisinfo.org. Any resulting reports by the qualified consultant should be submitted to the South Central Coastal Information Center as soon as possible.

*The SCCIC does not endorse any particular consultant and makes no claims about the qualifications of any person listed. Each consultant on this list self-reports that they meet current professional standards.

If you have any questions regarding the results presented herein, please contact the office at 657.278.5395 Monday through Thursday 9:00 am to 3:30 pm.

Should you require any additional information for the above referenced project, reference the SCCIC number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the California Historical Resources Information System,

Lindsey Noyes
Lead Staff Researcher

Enclosures:

(X) Invoice #16641.2709

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.