DRAFT

Prepared For:

City of Santa Paula
200 Tenth Street
Santa Paula, CA 93060

Santa Paula West Business Park Specific Plan

Environmental Impact Report

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Planning Department
200 South Tenth Street
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November 2016

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EXECUTIVE SUMMARY

The Santa Paula West Business Park Specific Plan ("Specific Plan") is composed of 53.81 acres ("Project Site") within the City of Santa Paula's ("City's") 125-acre West Area 2 designation. West Area 2 was included as an expansion area in the City's General Plan, which was approved by the City of Santa Paula in 1998. This section provides information on the background of the Project, as described in **Section 2.0, Project Description**, assessed in this Environmental Impact Report (EIR), and a summary of the information in this EIR identifying the potential environmental impacts of the Project and the measures identified to mitigate these impacts.

ES.1 DESCRIPTION OF THE PROPOSED PROJECT

Project Location

The City of Santa Paula is located in Ventura County, directly north of State Route (SR) 126 and the Santa Clara River, west of the City of Fillmore, and east of the City of San Buenaventura in the Santa Clara River Valley. Regional access to Santa Paula West is provided by SR 126.

The 53.81-acre Project Site is area near the western boundary of the City of Santa Paula and currently lies within the unincorporated County of Ventura. The Project Site is bound to the north by Telegraph Road; to the south by SR 126; to the east by existing industrial and commercial development in the current City limits; and to the west by the Adams Barranca and agricultural operations. The Project Site is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way. Local access is provided by Telegraph Road, Beckwith Road, Clow Road, and Todd Lane.

Environmental Setting

The Project Site is situated within the Transverse Ranges physiographic province of California. The primary faults, folds, mountains, and valleys of this region are all aligned in an east–west direction. This province is a tectonically active region, with high rates of uplift, folding, and sedimentation.

The Project Site is located approximately 0.6 miles northwest of the Santa Clara River, which generally runs in an east–west direction south of the Project Site. The foothills of the Topatopa Mountains are to the north.

A variety of land uses surround the Project Site. Telegraph Road, which bounds the site along the north, is a two-lane roadway approximately 50 feet wide. North of Telegraph Road within the City limits are residential uses, consisting of a single-family residential neighborhood accessed from Country View Court opposite the western portion of the Project Site, and a mobile-home residential community accessed from Valencia Way opposite the eastern portion of the Project Site.

The southern portion of the Project Site is bound by SR 126, a four-lane freeway that runs east–west. South of SR 126 are agricultural operations and water storage basins. These agricultural lands contain row crops, avocados, and citrus, and extend to the Santa Clara River, which runs east–west along the base of South Mountain. A limited number of single-family residential units lie within some of the agricultural properties.

Along the east, the Project Site flanks the west and south boundaries of a light industrial area located immediately east of Beckwith Road and north of the VCTC railroad tracks. Beckwith Road is a two-lane road that separates the Project Site from the industrial uses to the east. The light industrial uses are within the City of Santa Paula limits, and include office and warehouse buildings that house Cornerstone Molds and Machining, other related offices, and the Church of Christ–Buenaventura. The industrial properties also contain a construction equipment storage and maintenance facility operated by United Site Services.

The Adams Barranca is adjacent to the Project Site on the southwest and contains areas with riparian vegetation. Immediately west of Adams Barranca are agricultural operations consisting of orchards and a limited amount of livestock. Single-family residences are located within these agricultural operations.

ES.2 SANTA PAULA WEST BUSINESS PARK SPECIFIC PLAN

Section 16.25.020 of the Santa Paula Municipal Code (SPMC) identifies this area as SP-6, West Area 2, with a land use designation of Mixed Use Commercial/Light Industrial. The Specific Plan would maintain the Commercial/Light Industrial (C/LI) and Light Industrial (LI) designations over the development portion of the Project Site. Adams Barranca along the western portion of the Project Site would be designated as Passive/Open Space, as described in Chapter 16.25 of the SPMC. The development standards for the C/LI and the LI zones that have been adopted by the City of Santa Paula are incorporated into the Specific Plan. All development within the Project Site would be required to adhere to the standards of the Specific Plan.

The Specific Plan is organized into six sections that address topics such as physical layout, development standards and design guidelines important to the planning of this area, as well as the required topics per the California Government Code for specific plans.

Land Use Plan

The Specific Plan includes a Land Use Master Plan, which provides for the land use designations of Commercial Light Industrial and Open Space/Passive. The corresponding zoning designations of C/LI, LI and Open Space/Passive would be established within the Specific Plan-Zoning Implementation Plan.

These land use and zoning designations will allow for the development of a mixture of light manufacturing, research and development, professional offices, and supporting commercial uses, consistent with the C/LI and LI zones of the City of Santa Paula's Zoning Ordinance. These uses are allowed in the C/LI and LI zones.

A summary of the land uses in the Specific Plan is provided in **Table ES-1, Summary of Land Uses in Approved Specific Plan.**

Table ES-1
Summary of Land Uses in Approved Specific Plan

Land Use	Acres	Percent of Project Site
Commercial/Light Industrial (C/LI)	41.96	78.0
Roadways (approximate)	6.95	12.9
Open Space/Passive	4.90	9.1
Total Gross Area	**53.81**	**100**

Source: Santa Paula West Specific Plan (May 24, 2016).

Circulation Network

The Specific Plan includes a Circulation Master Plan that provides a framework and standards for road development to ensure a safe and adequate system of vehicular, pedestrian, and bicycle circulation. The vehicular circulation system consists of public roadway access from Telegraph Road, Beckwith Road, and Faulkner Road that would provide direct access to the Project Site driveways.

Telegraph Road fronts the property to the north and is the principal arterial that would serve the Project. Primary north–south access to the Santa Paula West Business Park would be provided by Beckwith Road from Telegraph Road; and east–west access would be from Faulkner Road. Beckwith Road would be improved south from Telegraph Road into the Project. Under one option, the Beckwith Road improvements would include an at-grade railroad crossing providing access south of the railroad right-of-way and connect to Faulkner Road. The proposed Faulkner Road extension would parallel SR 126 and serve as an access point to the development. A second option would not include the Beckwith railroad at-grade crossing for public use. In this case, the crossing would be gated on the north and south sides, and only provide emergency access and Faulkner Road would provide access to portions of the Project Site south of the railroad right-of-way, while Beckwith Road would provide access to the parcel north of the railroad right-of-way. All street sections would be constructed according to City radius, crown, curb, and

pavement specifications. In addition, all streets designed as interior streets would be privately maintained.

Development Standards

The Specific Plan Development Standards direct the style of development and aesthetic character of the Business Park, and ensure a consistent use of signage, landscaping, and other design features. As part of the Development Standards, the Santa Paula West Business Park Specific Plan, SP-6, includes the following components that regulate future development within the Project Site: Zoning Standards and Architectural Design.

The businesses allowed within the Project Site will be low-intensity manufacturing, research and development, and professional offices, as well as limited commercial uses mainly to serve the employees of the businesses of the park.

The architectural design theme of the Business Park is high-quality Contemporary Tuscan. This style integrates historical Italian Tuscan features with modern materials and details. This architecture is typified by simple and strong exterior massing, a primarily symmetrical 2-story appearance, pyramid-shaped tiled roof accents, entry porticos, arches, columns, and metal accents. Warm shades of red, yellow, green, brown, and grey are natural earth tones that represent Tuscan colors. The design theme would be consistent on all building elevations.

Open Space

The Adams Barranca, located along the western boundary of the Project Site, would be zoned Open Space/Passive in the Specific Plan. A 64-foot-wide roadway for the extension of Faulkner Road through the Business Park would be dedicated to the City and would allow for integration of the Business Park with the existing developments to the east.

The Adams Barranca, SR 126, and parking lots would create a separation of between 50 and 100 feet from the agricultural areas to the west and south.

Infrastructure Plan

The Specific Plan includes an infrastructure plan establishing the network of on- and off-site infrastructure construction requirements to support development of the Specific Plan. These include infrastructure to support potable water delivery, wastewater pipelines, a storm drain system, electricity and natural gas, and other facilities. The development the Santa Paula West Business Park will require the extension of existing infrastructure and services into the Specific Plan area. The Project includes construction of an on-

site recycled water distribution pipeline system that could connect to the City's recycled water system and be used to irrigate the greenbelt and other on-site landscape irrigation areas.

ES.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A summary of the potential environmental impacts of the Project and the features of the Project and the measures identified to mitigate these impacts is provided below for each topic addressed in this Draft EIR. **Table ES-2, Summary of Project Impacts**, below, summarizes the significance of the impacts of the Project based on the information and analysis in **Section 4.0** of this Draft EIR.

Table ES-2
Summary of Project Impacts

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Aesthetics			
Construction activities within the Project Site and off-site improvements, such as along Beckwith Road and Faulkner Road, could potentially be visible from SR 126 and Telegraph Road and other vantage points that currently have views of these areas. Additionally, the construction timeframe would occur over approximately 10 years and would alter the existing open space character of the Project Site from immediate surroundings.	Potentially significant	The impact is on a temporary basis and there are no mitigation measures.	Potentially significant and unavoidable on a temporary basis
The Project would provide for the development of commercial and light industrial uses, along with roadways and open space across the 53.81-acre Project Site. Building heights would be consistent with the 1- to 2-story buildings having similar uses to the east of the Project Site, with a maximum building height of 35 feet and 45 feet for commercial/light industrial and industrial uses, respectively. Views of the agricultural fields from the SR 126 would be replaced with views of commercial and industrial uses related to the Project. Scenic aspects of the Project Site of the Project Site also include the agricultural lands and Adams Barranca west of the Site. While implementation of the Project would result in the loss of views of the	Less than significant	No mitigation measures required.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
existing agricultural lands in the immediate foreground with the addition of structures, circulation system, and supporting infrastructure, the urbanized appearance is similar to the adjacent uses and more distant scenic vistas views of the Santa Clara River Valley would not be significantly altered upon the development of structures on the Project Site. Therefore, the Project would result in less than significant adverse impacts to scenic vistas.			
The Project would incorporate various open space/passive uses into the Project design to preserve the visual quality of Adams Barranca, would not remove visually important trees or geologic features, and since the segment of SR 126 that is adjacent to the Project Site is not eligible for designation, implementation of the Project would not damage scenic resources within a designated state scenic highway.	Less than significant	No mitigation measures required.	Less than significant
The existing visual character and quality of the Project Site is predominantly agricultural in nature, with ancillary agricultural facilities, row crops, and orchards. Due to the Project Site's relatively low and flat elevations, many off-site vantage points of the Project Site are obstructed by existing structures and buildings. However, development within the Project Site can be seen from vantage points that are located immediately adjacent to the Project Site, such as those along SR 126, Telegraph Road, Beckwith Road, Todd Lane, and Faulkner Road. Furthermore, while	Potentially Significant	No mitigation measures.	Significant and unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
elevations of the Project Site would remain relatively flat and at low elevations, and although the Specific Plan development standards will be required to ensure a consistent and compatible aesthetic character with the developments to the east, the existing open space and agricultural character of the Project Site would substantially change. The altered views from the public viewpoints that immediately surround the Project Site are considered significant and unavoidable.			
The Project would result in a potential for increases glare from within the Project Site during the day from reflective surfaces, and an increase in artificial light during the night. Given that minimal outdoor lighting is currently emitted from the Project Site, these impacts related to the additional nighttime light and glare from the Project are considered to be potentially significant.	Potentially significant	**AES-1:** Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula Planning Director for approval that identifies the types of shielding that will be used for outside lighting. All exterior night lighting installed on the Project Site shall be of low-intensity, low-glare design, and hooded to direct light directly downward onto the area being lighted to prevent spillover onto adjacent parcels. Shielding must be included to eliminate uplighting. Exterior lighting fixtures must be kept to the minimum number and intensity needed to ensure public safety. These lights shall be dimmed after 10:00 PM to the maximum extent practical without compromising safety. Upward directed exterior lighting is prohibited.	Less than significant
Agricultural Resources			
According to the FMMP Important Farmland Map for Ventura County, there are approximately 44.20 acres of prime farmland and 4.88 acres of farmland of statewide importance on the site (total of 49.08 acres). Implementation of the Specific Plan would result in the conversion of the 49.08 acres of both prime farmland and important farmland to urbanized uses.	Potentially significant	**A-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. 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	Significant and unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		average of the total crop value for the four-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 [½] acre of land producing $1,000,000 per year.	
The County zoning designation for the Project area is Agricultural Exclusive (A-E) Urban Reserve for land currently in agricultural use. The Specific Plan area would be zoned Commercial/Light Industrial and Light Industrial in accordance with the Specific Plan's Zoning Implementation Plan and consistent with the City's Municipal Code for these designations. The development of a variety of manufacturing, research and development, office, and commercial uses that would be allowed under the Specific Plan would be compatible with the proposed City's General Plan designations. There are no Williamson Act contracts preserving agricultural that govern any parcels within the Project area.	Less than significant	No mitigation measures required.	Less than significant
The Project Site would be zoned C/LI (Commercial Light Industrial) and LI (Light Industrial) for areas that would be developed under the Specific Plan. The Adams Barranca and related detention basin used for flood control would be preserved with an Open Space/Passive zoning designation. The Project Site is not zoned as forestland or timberland, and there is no timberland	No impacts	No mitigation measures required.	No impacts

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
production within the vicinity of the Proposed Project.			
The Project does not include any loss of forestland or conversion of such forestland to any other designations.	No impacts	No mitigation measures required.	No impacts
As stated previously, approximately 49 acres of the 53.81-acre Project Site are under agricultural cultivation and would be taken out of production as a result of implementation of the Specific Plan. Existing agricultural lands producing avocados, citrus fruits, and a variety of row crops are located south of the Specific Plan area, south of State Route (SR) 126, and near the western boundary of the Specific Plan area, west of Adams Barranca. Agricultural operations to the south are separated from the Project Site by SR 126. The Specific Plan would not readily accommodate outdoor recreational activities for the general public or provide residential habitation components. As such, residential and general public exposure to dust, noise, and odors associated with nearby farming activities is considered less than significant. Therefore, based on the nature of the Project and design features to reduce any conflicts with adjacent agricultural land, potential impacts related to the conversion of off-site farmland to nonagricultural uses would be less than significant.	Less than significant	No mitigation measures required.	Less than significant
Air Quality			
The proposed Project will not increase the amount of housing within the Specific Plan	Less than significant	No mitigation measures necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
area, as no residences are planned to be built. The project employment increase would be approximately 1,510 employees and would not result in SCAG projections being exceeded. Therefore, as growth under the Specific Plan is not expected, the Project would not conflict with the 2007 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in Ventura County. Therefore, impacts regarding consistency with applicable air quality are considered less than significant.			
Construction activities associated with the construction of uses allowed with the Specific Plan would exceed VCAPCD threshold for ROG and NOx throughout the entire construction period and would be considered potentially significant. The construction emissions analysis was conducted for Year 2020, which was identified as the worst-case year due to the overlapping construction activities of paving and architectural coating. ROG emissions from architectural coating exceeded the significance threshold.	Potentially significant	**AQ-1:** During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust-preventative measures using the following procedures, as specified by the VCAPCD (including without limitation, to VCAPCD Rule 50 (Opacity) and Rule 51 (Nuisance): • On-site vehicle speed shall not to exceed 15 miles per hour (the Project Site will contain posted signs with the speed limit). • All on-site construction roads with vehicle traffic shall be watered periodically; • Streets adjacent to the Project reach shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust. • All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day. • All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust (contact the VCAPCD meteorologist for current information about average wind speeds).	

		• All material transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust. • The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust. These control techniques shall be indicated on Project grading plans. The Applicant and/or its contractor shall be responsible for implementing these measures and compliance with this measure will be subject to periodic site inspections by the City. **AQ-2:** Project grading plans shall show that for the duration of construction, ozone precursor emissions from construction equipment vehicles must be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Compliance with this measure will be subject to periodic inspections of construction equipment vehicles by the Public Works Department. **AQ-3:** All trucks that will haul excavated or graded material on site shall comply with California Vehicle Code Section 23114 with special attention to subsections 2311(b)(F), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads. **AQ-4:** A comprehensive Fugitive Dust Control Plan shall be developed by the Applicant and approved by the VCAPCD before the applicant commences grading and excavation operations. The Plan shall include all feasible, but environmentally safe, dust control methods. If a particular dust control method is determined or believed not to be feasible, or if it would conflict with other regulations, justification for not including the subject method shall be provided at the time the Fugitive Dust Control Plan is submitted to the VCAPCD. The Plan shall identify all fugitive dust sources, the means by which fugitive dust from each identified source will be minimized, and the schedule of frequency that each dust control method will be applied for each identified source.	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		AQ-5: The construction contractor shall adhere to VCAPCD Rule 74.2 (Architectural Coatings) for limiting volatile organic compounds from architectural coatings. This rule specifies architectural coatings storage, clean up, and labeling requirements.	
The Project would generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD for ROG. Many of the measures that the VCAPCD recommends to reduce the significant operational impacts are features of the Project. The off-site transportation demand management (TDM) fund is a mitigation measure that can be used by project proponents for projects and program that exceed the ROG and NOx significance thresholds. The City of Santa Paula utilizes this program to mitigate the significant air quality impacts of projects with its jurisdiction. While impacts will be reduced with mitigation, they will remain significant and unavoidable.	Potentially significant	**AQ-6:** Use low emission water heaters for residential, retail, and commercial water heating (Emissions reduction of 11 percent for ROG and 9.5 percent for NOx). **AQ-7:** Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, and bikeways and or lanes. Sidewalks and bikeways should be landscaped with trees (an approximately 4 percent emissions reduction). **AQ-8:** Provide shuttle/minibus service between the Project commercial and industrial land uses and the Project retail land uses and the Santa Paula downtown area during the lunchtime period (11:00 AM to 2:00 PM).	Significant and unavoidable
According to the VCAPCD, if an individual project results in air emissions of criteria pollutants that exceed VCAPCD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. By applying VCAPCD's cumulative air quality impact methodology, implementation of the Project would result in an increase of ROG, an ozone precursor, and NOx, such that significant cumulative impacts would occur.	Potentially significant	**AQ-12**: The Applicant and/or its contractor must plant and maintain shade trees to reduce heat build-up on structures. **AQ-13:** The Applicant and/or its contractor shall prepare a TDM for review and approval by the City and VCAPCD, before the City issues building permits. The plan shall incorporate reasonable and feasible measures to reduce Project-related traffic and vehicle miles traveled. At minimum, the TDM Program shall include the following measures: • Provision of connections to identified adjacent City or regional trails. • Provision of adequate way-finding features to direct pedestrians and bicyclists to nearby Project and City destinations, such as school, retail, and civic facilities.	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Accordingly, cumulative impacts would be potentially significant.		• Provision of homeowner information packets prior to close of escrow, identifying local and regional nonvehicular transportation options, and providing homeowners with basic information regarding telecommuting options. • Provision of adequate setbacks and design features such that the proposed future enhancement of commuter rail opportunities is not hindered by Project design. • Construction of pedestrian- and transit-friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeways, or lanes. Sidewalks and bikeways should be landscaped with trees. • Perform a traffic light synchronization study on streets impacted by Project development to reduce vehicle queuing time. The Project shall offset the increase in daily emission over the 25 pounds of reactive organic compounds and nitrogen oxides per day either through the purchase of emission offsets or through the in-lieu fees shall be paid to fund off-site TDM facilities or services, if such a program has been established at that time. These fees can reduce emissions from non-Project-generated motor vehicle trips by funding programs to promote ridesharing, public transit, and bicycling. The amount of this financial contribution should be calculated on a pro-rate basis as determined to be equitable by the VCAPCD, and in accordance with the VCAPCD Guidelines. These fees should be paid prior to the issuance of building permits by the County. The applicant shall demonstrate the availability of the offsets or contribution to fund off-site TDM services to the VCAPCD through a contract or other agreement with the offset source(s), which binds the reduction to the Project. **AQ-14:** The Applicant and/or its contractor shall install EPA-certified wood-burning stoves or fireplace inserts. If this is not feasible, then the installation of a ceramic coating on the	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		honeycomb inside a catalytic combustor must be utilized or the use of natural gas fireplaces may be used as a feasible alternative.	
All but one study area intersection is projected to operate at LOS D or better. This intersection is a freeway ramp and there are no sensitive receptors located within close proximity so as to be affected by vehicle emissions at this intersection. The closest residence is located approximately 200 feet east of the freeway ramp. Consequently, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.	Less than significant	No mitigation measures necessary.	Less than significant
An HRA was prepared to determine whether diesel particulate emissions from construction under the Santa Paula West Specific Plan will cause significant impacts to nearby sensitive receptors. In comparison to the 10 in 1 million threshold level, carcinogenic risks do not exceed the level posing no significant risk. Therefore, impacts are less than significant.	Less than significant	No mitigation measures necessary.	Less than significant
An evaluation of the potential noncarcinogenic effects was also conducted. Results of the analysis demonstrate that construction of the Project will not generate any significant air quality impacts with regards to emissions of toxic air contaminants.	Less than significant	No mitigation measures necessary.	Less than significant
Grading will include earth-moving activities during the grading phase that will cut soil and use as fill at the Project site. These activities could be considered conducive to disturbing the *Coccidioides immitis* spores if they are present. The fungus is not likely to be found in	Potentially significant	**AQ-9:** To the extent feasible, construction employees shall be hired from local populations, since it is more likely that they have been previously exposed to the fungus and are therefore immune. An individual is quite likely to be affected by valley fever if he or she lives in an area where the fungus is prevalent. A person (or animal) with a positive test has had a valley fever infection and has	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
soil that has been or is being cultivated and fertilized. Furthermore, the construction activities will be required to conform to Rule 403 to control fugitive dust, along with other rules, that will prevent significant dust. Use of enhanced dust control procedures such as continual soil wetting, use of supplemental binders, early paving, etc. can achieve a significant improvement in PM10 control efficiency. However, impacts related to exposure of people of Valley Fever during construction may be potentially significant.		developed immunity to the fungus and therefore, will never contract valley fever again. **AQ-10:** During periods of high dust in the grading phase, crews must use respirators in accordance with California Department of Occupational Safety and Health regulations. **AQ-11:** The operator cab of area grading and construction Equipment must be enclosed and air-conditioned.	
The uses allowed by the Santa Paula West Business Park Specific Plan do not include any operations that require large amounts of hazardous materials. Accordingly, the Project will not result in a significant impact with respect to use of hazardous materials during long-term operations.	Less than significant	No mitigation measures necessary.	Less than significant
The types of industrial activities that would occur with the Project are not known at this time, but would be evaluated at the time that permits to construct and operate are applied for from the APCD. Therefore, the potential impacts associated with objectionable odors will be less than significant.	Less than significant	No mitigation measures necessary.	Less than significant
The Project would not have a cumulatively considerable contribution to this impact with respect to conflicting with or obstructing the implementation of the applicable air quality plan.	Less than significant	No mitigation measures necessary.	Less than significant
Cumulative development activity within the City of Santa Paula would continue to	Less than significant	No mitigation measures necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development within the city is not expected to cause a significant impact associated with construction activities.			
Because Ventura County is currently in nonattainment for ozone, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Therefore, the emissions generated by the Project would be cumulatively considerable and are a significant and unavoidable impact.	Potentially significant	Implementation of mitigation measures **AQ-6-8 and AQ 12-14.**	Significant and unavoidable
Biological Resources			
Southern California black walnut (*Juglans californica*) is the only special-status plant species that was documented or determined to have a high likelihood of occurring within the Project Site. A total of 19 individual trees are located along the perimeter of the Project Site, mainly along the southwest boundary within the riparian habitat of the Adams Barranca and along the SR 126 right-of-way along the southeast boundary of the Project Site. Therefore, impacts to special-status plant species (e.g. black walnut) are considered potentially significant.	Potentially significant	**BR-1** Before issuance of a grading permit, the Applicant must identify on grading plans, the locations of any protected trees (such as the Southern California black walnut, *Juglans californica*) and must include a report pertaining to preserving the tree(s) that could be affected by the grading activity. The report shall be prepared by a tree expert and shall evaluate the subdivider's proposals for protected tree preservation, including avoiding grading, land movement, or other activity within the drip line of any protected tree. Prior to grading, the drip line must be fenced to prevent earthmoving equipment from inadvertently entering the drip line. In the event protected tree cannot be avoided, then the Applicant must provide a tree report in accordance with the City's Tree Protection Ordinance and must provide for the replacement or relocation of any protected trees that are to be removed, or would be subject to landmoving or grading within its drip line.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Invasive exotic species introduced as landscaping could be dispersed by stormwater, wind, or wildlife, or by various other means to natural habitats in the area, including Adams Barranca and other downstream water bodies, such as the Santa Clara River. Impacts from the introduction of invasive exotic landscape plants could be potentially significant.	Potentially significant	**BR-2** Before issuance of a grading permit for development within the 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. Nonnative 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. For areas adjacent to Adams Barranca riparian corridors, the plan must provide for adequate landscaping to reduce indirect impacts including attenuation of noise and reduction of nighttime lighting and glare.	Less than significant
The Southwestern willow flycatcher breeds in dense riparian habits along rivers and streams, and almost all southwestern flycatchers breeding habitat is within close proximity of water or saturated soils. The Project includes construction activity that could result in a temporary impact to the species if members are foraging or in the unlikely event they nest near the Project Site	Potentially significant	Implementation of mitigation measure **BR-2.**	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
at the time of construction. Therefore, impacts are considered potentially significant. The Project is consistent with the recovery plan for this species because if southwestern willow flycatchers are located on site, they would not be permanently impacted. Although, the Project would result in potentially significant impacts to the southwestern willow flycatcher, mitigation measures are included within this EIR, and the Project includes an Open Space dedication along the western boundary to avoid impacts to habitat for southwestern willow flycatcher individuals in the Santa Clara River Watershed.			
The least Bell's vireo was not observed during the Project surveys; however, Adams Barranca provides potential habitat for the species. Impacts are considered potentially significant in the unlikely event this species nests on site or in the immediate vicinity and is subject to disturbance from construction activity. The Project is consistent with the recovery plan for this species because the least Bell's vireo habitat present on the site would not be impacted. The Project would result in potentially significant impacts to the least Bell's vireo. However, mitigation measures are included within this EIR, and the Project would include an Open Space dedication along the western boundary to avoid impacts	Potentially significant	Implementation of mitigation measure **BR-2.**	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
to habitat for least Bell's vireo individuals in the Santa Clara River Watershed.			
The development of the Project Site would increase the number of nighttime light and glare sources on the site. Light and glare can "spillover" into adjacent open space areas, increasing the level of light currently experienced there. Nighttime light can disturb breeding and foraging behavior and can potentially alter foraging and breeding behavior of nocturnal birds, mammals, and invertebrates, which is considered a potentially significant impact.	Potentially significant	Implementation of mitigation measure **BR-2.**	Less than significant
No active bird nests were observed at the time of survey; however, suitable nesting habitat is present within the avocado orchard, ornamental trees within the Project area, and adjacent trees to the Project Site and within Adams Barranca. However, impacts to nesting birds may be potentially significant.	Potentially significant	**BR-3** To avoid impacts to native nesting birds, the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct nest surveys in potential nesting habitat within the Project Site prior to construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Wildlife Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. Surveys for special-status bird species can be conducted concurrently with general nesting bird surveys. Because birds known to use the Project area nest during the late winter, breeding bird surveys shall be carried out both during the typical nesting/breeding season (mid-March through September) and in January and February. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than 3 days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		include examination of trees, shrubs, and the ground within grassland for nesting birds, as several bird species known to occur in the area and are shrub or ground nesters, including burrowing owl, California horned lark, and mourning dove. **BR-4** If active nests are found, clearing and construction activities within 300 feet of the nest (500 feet for raptors) shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the qualified biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts to these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.	
The Project includes the dedication of Open Space for the areas identified as Mixed Willow Riparian, and no development would occur within the Mixed Willow Riparian habitat area, potential impacts to vegetation communities are considered less than significant.	Less than significant	No mitigation measures necessary.	Less than significant
The avocado orchard within the Project Site and the ecotone between the agricultural fields and Adams Barranca provides forging habitat for the American badgers, as they are most abundant in the drier, open stages of most shrub, forest, and herbaceous habitats	Potentially significant	**BR-5** The Applicant shall retain a qualified biologist (approved by the City of Santa Paula) to survey the Project Site for the presence of the American badger no earlier than 1 day prior to any grading activity. In particular, the survey shall include an examination of the fallow agricultural field in the eastern portion of the site that will be impacted during project implementation.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
with friable soils. Development under the Specific Plan could result in the loss of American badger habitat. Impacts are considered potentially significant.		If American badger is located on site, potential loss of individual animals shall be mitigated through one of the following: (1) an on-site passive relocation program, through which badgers are excluded from occupied burrows by installation of a one-way door in burrow entrances, monitoring of the burrow for 1 week to confirm badger usage has been discontinued, and hand excavation and collapse of the burrow to prevent reoccupation; or (2) active trapping and relocation of badgers to suitable off-site habitat by a qualified biologist and in coordination with the CDFW, as approved by the City and CDFW.	
The Pallid bat was not observed during the Project surveys, Adams Barranca provides foraging and roosting habitat for the species. Construction under the Specific Plan could result in potentially significant impacts to pallid bats. The Hoary Bat was not observed during the Project Surveys, however, Adams Barranca provides foraging and roosting habitat for the species. This species is not expected to breed in Adams Barranca but may use the habitat for roosting, and the agricultural areas of Project Area for foraging.	Potentially significant	**BR-6** To avoid impacts to the Pallid bat (*Antrozous pallidus*) and the Hoary Bat (*Lasiurus cinereus*), the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct roosting bat surveys within the Specific Plan area prior to site preparation activities. Thirty days before ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys in accordance with standard protocols to determine if roosting western red bats are present in the construction zone or within 300 feet of the construction zone. Roosting bat surveys shall be carried out from March through September. Surveys for special-status bat species may be conducted concurrently with nesting bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than three days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees and large shrubs in which this species is known to roost. Any bats found outside of the breeding season (May through August) shall be relocated by having a qualified biologist remove the bat from the roost. If roosting female bats are found with young during the breeding season (May through August) clearing and construction activities within 300 feet of the roost, shall be postponed or halted	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		until the roost is vacated and juveniles have been weaned, as determined by the biologist. Limits of construction to avoid an active roost site shall be established in the field with flagging, fencing, or other appropriate barriers. Construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active roost areas to ensure that no inadvertent impacts on these roosts will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of these bat species.	
Development under the Specific Plan would require the removal of the agricultural drainage ditch that bisects the Project Site and is considered State Waters pursuant to the Fish and Game Code and the Clean Water Act. Other state and federal jurisdictional waters (i.e., those within Adams Barranca) would be preserved through an Open Space dedication and prevention of construction activities within the Barranca.	Potentially significant	**BR-7** Before the issuance of a grading permit for areas that require state permits, the applicant shall coordinate with the CDFW to verify the impact to state-protected waters and associated vegetation on the Project Site. A Streambed Alteration Agreement (SAA) must be obtained, and mitigation measures recommended by the CDFW as part of the SAA shall be implemented. The SAA shall be provided to the City prior to issuance of a grading permit. The Applicant must mitigate for impacts to jurisdictional waters as administered by the CDFW jurisdiction by restoring habitats within those jurisdictions acceptable to the resource agency. Habitat must be mitigated onsite or within the same watershed, if feasible. • The mitigation site(s) shall have been evaluated and selected on the basis of their suitability for use as riparian mitigation areas. • The mitigation area shall provide procedures to prepare soils in the mitigation area, provide detailed seeding/planting mixtures, provide seeding/planting methods, and other procedures that will be used for successful re-vegetation. • Impacts to jurisdictional waters shall be avoided to the extent feasible in the design phase of the Project.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		• Maintenance and monitoring requirements shall be established, including quarterly and annual monitoring reports to CDFW. **BR-8** Prior to the issuance of a grading permit for areas that require state or federal permits, the applicant and/or its contractor shall coordinate with the Army Corps of Engineers (ACOE) to verify the impact to federally regulated waters on the Project Site. A Nationwide Permit (NWP) shall be obtained and mitigation measures recommended by the ACOE and National Marine Fisheries, as part of the NWP shall be implemented. The NWP shall be provided to the City prior to initiating construction of the bridge crossing Santa Paula Creek. Areas determined to be federally regulated by the ACOE shall also fall under the jurisdiction of the Regional Water Quality Control Board (RWQCB), and a Clean Water Act Section 401 Water Quality Certification (401 Certification) will be required from the RWQCB for impacts to those areas. **BR-9** For impacts to Regional Board jurisdiction, the Applicant shall: • Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio) on site; or • Provide a one-time in-lieu fee to a Regional Board–approved mitigation bank and/or in-lieu fee program within the Santa Clara River Watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1.27 acres of Regional Board jurisdiction; or • A combination of on-site and/or off-site compensatory mitigation options, as described above. **BR-10** As mitigation impacts to CDFW jurisdiction, the Applicant shall: • Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio acres of CDFW jurisdiction for loss of State Waters; or	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		• Provide a one-time in-lieu fee to a CDFW-approved mitigation bank and/or in-lieu fee program within the Santa Clara River watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1:1 CDFW jurisdiction area; or • A combination of on-site and/or off-site compensatory mitigation options, as described above.	
Alteration of state-protected waters and associated riparian vegetation would require the acquisition of a Fish and Game Code Section 1602 SAA from the CDFW. Due to the high habitat value that drainages and swales are known to provide for wildlife and because these areas are under the jurisdiction of the CDFW, the proposed removal of these waters is considered a potentially significant impact.	Potentially significant	Implementation of mitigation measures **BR-7, BR-8, BR-9, and BR-10.**	Less than significant
Development under the Project can be expected to increase human activity near Adams Barranca, which could result in an increase in the frequency of human encroachment into the Barranca when compared to existing conditions. The Open Space designation of the Specific Plan, upland buffers from the riparian area and development under the Project, and the Project characteristics that would provide predominantly indoor daytime work areas would minimize any potential for increase human disturbance to the Adams Barranca. Therefore, indirect impacts from human encroachment would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Specific Plan is designed to include stormwater infiltration and treatment. This	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
includes low-impact development (LID) best management practices (BMPs) to ensure that the Project does not result in adverse effects to water quality in the Adams Barranca or the Santa Clara River. The Santa Paula West Business Park Specific Plan Drainage Master Plan will provide storm drains and runoff directed to an on-site detention basin for passive treatment of runoff from the Project driveways and other hard surfaces. Overall, the BMPs and the Project Design Features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all applicable federal, state, and local water quality rules and regulations in order to effectively minimize the Project's impact on water quality. Accordingly, impacts would be less than significant.			
Adams Barranca, located along the western border of the Project Site is could provide a wildlife movement corridor with linkage between the foothills of the mountains north of the City and the Santa Clara River. No historical or active raptor nests or communal roosts exist at the Project Site or within 100 feet of any area that is or will be subject to development within the Project Site. Raptors are mobile species with generally large home ranges, they are capable of compensating for the loss of small acreages of foraging habitat in a local area by moving to other suitable foraging habitats. Therefore, development of	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
the Project would not eliminate significant raptor foraging areas or limit raptors' access to food resources, making potential impacts to raptors due to the development of the Project less than significant.			
The Project includes the dedication of approximately 4.9 acres (9.1 percent) of the Project Site as Open Space along the western boundary to preserve and provide a buffer area from the Adams Barranca. Therefore, the Project is consistent with the City General Plan Conservation and Open Space Element because it provides for the protection the City's natural resources, and impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Cultural Resources			
While a majority of the Project Site consists of younger Holocene alluvial soils, older Pleistocene alluvial deposits are presumed to underlie these younger soils. Because these depths of older alluvial soils are unknown, there is a moderate to high potential for development-related earthmoving activities and unauthorized fossil collecting within older alluvium on the Project Site to result in the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data.	Potentially significant	**CUL-1:** Should unexpected paleontological resources be discovered during any ground-disturbance activities greater than 10 feet below existing grade of Project Site, work in the immediate area of the discovery shall be halted and the City shall require an assessment by a qualified paleontologist to determine the significance of the find.	Less than significant
The Project Site consists in majority of younger alluvial soils, which are considered to have low potential of containing significant paleontological resources. At shallow depths,	Potentially significant	Implementation of mitigation measure **CUL-1.**	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
the younger alluvium is considered too young to contain remains old enough to be considered fossilized. As a result of the unlikelihood of significant fossil resources being found within these younger soils, ground-disturbing activities of less than 10 feet below the current grade of the Project Site are anticipated to have low potential to impact any paleontological resources.			
The nearest formal cemetery to the Project Site is the Pierce Brothers Santa Paula Cemetery, which is located approximately 1.4 miles northeast of the Site at 380 Cemetery Road. No known sites containing human remains exist within the Project area. However, currently unknown human remains potentially could be discovered during the construction of future projects within the Specific Plan. Project construction would require ground-disturbing activities, including grading and excavation, and the presence of construction equipment. These construction activities could potentially result in the discovery of previously unrecorded human remains, including Native American burials. Impacts related to construction would be limited to the construction area for each individual project within the Specific Plan	Potentially significant	**CUL-2:** 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).	Less than significant
A majority of the Project Site has been extensively farmed with various row crops and orchards, which has continually disturbed the surface of the soils. While the Project Site does not contain any known sensitive archaeological resources within the	Potentially significant	**CUL-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,	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
disturbance area, the general Santa Clara River Valley is considered sensitive, and there is potential for unknown resources to be uncovered by activities, such as grading, that disturb the ground surface.		must assess the significance of the find and make mitigation recommendations.	
The historic resource evaluation report concludes that while the development of the Project would result in an adverse impact by eliminating elements that contribute to a historic district, this impact would not cause a substantial change in the significance of the Santa Clara Valley rural historic district. Given the large size and complex nature of the historic district, the loss of a single employee residence and associated fields would not reduce the integrity of the historic district such that it could no longer convey historic significance. The Santa Clara Valley rural historic district would remain eligible for the NRHP and the CRHR. Therefore, the impact resulting from the Project would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Geology and Soils			
The Specific Plan area is neither located within an established Alquist-Priolo Earthquake Fault Zone, nor is it crossed by a known active fault. The risk of loss, injury, or death associated with surface rupture of a known earthquake fault is considered very low, and impacts will be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Specific Plan area could be subject to strong ground shaking in the event of an earthquake originating along one of the faults	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
listed in **Table 4.6-1** (or another active or potentially active in the Southern California area, such as the San Andrea Fault). Construction allowed by the Specific Plan will be required to comply with the version of the CBC in effect at the time individual building permits are obtained. The Project will not expose residents to unknown safety issues associated with seismicity (including ground shaking), and potential impacts are less than significant.			
Most of the Project Site lies within a liquefaction hazard zone, an area where the historic occurrence of liquefaction or groundwater conditions indicate a potential for ground displacements as a result of liquefaction, as designated by the State of California and the City of Santa Paula. Settlement caused by ground shaking is often non-uniformly distributed, which can result in differential settlement. If settlement occurs, it could result in damage to improvements. Seismic settlement could occur on the site and is thus considered a potentially significant impact.	Potentially significant	**G-1:** Additional explorations must be performed at the tentative tract map and grading plan review stages of the development planning. The purpose of the explorations would be to establish required removal depths and delineate any portion of the Project Site deemed susceptible to seismically induced settlement.	Less than significant
The topography of the project area is relatively flat and has no landforms where a landslide could form. Therefore, the potential for impacts from earthquake-induced landslides or other landslides (except lateral spread landslides) is considered less than significant.	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
The native topsoil and alluvial soils in the annexation area may be moderately susceptible to erosion. Construction activities would comply with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. After construction, the project may result in a limited degree of soil erosion effects from vegetated areas. However, in accordance with NPDES requirements, the project would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of each development within the Specific Plan. While BMP design features would be developed with more refined engineering for each development prior to implementation of the above requirements, impacts associated with erosion and sedimentation are considered potentially significant.	Potentially significant	**G-2:** Detailed, design-level geotechnical investigation reports for all future subdivision and other discretionary development approvals must be submitted to the Public Works Director, or designee, for approval. In addition, grading plans and geotechnical reports prepared by a licensed Engineering Geologist (approved by the Public Works Director) must be provided to the Public Works Director, or designee, before the City issues grading building permits for individual development projects within the Project Site. Requirements for the geotechnical reports and compliance are described below. • The Engineering Geologist must make recommendations to address any seismically induced settlement within portions of the Project Site. In particular, seismically induced settlement must be addressed in the western parts of the Project Site, where preliminary geotechnical investigations determined that the area may experience up to several inches of seismically induced settlement in the event of strong ground motion. • The Engineering Geologist must inspect and certify that any expansive soils underlying individual building pads and all roadway subgrades have been either removed or amended in accordance with construction specifications, and make site-specific recommendations for grading, drainage installation, and foundation design, as appropriate. • The Public Works Director, or designee, must ensure that all soils and engineering report recommendations are incorporated into the project engineering and construction plans, including soils tests to ensure that it meets the soil classifications assumed in the soils reports, and that soils meet the CBC requirements. • All Project plans as determined necessary by the Public Works Director, or designee, including Grading and Construction Plans, must be reviewed and stamped by a	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		Project soils engineer and submitted to the Public Works Director, or designee, for review and verification that all requirements are incorporated before the City issues grading or construction permits. • The Applicant and/or contractor must retain a licensed soils engineer acceptable to the Public Works Director, or designee, to review all construction plans for consistency with the soils reports and to monitor on-site grading and construction to ensure the conditions at the Project Site do not substantially change the requirements of report recommendations for design-level geotechnical investigations. The project soils engineer must monitor grading and construction activity and report observations to the Public Works Director, or designee. The Public Works Director, or designee, will conduct field inspections as needed.	
Expansive soils units may be found in the Qht deposits that could cause damage to foundations and walls due to repeated drying and wetting (shrink and swell). Therefore, geologic, soils, and geotechnical impacts would be potentially significant.	Potentially significant	Implementation of mitigation measure **G-2** and: **G-3:** The final grading and erosion control plan shall be designed to minimize erosion. The plan shall include, but not be limited to, the following: Best management practices (BMPs), such as temporary berms and sedimentation traps (such as silt fencing, straw bales, and sand bags), shall be installed in association with project grading. The BMPs shall be placed at the base of all cut/fill slopes and soil stockpile areas where potential erosion may occur and shall be maintained to ensure effectiveness. The sedimentation basins and traps shall be cleaned periodically, and the silt shall be removed and disposed of in a location approved by the City. Nonpaved areas shall be revegetated or restored (i.e. geotextile binding fabrics) immediately after grading and installation of utilities to minimize erosion and to re-establish soil structure and fertility. Revegetation shall include drought-resistant, fast-growing	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		vegetation that would quickly stabilize exposed ground surfaces. Alternative materials rather than reseeding (e.g., gravel) may be used, subject to review and approval by the City. Runoff shall not be directed across exposed slopes. All surface runoff shall be conveyed in accordance with the approved drainage plans. Energy dissipaters or similar devices shall be installed at the end of drainpipe outlets to minimize erosion during storm events. Grading shall occur during the dry season (April 15 to November 1) unless a City-approved erosion control plan is in place and all erosion control measures are in effect. Erosion control measures shall be identified on an erosion control plan and shall prevent runoff, erosion, siltation, and tracking of mud and soil onto City streets. All exposed graded surfaces shall be reseeded with ground cover vegetation to minimize erosion. Graded surfaces shall be reseeded within four (4) weeks of grading completion, with the exception of surfaces graded for the placement of structures. These surfaces shall be reseeded if construction of structures does not commence within four (4) weeks of grading completion. Site grading shall be completed such that permanent drainage away from foundations and slabs is provided and so that water shall not pond near proposed structures or pavements.	
Greenhouse Gasses			
All industrial land use projects that exceed 10,000 MTCO2e per year would be considered potentially significant under the screening threshold. The estimated Project operational GHG emissions with project design features would be 6,674.83 MTCO2e per year, which would not exceed the screening threshold. In addition, the proposed Project would generate approximately 1,510 job opportunities and would achieve a project-level efficiency target of 4.4 MTCO2e per	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
service population. This would be below the 4.8 MTCO2e per service population threshold. Potential impacts would be less than significant based on the screening threshold.			
The Specific Plan would incorporate measures that reduce GHG emissions compared to a conventional project of similar size and scope. The Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of a building's life cycle. These designs would increase the structures energy efficiency, water efficiency, and overall sustainability. These measures and features are consistent with existing recommendations to reduce GHG emissions. In addition, the Project would result in less than significant impact. Therefore, the Specific Plan would not conflict with the 2008 Scoping Plan and the 2014 Updated Scoping Plan.	Less than significant	No mitigation necessary.	Less than significant
Given the Specific Plan's consistency with state and county GHG emission reduction goals and objectives, the Specific Plan's contribution to the cumulative impact of greenhouse gas emissions would not be cumulatively considerable and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (i.e., the 2014 Updated Scoping Plan). Similarly, related projects would also be anticipated to comply with these same emissions reduction goals and objectives.	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Therefore, cumulative impacts with respect to greenhouse gas emissions would be less than significant.			
Hazards and Hazardous Materials			
Spills or leakages encountered during construction and hauling would be temporary and would be required to be remediated in accordance with the State and local regulations for hazardous waste cleanup. As such, impacts from the use and handling of hazardous materials would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
If the railroad is commissioned for service within the future, any transport of hazardous materials would comply with US Department of Transportation (USDOT) Federal Railroad Administration (FRA) safety regulations. Therefore, the probability of an accident involving the transport of hazardous materials within proximity to the Project Site is considered to be unlikely. Impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
During construction of the Project, delivered materials to the site could contain hazardous materials, such as fuels, solvents, oils, coatings, etc. The event of a spill or release related to these hazardous materials could cause a short-term threat of exposure to nearby schools and residential areas along SR 126 and W. Telegraph Road. Therefore, the Project would have potentially significant impacts related to the transport of hazardous materials during construction activities.	Potentially significant	**HM-1:** Prior to demolition and construction activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that an asbestos survey has been conducted on any buildings and irrigation pipelines that are to be demolished or removed from the Project Site. If asbestos is found, the Applicant shall follow all procedural requirements and regulations of the VCAPCD Rule 62.7 to properly dispose of all on-site ACM's before general demolition activities commence. **HM-2:** Prior to demolition and any renovation activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that a lead-based paint	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		survey has been conducted at all existing buildings located on the Project Site. If lead-based paint is found, the Applicant shall follow all OSHA procedural requirements and regulations for its proper removal and disposal before general demolition activities commence. **HM-3:** Prior to disposal, all fluorescent light fixtures within the existing buildings shall be inspected for PCB content labels throughout demolition of the Project Site. **HM-4:** Pole-mounted transformers, light ballasts, or other equipment suspected to contain PCBs must be inspected for the presence of PCBs prior to before any disturbance or removal. All equipment found to contain PCBs must be removed and disposed in accordance with all applicable local, State and Federal regulations including but not limited to California Code of Regulations Title 22, 40 CFR Part 261, and EPA 40 CFR. Utility Plans prepared as part of building permit review must include notes requiring inspection and plan for removal and disposal.	
The Project Site has been historically used for agricultural uses for more than 75 years, it is possible that residual pesticides may be exposed during grading and excavation activities. The limited Phase II ESA conducted for the Project Site determined that exposure of residual pesticides is considered low. However, soil testing may not always indicate of every condition within the Project, and clearing of existing debris or soils could uncover hazardous material contamination not previously known to occur on site. Therefore, potential impacts related to the presence of hazardous substances would be potentially significant.	Potentially significant	**HM-5:** In the unlikely event that hazardous materials are encountered during grading or excavation activities anywhere on the Project Site, earthwork must be temporarily suspended in order to coordinate investigation/remediation efforts with the oversight of the Santa Paula Fire Department. An environmental professional (e.g. a professional geologist) is recommended to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan must be developed by a professional geologist approved by the City and submitted to the City Planning Director, or designee, for approval as required before continued work in the area.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
The Project Site has historically been used for agricultural production. However, any new development occurring on any of these documented hazardous materials sites would have to be preceded by remediation and cleanup under the supervision of the State DTSC or other regulatory agency (as deemed appropriate) before construction activities could begin, if such actions have not already occurred. In addition, these listed areas are down gradient from the Project Site, so exposure to contaminants from migration through surface water or groundwater flow from the contaminated zones is not expected. Therefore, potential for contamination of the Project Site from off-site contamination sources is considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Project Site is not within 0.25 miles of an existing school. The Project would involve the use of hazardous materials on site typical of industrial-type uses. The storage and disposal of these hazardous materials on the Project Site would comply with City and SPFD regulations and standards. Therefore, impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Project Site contained two historical ASTs and one UST. These historical tanks have either been abandoned or removed from the Project Site as of 2005. Sources of contamination were identified within the areas of the ASTs and UST; however, these areas on the Project Site have been cleaned up and remediated and are not considered an	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
environmental concern. Due to the regulatory status of hazardous materials incidents at the facility (e.g., closed case), the distance between the facility and the site, or the hydrogeologically cross-gradient location from the site, and given that site reconnaissance did not reveal the presence of hazardous chemicals, on-site impacts related to nearby hazardous materials sites are considered less than significant.			
The Specific Plan is not located within any of the three Safety Zones as established by the Ventura County Airport Land Use Commission (ALUC) within their Comprehensive Land Use Plan (CLUP). Therefore, the Specific Plan would not conflict with the requirements set forth in the Ventura County ALUC or the City's General Plan. Impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
No portion of the Specific Plan is within a private airstrip other than the Santa Paula Airport. Implementation of the Project would result in less than significant impacts related to the exposure of employees or visitors to hazards from plane accidents due to the proximity of any private airstrips.	Less than significant	No mitigation necessary.	Less than significant
Construction activities of the Project may require the closure of vehicle travel lanes. The City's designated evacuation routes are along SR 126 and SR 150. While, SR 126 runs along the southern boundary of the Project Site, construction activities of the Project are not anticipated to interfere with access to the	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
roadway or interfere with operation of the County's Hazard Mitigation Plan. Emergency access and potential traffic access impacts would less than significant.			
The Specific Plan area has the potential for residents and employees to encounter human-made and natural hazards, which could cause undue hardship to residents and employees. The working population within the Specific Plan would be made aware of such disaster plans through public education and outreach activities. In addition, the Project would comply with the SPFD's recommended standards for emergency accessibility and circulation. Thus, the Project's operational impacts on the implementation of the Ventura County Hazard Mitigation Plan would be considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Specific Plan is located not within a CAL FIRE designated LRA or SRA. As the Project would not expose employees or visitors to any increased risks to fire hazards on the site, impacts are considered to be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Hydrology and Water Quality			
Pollutants such as soil, sediments, and other substances associated with construction activities (e.g. oil, gasoline, grease, and surface litter) could be present in stormwater runoff from the site. Through compliance with the SWRCB and USEPA permits and SWPPP	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
requirements, potential impacts to water quality during Project construction would be less than significant.			
The development of the Project would increase the amount of impervious surfaces on the Project Site, which has the potential to increase runoff within the Project Site. The BMPs and the project design features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all applicable federal, state, and local water quality rules and regulations to effectively minimize the Project's impact on water quality. Accordingly, impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Project will not result in a significant new demand for water and will not substantially deplete groundwater supplies. In addition, the Specific Plan would incorporate design features such as bioswales, bioretention cells, infiltration trenches and permeable pavement to allow surface water runoff percolation. Therefore, the Specific Plan would not substantially interfere with groundwater recharge. There will be no substantial impact to local groundwater recharge. Therefore, impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Site-clearing and grading operations have the greatest potential for discharging sediment downstream during storm events. The Project would be required to develop a site-specific	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
SWPPP in accordance with the NPDES Program General permits authorized under the Clean Water Act for Construction Activities. Adherence to the SWPPP and implementation of standard BMPs during construction would reduce the potential for increased siltation, erosion, and hazardous material spills. Through compliance with the SWPPP and standard BMPs, potential erosion and siltation, potential impacts will be less than significant.			
The operation of the Specific Plan will contain a number of features to reduce the amount of runoff that will occur within the Specific Plan area, and limit the amount and rate of surface water flow downstream of the Specific Plan. The existing SR 126 culverts are exposed, but once the site is elevated by fill, the pipes would be underground and integrated into the new storm drain system. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. Therefore, potential impacts are considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Specific Plan would not substantially alter drainage patterns within the Project area. The storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. Peak flows would not exceed existing conditions, so there would not be	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
adverse effects downstream. Therefore, impacts are considered less than significant.			
The Project incorporates detention basins sized to treat 10 percent of the Q50 (50-year storm event) from the storm drain system consistent with the Ventura County SQUIMP guidelines. The proposed detention basins would be incorporated into the underground storm drain system, preventing any sedimentation to occur. Consequently, impacts related to water quality would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
To reduce the discharge of expected pollutants during grading and other construction activities, such as sediment into receiving waters during construction, the Project Applicant will be required to prepare a SWPPP consistent with the Ventura County NPDES permit and the Technical Guidance Manual for Storm Water Quality Control Measures to minimize or eliminate the discharge of pollutants into receiving waters. The design features would comply with all NPDES permit requirements and no significant impacts to water quality will result.	Less than significant	No mitigation necessary.	Less than significant
The Specific Plan would not introduce new housing into the area. Therefore, impacts to housing within a 100-year flood hazard area would be considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
The new channel design would have the capacity to handle flows that overtop the bank on the east side and the water that ponds due to the undersized culvert at SR	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
126. The channel also has a debris catchment area at the railroad bridge with a second culvert under the railroad bridge to accommodate peak flows rerouted due to the debris. A geotextile would be used in the channel to stabilize the soil for high velocities. Accordingly, impacts would be less than significant.			
The Specific Plan does not propose any residential land uses. Therefore, no new residential uses would be located in the flooding hazard zone. As such, impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Project Site is approximately 12 miles inland from the Pacific Ocean and is approximately 230 to 350 feet above mean sea level (amsl). There are no lakes, ponds, or dams adjacent to the Project Site. Therefore, the risk that the Project Site would be inundated by a seiche is considered negligible, and. impacts associated with tsunamis or seiches would be less than significant. The proposed parallel channel and debris basin are incorporated into plans to improving the Adams Barranca. In addition, no on-site stormwater would be directed to the Adams Barranca. Therefore, impacts associated with mudflows would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Land Use			
The Project would not physically divide the existing community of Santa Paula or any smaller enclaves outside the City limits. The Project would not create incompatible land	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
use relationships between the Project site and existing off-site uses, and as a result of would not disrupt, divide, or isolate existing neighborhoods or communities. Therefore, impacts related to dividing an established community would be less than significant.			
The Project would be consistent with the County of Ventura General Plan and Non-Coastal Zoning Ordinance, the Santa Paula General Plan and SPMC, the 2016 SCAG RTP/SCS, and with Ventura LAFCo. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The Specific Plan includes a dedication of Open Space/Passive uses over 4.9 acres that includes the Adams Barranca and buffer areas on the western portion of the Project Site. This dedication would preserve the habitat and natural community as envisioned in the City's Open Space and Conservation Element of the General Plan. Therefore, impacts related to habitats conservation or natural community conservation plans would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Noise			
Construction noise could exceed construction noise thresholds for the County with an increase of greater than 3 dB(A) at residences located within the agricultural operations to the west. There is a residence located near the northwest boundary of the Project Site	Potentially significant	**N-1:** Stationary construction equipment, such as pumps, generators, or compressors, shall be placed as far from noise sensitive uses as feasible during all phases of project construction. **N-2:** All construction equipment shall be equipped with appropriate mufflers in good working condition.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
within 75 feet that would be subject to construction noise in excess of 65 dB(A) for exterior areas. Therefore, construction noise impacts to residences to the west are considered potentially significant.		**N-3:** Before any site activity, the contractor shall be required to submit a material haul route plan to the City of Santa Paula and Ventura County for review and approval. The contractor shall 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. **N-4:** During all site preparation, grading and construction, the construction contractor shall locate all stockpiling and vehicle staging areas away from existing residences, to the extent feasible.	
An increase of 3 dB(A) or greater in traffic noise levels that occurs from Project-related activities would be considered significant if the resulting noise levels that occurs from Project-related activities would exceed the City Noise Compatibility Matrix for "acceptable" exterior or interior noise levels. These roadway systems do not experience an increase in noise levels of 3 dB(A) or greater. In addition, vehicle trips and traffic noise levels would remain the same with the proposed Beckwith Road extension and would not cause an increase of 3 dB(A) or greater due to Project-related activities. Therefore, the Santa Paula West Specific Plan Area would not result in noise impacts in the local and regional street system. Impacts along these roadway systems are considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
Predicted noise levels at 50 feet from the railway centerline to the southern boundary would be approximately 69.4 dB(A). Due to its proximity to the rail road track, uses allowed	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
within the southern boundary of the Project Site are not sensitive to that estimate level.			
Assuming noise levels at 69.4 dB(A) within 50 feet from the railway centerline, interior noise could be reduced to 44.4 dB(A), below the General Plan noise threshold of 45 dB(A). Therefore, potential interior noise within the proposed development would be considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
The surrounding land uses within 25 feet of the Project Site include the scattered residential uses immediately to the west. The construction near this portion of this site may include some earthwork and grading activities. While offsite surrounding land uses may experience vibration events, these would not be frequent and impacts would be considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the Project's operational-related vibration sources, such as mechanical and electrical equipment, would incorporate vibration attenuation mounts, as required by the particular equipment specifications. Therefore, operation of the Project Site would not increase the existing vibration levels at off-site surrounding uses; and as such, vibration impacts associated with operations would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Given vibration from the railroad track would not be constant and would be approximately	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
50 feet from the track, uses allowed within Santa Paula West Specific Plan Area would not be susceptible to these conditions. Therefore, impacts would be considered less than significant.			
The noise that could be generated from within the Specific Plan area and mobile source noise impacts would not substantially increase the ambient noise conditions in the surrounding area. Any permanent increase in ambient noise levels is considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
Average daily trips associated with construction activities would not result in a doubling of trip volume along study-area roadways. Given that it takes a doubling of average daily trips on roadways to increase noise by 3 dB(A), the noise-level increases associated with construction vehicle trips along major arterials in the City of Santa Paula and nearby roadways that are within the area (unincorporated County of Ventura) would be less than 3 dB(A), and potential impacts will be less than significant.	Less than significant	No mitigation necessary.	Less than significant
There are no commercial aircraft in operation at the airport. The general aircraft travel pattern is south of the City, with a required approach and departure altitude of 1,500 feet. Noise levels for the Airport, where most of the flight activities occur, are below 60 dB(A). Thus, people residing, attending school, or working within the future land uses of the Specific Plan area would not be exposed to excessive noise due to the aircraft travel	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
pattern. Therefore, implementation of the Specific Plan would result in less than significant impacts related to noise generated by the Santa Paula Airport.			
All the stationary sources would be required to provide shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to distance, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. As such, it is not anticipated that a significant cumulative increase in permanent ambient noise levels would occur and, therefore, the impact would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Public Services			
Fire Protection and Emergency Medical Services			
The Specific Plan will result in an increase in the need for services from existing Santa Paula Fire Department facilities, equipment, and staff personnel. Under the terms of the Development Agreement, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection facilities and personnel costs. No new facilities would be required to serve the Project Site as a result of the implementation of the Specific Plan. As such, mitigation is not required. the SPFD will review all future building plans and require adequate fire-flow pressure and flow rates through automatic fire sprinkler	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
systems, fire hydrants, and other design features where appropriate (as required by appropriate federal, state, and local fire code and building code requirements. As such, potential impacts with regard to fire-flow requirements will be less than significant.			
Police Services			
Development of the Specific Plan would increase the demand for services and resources provided by the Santa Paula Police Department. The Project would not require construction of new or expanded police protection facilities, project-related police protection impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Public Schools			
No new residential zoning or new residential development is proposed; the Project would not generate new housing with residents who would have a need for public school facilities. Therefore, the Project would not significantly impact the local school districts.	Less than significant	No mitigation necessary.	Less than significant
Parks and Recreation Facilities			
The Project does not include any new residential zoning or any new residential development projects, it would not result in an increase in the residential population that could visit the City's parks and recreation facilities. Project impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Other Public Services			
Annexation of the Project area would shift all local government services to the City of Santa Paula. There would be increased demand for a variety of City resources, especially during the development planning, permitting, and inspection phases, and much less so thereafter. All services can be provided from the City's existing administrative facilities. No new governmental facilities would need to be constructed to administer governmental services for the Project area, there would be no environmental impacts related to public facilities construction projects.	Less than significant	No mitigation necessary.	Less than significant
Transportation and Traffic			
Existing with Project with Beckwith Road			
If Beckwith Road is extended south to Faulkner Road, 10th Street and Harvard Boulevard intersection is forecast to operate at LOS D during the AM peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Mitigation measures from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due	Significant and unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		to the planned bicycle lanes, these mitigations were not considered as a feasible mitigation.	
If Beckwith Road is extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street is forecast to operate at LOS D during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	**TRA-1** This intersection could be mitigated to LOS C or better with the addition of one travel lane to both the northbound and southbound approaches on Peck Road and the addition of a northbound right overlap phase. The northbound lane configuration would be one right-turn lane, two through lanes, and one left-turn lane. The northbound right-turn movement would also have an overlap signal head installed to accommodate the overlap phase. The southbound lane configuration would be one shared through/right-turn lane, one through lane, and one left-turn lane. Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.	Less than significant
If Beckwith Road is extended south to Faulkner Road, Peck Road and SR 126 Eastbound On/Off Ramps/Acacia Way is expected to operate at LOS E during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	**TRA-2** This intersection could be mitigated to LOS C or better by installing a traffic signal. A peak-hour signal-warrant analysis is provided in Appendix D of the Traffic Impact Analysis and indicates that the installation of a traffic signal would be warranted under existing plus project conditions during the PM peak hour. Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.	Less than significant
If Beckwith Road is extended south to Faulkner Road, Beckwith Road and Telegraph Road is expected to operate at LOS D during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	**TRA-3** This intersection could be mitigated to LOS C or better by installing a traffic signal and reconfiguring the westbound approach. A peak-hour signal-warrant analysis is provided in Appendix E and indicates that the installation of a traffic signal would be warranted under existing plus project conditions. The westbound approach can be restriped to provide one right-turn lane, one through lane, and one left-turn lane (a reconfiguration of the existing two-way left-turn lane). With the development of the Santa Paula West Business Park, Beckwith Road will be widened to full City standards, which provide	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		for a 64-foot roadway within an 84-foot right-of-way. With the additional roadway width, the northbound approach could be widened from its current single-lane configuration to provide one left-turn lane and one shared through/right-turn lane. With this configuration as mitigation, the intersection would operate at LOS C or better under existing plus project conditions. Since the impacts at this intersection are project-related impacts (rather than cumulative impacts to which the project would contribute), the Project applicant shall be responsible for providing 100 percent of these mitigation improvements.	
Existing with Project without Beckwith Road			
If Beckwith Road is not extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would operate at LOS during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-1.**	Less than significant
If Beckwith Road is not extended south to Faulkner Road, Peck Road and SR 126 Eastbound On/Off Ramps/Acacia Way would operate at LOS E during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-2.**	Less than significant
If Beckwith Road is not extended south to Faulkner Road, Beckwith Road and Telegraph Road would operate at LOS D during the PM	Potentially significant	Implementation of mitigation measure **TRA-3.**	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.			
Other Impacts with Project			
The freeway segments currently operate at LOS C or better in both directions. Based on the significance threshold for the Los Angeles County CMP, the Project does not operate at LOS F after the addition of project traffic and the Project does not cause a net increase in traffic demand of 2 percent of capacity or more. Therefore, the Project would result in less than significant impacts to freeway and multilane segments.	Less than significant	No mitigation necessary.	Less than significant
An analysis was completed to comply with the monitoring requirements found in the Ventura County Transportation Commission's (VCTC) 2009 VCCMP. The analysis indicated that these facilities would operate at LOS C or better during both peak hours under the Existing plus Project scenario and cumulative base plus project conditions in the year 2031. Therefore, impacts to the VCCMP would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The nearest airport is the Santa Paula Airport, located to the southeast of the Project Site. The Project Site is not located within any of the various safety zones established by the Comprehensive Land Use Pan (CLUP), nor is it within the Safety Zone, which includes the	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Inner Safety Zone (ISZ), the Outer Safety Zone (OSZ), and the Traffic Pattern Zone (TPZ), as provided in the City's General Plan Safety Element. Therefore, the Project would result in a less than significant impact to air traffic patterns or safety risks.			
The internal circulation network would be constructed in compliance with the Santa Paula Municipal Code and would not contain dangerous design features (e.g., sharp curves, dangerous intersections) and would be designed to accommodate traffic of the Project, including any delivery trucks related other commercial vehicles related to the uses allowed under the Specific Plan. Implementation of the Project would result in less than significant impacts related to roadway design features and incompatible uses.	Less than significant	No mitigation necessary.	Less than significant
No changes are proposed that would impact emergency access. In addition, as required by the City's Fire Code all individual building permit applications will include a review by the SPFD to ensure adequate setbacks between structures are maintained and that all sides of a building can be accessed by emergency personnel and emergency equipment. Impacts with regard to emergency accessibility would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The City's General Plan includes goals to ensure that City residents have alternative transportation opportunities, such as transit, bikeways, and pedestrian routes. Therefore,	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
impacts to public transit, bicycle, or pedestrian facilities would be less than significant.			
Cumulative Base Conditions			
Under future conditions without the Project, 10th Street and Harvard Boulevard is expected to operate at LOS E during the AM Peak hour and LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Mitigation measures from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these mitigations were not considered as a feasible mitigation.	Significant and unavoidable
Under future conditions without the Project, Peck Road and Harvard Boulevard/Telegraph Road/Main Street is expected to operate at LOS E during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-1.** This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the	Significant and unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.	
Under future conditions without the Project, Peck Road and SR 126 EB On/Off Ramps/ Acacia Way is expected to operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-2.**	Less than significant
Under future conditions without the Project, Faulkner Road and SR 126 WB On/Off Ramps is expected to operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	**TRA-4** This intersection could be mitigated to LOS C or better by reconfiguring the westbound approach The westbound approach can be restriped to provide one shared through/right-turn lane and two left-turn lanes. While the freeway on-ramp at this location currently provides two lanes, this improvement would require coordination with and approval by Caltrans. Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.	Less than significant
Cumulative with Project with Beckwith Road			
Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, 10th Street and Harvard Boulevard would operate at LOS F during the AM and PM Peak hours. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Mitigation measures from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The	Significant and unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these mitigations were not considered as a feasible mitigation.	
Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-1.** This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.	Significant and unavoidable
Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Peck Road and SR 126 EB On/Off Ramps/Acacia Way would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-2.**	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Faulkner Road and SR 126 WB On/Off Ramps would operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-4.**	Less than significant
Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Beckwith Road & Telegraph Road would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-3.**	Less than significant
Cumulative with Project without Beckwith Road			
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, 10th Street and Harvard Boulevard would operate at LOS F during the AM and PM Peak hours. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Mitigation measures from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn	Significant and unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these mitigations were not considered as a feasible mitigation.	
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would operate at LOS F during the AM Peak hour and LOS D during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-1.** This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.	Significant and unavoidable
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Peck Road and SR 126 Eastbound On/Off Ramps would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-2.**	Less than significant
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Faulkner Road and SR 126	Potentially significant	Implementation of mitigation measure **TRA-4.**	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Westbound On/Off Ramps would operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.			
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Beckwith Road and Telegraph Road would operate at LOS E during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially significant	Implementation of mitigation measure **TRA-3.**	Less than significant
Other Cumulative			
Of the 10 directional freeway segments selected for analysis, all are projected to operate at LOS E or better during both the AM and PM peak hours under cumulative base conditions. As defined in the VCCMP, the minimum desirable level of service on freeway segments is LOS E. Therefore, no freeway segments would be significantly impacted due to cumulative development.	Less than significant	No mitigation necessary.	Less than significant
Utilities			
Wastewater			
The treated effluent from the Project will not exceed applicable requirements, and the Project's potential impacts related to wastewater treatment are less than significant.	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Water and recycled water pipeline construction impacts would be less than significant because they would be required to comply with the City's noise ordinance, construction traffic management plan, requirements to cease construction should cultural resources be uncovered, and restrictions to avoid underground pipelines during excavation. In addition, no new or increased severity of impacts would occur as a result of the Project.	Less than significant	No mitigation necessary.	Less than significant
The new WRF has a normal operating capacity of 3.15 mgd, with a final build-out capacity of 4.2 mgd and a peak operating capacity of 7.0 mgd. The City is currently generating approximately 2.0 mgd, so there is unused capacity at the facility to accept the incremental addition of 0.026 mgd that is anticipated from occupancy of the Specific Plan area. Therefore, the Project would have less than significant impacts to wastewater treatment capacity within the City.	Less than significant	No mitigation necessary.	Less than significant
As concluded in the Sanitary Sewer Technical Report, the Project site sewer system will be in accordance with the City of Santa Paula design guidelines. The Santa Paula West sewer system is in agreement with the design flows anticipated within the City's Wastewater Master Plan for this development. Also, the main backbone, will have additional capacity before reaching 50% pipe utilization of 253 gpm (0.564 cfs) for future connections and therefore there would be no impacts.	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Completion of proposed Project improvements would convey most of the wastewater flow to the POC along the existing sewer lines north of the site along Telegraph Road. In addition, the WRF has been designed to accept wastewater from the cumulative growth of the City under the General Plan, including all related projects. As such, the Project's contribution to cumulative wastewater system and treatment impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
Stormwater			
The storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under State Route (SR) 126. The existing SR 126 culverts are exposed, but once the site is elevated by fill, the pipes would be underground and integrated into the new storm drain system. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. The detention basins will significantly reduce peak runoffs downstream by storing the peak event flows and lagging their release after the storm peak. The Project's proposed design features and drainage plan would not result in an increase in stormwater runoff from the site or exceed stormwater drainage requirements established by the USACE, VCWWD, or City. Impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Water			
Water demand from the Project represents 0.81 percent of City's total projected urban water demand in 2017, and decreasing to 0.65 percent in 2037. The 2010 UWMP Update projects total water demands for the Santa Paula Business Park through 2035 and demonstrates that supplies are sufficient to meet demands. The projected demand for the Project will account for only a small fraction of the projected demands. Therefore, there would be no impacts to available water supplies and no new or expanded entitlements are needed.	Less than significant	No mitigation necessary.	Less than significant
The Specific Plan's demand for water use would meet the projected development demands within the City. Therefore, the cumulative increase in water demand of related projects and build-out of the City pursuant to the General Plan is considered less than significant.	Less than significant	No mitigation necessary.	Less than significant
Solid Waste			
As provide by the SPMC, Section 50.140, Construction and Demolition Diversion, demolition and construction must divert 50 percent of waste tonnage from landfills. Separate calculations and reports are required for the demolition and construction portion of projects involving both activities. Impacts related to construction solid waste generation are considered potentially significant.	Potentially significant	**SW-1** Before issuance of a demolition permit or construction permit, 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.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
The proposed Project would account for less than 1 percent of the Toland Road Landfill permitted daily capacity. Additionally, the Project would account for less than 1 percent of the maximum permitted daily capacity for Chiquita Canyon Sanitary Landfill and Simi Valley Landfill & Recycling Center. However, the Chiquita Canyon Sanitary Landfill is only permitted through 2019. While there would be a substantial increase in generated solid waste on the Project Site, adequate landfill capacity appears to be available within the City and nearby landfills. Solid waste generated during construction and operation of the Project would be required to comply with all federal, state, and local statutes and regulations to reduce and recycle solid waste. Therefore, impacts would be less than significant.	Less than significant	No mitigation necessary.	Less than significant
The proposed Project would comply with AB 939 and AB 231 and the City's Construction and Demolition Diversion section of the Municipal Code, which states that demolition, construction, and remodeling shall divert 50 percent of waste tonnage. However, given that future landfill capacity may not be ensured through the life of the development of the Specific Plan, for many years after occupancy, impacts to solid waste would be potentially significant.	Potentially significant	Implementation of mitigation measure **SW-1**.	Less than significant
The City would utilize the Toland Road Sanitary Landfill until the landfill reaches capacity. At the time Toland Road Sanitary	Less than significant	No mitigation necessary.	Less than significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Landfill closes, the City would utilize the capacity of the five remaining landfills previously used for solid waste disposal. The combined remaining capacity of the five landfills is estimated to last for 95 years, or an average of 19 years. As such, cumulative impacts would be less than significant because the six landfills discussed above have sufficient capacity for decades to service the development of the Specific Plan and other development requiring solid waste disposal.			

1.0 INTRODUCTION

1.1 BACKGROUND

The West Area 2 expansion area consists of 125 acres on the west end of the City of Santa Paula ("City") that will be added to the 68 acres that was included in the General Plan's 1978 Sphere of Influence (SOI).

The Santa Paula West Business Park Specific Plan ("Specific Plan") is a comprehensive set of plans, exhibits, regulations, conditions, and programs for the orderly development of 53.81 acres of the West Area 2 portion of the City of Santa Paula General Plan. The Specific Plan and other off-site improvements to support the Specific Plan development are collectively referred to as the Project.

The Specific Plan was prepared to implement the City's plan for a portion of West Area 2 in accordance with the requirements of the California Government Code (Sections 65450 through 65457) and Chapter 16.216 of the City of Santa Paula Development Code. As such, the Specific Plan establishes the regulations, programs, and procedures required to implement the General Plan's goals and polices for this expansion area of the City. The Specific Plan also serves to facilitate development within the Project Site as a master-planned business park that includes a variety of light industrial and commercial uses.

The Specific Plan is designed to streamline the entitlement process within the Specific Plan area ("Project Site") and provide guidelines for development and City review. The Specific Plan would be implemented by the City of Santa Paula, and may be amended or augmented under the City's Specific Plan amendment procedures.

This Project is described in detail in **Section 2.0**, Project Description.

1.2 PURPOSE OF THE EIR AND LEGAL AUTHORITY

All projects within the State of California are required to undergo environmental review to analyze the environmental impacts associated with implementation of the project in accordance with the California Environmental Quality Act ("CEQA").[1] An environmental impact report (EIR) provides information to assist a lead agency in considering environmental effects when making decisions on a proposed project.

This EIR, which has been prepared in accordance with the State CEQA Guidelines, identifies and discusses potential proposed Project-specific and cumulative environmental impacts that may occur should this proposed Project be implemented. The intent of this EIR is to (1) be an informational document that serves to inform public agency decision makers and the general public of the potential environmental impacts of the Project; (2) identify possible ways to minimize or avoid any potential significant impacts, either

1 Public Resources Code, sec. 21000, et seq.

through mitigation or the adoption of alternatives; and (3) disclose to the public required agency approvals.

The principal use of an EIR is to provide input and information to the comprehensive planning analysis undertaken for this proposed Project. Given the role of the EIR in this planning and decision-making process, it is important that the information presented in the EIR be factual, adequate, and complete. The standards for adequacy of an EIR, defined in Section 15151 of the State CEQA Guidelines, are as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

1.3 PUBLIC AND AGENCY REVIEW OF THE DRAFT EIR

This Draft EIR is subject to a 45-day public review period starting from the date of the Notice of Availability (NOA). Copies of this Draft EIR have been sent to the State Clearinghouse, Responsible Agencies, agencies that have commented on the Notice of Preparation (NOP), and all other interested parties that have requested notice and copies of the Draft EIR. A complete distribution list is included in **Appendix 1.0** of this Draft EIR.

Interested individuals, organizations, responsible agencies, and other agencies can provide written comments to:

City of Santa Paula
Planning Department
970 Ventura Street
Santa Paula, California 93060
Contact: Janna Minsk, AICP, Planning Director

Comments may also be sent by facsimile to (805) 933-8793 or by e-mail jminsk@spcity.org. Please put "Santa Paula West Business Park Specific Plan EIR" in the subject line.

Agency responses should include the name of a contact person within the commenting agency.

In addition, the Draft EIR is available on the City's website at http://www.ci.santa-paula.ca.us/.

1.4 NOTICE OF PREPARATION (NOP) AND RESPONSES TO THE NOP

On August 29, 2014, the City of Santa Paula circulated a Notice of Preparation (State Clearinghouse Number [SCH] 2014081104) of an EIR for review and comment by the public and responsible and reviewing agencies. The 30-day NOP review period ended on September 29, 2014. A copy of this NOP is provided in **Appendix 1.0**. Written comments received by the City on the NOP are also provided in **Appendix 1.0.**

The City also held a public scoping meeting to provide an additional opportunity for comments on September 9, 2014 at 6:30 PM at Santa Paula City Hall, 970 Ventura Street, Santa Paula, CA 93060.

1.5 ORGANIZATION OF THE EIR

A description of the organization of this EIR and the content of each section is provided below to assist the reader as a source of information about the Project. Sections of the EIR following this introduction are organized as follows.

Section ES, Executive Summary, presents a concise summary of the environmental information, conclusions, and analysis in this EIR.

Section 1.0, Introduction, provides information on the background of the Project, CEQA process, and organization of the EIR.

Section 2.0, Project Description, presents a detailed description of the Project, including identification of all discretionary actions requiring approval to allow the implementation of the Project.

Section 3.0, Related Projects, describes the related projects in the City that provide the basis for cumulative analyses and lists recent past, present, and reasonably foreseeable probable future projects.

Section 4.0, Environmental Impact Analysis, contains analysis of the existing conditions, impacts of the Project, and cumulative impacts, and provides mitigation measures (if applicable) in each environmental issue.

Section 5.0, Alternatives, discusses alternatives to the proposed Project that have been developed and analyzed to provide additional information on ways to avoid or lessen the impacts of the proposed development. The alternatives include the “No Project Alternative” as required by State CEQA Guidelines, along with other alternatives.

Section 6.0, Effects Not Found to be Significant, presents information used by the City to determine why certain environmental effects of the proposed Project were found not to be significant and are not evaluated in detail in this EIR.

Section 7.0, Growth-Inducing Impacts, contains a discussion of the potential for the proposed project to remove impediments to growth, foster economic growth, result in a precedent-setting action, and develop or encroach on isolated open space.

Section 8.0, Significant Irreversible Environmental Changes, includes a discussion of significant irreversible environmental changes that would be caused by the proposed project should it be implemented with a brief description of potentially irreversible uses of nonrenewable resources that would result from the project.

Section 9.0, Organizations and Persons Consulted, lists persons involved in the preparation of this Draft EIR or who contributed information.

Section 10.0, References, lists the principal documents, reports, maps, and other information sources reviewed or referenced in the preparation of this EIR.

Appendices to this EIR include technical information and other materials used in the preparation. Appendices in this EIR are as follows:

1.0 Notice of Preparation and Comments

4.3 Air Quality and Greenhouse Gas Emissions Model Output

4.5 Cultural Resources

4.6 Preliminary Geotechnical Investigation Report

4.8 Phase I Environmental Site Assessment

4.9 Adams Barranca Existing Condition Hydrology Study and Preliminary Hydrology Report for Santa Paula West Business Park

4.11 Noise Monitoring and Roadway Noise Modeling Datasheets

4.13 Traffic Impact Analysis Study

4.14 Draft Water Supply Assessment & Water Supply Verification Report for the Proposed Santa Paula West Business Park Specific Plan Project

2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The Santa Paula West Business Park Specific Plan ("Specific Plan") is a comprehensive set of plans, exhibits, regulations, conditions, and programs for the orderly development of a portion of the West Area 2 of the City of Santa Paula General Plan. The Specific Plan and other off-site improvements to support the Specific Plan development are collectively referred to as the Project.

The Specific Plan would guide future land use development on approximately 53.81 acres of the City's 125-acre West Area 2 designation. West Area 2 was included as an expansion area in the City's General Plan, which was approved by the City of Santa Paula ("City") in 1998. This designation allows for a variety of manufacturing, research and development, professional office, and limited commercial uses, with integrated vehicular circulation, pedestrian walkways, and infrastructure. The land uses envisioned within the Specific Plan will be a mix of low-intensity industrial (such as light manufacturing or research and development), professional offices, and supporting commercial businesses. These uses are allowed in the Commercial/Light Industrial and Light Industrial zones.

The Specific Plan was prepared to implement the City's plan for a portion of West Area 2 in accordance with the requirements of the California Government Code (Sections 65450 through 65457) and Chapter 16.216 of the City of Santa Paula Development Code. As such, the Specific Plan establishes the regulations, programs, and procedures required to implement the General Plan's goals and polices for this expansion area of the City. The Specific Plan also serves to facilitate development within the Project Site as a master-planned business park that includes a variety of light industrial and commercial uses.

The Specific Plan is designed to streamline the entitlement process within the Specific Plan area and provide guidelines for development and City review. The Specific Plan would be implemented by the City of Santa Paula, and may be amended or augmented under the City's Specific Plan amendment procedures.

2.2 PROJECT OBJECTIVES

The following Project objectives are based on the overall intent of the City's General Plan and the existing physical, environmental, demographic, and market conditions:

1. Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in West Area 2 that reflects and complements the existing pattern and scale of development in Santa Paula;

2. Provide for light industrial and commercial uses that complement existing uses adjacent to the Project area; and

3. Provide suitable sites for Light Industrial and commercial buildings that meet the needs of the community but which are not presently available in the City of Santa Paula.

2.3 PROJECT LOCATION

The City of Santa Paula is located in Ventura County, directly north of State Route (SR) 126 and the Santa Clara River, west of the City of Fillmore, and east of the City of San Buenaventura in the Santa Clara River Valley. The regional location is shown in **Figure 2.0-1**, **Regional Location Map**. Regional access to Santa Paula West is provided by SR 126.

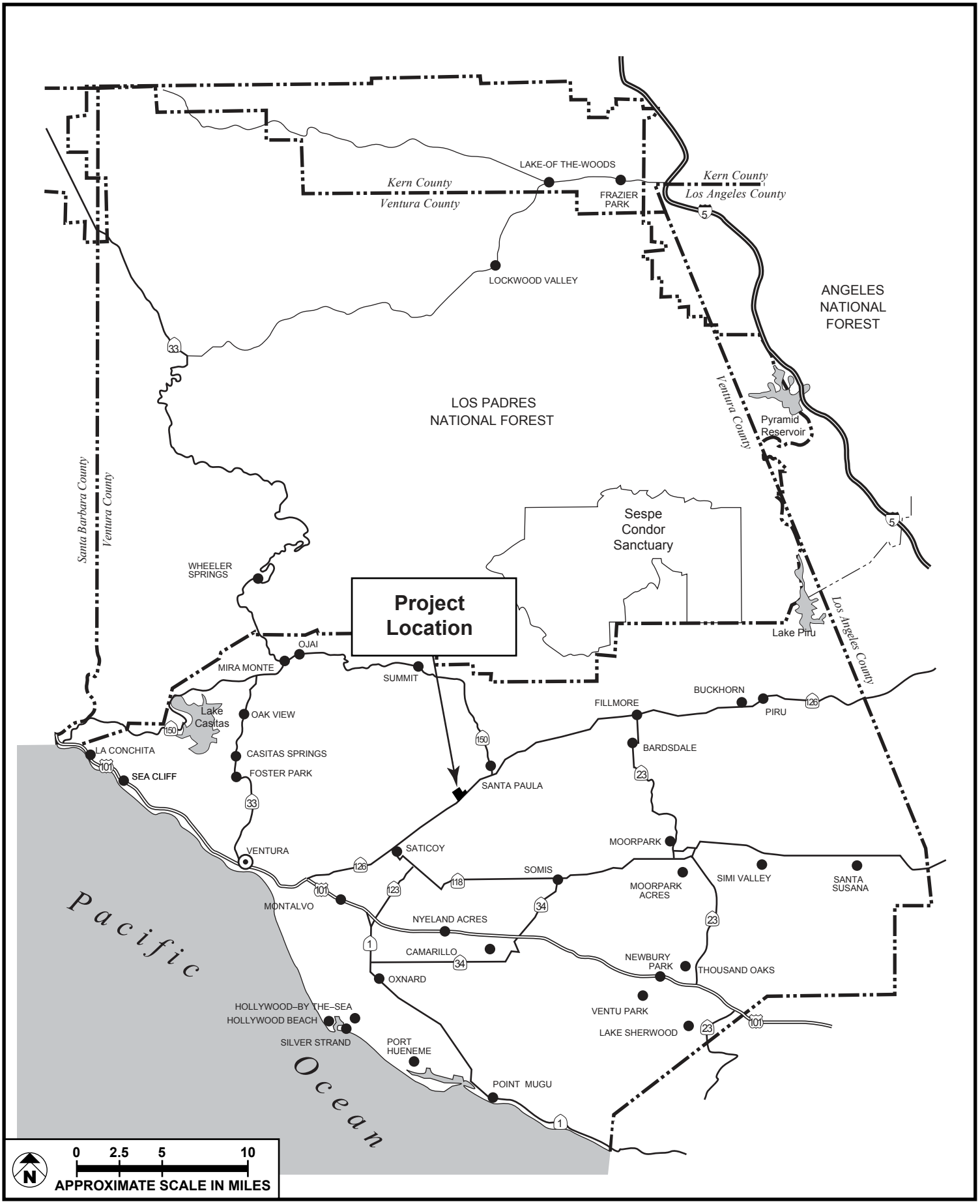
The Project Site is a 53.81-acre area near the western boundary of the City of Santa Paula and currently lies within the unincorporated County of Ventura. The Project Site location is shown in **Figure 2.0-2**, **Project Location Map**. The Project Site is bound to the north by Telegraph Road, to the south by SR 126, to the east by existing industrial and commercial development in the existing City limits, and to the west by the Adams Barranca and agricultural operations. The Project Site is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way. Local access is provided by Telegraph Road, Beckwith Road, Clow Road, and Todd Lane.

The Project Site includes five Assessor Parcels, identified as Assessor Parcel Nos. (APNs) 098-0-010-150, 098-0-010-160, 098-0-010-190, 098-0-010-180, and 098-0-020-040.

2.4 EXISTING GENERAL PLAN AND ZONING DESIGNATIONS

The Project Site is currently within the County of Ventura jurisdiction and has a County General Plan Land Use designation of Agricultural—Urban Reserve and a County Zoning Designation of Agriculture. It is currently zoned AE-40 (Agricultural Exclusive, 40-acre minimum parcel size) in the Ventura County Noncoastal Zoning Ordinance. The Project Site is also within the Local Agency Formation Commission (LAFCo) SOI for the City of Santa Paula and the City of Santa Paula CURB (City Urban Restriction Boundary).

The City of Santa Paula General Plan designates the Project Site as part of the West Area 2 Expansion Area. The West Area 2 Expansion Area is a 125-acre area along the western portion of the City boundary. The City's General Plan Land Use Element currently designates the Project Site for Mixed-Use Commercial/Light Industrial uses (C-LI). Section 16.25.020 of the Santa Paula Municipal Code (SPMC) identifies this area as SP-6.



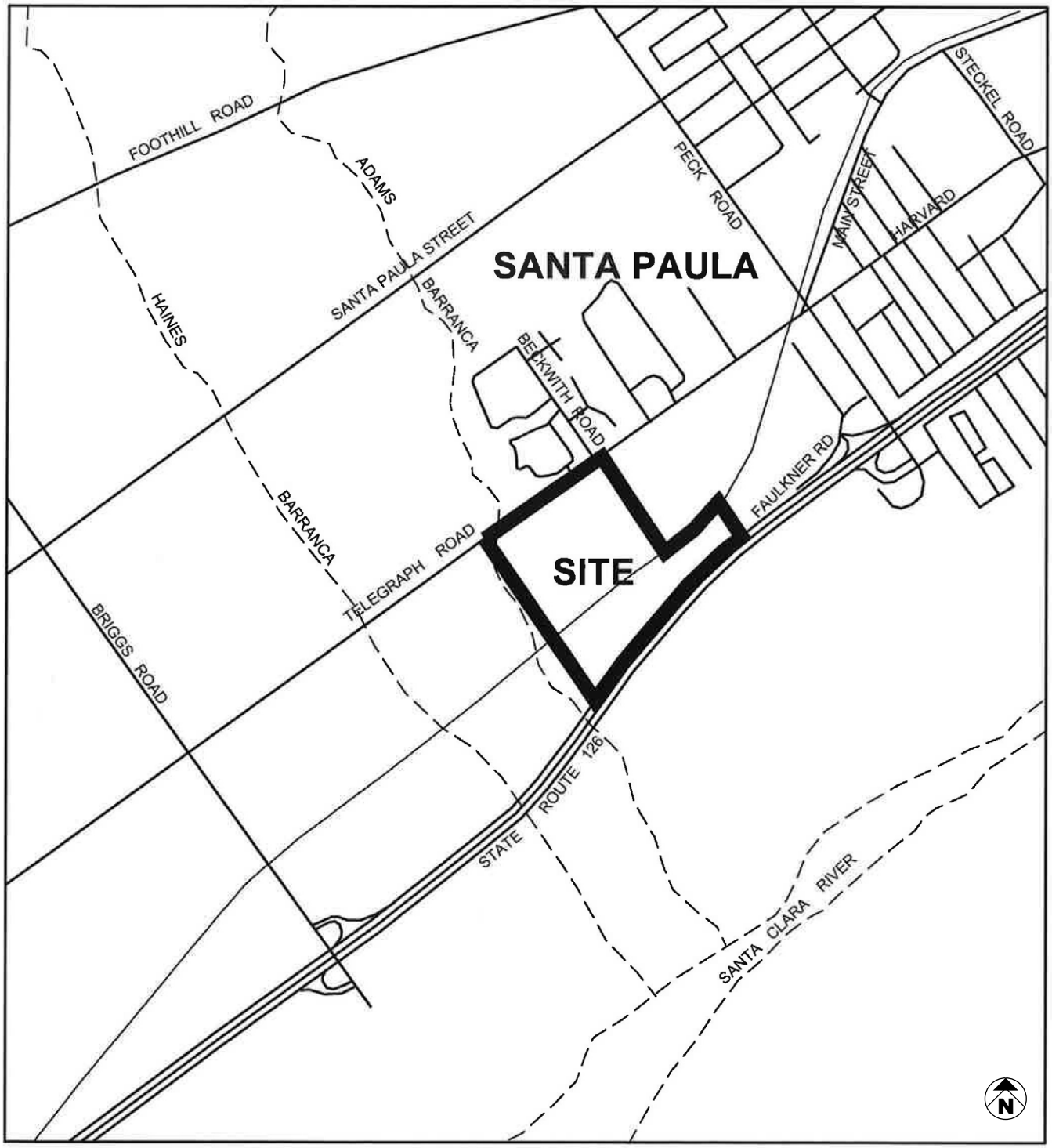
SOURCE: Meridian Consultants – 2015

FIGURE **2.0-1**

Meridian Consultants

Regional Location Map

050-002-13



SOURCE: Jensen Design and Survey – May 2016

FIGURE **2.0-2**

Meridian Consultants

Project Location Map

050-002-13

2.5 ENVIRONMENTAL SETTING

2.5.1 On-site Characteristics and Uses

The Project Site exhibits limited topographic variation and contains no natural slopes, rock outcrops, or other geological formations. The topography of the Project Site slopes gently, generally from north to south, with the highest elevation in the northern portion at approximately 250 feet above mean sea level (amsl) near Telegraph Road, and its lowest elevation at approximately 226 feet amsl near the boundary with SR 126.

An aerial view of the Project Site is provided in **Figure 2.0-3**, **Aerial View of the Project Site,** and shows the site's main physical features**.** Approximately 49 acres of the 53.81-acre Project Site are currently used for agricultural production. The Project Site has undergone extensive surface grading and leveling as part of the ongoing agricultural operations. There are several unpaved roads throughout the Project Site providing access to the existing agricultural operations. As noted earlier, the VCTC railroad right-of-way, containing railway tracks, bisects the Project Site. The southwest portion is bound by the lower reaches of the Adams Barranca, an improved channel that runs generally north–south.

The Project Site is currently farmed by two organizations, Bender Farms and McGrath Farms. Bender Farms grows avocados on approximately 9.2 acres of land in the northeastern portion of the site and herbs on approximately 12.3 acres within the southeastern portion of the site. Approximately 4.5 acres of the Bender Farms portion of the Project Site consists of agricultural operations maintenance equipment storage facilities, offices, and other ancillary uses, such as packing facilities and related farming materials. McGrath Farms grows a variety of row crops on approximately 27.5 acres of land that make up roughly the western half of the Project Site.

2.5.2 Surrounding Characteristics and Uses

The Project Site is situated within the Transverse Ranges physiographic province of California. The primary faults, folds, mountains, and valleys of this region are all aligned in an east–west direction. The Transverse Ranges are a tectonically active region, with high rates of uplift, folding, and sedimentation.

The Project Site is located approximately 0.6 miles northwest of the Santa Clara River, which generally runs in an east–west direction south of the Project Site. The foothills of the Topatopa Mountains are to the north.

A variety of land uses surround the Project Site. Telegraph Road, which bounds the site along the north, is a two-lane roadway approximately 50 feet wide. North of Telegraph Road within the City limits are residential uses, consisting of a single-family residential neighborhood accessed from Country View Court

opposite the western portion of the Project Site, and a mobile-home residential community accessed from Valencia Way opposite the eastern portion of the Project Site.

The southern portion of the Project Site is bound by SR 126, a four-lane freeway that runs east–west. South of SR 126 are agricultural operations and water storage basins. These agricultural lands contain row crops, avocados, and citrus, and extend to the Santa Clara River, which runs east–west along the base of South Mountain. A limited number of single-family residential units lie within some of the agricultural properties.

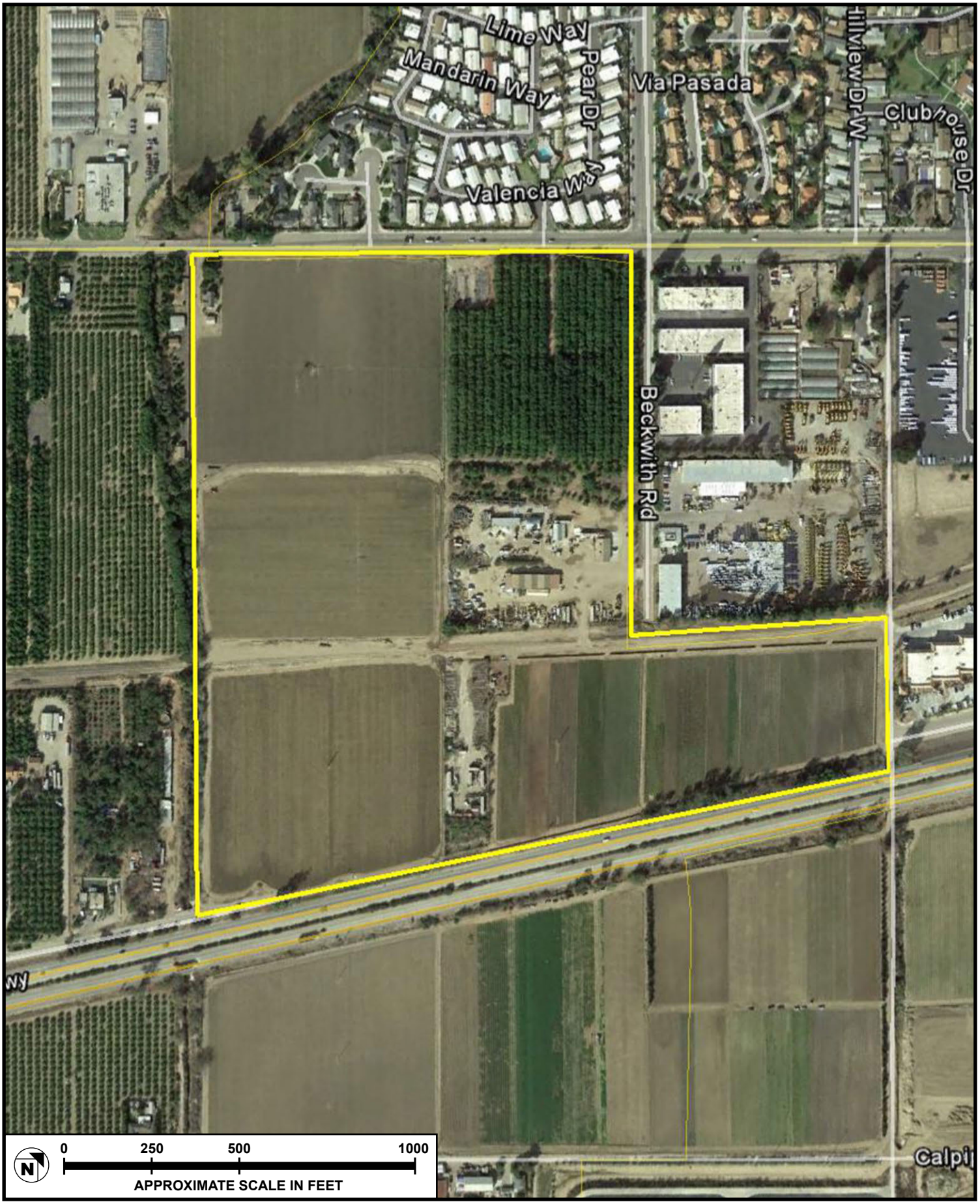
Along the east, the Project Site flanks the west and south boundaries of a light industrial area located immediately east of Beckwith Road and north of the VCTC railroad tracks. Beckwith Road is a two-lane road that separates the Project Site from the industrial uses to the east. The light industrial uses are within the City of Santa Paula limits, and include office and warehouse buildings that house Cornerstone Molds and Machining, other related offices, and the Church of Christ–Buenaventura. The industrial properties also contain a construction equipment storage and maintenance facility operated by United Site Services.

The Adams Barranca is adjacent to the Project Site on the southwest and contains areas with riparian vegetation. Immediately west of Adams Barranca are agricultural operations consisting of orchards and a limited number of livestock. Single-family residences are located within these agricultural operations.

2.6 SANTA PAULA WEST BUSINESS PARK SPECIFIC PLAN

Section 16.25.020 of the SPMC identifies this area as SP-6, West Area 2, with a land use designation of Mixed-Use Commercial/Light Industrial. The Specific Plan would maintain the Commercial/Light Industrial (C/LI) and Light Industrial (LI) designations over the development portion of the Project Site. Adams Barranca along the western portion of the Project Site would be designated as Passive/Open Space, as described in Chapter 16.25 of the SPMC. The development standards for the C/LI and the LI zones that have been adopted by the City of Santa Paula are incorporated into the Specific Plan. All development within the Project Site would be required to adhere to the standards of the Specific Plan.

The Specific Plan is organized into six sections that address topics such as physical layout, development standards and design guidelines important to the planning of this area, as well as the required topics per the California Government Code for specific plans.



SOURCE: Google Earth – 2015

FIGURE **2.0-3**

Meridian Consultants

Aerial View of the Project Site

050-002-13

2.6.1 Land Use Plan

The Specific Plan includes a Land Use Master Plan (**Figure 2.0-4, Land Use Master Plan**), which provides for the land use designations of Commercial Light Industrial and Open Space/Passive. The corresponding zoning designations of C/LI, LI and Open Space/Passive would be established within the Specific Plan Zoning Implementation Plan (**Figure 2.0-5, Zoning Implementation Plan**).

These land use and zoning designations will allow for the development of a mixture of light manufacturing, research and development, professional offices, and supporting commercial uses, consistent with the C/LI and LI zones of the City of Santa Paula's Zoning Ordinance. These uses are allowed in the C/LI and LI zones. A list of the uses that are permitted is included in Table 2.2 of the Specific Plan.[1]

Figure 2.0-6, Conceptual Site Plan, shows the estimated lot configuration for the Specific Plan, which is designed to create campus-like groupings of professional, administrative, and high technology research and manufacturing uses, accompanied by limited commercial activities to support these uses. The sizes of the proposed parcels and roadway layout is planned to achieve orderly and logical circulation among the light industrial and office uses of the Specific Plan area. Estimated building footprints are also shown.

The Adams Barranca, located along the western boundary of the Project Site, would be zoned Open Space/Passive in the Specific Plan. A 64-foot-wide roadway for the extension of Faulkner Road through the Business Park would be dedicated to the City and would allow for integration of the Business Park with the existing developments to the east.

The areas along the VCTC railroad right-of-way would be improved with landscaped screening along the railroad corridor, and an existing at-grade crossing will be realigned approximately 100 feet to the east to align with Beckwith Road.

The Adams Barranca, SR 126, and parking lots would create a separation of between 50 and 100 feet from the agricultural areas to the west and south.

A summary of the land uses in the Specific Plan is provided in **Table 2.0-1, Summary of Land Uses in Approved Specific Plan.**

1 *Santa Paula West Business Park Specific Plan*, SP-6 West Area 2, Table 2.2, Permitted Uses in the Santa Paula West Business Park Specific Plan (amended May 24, 2016).

Table 2.0-1
Summary of Land Uses in Approved Specific Plan

Land Use	Acres	Percent of Project Site
Commercial / Light Industrial (C/LI)	41.96	78.0
Roadways (approximate)	6.95	12.9
Open Space / Passive	4.90	9.1
Total Gross Area	**53.81**	**100**

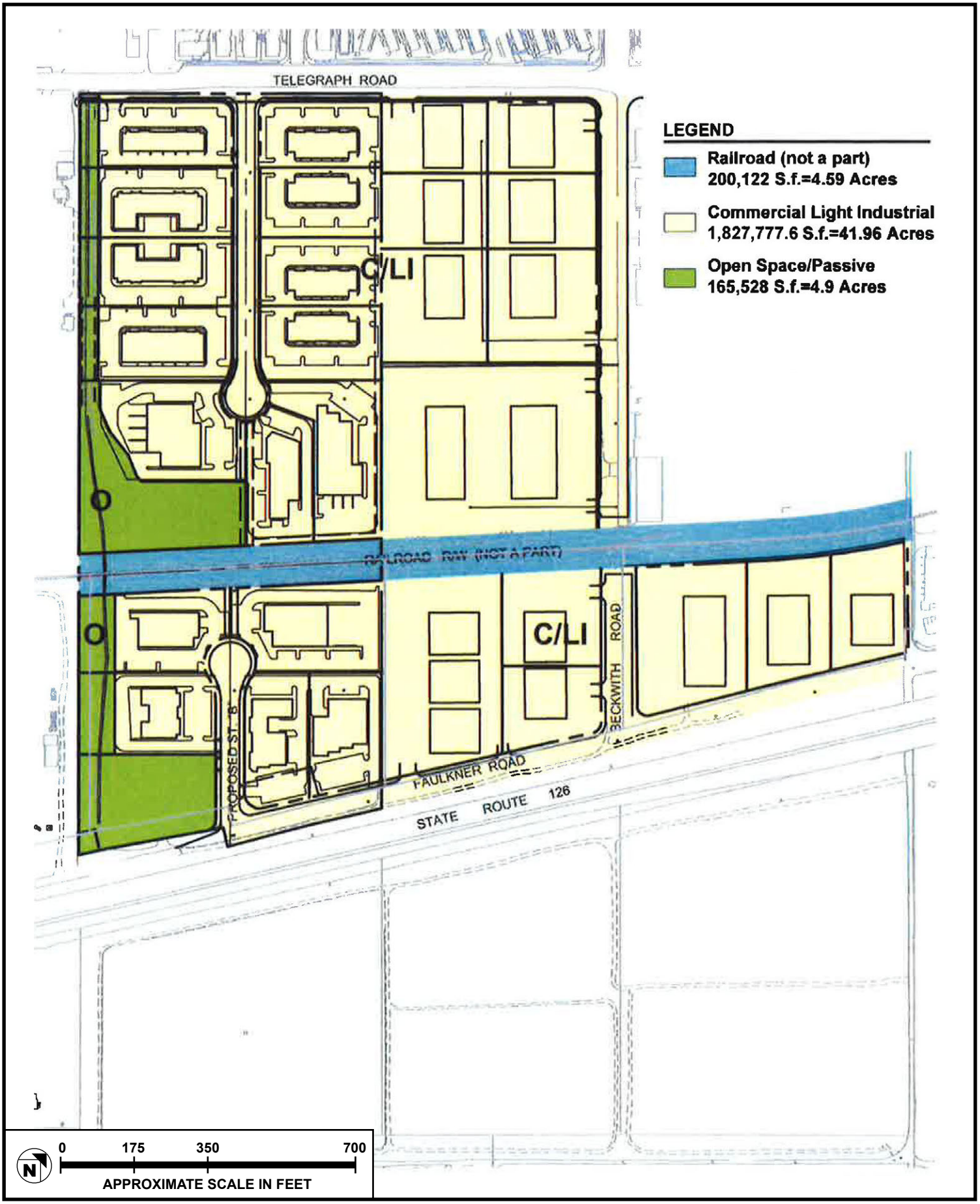
Source: Santa Paula West Specific Plan (October, ,2016).

2.6.2 Development Standards and Design Guidelines

The Specific Plan Development Standards direct the style of development and aesthetic character of the Business Park, and ensure a consistent use of signage, landscaping, and other design features. The standards also ensure that the Santa Paula West Business Park (a) has a clear identity and sense of place; (b) meets the needs of the future owners or tenants; (c) provides a harmonious and pleasing environment for uses and activities; and (d) establishes standards to achieve and maintain a harmonious development identity and level of quality.

Zoning Standards

The businesses allowed within the Project Site will be low-intensity manufacturing, research and development, and professional offices, as well as limited commercial uses mainly to serve the employees of the businesses of the park.



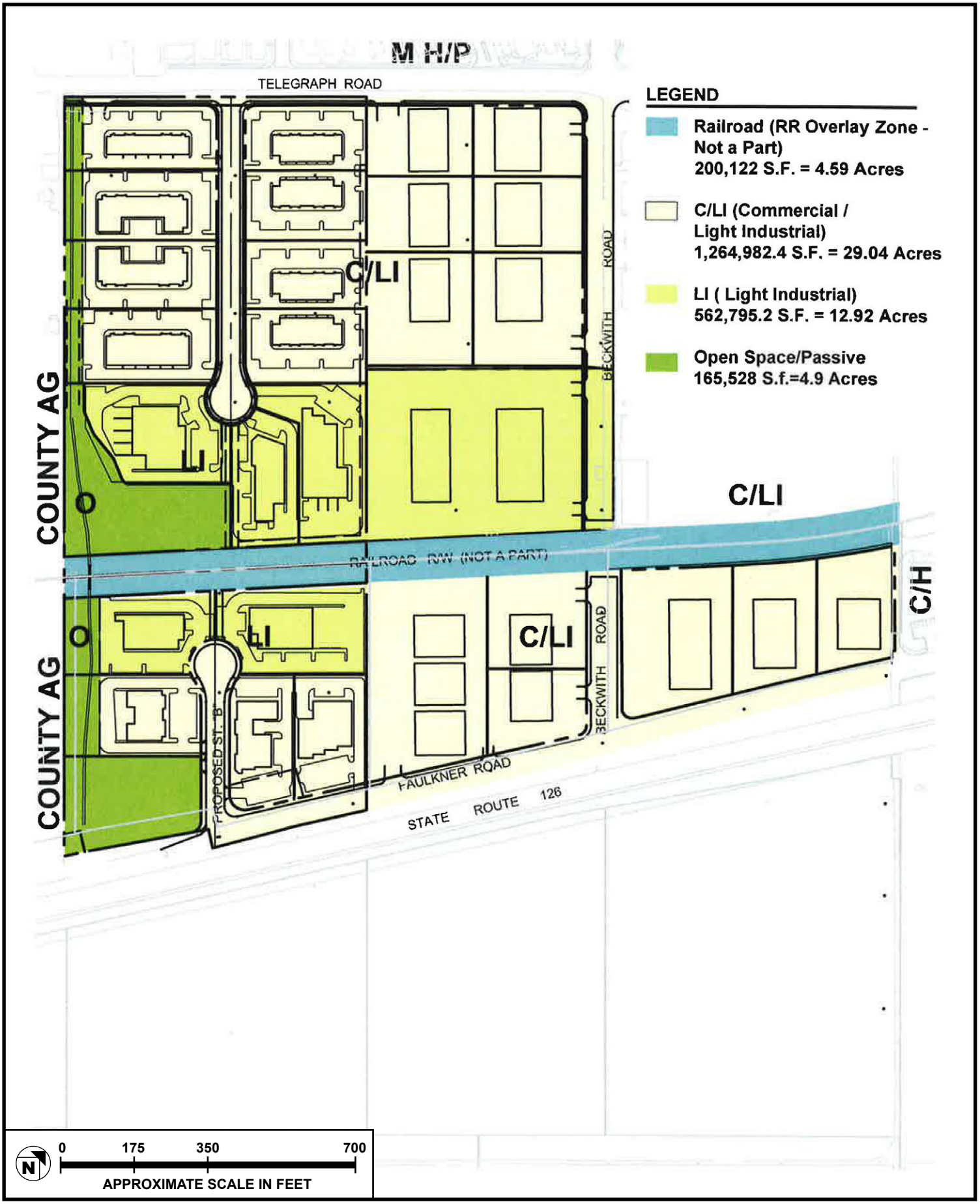
SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-4**

Meridian Consultants

Land Use Master Plan

050-002-13



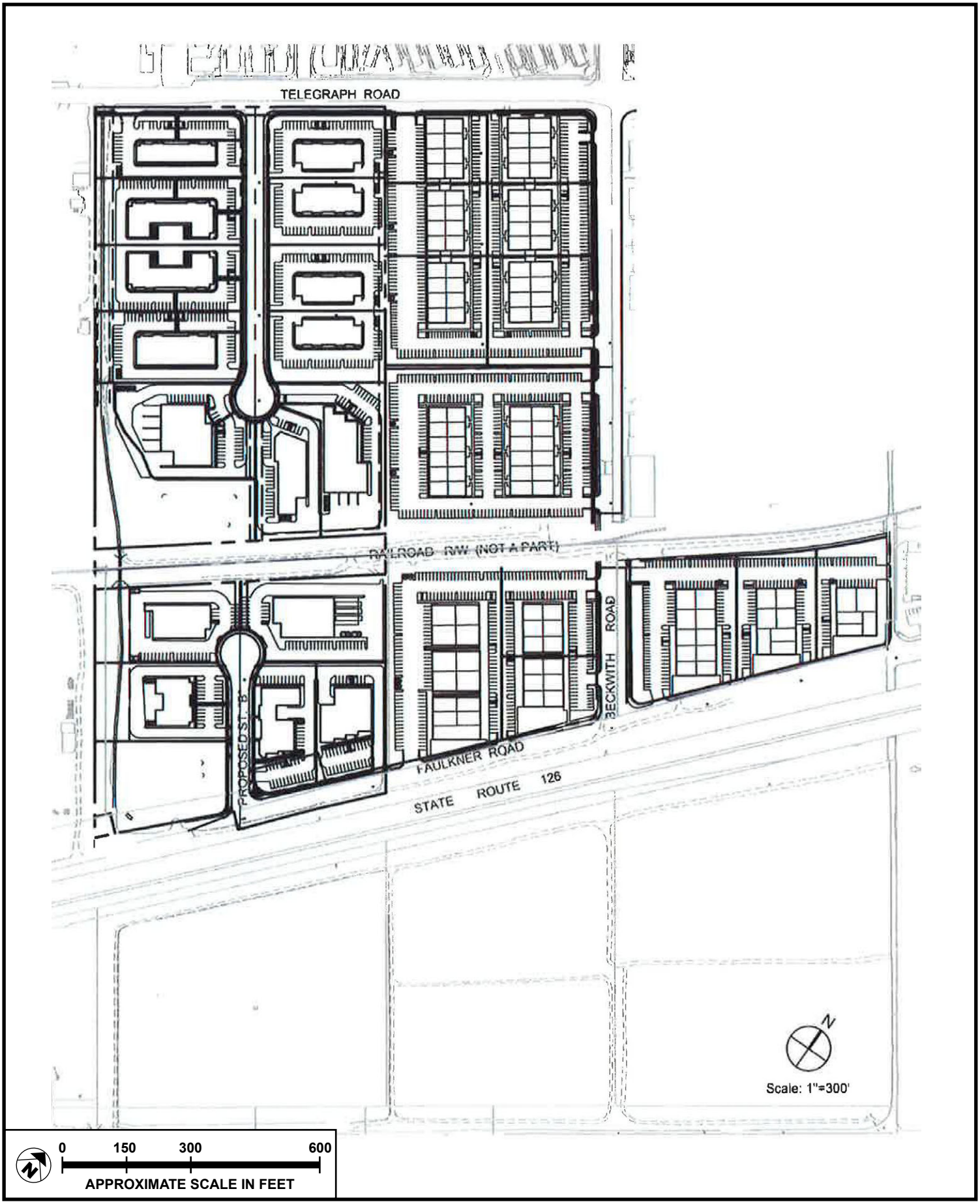
SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-5**

Meridian Consultants

Zoning Implementation Plan

050-002-13



SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-6**

Meridian Consultants

Conceptual Site Plan

050-002-13

Table 2.0-2, Development Standards, lists the site design standards that govern lot size and dimensions, lot coverage (including Floor Area Ratio), setbacks from the lot lines, and building heights.

Table 2.0-2
Development Standards

Design Factor	C/LI	LI
Minimum size for industrial subdivision	5 acres	5 acres
Minimum lot size	6,000 sq. ft.	10,000 sq. ft.
Minimum lot width	60 ft.	60 ft.
Minimum lot depth	80 ft.	100 ft.
Floor-area ratio	0.35	0.35
Front yard setback (minimum)	10 ft.	10 ft.
Side yard interior setback (minimum)	0 ft.	0 ft.
Side yard street side setback (minimum)	10 ft.	10 ft.
Rear yard setback (minimum)	0 ft.	0 ft.
Lot coverage (maximum)	80 %	85 %
Building height (maximum)	35 feet	45 feet

Source: Santa Paula Business Park Specific Plan, 7.
Notes: ft. = feet; sq. ft. = square feet.

Architectural Design

The architectural design theme of the Business Park is high-quality Contemporary Tuscan. An illustration of Contemporary Tuscan is depicted in **Figure 2.0-7**, **Architectural Theme**. This style integrates historical Italian Tuscan features with modern materials and details. This architecture is typified by simple and strong exterior massing, a primarily symmetrical 2-story appearance, pyramid-shaped tiled roof accents, entry porticos, arches, columns, and metal accents. Warm shades of red, yellow, green, brown, and grey are natural earth tones that represent Tuscan colors. The design theme would be consistent on all building elevations.

2.6.3 Circulation Network, Access, and Parking

The Specific Plan includes a Circulation Master Plan that provides a framework and standards for road development to ensure a safe and adequate system of vehicular, pedestrian, and bicycle circulation. The Circulation Master Plan is provided in **Figure 2.0-8, Circulation Master Plan**.

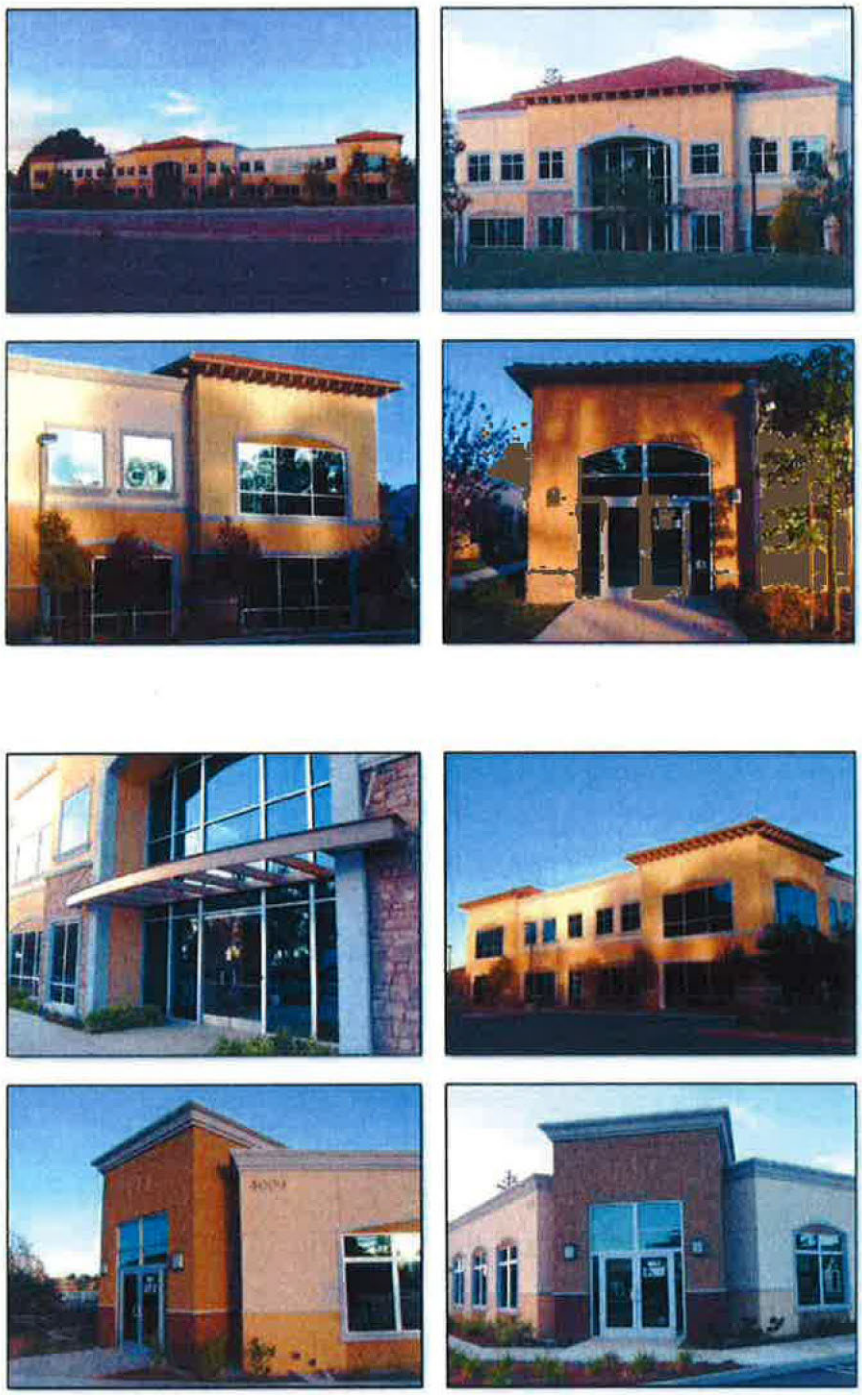
The vehicular circulation system consists of public roadway access from Telegraph Road, Beckwith Road, and Faulkner Road that would provide direct access to the Project Site driveways. Telegraph Road fronts the property to the north and is the principal arterial that would serve the Project. Primary north–south

access to the Santa Paula West Business Park would be provided by Beckwith Road from Telegraph Road; and east–west access would be from Faulkner Road. Beckwith Road would be improved south from Telegraph Road into the Project. Under one option, the Beckwith Road improvements would include an at-grade railroad crossing providing access south of the railroad right-of-way and connect to Faulkner Road. The proposed Faulkner Road extension would parallel SR 126 and serve as an access point to the development. A second option would not include the Beckwith railroad at-grade crossing for public use. In this case, the crossing would be gated on the north and south sides, and only provide emergency access and Faulkner Road would provide access to portions of the Project Site south of the railroad right-of-way, while Beckwith Road would provide access to the parcel north of the railroad right-of-way. All street sections would be constructed according to City radius, crown, curb, and pavement specifications. In addition, all streets designed as interior streets would be privately maintained.

Parking regulations and standards ensure that the Specific Plan contains sufficient off-street parking and loading facilities for the uses proposed, and that these off-street parking and loading areas enhance and preserve the appearance, character, and value of the Business Park.

All vehicle off-street parking and loading facilities planned for and constructed within the Specific Plan would comply with the City of Santa Paula Development Code, Chapter 16.46, Off-Street Parking and Loading. All the requirements of these regulations and standards apply and include the following:

- Vehicle off-street parking
- Handicapped parking
- Design standards for parking areas
- Parking area landscaping
- Parking areas paving and construction standards
- Off-street loading and unloading areas



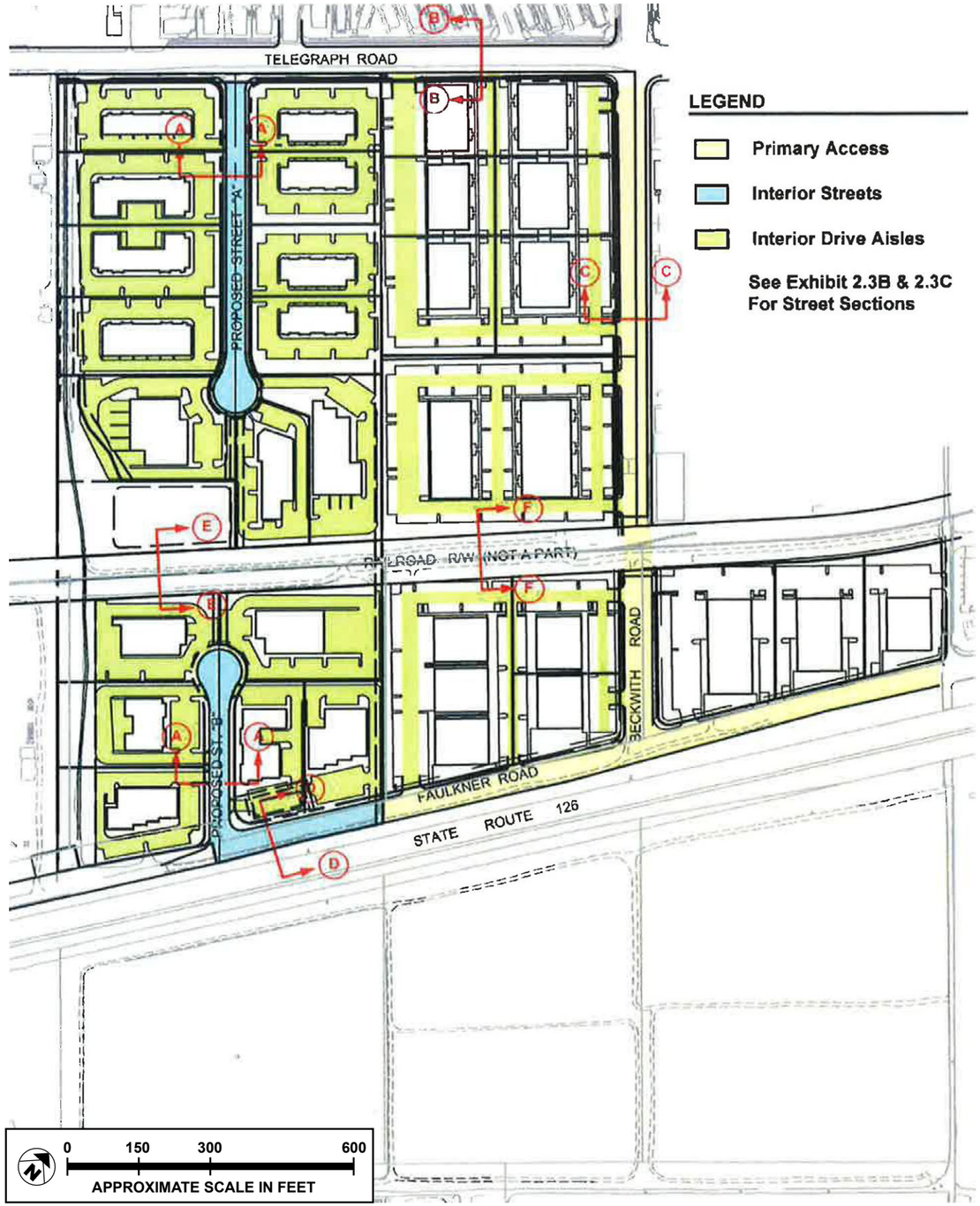
SOURCE: Johnson Muller Architects – 2016

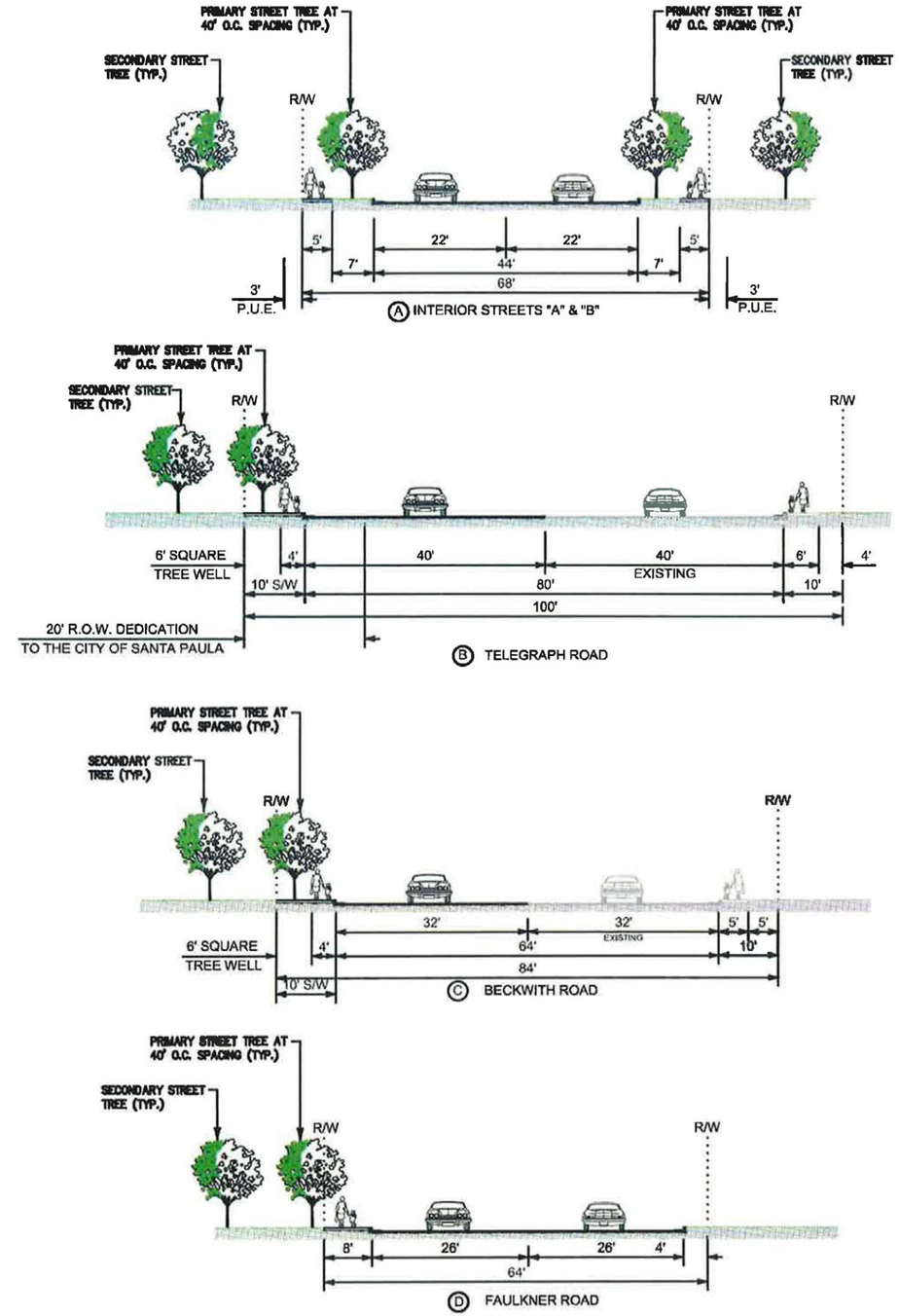
FIGURE **2.0-7**

Meridian Consultants

Architectural Theme

050-002-13





SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-8**

Meridian Consultants

Circulation Master Plan

050-002-13

2.6.4 Landscaping and Signage

Landscaping

The Landscape Master Plan, as shown in **Figure 2.0-9, Landscape Master Plan,** was developed to meet the landscape standards of the City of Santa Paula and consists of ornamental and erosion control plants and man-made exterior elements. There are three distinctive landscape zones within the Specific Plan area. Each of these zones has individual characteristics that further solidify the overall landscape master plan:

Streetscape Landscaping: Landscape elements within the streetscape zone include sidewalks, irrigation, street lighting, project entry signage (where applicable), and landscaping. Telegraph Road, Beckwith Road, and Faulkner Road would incorporate a formal pattern of primary street trees with sidewalks. Streetscapes would be installed as part of the improvement for each street.

Site Landscaping: Site landscaping includes all elements within an individual parcel, excluding parking lots. This zone should meet the needs of each individual tenant and have a greater degree of design flexibility while still meeting the drought-tolerant overall concept. Design elements within these areas would include landscape amenities, site lighting, regulatory and directional signage, service area screening, and side and rear property-line treatment.

Parking Area Landscaping: Parking lot landscaping requirements would be specified per City Code requirements and City of Santa Paula Parking Regulations and Standards for parking lot design.

The development and landscaping of bioswales and detention basins are incorporated into the Business Park landscape design to manage and capture on-site stormwater.

All tree, shrub, vine, and ground cover species must be selected form the Specific Plan's plant list. All planted landscape areas within the Business Park would have irrigation systems that are fully automatic and employ the latest low-volume water conservation design criteria. No overspray of irrigation water onto walkways, common-area hardscape areas, or any architectural walls would be allowed.

Signage

All signs would comply with the Specific Plan sign requirements and the City of Santa Paula Development Code. Signs are grouped into the following categories: Canopy Signs, Projecting Signs, Monument Signs (Site Identity and Tenant/Multi-Tenant Identity), Wall and Window Signs, and Freeway-Oriented Signs. The intent of the Sign Program is to produce uniform standards and continuity, consistency, and overall harmony with the visual quality of the Business Park. Illustrative examples of signage that would occur as part of the Project are included in **Figure 2.0-10**, **Master Sign Plan**.

2.6.5 Utilities

The Project Site is within the City of Santa Paula for domestic water services. The development the Santa Paula West Business Park will require the extension of existing infrastructure and services into the Specific Plan area.

The Specific Plan includes an infrastructure plan establishing the network of on- and off-site infrastructure construction requirements to support development of the Specific Plan. These include infrastructure to support potable water delivery, wastewater pipelines, a storm drain system, electricity and natural gas, and other facilities.

Water Supply and Delivery System

Water supply for irrigation on the Specific Plan area has been historically supplied from an on-site well that overlies the Santa Paula Basin. The existing well, developed in approximately 1940, is owned and operated by McGaelic Group and Bender. For purposes of future conditions, this on-site well has run its design life. The existing well would be utilized for construction water as the Project Site is graded, in accordance with the Specific Plan, and then would be abandoned pursuant to State and local regulations.

Water main pipelines are currently located in the streets surrounding the Project Site, within Faulkner Road and Telegraph Road. The Specific Plan domestic water system would operate entirely within the City's 200 Zone, and would receive water via connections with the existing 10-inch diameter main pipeline water pipeline in Telegraph Road and via the existing 12-inch main line located at the end Faulkner Road at Todd Lane. These connections are consistent with the City's Potable Water System Master Plan, as shown in **Figure 2.0-11, Domestic and Recycled Water Master Plan.**

From the water system point of connection (POC), a new 12-inch line will be installed north through the Project. The proposed distribution system will be composed of 8- through 12-inch mains. The water mains located in Beckwith Road, Road A, and Faulkner Road will be publicly owned and maintained by the City, while the remaining on-site domestic water and fire lines will be maintained by the Applicant.

Recycled Water Plan

Currently there are no recycled water systems in the Project vicinity. According to the City's Potable Water System Master Plan (amended October 2005), the City will develop a recycled water system conveyance plan that includes a line in Telegraph Road. As such, the Project includes construction of an on-site recycled water distribution pipeline system that could connect to the City's recycled water system and be used to irrigate the greenbelt and other on-site landscape irrigation areas.

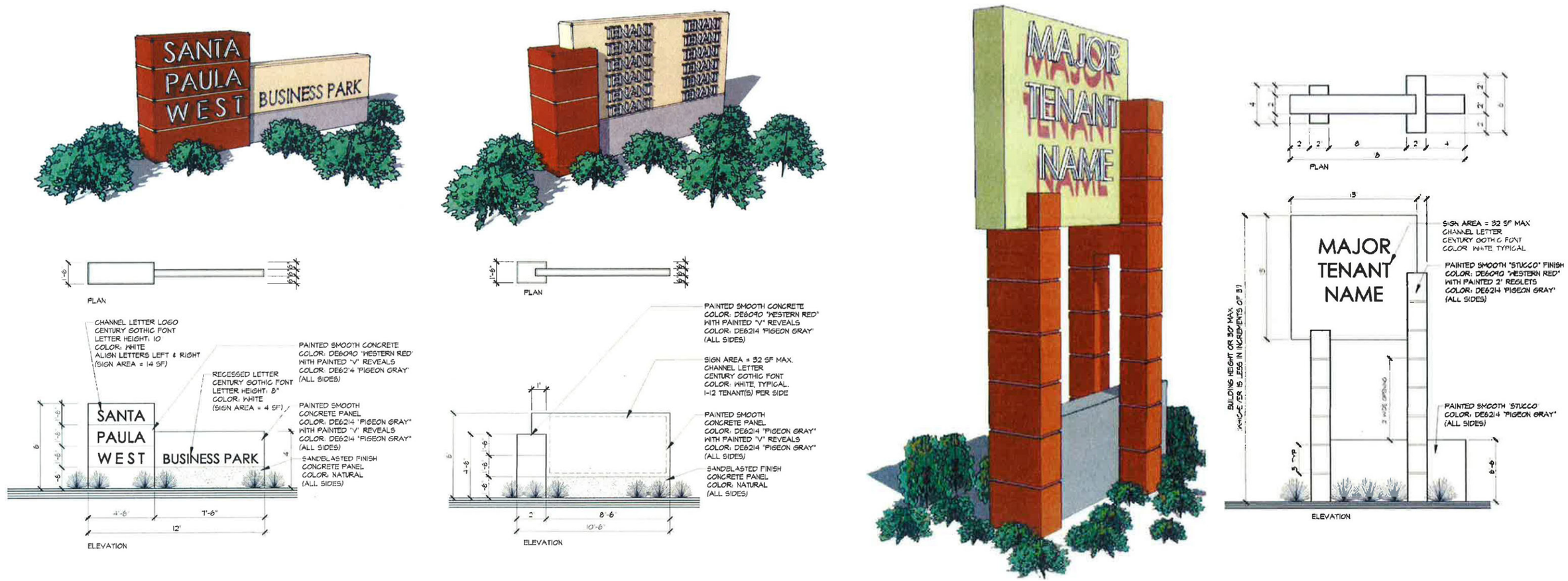
SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-9**

Meridian Consultants

Landscape Master Plan

050-002-13



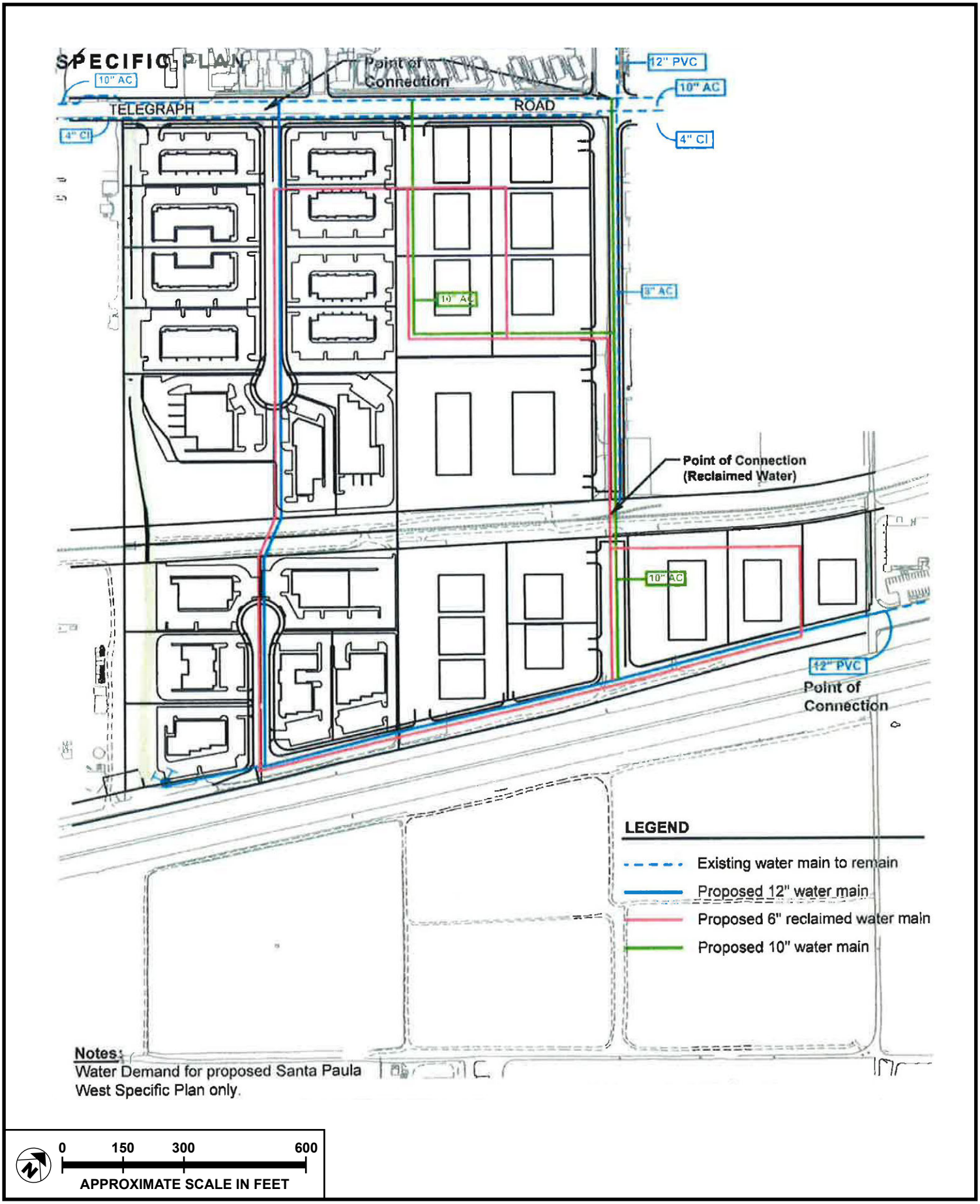
SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-10**

Meridian Consultants

Sign Master Plan

050-002-13



SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-11**

Meridian Consultants

Domestic and Recycled Water Master Plan

050-002-13

The Project's recycled water system would operate via a proposed 12-inch distribution main constructed in Telegraph Road, within the City limits. This terminus would become the main POC for the Project. The distribution system would comprise 6-inch mains from the POC of the City's recycled water system. Anticipated demand for recycled water in the Business Park is estimated to be 13 acre-feet per year (afy). A preliminary recycled water site plan layout is presented in **Figure 2.0-11.**

Wastewater

The City's Wastewater System Master Plan (amended June 2012) addresses the provision of wastewater collection facilities to serve the Specific Plan area. The wastewater infrastructure system is shown in **Figure 2.0-12**, **Sewer System Master Plan**.

While no sewer system currently exists within the Project area, the City's *Wastewater System Management Plan* identifies a new off-site mainline that will need to be completed prior to implementation of the Project. These improvements would bring the Project's POC for sewer service to the intersection of Beckwith Road and Faulkner Road at the southeast corner of the Project Site. **Figure 2.0-11** identifies the Project sewer lines, directions of sewerage flow, and POCs, as well as the proposed lift station. The proposed lift station would be required to move wastewater to the higher elevations that slope towards the north across the Project Site.

Electricity

Southern California Edison Company (SCE) provides electricity to the City of Santa Paula. SCE would service and maintain the Project area's electrical facilities. New local-serving electrical lines would be placed underground. All conduits would be with full encasement. The Specific Plan includes energy conservation–related design standards to reduce electric energy consumption.

Gas

The Southern California Gas Company (SCG) provides natural gas in Santa Paula. SCG serves much of Southern California with a network of transmission and distribution lines. An existing 12-inch, high-pressure supply line runs east–west in Telegraph Avenue. This line feeds pressure-reducing stations supplying the City. Major distribution lines run from these stations. These, in turn, branch into the network of smaller gas mains in all of the streets. Service connections would be provided and maintained throughout the Specific Plan area as needed.

Telephone

Telephone service and maintenance to the area is provided by Verizon. Telephone facilities would be located underground within the streets' rights-of-way. No overhead telephone facilities would be permitted.

Cable

Cable television is provided in the area by Time Warner Cable. This company would serve the Santa Paula West Business Park Specific Plan area. Cable television facilities would be located underground within public rights-of-way or in easements on private property.

Solid Waste

Solid waste collection services are provided in the City of Santa Paula by a private solid waste collection company and disposed of at the Toland Road Landfill, operated by the Ventura Regional Sanitation District.

The City participates in a curbside recycling program, which includes the recycling of glass (food and beverage containers), metal (aluminum cans, etc.) and plastic. Curbside pickup of paper, cardboard, and yard trimmings is provided. Additionally, periodic community drop-off events give residents opportunities to dispose of large items, household hazardous waste, and motor oil and filters.

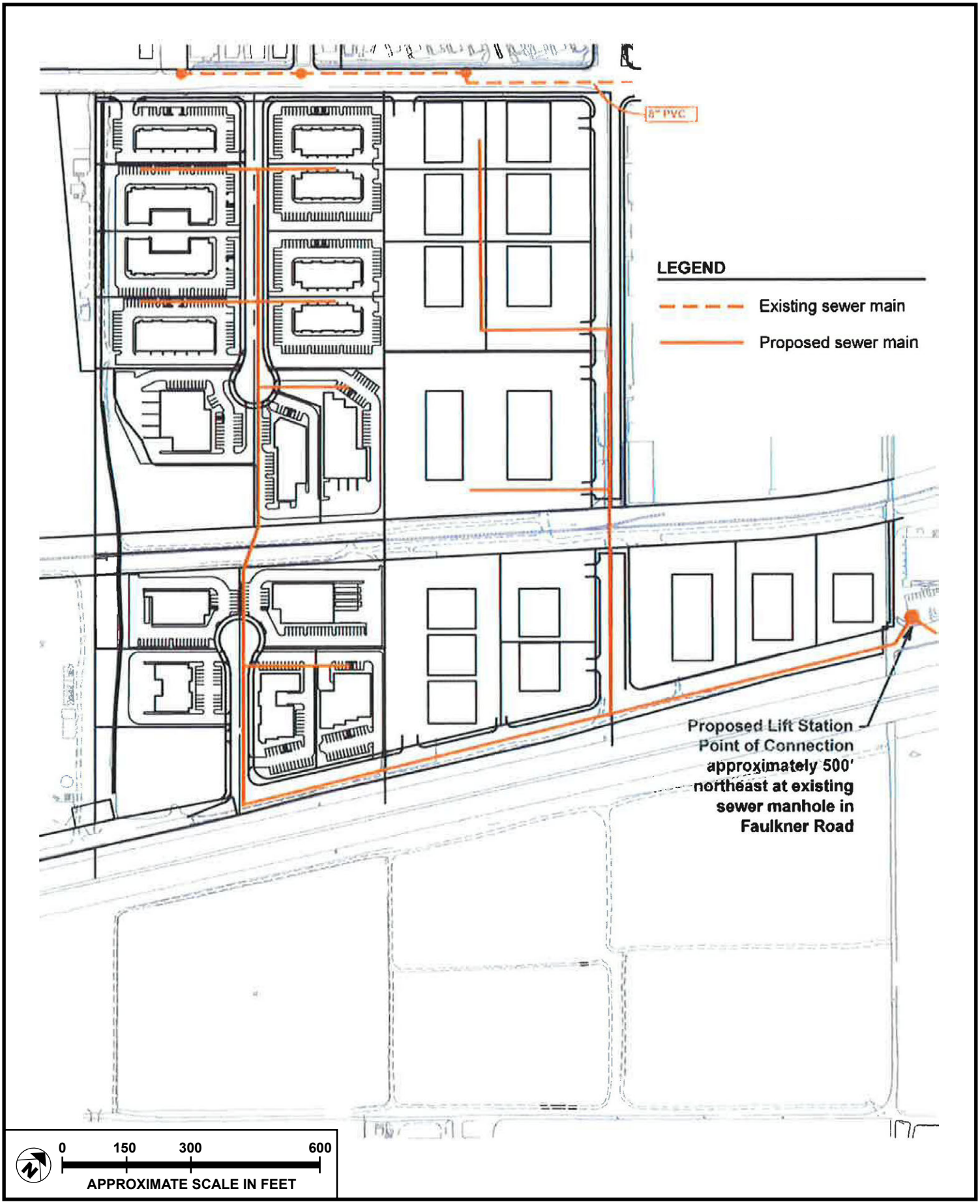
The proposed street network and street types provide multiple routes for collection vehicles to access the various blocks, buildings, and uses in the Project Site. In addition to street access, many blocks feature alley access, both as an alternative route and as a collection point not in conflict with on-street parking. Accordingly, each street type anticipates and accommodates such service needs through its sectional configuration and performance characteristics (e.g., curb radii, intersection spacing, and paved width).

Solid waste and recycling enclosures, illustrated on **Figure 2.0-13, Solid Waste and Recycling Enclosures,** would be appropriately placed throughout the Santa Paula West Business Park.

2.6.6 Grading and Drainage

Conceptual Grading Master Plan

The Specific Plan includes a Grading Master Plan for the earthwork needed to support development of the Project. The Grading Master Plan is shown in **Figure 2.0-14, Grading and Drainage Master Plan**. The Grading Master Plan provides for the cut and fill grading of the Project Site into a roughly 2 percent



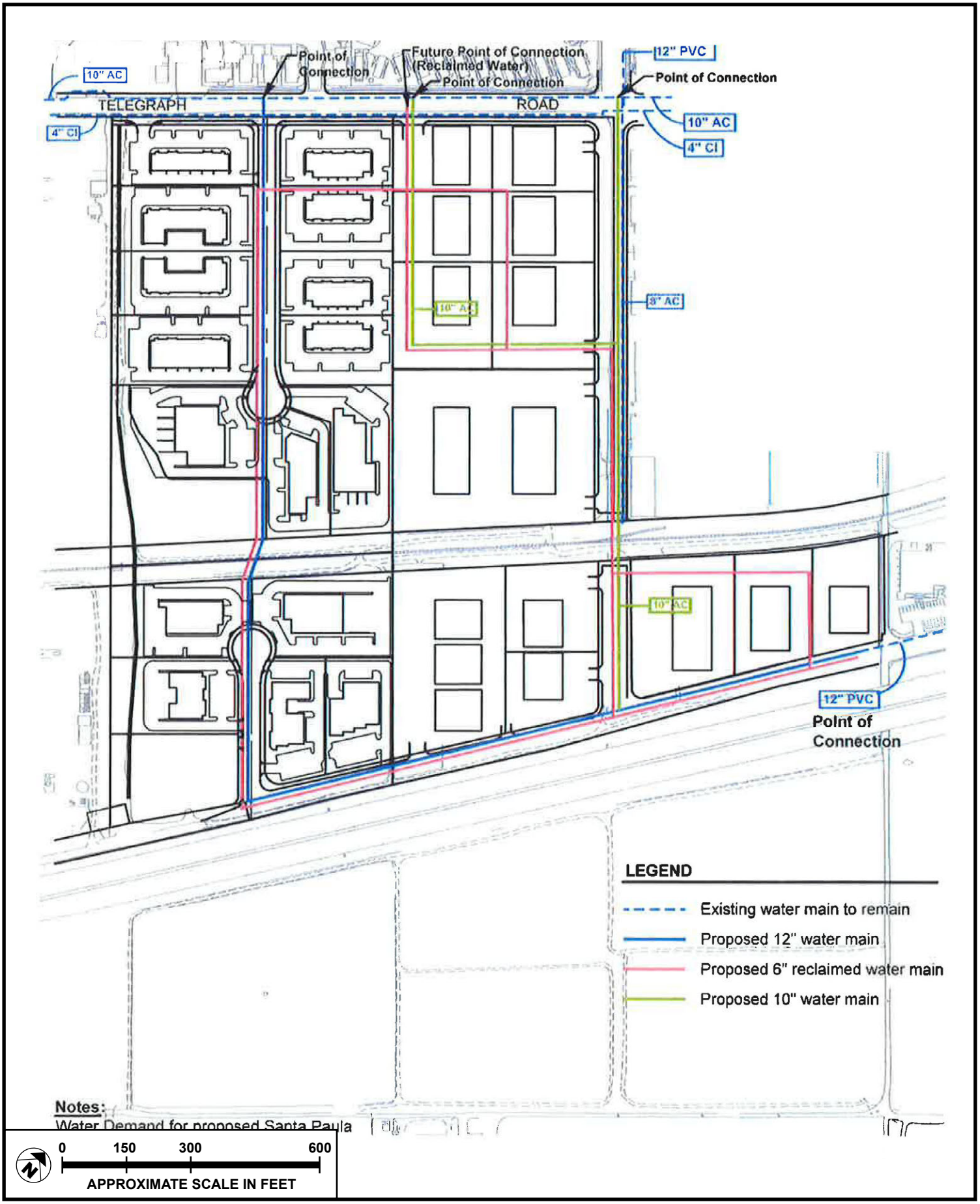
SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-12**

Meridian Consultants

Sewer System Master Plan

050-002-13



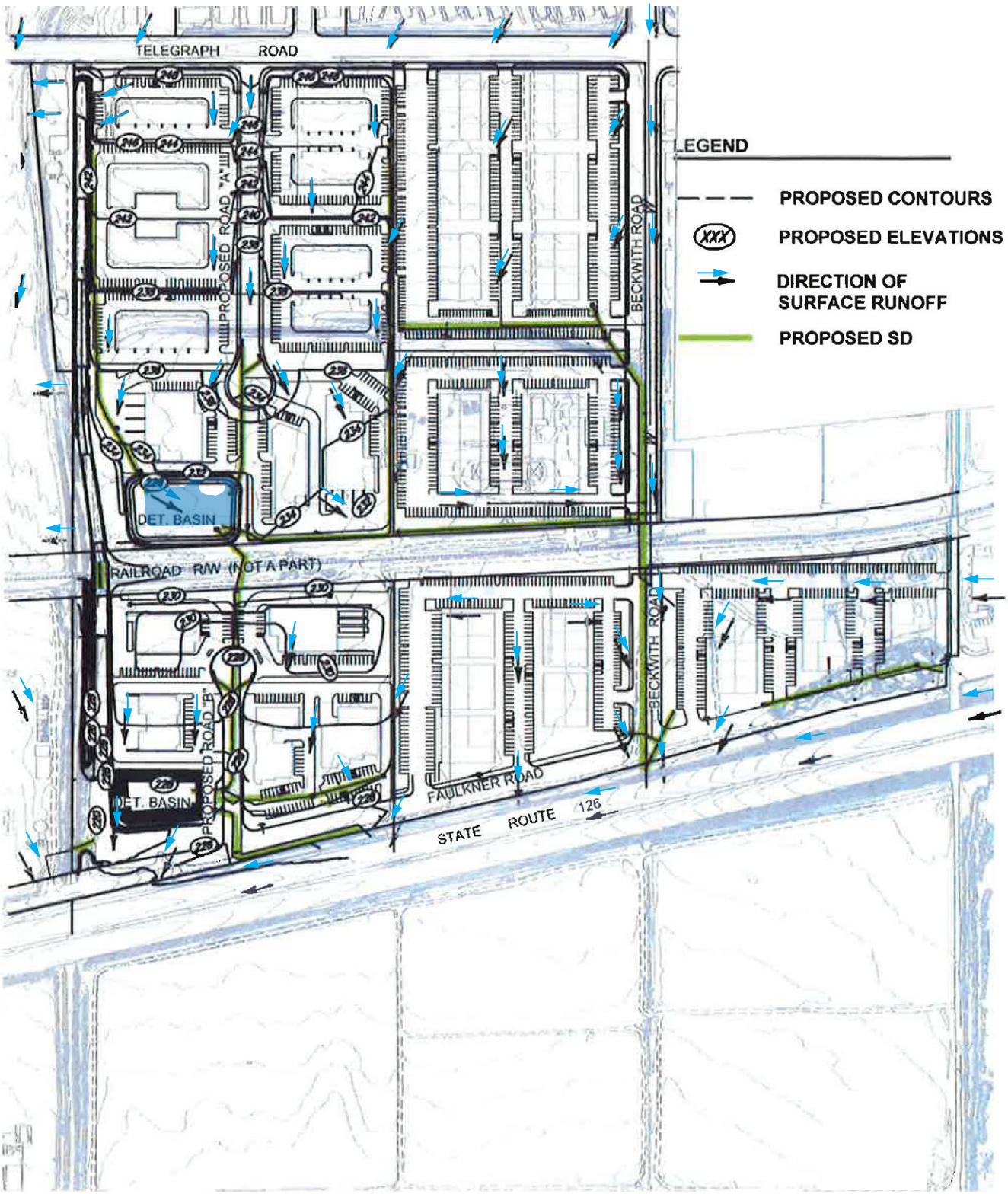
SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-13**

Meridian Consultants

Solid Waste and Recycling Enclosures

050-002-13



SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-14**

Meridian Consultants

Grading and Drainage Master Plan

050-002-13

land gradient overall, which would maintain the existing gradient from north to south. Cut and fill grading will be conducted using on-site soils with an overexcavation and recompaction depth of approximately 6 feet. Grading will also raise portions of the Project Site above the flood hazard elevation, with up to 6 feet of fill to be placed along the western boundary near Adams Barranca. Grading over the Project Site includes an estimated 80,000 cubic yards of cut and 179,000 cubic yards of fill, requiring the import of approximately 99 cubic yards of soil. The finished grade of the Project Site will maintain the existing 2 percent maximum gradient, and yield roadways and blocks in the lower areas generally within the 0.5 percent to 2 percent gradient range.

Six-foot-high fencing, such as chain link with screen cloth, will be placed along the perimeter of each construction site during the development of individual parcels to limit potential impacts of construction dust.

Drainage Master Plan

The Project Site is located within the greater Santa Clara River watershed, and is tributary drainage to the Santa Clara River. Currently a portion of the Specific Plan area is located in a floodplain per FIRM 06111C0779E, the result of Adams Creek overtopping its banks during a 100-year storm event. This flooding is cause by a lack of capacity within the channel, a lack of capacity at the SR 126 undercrossing, and debris issues at the Railroad Bridge.

The existing gradients of the land are such that the Project Site is divided up into two major separate drainage subareas on the north and one on the south. These areas comprise a total drainage area of approximately 50 acres.

On-site Storm Drain System, Infiltration, and Flood Control

The Project design includes a Drainage Master Plan to control stormwater runoff from within the drainage areas that affect the Project Site. The Project includes a series of storm drain pipelines, detention basins, and a trapezoidal channel that will run along the Adams Barranca. One acre of land within the Specific Plan boundary has been set aside for detention basins totaling approximately 6 acre-feet of volume for detention and retention requirements. The basin along Adams Barranca will include debris catchment facilities to reduce debris from storm flows that have caused problems at the railroad culvert and the Caltrans culvert in this channel. These detention basins will serve dual roles of flood protection and water quality enhancement. The trapezoidal channel will be approximately 6 feet in depth, with a 15-foot bottom width and 2:1 side slopes that will accommodate flood waters in a large storm event and protect the buildings on site; in addition, the channel will remove a portion of the property form the floodplain

through a Letter of Map Revision with FEMA. The new channel would join with the existing Adams Barranca at the railroad crossing and the SR 126 crossing.

The new channel design has the capacity to handle flows that overtop the bank on the east side and the water that ponds due to the undersized culvert at SR 126. The channel also has a debris-catchment area at the railroad bridge, with a second culvert under the railroad bridge to accommodate peak flows rerouted due to the debris. A geotextile fabric would be used in the channel as an erosion control measure to stabilize the soil during high velocities of runoff.

The Drainage Plan for the Specific Plan is presented in **Figure 2.0-15, Storm Drain Plan.** Storm drain facilities would be sized to meet City of Santa Paula standards and accommodate the increased runoff generated by the increase in impervious surfaces. The storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. The existing SR 126 culverts are exposed, but once the site is elevated by fill, the pipes would be underground and integrated into the new storm drain system. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream.

Detention basins would significantly reduce peak runoffs downstream by storing the peak-event flows and lagging their release after the storm peak.

2.7 GENERAL PLAN AMENDMENT, REZONE, AND ANNEXATION

As previously discussed, the City of Santa Paula General Plan designates the Project Site as part of the 125-acre West Area 2 Expansion Area near the western portion of the City boundary. The City's General Plan Land Use Element currently designates the Project Site for Mixed-Use Commercial/Light Industrial uses (C-LI). Section 16.25.020 of the Santa Paula Municipal Code (SPMC) identifies this area as SP-6.

The Project would implement the City's plans for a portion of the West Area 2 Planning Area as defined in the Santa Paula General Plan. The Project includes a series of related actions including jurisdictional reorganization (annexation), a General Plan Amendment (to the Land Use Element), and the adoption of a Specific Plan and prezoning for the Project area.

The Project Site is also within the LAFCo SOI for the City of Santa Paula and the City of Santa Paula CURB. If approved by LAFCo, jurisdictional reorganization would remove the Project from the unincorporated territory of the County once the annexation is recorded. Accordingly, the County of Ventura General Plan Land Use designation of Agricultural—Urban Reserve and the County zoning designation of AE-40 (Agricultural Exclusive, 40-acre minimum parcel size) would be removed.

0 150 300 600
APPROXIMATE SCALE IN FEET

SOURCE: Jensen Design and Survey – October 2016

FIGURE **2.0-15**

Meridian Consultants

Storm Drain Plan

050-002-13

2.8 DEVELOPMENT TIMEFRAME

Development of the Project is anticipated to occur over approximately 10 years or as market conditions allow. For purposes of the analysis within this Environmental Impact Report (EIR), development is expected to begin in 2017 and be completed by 2027. Construction would occur continuously during this 10-year period but would generally occur based on market and economic conditions to provide for orderly development.

2.9 PERMITS AND APPROVALS

Development of the Project will require approvals from both the City of Santa Paula and other agencies.

City of Santa Paula

The City of Santa Paula, as Lead Agency, will require the following approvals, permits, and actions to implement the proposed East Gateway Project:

- General Plan Amendment for the West Area 2 Expansion Area
- Specific Plan Approval
- Development Agreement
- Master Vesting Tentative Map

Other Public Agencies

- Annexation to the City of Santa Paula from LAFCo
- Encroachment Permit by the California Department of Transportation for the construction of roadway and utility improvements in the State right-of-way
- California Public Utilities Commission Approval of a Formal Application for an at-grade crossing of the VCTC railroad

3.0 RELATED PROJECTS

Related projects are other projects near the Project Site that may, in combination with the Santa Paula West Business Park Specific Plan and other related improvements, result in the potential for cumulative impacts. As shown in **Table 3.0-1, Related Projects,** the list of related projects used in this Environmental Impact Report (EIR) includes all the projects identified on the City of Santa Paula Planning Department's Development Activity List, including proposed projects located within the City's sphere of influence. The location of these related projects and expansion areas are identified on **Table 3.0-1** and mapped in **Figure 3.0-1, Location of Related Projects**. An estimated total of 1,781 residential units and 1,022,772 square feet of commercial and industrial facilities and 16 motel units (not including this Project) is pending, approved, under construction, or built. In addition, a total of 7,657 acres of expansion area is proposed for annexation into the City's boundaries.

The cumulative impact analysis for each environmental issue addressed in **Section 4.0, Environmental Impact Analysis,** is based on this list of related projects, as applicable, as well as growth anticipated under the City of Santa Paula General Plan.

Table 3.0-1
Related Projects

Project No.	Location	Category	Size	Status
Residential Land Uses				
1	Cliff Drive and Forrest Drive	Single-family units	19 du	Plan check
2	840 N 10th Street—Ridgeview at Vista Glen	Single-family units	75 du	Completed
3	NW corner of Foothill and Peck Road	Single-family units	79 du	Proposed
4	815 Montclair Drive	Single-family unit	1 du	Approved
5	838 Montclair Drive	Single-family unit	1 du	Completed
6	220 W Main Street	Assisted-living apartment units	20 du	Completed
7	812/820 E Santa Barbara Street	Assisted-living apartment units	6 du	Completed
8	Santa Anna Street/Larmon Loop	Condominiums	2 du	Plan check
9	Cemetery and Santa Paula Street	Single-family units	8 du	Under Construction
10	615 E Harvard Boulevard	Apartments Live/work units	6 du 6 du	Completed
11	1445 E Main Street	Live/work units Motel Restaurant	9 du 16 rooms 500 sq. ft.	Approved
12	125 Oak Street	Multifamily units	8 du	Approved
13	327 Acacia Road	Multifamily units	6 du	Proposed
14	3615 Ojai Road	Single-family unit	1 du	Plan Check
15	East Area 1[a]	Single-family units Multifamily units	1,100 du 400 du	Approved
19	Hallock Drive	Commercial office (w/dwelling unit)	1 du	Completed
20	1170 Montebello Street	Airport hangars and upper-level condo dwellings	37 units	Approved
30	250 S Hallock Drive	Mixed-use warehouse (w/dwelling unit)	7,800 sq. ft. + 1 du	Under Construction
		Total residential units	**1,786 du**	
Commercial Land Uses				
16	101 W Harvard Boulevard	Auto dealership	N/A	Completed
17	310 S Palm Avenue	Retail – Coffee shop	1,798 sq. ft.	Completed
18	100-106 Calavo Street	Commercial and light industrial	N/A	Proposed
19	Hallock Drive	Commercial office (w/dwelling unit)	N/A	Completed

Project No.	Location	Category	Size	Status
11	1445 E Main Street	Live/work units Motel Restaurant	9 du 16 rooms 500 sq. ft.	Approved
15	East Area 1[a]	Commercial	215,000 sq. ft.	Approved
		Total commercial	**217,298 sq. ft.**	
Industrial Land Uses				
20	1170 Montebello Street	Airport hangars and upper-level condo dwellings	72,162 sq. ft.	Approved
21	324 Santa Maria Street	General Industrial (Tentative Map 5428)	571,370 sq. ft.	Under construction
22	8 Wright Taxiway	Airport hangar	N/A	Under Construction
23	957 Calpipe Road	General industrial (Calpipe I)	13,500 sq. ft.	Completed
24	957 Calpipe Road	General industrial (Calpipe II)	44,000	Under Construction
25	801/853 Corporation Street	General industrial lot merger and expansion	4,104 sq. ft.	Completed
26	905 Corporation Street	Waste disposal operation business	N/A	Completed
27	126-140 Santa Barbara Street	Manufacturing	139,700 sq. ft.	Completed
28	12th Street	Outdoor storage yard w/office	N/A	Under Construction
29	18201 E Telegraph Road	Private self-storage facility	80,755 sq. ft.	Proposed
30	250 S Hallock Drive	Mixed-use warehouse (w/dwelling unit)	7,800 sq. ft. + 1 du	Under Construction
15	East Area 1[a]	Light industrial	25,000 square feet	Approved
		Total industrial	**805,474 sq. ft.**	
Infrastructure				
31	N-NW of Steckel Drive/Anacapa Terrace	Water-storage tank	N/A	Completed
32	1483 Ojai Road	Wireless telecommunications facility	N/A	Completed
33	Citywide	Crosstown pipeline	N/A	Completed
		Total infrastructure	**N/A**	
City Expansion Areas[b]				
34	Fagan Canyon	Outside the northwestern portion of City boundary	2,173 acres	TBD
35	Adams Canyon	Outside the northwestern portion of City boundary—adjacent to Fagan Canyon	5,413 acres	TBD

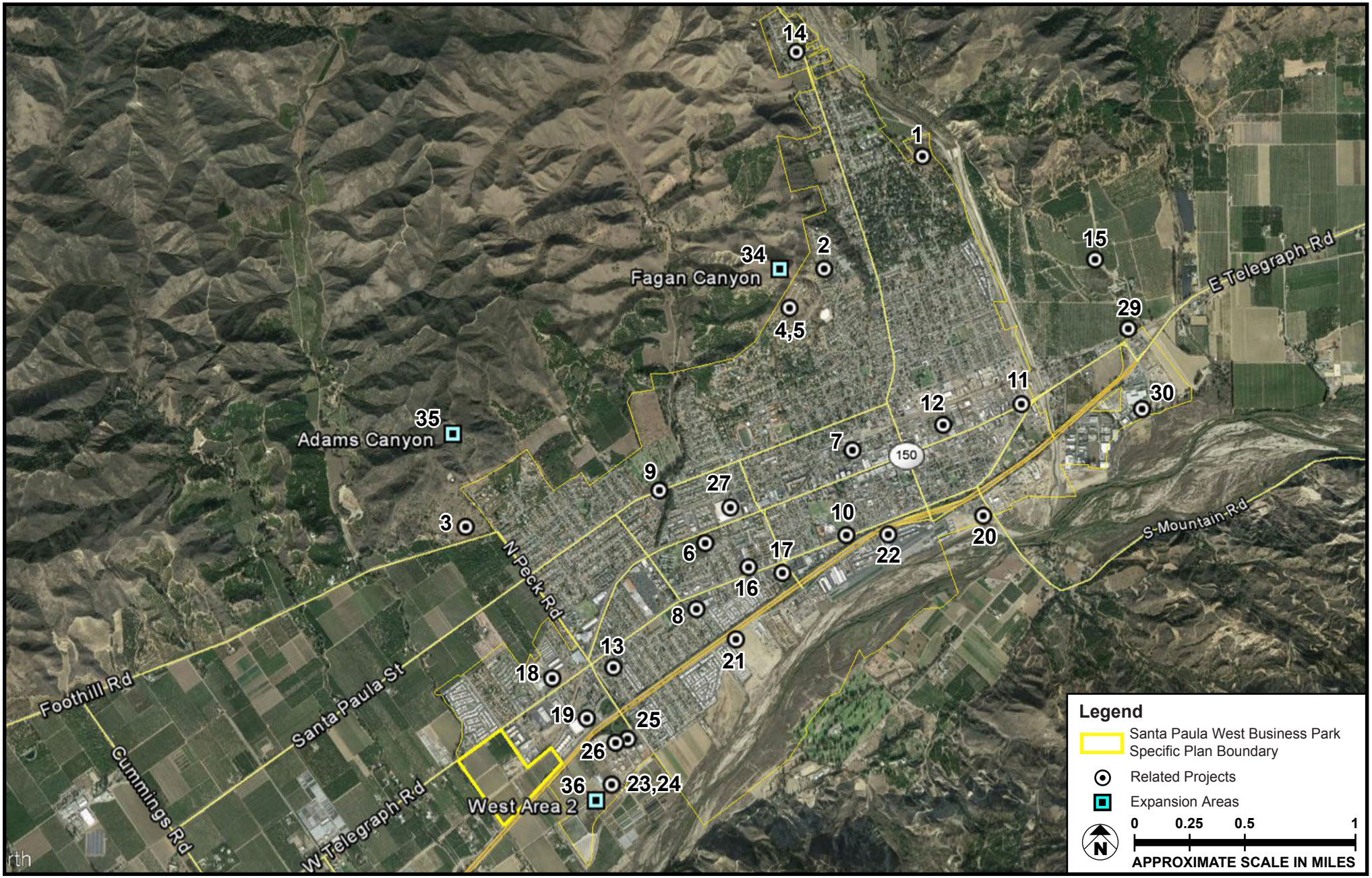
Project No.	Location	Category	Size	Status
36	West Area 2[c]	Outside the southwestern portion of City boundary—north and south of SR 126	71 acres	Proposed
		Total expansion area	**7,657 acres**	

Source: City of Santa Paula Planning Department (2016); City of Santa Paula General Plan, "Land Use Element" (2013); and Fehr & Peers, East Area 1 Traffic Study (May 2014).
Abbreviations: du = dwelling units; sq. ft. = square feet
N/A = not available

[a] Project is a part of the approved 2008 East Area 1 City Expansion Area. The 501-acre site is currently annexed within the City's boundaries.

[b] It should be noted that various related projects may be located within expansion areas. For the purposes of this table, the expansion areas were separated by total acreage proposed for annexation into the City.

[c] The Santa Paula West Business Park Specific Plan is located within the West Area 2 Expansion Area. The approximately 54-acre Project Site has been deducted from the total acreage of this Expansion Area to represent the total additional acreage proposed for annexation into the City's boundaries.



SOURCE: Google Earth - 2014; Meridian Consultants, LLC - 2014

FIGURE **3.0-1**

Meridian Consultants

Location of Related Projects

007-001-12

4.1 AESTHETICS

This section describes the existing aesthetic characteristics of the Santa Paula West Business Park Specific Plan area ("Project Site") and its surrounding areas and analyzes the potential aesthetic impacts of future development under the Specific Plan. The analysis considers the visual character and quality, scenic resources, and sources of light and glare. The analysis is based on site reconnaissance, which included photographic documentation and review of the Specific Plan development standards and design guidelines. The information and analysis in this section are also based on review of the County of Ventura General Plan, the Santa Paula General Plan and General Plan FEIR, and the Santa Paula Municipal Code (SPMC).

4.1.1 EXISTING CONDITIONS

Local Setting

The City of Santa Paula is located within the Santa Clara River Valley of Ventura County. The City is bordered on the north by the Topatopa Mountains, including the Santa Paula Ridge and the Los Padres National Forest beyond, and on the south by the South Mountain summit within the Oak Ridge of the Santa Susana Mountains. The Santa Clara River runs generally east–west along the southern boundary of the City. The surrounding mountains and Santa Clara River provide a natural backdrop for the Santa Clara River Valley.

The existing visual character of the City of Santa Paula is a mixture of developed and undeveloped landscapes, reflecting its transition from an agricultural heritage to suburban development. The City of Santa Paula contains a centralized downtown along Main Street, with a decreasing intensity of development toward the edges of the City. State Route (SR) 126, a raised four-lane divided highway, runs approximately parallel to the Santa Clara River through the southern portion of the City. Most of the City area lies north of SR 126. Areas surrounding the City lie within the unincorporated County of Ventura. The City streets are generally arranged in a grid pattern. The built environment consists of a range of housing, commercial, and industrial uses. Most buildings are 1 or 2 stories in height, with a limited number of 3-story structures. Areas immediately surrounding the City consist of wide expanses of agriculturally cultivated lands, including avocado and citrus orchards and row crops; natural open space; rolling foothills; and rugged mountain ridges at the higher elevations north and south of the Santa Clara River.

The Project Site is located in the western portion of the City of Santa Paula, between SR 126 immediately to the south and Telegraph Road immediately to the north. The Santa Clara River is located approximately 3,000 feet to the south.

Visual Character and Quality of the Specific Plan Area and Surroundings

On-Site Visual Character and Quality

The Project Site is approximately 53.81 acres and is near the southwestern portion of the City limits, within the County of Ventura. At the western boundary of the City, the Project Site is at the urban interface between urbanized City development to the east and north, and the County agricultural lands to the west and south.

The Project Site is cultivated in agricultural production and is relatively flat due to past grading activity to support agricultural production and operations. It contains little or no unaltered natural features. The Project Site also contains agricultural support facilities, such as offices, packing areas, and equipment maintenance and storage facilities. There is also a single-family residential unit located in the northwest portion near Adams Barranca and Telegraph Road. Several unpaved roads have been graded throughout the Project Site, thereby providing access to the existing agricultural operations. The Ventura County Transportation Commission (VCTC) railroad right-of-way, containing railway tracks, bisects the Project Site. The southwest portion is bound by the lower reaches of the Adams Barranca, an improved channel that runs generally north–south. The channel has been altered from its natural course through past agricultural grading on both sides. The Barranca is lined with earthen berms that are vegetated with riparian trees and shrubs. The topography of the Project Site is gently sloping, generally from north to south; with the highest elevation in the northern portion near Telegraph Road, approximately 250 feet above mean sea level (amsl), and the lowest elevation of approximately 226 feet amsl near its boundary with SR 126. There is minimal topographic variation between the elevations of the Project Site and surrounding areas. The Project Site lies at a lower elevation relative to SR 126, which is raised on pilings

Figure 4.1-1, **Viewpoint Locations,** provides an aerial photograph of the Project Site and the immediate surroundings. **Figure 4.1-1** also includes indicator locations from which on-site photographs were taken; these are described further below.

Figures 4.1-2, **On-Site Views,** provide photographs of the Project Site from various vantage points. As shown in **On-Site View 1** in **Figure 4.1-2a**, the Ventura County Transportation Commission (VCTC) railroad corridor transects the Project Site in an east–west direction. The Project Site is currently being utilized for active agricultural operations for avocado orchards, various herbs, and row crops. Agricultural operations consist of relatively flat, graded, and cultivated lands with a limited amount of structures. As discussed in **Section 4.2, Agricultural Resources,** approximately 9.2 acres of the Project Site are dedicated to avocados, 12.3 acres are dedicated to herbs, and 27.5 acres are dedicated to various row crops.

SOURCE: Googole Earth – November 2014

FIGURE **4.1-1**

Meridian Consultants

Viewpoint Locations

050-002-13

On-Site View 1: Looking east from the western boundary of the Project Site across the VCTC railroad corridor.

On-Site View 2: Looking west across the Project Site showing the existing herb crops located along Todd Lane.

SOURCE: Googole Earth – November 2014

FIGURE **4.1-2a**

Meridian Consultants

On-Site Views

050-002-13

As can be seen in **On-Site View 2** in **Figure 4.1-2a,** the area of the Project Site south of the VCTC railroad corridor and adjacent to Todd Lane and SR 126 contains herb crops, which cover roughly 33 percent of the Project Site. **On-Site Views 3 and 4** in **Figure 4.1-2b** show the plowed lands used for the production of various row crops, which represent roughly 50 percent of the Project Site. The remainder of the Project Site consists of citrus and avocado orchards on the northeastern portion, which cover roughly 17 percent of the Project Site.

As shown in **On-Site Views 5 and 6** in **Figure 4.1-2c**, ancillary facilities to support agricultural operations, such as a maintenance yard, packing and processing facilities, offices, and farmworker housing, have been constructed over approximately 4.5 acres of the Project Site. Many of these facilities are located within the central portion of the Project Site on both sides of the VCTC railroad corridor. Most of the structures are visible intermittently along SR 126 and Telegraph Road. Because the majority of the Project Site is cultivated for agricultural production, there is minimal occurrence of natural vegetation. Various shrubs and tree species serve as a buffer between the southern boundary of the Project Site and SR 126, as well as within the vicinity of the VCTC railroad corridor that runs through the Site.

Specific Plan Area Visibility from Surrounding Areas

Given the elevations of the Project Site, its visibility is generally limited to the immediate surroundings, and it is relatively inconspicuous from off-site viewpoints in the more distance areas of the City and County. Photographs are provided of existing views of the Project Site from off-site locations within the City of Santa Paula and surrounding areas. As noted earlier, **Figure 4.1-1** illustrates the locations from which the off-site photographs were taken. As shown in **Figures 4.1-3, Off-Site Views,** surrounding areas consist of an array of developed lands with residential neighborhoods, agricultural operations, and light industrial/commercial facilities. Public views of the Project Site from the surrounding areas are limited to the north, south, and east. In particular, the public viewshed containing the Project Site is found along SR 126, Telegraph Road, Beckwith Road, and Todd Lane. From the west, the generally flat terrain with extensive agricultural operations, including orchards and the windrows of trees along the Adams Barranca block views of the westerly boundary of the Project Site from the west. In various views in **Figure 4.1-3,** the building height outlines, as projected by the Specific Plan, are denoted by a red line.

Views from the North

Views of the Project Site from the north are only limited by intervening avocado orchards at the corner of Telegraph Road and Beckwith Road; however, most views along Telegraph Road offer a direct line of sight to the Project Site. Intermittent views of the Project Site can be seen from the adjacent residential properties. **Off-Site View 1** in **Figure 4.1-3a,** offers an expansive middle-distant view of the Project Site as it would be seen by a person entering Telegraph Road from the residential neighborhood. From this view,

the South Mountains are clearly visible across the Project Site with minimal obstructions. The existing orchards, row crops, and structural facilities are visible along the northern boundary of the Project Site, as shown in **Off-Site View 2** in **Figure 4.1-3a.** The farmworker housing unit and storage shed are distinctive identifiers of the Project Site's western boundary and are visible along W. Telegraph Road, as shown in **Off-Site View 3** in **Figure 4.1-3b.**

Views from the South

Views toward the Project Site from the south are limited to the public road rights-of-way along SR 126. Given the gradual elevation changes within the western area of the City and the location of the Project Site relative to prominent public thoroughfares, the extent of the public viewshed containing the Project Site is fairly limited.

On the generally level terrain of the Project Site's immediate surroundings, features of the built environment (e.g., buildings, walls, and landscaping) have typically resulted in physical barriers of sufficient heights to block views of the Site from most nearby public streets.

When traveling westbound along SR 126, as shown in **Off-Site View 4** in **Figure 4.1-3b,** there are certain viewpoints of the Project Site that are blocked by vegetation (e.g. trees and brush); however, gaps in the vegetation allow the Project Site to enter public view along SR 126. The view of the Project Site is fleeting because people would have to turn to look north as they pass the area. Views of the Project Site from the eastbound approach are, for the most part, also blocked by the vegetation that makes up the central divider of SR 126. In addition, the views from the eastbound approach are directed more southeasterly, toward South Mountain and away from the Project Site on the opposite side of the raised highway.

As shown in **Off-Site View 5** in **Figure 4.1-3c,** distant views of the Topatopa Mountains are prominent when looking north across the Project Site. A mixture of low-scale structural forms and textures, masses of trees and shrubbery, poles and overhead lines, street pavement, dirt surfaces, and distant hillsides in the background are seen within the public right-of-way along SR 126.

Little visual connectivity exists between the Project Site and the Santa Clara River or mountains south of the City because of the raised elevation and width of SR 126, and the relatively flat terrain with existing intervening landscaping.

On-Site View 3: Looking southwest across Project Site toward the South Mountains.

On-Site View 4: Looking northwest across the Project Site showing the existing plowed lands used for row crops.

SOURCE: Googole Earth – November 2014

FIGURE **4.1-2b**

Meridian Consultants

On-Site Views

050-002-13

On-Site View 5: Looking north from the Project Site along the VCTC railroad corridor showing the existing agricultural operations.

On-Site View 6: Looking northwest on the Project Site showing the existing agricultural operations.

SOURCE: Googole Earth – November 2014

FIGURE **4.1-2c**

Meridian Consultants

On-Site Views

050-002-13

Off-Site View 1: Looking southeast along Country View Court from the adjacent residential community north of the Project Site.

Off-Site View 2: Looking southeast along W Telegraph Road from the northwestern corner of the Project Site.

SOURCE: Googole Earth – November 2014

FIGURE **4.1-3a**

Meridian Consultants

Off-Site Views

050-002-13

Off-Site View 3: Looking south from W Telegraph Road
from the northwestern corner of the Project Site showing the South Mountains.

Off-Site View 4: Initial views of the Project Site from the east when traveling westbound on SR 126.

SOURCE: Googole Earth – November 2014

FIGURE **4.1-3b**

Meridian Consultants

Off-Site Views

050-002-13

Off-Site View 5: Looking northwest along SR 126 and across Faulkner Road toward the Project Site.

Off-Site View 6: Looking southeast toward the Project Site at the corner of W Telegraph Road and Beckwith Road.

SOURCE: Googole Earth – November 2014

FIGURE **4.1-3c**

Meridian Consultants

Off-Site Views

050-002-13

Views from the East

Views of the Project Site from the east are generally accessed along Beckwith Road and Todd Lane, which are adjacent to the boundary of the Site on both sides of the VCTC railroad corridor. While views are obstructed by landscaping trees found at the corner of W. Telegraph Road and Beckwith Road, as shown in **Off-Site View 6** in **Figure 4.1-3c**, direct views of the Project Site are available at the end of Beckwith Road. From this view, a service/contractor storage yard, ancillary facilities for the agricultural operations, and an office structure can be seen on the Project Site. These existing structures are approximately 1 story in height and do not significantly obstruct views across the Site towards the South Mountains.

General Plan Scenic Viewpoints and Scenic Highways

Scenic Highways

The County of Ventura General Plan identifies SR 126 as an eligible county scenic highway.[1] The City of Santa Paula's General Plan Conservation and Open Space Element identifies SR 126 and SR 150 as man-made scenic resources.[2] SR 126 offers sweeping 360-dgree views of the higher elevations of the surrounding mountains from throughout the travel corridor. Views include portions of the Topatopa Mountains and Santa Paula Peak to the north, and the South Mountain to the south. Where openings in landscaping or structural development along the right-of-way occur, wide-ranging views of agricultural lands are also available along the corridor, predominantly occurring outside the City's limits. As described previously, a majority of the Project Site is visible from SR 126. This is due to the minimal landscaping, vegetation, and power lines that would obstruct views when seen from a moving vehicle.

Scenic Resources

Scenic resources within the County of Ventura are identified to be the viewsheds of County lakes and scenic highways. The County of Ventura General Plan does not identify any scenic resources on or adjacent to the Project Site.[3] However, the City of Santa Paula identifies scenic resources on and adjacent to the Project Site, including Santa Paula Creek, Santa Paula Canyon, barrancas, the hillsides east of the City, agricultural lands, and SR 126. The City also recognizes SR 150 and other various roadways (e.g., Foothill Road and Twelfth Street south of SR 126) as scenic routes. In addition, California's Scenic Highway Program classifies SR 126 and SR 150 as "eligible state scenic highways."[4] However, only the portion of SR 126 that extends from SR 150 to the Interstate 5 (I-5) north of Castaic in Los Angeles County is so designated. In addition to views from SR 150, Foothill Road, and Twelfth Street being blocked by

1 County of Ventura, *General Plan,* "Resources Appendix," (2011).
2 City of Santa Paula, *General Plan,* "Conservation and Open Space Element," (1998).
3 County of Ventura, *General Plan,* "Resources Appendix," (2011).
4 California Department of Transportation, Scenic Highway Program, "Eligible (E) and Officially Designated (OD) Routes" (2013), http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm.

intervening terrain, vegetation, and the developed surroundings, the Project Site is located on the westerly boundary of the City and is not visible from these scenic routes.

Existing Sources of Light and Glare

Sources of illumination from within the Project Site are limited to common low-intensity outdoor lighting fixtures that are focused on immediate illumination of driveways, parking, and outdoor storage areas within the farmworker housing areas. Sources of light may also include the light emanating from the windows of farmworkers' houses. The building exteriors are finished with wood, concrete, and other nonreflective materials. Off-site sources of illumination include streetlights, light fixtures, and light emanating from windows in the residential areas to the north, and light industrial/commercial uses to the east of the Project Site. Headlights from vehicles on adjacent roadways, and particularly from vehicles traveling on SR 126, are additional sources of light in the area.

4.1.2 REGULATORY SETTING

The County of Ventura and City of Santa Paula provide regulations related to visual resources, scenic resources, and light and glare. However, as the Project Site is proposed for annexation by the City of Santa Paula, the analysis in this EIR only considers goals and policies from the City's General Plan.

State

The California Environmental Quality Act (CEQA) establishes that it is the policy of the state to take all action necessary to provide the people of the state with "enjoyment of aesthetic, natural, scenic and historic environmental qualities."[5]

The California Scenic Highway Program was created by the California Department of Transportation (Caltrans) to preserve and protect scenic highway corridors from change, which would diminish the aesthetic value of lands adjacent to highways. The state laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260–284.[6] SR 126 is designated as an "eligible designated route" for the segment between SR 150 and I-5.

5 California Public Resources Code Section 21001(b).
6 California Streets and Highways Code Section 260-284.

City of Santa Paula General Plan[7]

Scenic resources in the overall Santa Paula planning area are identified in the Conservation and Open Space Element of the City of Santa Paula General Plan. These scenic resources include both natural and developed resources.

The aesthetic qualities of the City of Santa Paula vary as widely with the topography and the built environment. The proximity of the distinct landforms from the mountains to the river valley, the agricultural fields that border the City, and the historic downtown buildings provide an exceptional scenic environment for the area.

It is important to conserve both natural and developed land areas that are high in scenic value. The Conservation and Open Space Element serves not only to identify these resources, but also to provide policies that will conserve and enhance the resources for future generations.

The Conservation and Open Space Element identifies the following inventories:

Natural Scenic Resources

- Santa Clara River
- Santa Paula Creek
- Fagan Canyon
- Santa Paula Canyon
- Barrancas
- Mountains to the north and south
- Hillsides to the east
- Agricultural lands

Developed/Man-Made Scenic Resources

- SR 126 (eligible state scenic highway)
- SR 150 (eligible state scenic highway)
- City scenic routes: Foothill Road; State Highways 126 and 150; Twelfth Street south of the highway
- Historic districts
- In-town scenic drive

7 As the Project Site is proposed for annexation from the County of Ventura into the City of Santa Paula, only goals and polices of the City's General Plan are considered within this analysis.

- Open space of agricultural lands
- Open space of city parks
- Views of the town from the hillsides

Additionally, the Conservation and Open Space Element identifies opportunities and constraints associated with the West Area 2 Expansion Area, which includes the Project Site, regarding conservation of scenic resources, such as the Adams Barranca. The scenic resources of the Santa Clara River Valley, SR 126 and SR 150, and agricultural lands surrounding the Project Site should be maintained throughout the development of the Santa Paula West Specific Plan Project. Architectural standards are established to ensure that development of the Project Site complements the existing small-town character of the City of Santa Paula.

The Conservation and Open Space Element's goals, objectives, and policies for preservation of scenic resources include:

Goals

Goal 10.1 Scenic views and vistas, tree-lined streets, open spaces, natural areas, ridgelines, and land forms should be preserved.

Objectives

Objective 10(a): Use a variety of land use planning tools to preserve scenic resources.

Policies

Policy 10a.a: The mountains surrounding Santa Paula are an important asset that should be protected for the view and open space.

Policy 10b.b: Preserve viewing opportunities in canyon areas as development proceeds.

4.1.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, the CEQA identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guideline (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on aesthetic resources if it would:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Substantially degrade the existing visual character or quality of the site and its surroundings?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?

4.1.4 PROJECT IMPACTS

Temporary Construction Impacts

Construction activities within the Project Site and off-site improvements, such as along Beckwith Road and Faulkner Road, could potentially be visible from SR 126 and Telegraph Road and other vantage points that currently have views of these areas. Additionally, there would be off-site improvements along SR 126 for the connection of Beckwith Road to the extended Faulkner Road. Development of the Specific Plan would occur over a 10-year period or as market conditions allow. Construction activities would include various site preparation, vegetation removal, and grading activities. As the Project Site is relatively flat and is at relatively low elevation, grading activities would include the import of approximately, 99,000 cubic yards of soil to raise portions of the western areas above flood elevations from Adams Barranca flows. Finished grades not substantially also the existing be contours and would result in slightly reduced differences in elevations over the Project Site. The infrastructure improvements, such as water and sewer pipelines, and roadways would be constructed to meet the needs of the development as it progresses over time.

Construction activities would entail site grading and contouring to establish building pads, roadway configurations, and drainage features such as basins and weirs. Views during construction may include earthwork, buildings at various stages of construction, and a wide range of construction equipment and materials. While buildings are under construction, framing, scaffolding, and cranes may be visible from off site during construction of the upper stories. Also during construction, mechanical equipment, material stockpiles, staging areas, and trash bins could temporarily degrade the visual quality of the Project Site at adjacent ground-level vantage points. The extent to which the construction of the Project's

buildings would affect the field of view and result in changes in visual character would be temporary and would not block views to a degree that would exceed view blockage of buildings once completed, which, as discussed below, will not substantially block views of existing prominent visual resources. In addition, the Project Site is currently graded and cultivated, requiring use of heavy equipment and disturbed ground surfaces on a routine basis. However, as the construction timeframe would occur over approximately 10 years and would alter the existing open space character of the Project Site from immediate surroundings, these visual impacts from construction would be potentially significant and unavoidable on a temporary basis.

Threshold: Have a substantial adverse effect on a scenic vista?

As previously discussed, views from SR 126 are of scenic vistas throughout the City's planning area as provided in the Santa Paula General Plan Conservation and Open Space Element. As noted, scenic aspects in the Project Site include agricultural lands; Adams Barranca on the west boundary of the Project Site; open spaces in the foreground and middle-ground views; and the background views of foothills and slopes rising to the Santa Paula Ridge on the north. Scenic aspects of the Project Site include the agricultural lands and Adams Barranca west of the Site. These existing views of the Project Site from SR 126 are considered scenic views, as identified by the City's General Plan. However, West Area 2 is an expansion area along the City's western boundary; as such, it provides for the expansion of the City-built land uses to occur within close proximity to other developments in the west part of the City limits.

Development in accordance with the Specific Plan would result in an expanded urban fringe on the westerly limits. The Project would provide for the development of commercial and light industrial uses, along with roadways and open space across the 53.8-acre Project Site. Building heights would be consistent with the 1- to 2-story buildings having similar uses to the east of the Project Site, with a maximum building height of 35 feet and 45 feet for commercial/light industrial and industrial uses, respectively.

Passengers within vehicles traveling eastbound on SR 126 have northeasterly directed views of the urbanized middle distant horizon of the City directly east and north the Project Site. Most prominent views from eastbound SR 126 are directed southerly toward the Santa Clara River and South Mountain. Passengers traveling westbound on SR 126 would have fleeting views across the Project Site between SR 126 landscape-screening vegetation. However, views would be mostly directed northwesterly toward the more expansive agricultural lands and the foothills of the Santa Paula Ridge north and west of the Project Site as vehicles travel high rates of speed (65 miles per hour) past the Project Site.

As described above, south-oriented views of South Mountain are currently available from Telegraph Road and its intersecting north–south streets (Country View Court) across the undeveloped portions of the

Project Site. As shown in **Off-Site View 1** in **Figure 4.1-3a**, build-out of the Specific Plan with 35- and 45-foot-tall structures, along with associated landscaping, would partially obstruct southerly street level views across the Site toward South Mountain. However, the upper reaches of South Mountain will be largely maintained, although the views may become somewhat channeled by landscaping.

The more panoramic vistas that take in a sweeping breadth of the mountains and foothills forming the river valley and vistas overlooking the lower man-made and natural horizon features of the area would not be blocked through development under the Specific Plan. Rather, more immediate foreground and middle-distant open views across the Project Site would be replaced with structures. Landscaping within the Project Site could channel some views from the immediate surroundings. However, as previously stated, this development would add an anomalous element to the viewshed because it would occur on the urban fringe of the City near existing light industrial and residential areas.

Adams Barranca is visible as a distinctive linear open space element adjacent to the western boundary of the Project Site, and would be preserved in open space as part of the Specific Plan land use designation for that area.

While implementation of the Project would result in the loss of views of the existing agricultural lands in the immediate foreground with the addition of structures, circulation system, and supporting infrastructure, the urbanized appearance is similar to the adjacent uses and more distant scenic vistas views of the Santa Clara River Valley would not be significantly altered upon the development of structures on the Project Site. Therefore, the Project would result in less than significant adverse impacts to scenic vistas.

Threshold: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Project Site exhibits limited topographic variation and contains no natural slopes, rock outcrops, or other geological formations. SR 126 is not designated a state scenic highway, but it is considered an eligible scenic highway. However, the Santa Paula General Plan Conservation and Open Space Element identifies the Adams Barranca, agricultural lands, and views from SR 126 (an eligible state scenic highway) as scenic resources. The Project involves the removal of the row crops on the Site and would convert these agricultural lands to light industrial and commercial structures, in addition to a circulation system and supporting infrastructure.

There are no existing structures on the Project Site that have historical significance; thus, the Project would not damage any historic buildings considered visual resources. Besides vegetation within Adams Barranca, the Project Site currently contains minimal natural vegetation, which is mostly limited to scatter

weeds on the perimeter of the tilled agricultural fields, some ornamental trees locate near the agricultural facilities adjacent to Beckwith Road, and a row of trees (eucalyptus and others) in the southeast corner near the SR 126 right-of-way. Other vegetation consists of the avocado trees in approximately the northeast quadrant of the Project Site. The scattered weeds, ornamental landscape trees, and orchards would be removed with implementation of the Specific Plan, while trees at the eastern corner of the Site along SR 126 would be largely maintained as a visual screen. The trees that are removed would be replaced with landscaping according the landscape plan provided in the Specific Plan. The trees to be removed do not in and of themselves represent significant visual features of the Project Site.

The Specific Plan would dedicate 3.65 acres of the Site for open space/passive uses, including various landscaping and the development of bioswales and detention basins. These open space/passive uses would provide for a greenway open space buffer between the Adams Barranca on the western boundary of the Project Site, as well as a small buffer along the northern portion of the VCTC railroad corridor. The landscaping that would be incorporated throughout the Project Site would also provide additional buffers between the Site and SR 126 and W. Telegraph Road.

Since the Project would incorporate various open space/passive uses into the Project design to preserve the visual quality of Adams Barranca, would not remove visually important trees or geologic features, and since the segment of SR 126 that is adjacent to the Project Site is not eligible for designation, implementation of the Project would not damage scenic resources within a designated state scenic highway. Therefore, the Project would result in less than significant impacts to scenic resources.

Threshold: Substantially degrade the existing visual character or quality of the site and its surroundings?

The existing visual character and quality of the Project Site is predominantly agricultural in nature, with ancillary agricultural facilities, row crops, and orchards. The agricultural character of the Project Site is viewed from SR 126, Telegraph Road, Beckwith Road, Todd Lane, and Faulkner Road.

Direct views of the Project Site from Beckwith Road also include the on-site ancillary facilities for the agricultural operations, and an office structure. This area contains open storage of materials and equipment. The Project would remove these features and replace this view with the light industrial and commercial uses allowed under the Specific Plan. These existing structures are approximately 1 story in height and do not significantly obstruct views across the Site towards the South Mountains.

The Specific Plan contains design features that take into account the character of the surroundings. The Project includes development standards for frontage, building types, architecture, thoroughfares, and landscape to ensure that the implementation of the business park is harmonious with the scale of existing buildings in the City of Santa Paula. These design features would ensure that the Project is consistent with

height, density, and elevation of the surrounding land uses to the light industrial uses located east of the Project Site, and overall would have a similar aesthetic character. Building heights would not exceed 45 feet, and lot coverage of building footprints would be between 80 and 85 percent; a minimum 10-foot setback would be required for lot frontage and where buildings are located along streets. The design standards set forth in the Specific Plan are intended to guide the future development under the Specific Plan and include the following purpose and intent:

- Create a clear identify and sense of place;
- Ensure a consistent use of building materials, landscaping, colors, and other design features;
- Provide a harmonious and pleasing environment for all contemplated uses and activities; and
- Guide the development process, including qualitative aspects of how buildings, landscaping, and permitted operation by tenants and owners will develop.

In addition to incorporating similar development standards as existing developments to the east of the Site, the Project would include standards in grading, building design, lighting design, and landscape design, as well as a sign program.

The Specific Plan includes design guidelines that will direct the style and aesthetic character of the individual parcel development and ensure a consistent use of building materials, landscaping, colors, and other design features of the buildings. Site design guidelines will provide provisions for driveways, service and loading areas, refuse collection, screening of mechanical equipment, aesthetic features of wall and fences, undergrounding of utilities (such as electrical lines), and enclosures for mailboxes, along with other guidelines.

The Project includes a buffer of open space/passive uses along the western boundary of the Site, which would preserve the visual appearance of Adams Barranca.

Due to the Project Site's relatively low and flat elevations, many off-site vantage points of the Project Site are obstructed by existing structures and buildings. However, development within the Project Site can be seen from vantage points that are located immediately adjacent to the Project Site, such as those along SR 126, Telegraph Road, Beckwith Road, Todd Lane, and Faulkner Road. Furthermore, while elevations of the Project Site would remain relatively flat and at low elevations, and although the Specific Plan development standards will be required to ensure a consistent and compatible aesthetic character with the developments to the east, the existing open space and agricultural character of the Project Site would substantially change. The altered views from the public viewpoints that immediately surround the Project Site are considered significant and unavoidable.

Threshold: Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?

Implementation of the Project would permanently change the visual character of the Project Site from agricultural lands to developed urban uses. The Project would result in a potential for increases glare from within the Project Site during the day from reflective surfaces, and an increase in artificial light during the night.

The Project's development standards establish the types of materials that can be used for various types of structures on the Project Site; reflective, glare-producing materials are prohibited. Daytime sources of glare would include the sun reflecting off glass windows of structures and vehicles. Glare produced from these sources would be brief and intermittent. Therefore, impacts related to glare would be less than significant.

The Project's nighttime sources of light would include outdoor lights, such as mounted lights and lighted signs on the buildings, parking lot lighting, interior building lights, and headlights of vehicles. Given that minimal outdoor lighting is currently emitted from the Project Site, these impacts related to the additional nighttime light and glare from the Project are considered to be potentially significant.

With the implementation of **Mitigation Measure AES-1,** the outward and upward migration of nighttime light would be minimized to avoid adverse impacts to nighttime views near the Project Site. **Mitigation Measure AES-1** would reduce impacts to a level that is less than significant.

4.1.5 CUMULATIVE IMPACTS

As provided in **Section 3.0, Related Projects,** there are numerous pending development projects Citywide that would contribute to the urbanization of the City, thus collectively changing the overall aesthetic character of the City. These areas have been predominantly identified in the Santa Paula General Plan as appropriate areas for growth. The remainder of the West Area 2 Expansion Area, which includes the Project Site, is proposed for annexation and development of light industrial and commercial uses. On the east side of the City, the East Gateway Specific Plan was approved in 2012 and entails the development of a mixture of retail, service and light industrial, and office uses throughout a 94.5-acre span on the eastern edge of the City. Full buildout of the East Gateway Specific Plan would transition the eastern edge of the City from a more rural setting to one with more urbanized development, especially along the main corridors, such as SR 126. Additionally, the East Area 1 Specific Plan Amendment on the eastern portion of the City will include the development of various residential, commercial, light industrial, commercial, and civic uses across a 501-acre area. In the foothills to the north of the City, there are two potential expansion areas that could accommodate large residential subdivisions: Adams Canyon and Fagan

Canyon. These potential future developments would occur on agricultural lands and open space at the outer limits of the City.

In combination with the Project, all of these related projects previously mentioned would change the visual character of the area over time from a more rural setting to one with more urbanized development, especially along the main travel corridors, such as SR 126. The cumulative development would transform the visual character of the City by reducing the amount of open space within the City limits and expanding the urban visual character. However, implementation of the Project and related projects would be consistent with the City's General Plan. The General Plan establishes measures—such as design standards, open space protection, and appropriate buffering and setbacks—that are designed to mitigate potential visual impacts within the City. These measures would allow for expansion within the City while minimizing potential impacts to the City's existing visual resources. While the Santa Paula West Business Park Specific Plan would include various open space and would not affect the Adams Barranca, the development would contribute (albeit to a lesser degree) to the cumulative changes in visual character of the City in combination with the other relatively large scale related projects. Therefore, as with the Project, impacts related to the views and visual character of the City as a result of the Specific Plan amendment, are considered cumulatively considerable, and significant and unavoidable.

4.1.6 MITIGATION MEASURES

The following mitigation measure would reduce the Project's potentially significant impacts to less than significant:

AES-1: Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula Planning Director for approval that identifies the types of shielding that will be used for outside lighting.

All exterior night lighting installed on the Project Site shall be of low-intensity, low-glare design, and hooded to direct light directly downward onto the area being lighted to prevent spillover onto adjacent parcels. Shielding must be included to eliminate uplighting. Exterior lighting fixtures must be kept to the minimum number and intensity needed to ensure public safety. These lights shall be dimmed after 10:00 PM to the maximum extent practical without compromising safety. Upward directed exterior lighting is prohibited.

4.1.7 RESIDUAL IMPACTS AFTER MITIGATION

The Project would result in the conversion of agricultural resources and open space to a built visual character. Impacts to scenic views and visual resources would be considered less than significant. Loss of the on-site agricultural character would be significant and unavoidable. In regard to impacts related to light and glare, implementation of **Mitigation Measure AES-1** would reduce impacts to less than significant.

4.2 AGRICULTURAL RESOURCES

This section analyzes the potential for the Santa Paula West Business Park Specific Plan, ("Specific Plan") to affect agricultural resources located within or near the Specific Plan area ("Project Site"). The analysis describes the existing agricultural resources located on and immediately surrounding the Specific Plan area, potential environmental impacts, recommended mitigation measures to help reduce or avoid identified impacts, and the level of significance of adverse impacts after mitigation.

Information presented in this section is primarily derived from site investigations conducted in 2015, the Santa Paula General Plan, and Important Farmland Inventory Mapping on record with the County of Ventura Resource Management Agency.

4.2.1 ENVIRONMENTAL SETTING

The proposed Project is in Ventura County, within the Sphere of Influence (SOI) and City Urban Restriction Boundary (CURB) for the City of Santa Paula. The proposed Project is also located within the Area of Interest of the City of Santa Paula, as defined by the Ventura Local Agency Formation Commission (LAFCo); and is designated as an Expansion Area as defined in the City's General Plan.[1]

4.2.1.1 Ventura County Agricultural Production

In terms of productivity per acre, Ventura County is one of the leading agricultural areas in the nation. The combination of fertile soil and mild climate allows high-value crops to be planted year-round. Per the Ventura County Annual Crop and Livestock Report for 2014, the estimated gross value for Ventura County agriculture for 2014 was $2,137,033,000.[2] This is an overall increase of 2.0 percent, or $42,118,000, from 2013.

The leading crops in Ventura County are shown in **Table 4.2-1, Leading Crops in Ventura County 2014.**

1 City of Santa Paula, *General Plan,* "Land Use Element" (1998). LU-24.

2 County of Ventura, *Ventura County's Crop & Livestock Report 2014* (2015). http://www.farmbureauvc.com/new/assets/pdf-forms/2014-CropReport.pdf.

Table 4.2-1
Leading Crops in Ventura County 2014

Rank	Crop	Acreage in Production	Value
1	Strawberries	11,630	$627,964,000
2	Lemons	14,926	$269,428,000
3	Raspberries	4,629	$240,662,000
4	Nursery stock	3,326	$180,499,000
5	Celery	11,003	$152,153,000
6	Avocados	19,709	$127,978,000
7	Tomatoes	466	$72,207,000
8	Peppers	4,352	$67,269,000
9	Cut flowers	736	$47,615,000
10	Kale	1,898	$35,932,000

Source: County of Ventura, Ventura County's Crop & Livestock Report 2014 (2015).

Ventura County currently has a total of 95 registered organic growers, with a total of 7,232 acres in Organic production.[3] Organic farming is defined by the United States Department of Agriculture (USDA) as "a production system that is managed to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity."[4] The federal Organic Foods Production Act of 1990 and the California Organic Products Act of 2003 set forward guidelines and standards that must be followed by any grower, handler, processor, wholesaler, or retailer who wish to sell or advertise their product as "organic."

4.2.1.2 City of Santa Paula

Agriculture plays a central role in Santa Paula's economy. Approximately 33,719 acres within Santa Paula's Area of Interest are devoted to agriculture, which is about 78 percent of the total acreage within the Area of Interest.[5] More than half (57 percent) of this acreage is used as grazing and pasture land. The remaining 43 percent of the area is generally used for growing crops, including avocados, lemons, oranges, other orchard crops, and row crops.[6]

3 County of Ventura, *Ventura County's Crop & Livestock Report 2014* (2015).
4 United Stated Department of Agriculture, *Organic Production/Organic Food: Information Access Tools*, http://www.nal.usda.gov/afsic/organic-productionorganic-food-information-access-tools.
5 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998), p. CO-8.
6 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998), p. CO-8.

Most of the land surrounding the current City limits has a long history of agricultural use. Within the Area of Interest, 196 parcels totaling 13,570 acres are under contracts for the California Land Conservation Act (LCA), also known as the Williamson Act. The LCA is a voluntary land conservation program adopted by the California Legislature in 1965 and administered by the County of Ventura since 1969 to help preserve the supply of agricultural land in the County through agricultural LCA contracts. This is about 40 percent of all the agricultural acreage in the Area of Interest. However, almost all of this area is outside the City's 2015 SOI. No land within the existing City limits is under LCA contract, and only 94 acres within the City's 2015 SOI are under contract. Within the City's proposed expansion areas, portions of West Area 2 are under contract, mostly consisting of citrus groves near the Santa Clara River.[7]

West Area 2

The agricultural industry has been entrenched in areas just west of the City for well over 100 years and agriculture is one of the most important facets of the local economy. The Land Use Element calls for no urban expansion beyond Adams Barranca to the west to maintain these areas in agriculture and to maintain the physical buffer between Santa Paula and the neighboring City of Ventura. Most of the parcels west of the City and east of Adams Barranca are not under an LCA contract. One large parcel in lemon production (located south of SR 126) is under an LCA contract. Consequently, LCA contracts do not present a significant constraint to future planning efforts affecting this area. Much of the productive agricultural land in the Santa Clara River Valley west of the current City limit is either considered prime farmland or farmland of statewide importance. Most of this area west of the City limits is prime farmland, including nearly all of the area south of the freeway and east of Adams Barranca. Based on the State's Important Farmlands Inventory system, such prime farmland has the highest potential for continued agricultural use.[8]

Furthermore, the Santa Paula–Ventura Greenbelt—the first greenbelt in Ventura County—was adopted in 1967 to maintain the land generally between the Franklin Barranca and Adams Barranca in agricultural production. As such, Adams Barranca represents the eastern reaches of the Santa Paula–Ventura Greenbelt; none of the area east of the Adams Barranca is in the Ventura–Santa Paula Greenbelt.[9]

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7 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998), CO-8.
8 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998), CO-37.
9 Ventura County Board of Supervisors, Ordinance No. 4338 (February 2006).

Soils

The suitability of soils for agricultural use depends on many factors, including fertility, slope, texture, drainage, depth, and salt content. As with most soils in the Santa Paula area, the Project Site soils are highly suitable for agriculture because of their high mineral content, good drainage, and loamy quality.[10]

Soils within the City of Santa Paula are of the Pico-Metz-Anacapa association. Soils of this association are located on level to moderate slopes; are very deep, well-drained sandy loam; and are very deep, somewhat excessively drained loamy sands. Along the Santa Clara River, soils are of the riverwash–sandy alluvial land–coastal beaches association, which tends to be located on level to gentle slopes. These soils are excessively drained to poorly drained, with material consisting of stratified sand, gravel, and cobbles.[11]

Constraints to Agricultural Production

Avocado trees are becoming increasingly difficult to grow commercially because of the presence in the baseline soil of the fungus *Phytophthora cinnamomi* (more commonly referred to as "root rot"), which cannot be eliminated. While *Phytophthora cinnamomi* has been studied for more than 60 years, no definitive elimination measures have been found. The fungus is very difficult, if not impossible, to control.

Several strategies to control the fungus have been used. These include:

- **Clean nursery strategies:** The best control for avocado root rot is to prevent introduction of the fungus into the orchard, caused by the purchasing of already infected plants from nurseries. Nurseries are aware of the infectious root rot, and those certified by the local government or local growers have taken steps to control the spread of the disease.
- **Selecting low-hazard sites:** Sites that are typically associated with root rot include the following: soil with poor drainage, high clay content, high water tables, hard pans, or clay pans; or where water pools after irrigation or rainfall.
- **Planting on mounds in more hazardous sites:** Planting on mounds on sites that are already infected with root rot would provide young trees a well-drained soil to become established in before they encounter the more hazardous surrounding soil.
- **Prevention strategies:** Groves should be fenced to protect them from human and animal traffic. The movement of soil and water from diseased groves into healthy ones should be prevented. Boxes of copper sulfate would be placed at the property entrance, and all workers and visitors would be prompted to dust their shoes with the copper sulfate before entering. Diversion furrows should be

10 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998), p. CO-10.
11 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998), p. CO-10.

dug to divert rainwater that passes through the diseased grove away from the healthy grove, and also to isolate healthy groves from diseased ones.

- **Using resistant rootstocks:** Breeding and selection programs around the world have identified rootstocks with a high degree of tolerance to root rot. Rootstocks that are resistant to the disease must be clonally propagated so that they all contain the same genetic identity. This process has the greatest possibility of successfully controlling avocado root rot in the long run.
- **Avoiding over- or underirrigation:** It is difficult to manage irrigation of avocado to benefit the avocado and not *Phytophthora cinnamomi* because avocado roots are very shallow and sensitive to drying. Overwatering an area that is already infested by the disease would only exacerbate the situation because avocado trees already damaged from the disease have fewer roots and less water intake. Overwatering would cause the disease to spread to other areas of the site that are not already infected.
- **Applying fungicides:** Two fungicides have been very successful at reducing avocado root rot: metalaxyl and fosetyl-Al (Aliette). Application of either of these two fungicides would thus help reduce avocado root rot.
- **Treating with gypsum and adding organic mulches**: The use of both methods adds needed nutrition to the soil for the consumption of the avocado trees. The trees would be vigorous and healthy and less susceptible to root rot.

Another major impact on agriculture in Ventura County is the introduction of invasive species, the presence of which can have an impact on the success and sustainability of crops. The Asian citrus psyllid is a pest that acts as a carrier, or vector, spreading huanglongbing (HLB), a devastating disease of citrus trees. This bacterial disease, which is transmitted to healthy trees by the psyllid after it feeds on infected plant tissue, has already decimated the citrus industry in Florida. The pest and disease have arrived in Ventura County, and HLB has also been found in neighboring Los Angeles County.

4.2.1.3 Project Site

The Project Site is designated as Agricultural–Urban Reserve (40-acre minimum) in the Ventura County General Plan[12] and is designated for agricultural uses with the zoning designation Agricultural Exclusive (A-E).[13] Approximately 49 acres of the 53.81-acre Project Site are currently used for agricultural production, which is farmed by two organizations, Bender Farms and McGrath Farms. Bender Farms grows avocados on approximately 9.2 acres of land and herbs on approximately 12.3 acres. McGrath Farms grows a variety of row crops on approximately 27.5 acres of land. As shown in **Figure 4.2-1, Farmland Inventory Map**, farmlands on the Project Site have been designated on the State Important Farmland

12 Ventura County General Plan, General Plan Land Use Map (April 2010). http://www.ventura.org/rma/planning/pdf/plans/General_Plan_Land-Use_Map.pdf

13 Ventura County Non-Coastal Zoning Ordinance, sec. 8104-1.2.

Map to include approximately 44.20 acres of prime farmland, 4.88 acres of farmland of statewide importance, and 4.48 acres of urban and built-up land.[14] None of the parcels within the Project Site is within a Williamson Act contract.[15]

In addition to active agricultural operations, approximately 4.5 acres of the Project Site consists of a maintenance yard and storage for farm equipment and packing crates, along with a single-family worker residence. An additional small single-family residence and storage shed are located along Telegraph Road on the western corner of the Project Site.

Adjacent Land Uses

Adjacent agricultural production occurs east, south, and west of the Project Site and is within the County of Ventura jurisdiction. The County of Ventura General Plan land use designation for adjacent agricultural lands to the east, south, and west is Agriculture (40-acre minimum). In addition, the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) Important Farmland Map designates adjacent lands to the north as Farmland of Statewide Importance, and adjacent lands to the east as prime farmland and farmland of statewide importance. Existing agriculture to the north includes citrus and avocado orchards; operations to the east include orchards and row crops along with ancillary facilities, such as packing house and a limited number of interspersed resident or farmworker housing units.

Beyond the Project Site boundary to the north are a variety of industrial uses within the City of Santa Paula, including cornerstone Molds and Machining and United Site Services. The Santa Paula Animal Clinic is located to the northeast of the Project Site. The Adams Barranca, which is adjacent to the Project Site on the southwest, contains areas with riparian vegetation. Finally, single-family residences located within Santa Paula City limits across Telegraph Road are located to the northwest of the Project Site.

4.2.2 REGULATORY SETTING

The preservation of agricultural activities and soils is an explicit goal of the USDA and the California DOC. Agricultural activities are broadly defined and include activities such as ranching. Agricultural soils are limited nonrenewable resources that are usually confined to a location. However, not all agricultural activities occur on soils classified as appropriate for agriculture, and not all soils rated as excellent farming

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14 California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, "Ventura County Important Farmland 2012" (2012). ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/ven12.pdf

15 Department of Conservation, Division of Land Resource Protection, Williamson Act Program, Map: Ventura County Williamson Act FY (Fiscal Year) 2013/2014. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Ventura_13_14_WA.pdf.

soils are used for crop production. Generally, policies implemented to preserve agriculture are aimed at either protection of the space or protection of the soil.

4.2.2.1 State

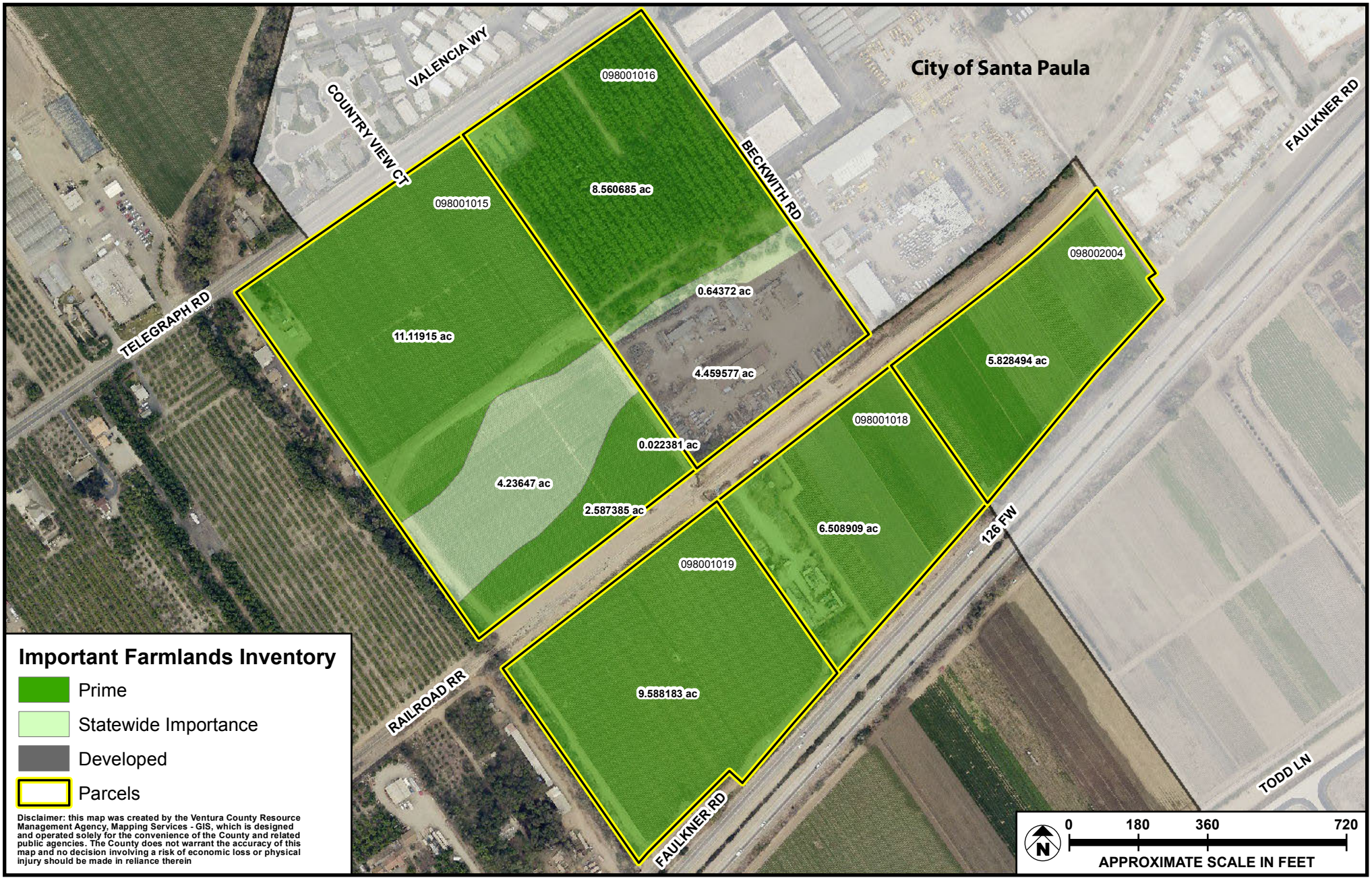
California Department of Conservation

The California Department of Conservation (DOC), Division of Land Resource Protection, and the FMMP produce maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is categorized according to soil quality and irrigation status. The maps are updated every 2 years through the review of aerial photographs, a computer mapping system, public review, and field reconnaissance.

FMMP's study area is contiguous with modern soil surveys developed by the USDA. A classification system that combines technical soil ratings and current land use is the basis for the Important Farmland Maps of these lands. Most public land areas, such as national forests and Bureau of Land Management holdings, are not mapped.

The minimum land use mapping unit is 10 acres unless otherwise specified. Smaller units of land are incorporated into the surrounding map classifications. To most accurately represent the Natural Resources Conservation Service (NRCS) digital soil survey, soil units of 1 acre or larger are depicted in Important Farmland Maps.

The FMMP utilizes the following categories to designate farmland:



SOURCE: Ventura County Resource Management Agency Information Systems - 2014

FIGURE **4.2-1**

Meridian Consultants

Farmland Inventory Map

050-002-13

Prime Farmland (P)

Farmlands with the best combination of physical and chemical features are able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the 4 years before the mapping date.

Farmland of Statewide Importance (S)

Farmlands similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years before the mapping date.

Unique Farmland (U)

Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include nonirrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the 4 years before the mapping date.

Farmland of Local Importance (L)

Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

Grazing Land (G)

Land on which the existing vegetation is suited to the grazing of livestock.

Urban and Built-up Land (D)

Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Other Land (X)

Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as other land.

Water (W)

Perennial water bodies with an extent of at least 40 acres.

Williamson Act

The California Land Conservation Act, also known as the Williamson Act, was established with the basic intent of encouraging the preservation of the state's agricultural lands in view of increasing trends toward their "premature and unnecessary" urbanization.[16] The act enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural and open space uses. In return, landowners receive reduced property tax assessments. These reduced rates are much lower than normal because they are based on farming and open space uses rather than on full-market value of the land. Local governments receive an annual subvention of forgone property tax revenues from the state via the Open Space Subvention Act.[17]

The California Department of Conservation, under the Farmland Security Zone Act passed in 1998, allows individual counties to establish an additional program for farmlands to enter into contract with the State to receive a benefit similar to Williamson Act contracts. The Farmland Security Zone Act is a 20-year, self-renewing contract that allows property owners with qualifying parcels to receive an additional 35 percent in tax savings above that which is received under the Williamson Act contract.

4.2.2.2 County of Ventura

Ventura County has adopted various programs designed to support and preserve agriculture. Agricultural preservation has been integrated into the Country's overall land use planning strategy and is a reciprocal beneficiary of many interagency regional land use planning and resource conservation programs. The principal interagency programs include the Guidelines for Orderly Development; several existing greenbelt agreements between cities and the County; and the various regional water programs.

The Ventura County Board of Supervisors also adopted a Right to Farm Ordinance intended to protect the farming community from developments that would inhibit its ability to continue agricultural production.[18] Such things as agricultural wind machines, odors, dust, and noise are the subjects of nuisance complaints by adjoining property owners. The Right to Farm Ordinance is intended to make a new purchaser of property aware that existing agricultural operations inherently have noise, odor, and other potentially

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16 California Government Code, sec. 51200-51297, California Land Conservation Act.

17 California Government Code, sec. 16140-16154, Open Space Subvention Act.

18 Ventura County. "Division 8, Chapter 1 of the Ventura County Ordinance Code." Ventura County Non-Coastal Zoning Ordinance. 2003.

annoying activities that are associated with accepted agricultural operations. The Right to Farm Ordinance is part of the Ventura County Coastal and Non-Coastal Zoning Ordinances.[19]

The County's Save Open Space and Agricultural Resources (SOAR) initiative was approved by the County Board of Supervisors on November 3, 1998. The County SOAR Ordinance requires countywide voter approval of any change to the Ventura County General Plan involving the Agricultural, Open Space, or Rural land use map designations; or any change to a General Plan goal or policy related to those land use designations.[20]

General Plan

Ventura County is one of the principal agricultural counties in the State. Ventura County has adopted a number of programs designed to preserve farmland. These programs include:[21]

- The Agricultural land use designation, which establishes a 40-acre minimum parcel size and A-E zoning;
- Participation in greenbelt agreements and the Guidelines for Orderly Development with the cities that seek to prevent urban encroachment into agricultural areas;
- Widespread use of Land Conservation Act contracts to provide tax rate reductions as an incentive for maintaining agriculture;
- Participation in numerous water resource development and conservation programs to ensure long-term availability of water for agriculture.

The Ventura County General Plan provides goals and policies intended to preserve agricultural land uses within the County as a nonrenewable resource.[22]

Agricultural Policy Advisory Committee

The Ventura Agricultural Policy Advisory Committee (APAC) was established by the Ventura County Board of Supervisors in 1976. Each of the five elected Supervisors appoints one member of the agricultural community to serve on the APAC. The APAC reviews Land Conservation Act Program applications; zoning and building regulations affecting agriculture; and all matters having direct, indirect, and cumulative

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19 Ventura County Non-Coastal Zoning Ordinance. Sec. 8183-4.1 and 8114-2.1.1.

20 County of Ventura, "SOAR Measure 'B' Ordinance" (1998), http://157.145.215.100/rma/planning/pdf/ordinances/soar_measure_b_ord.pdf.

21 Ventura County, *General Plan,* "Goals, Policies and Programs" (last amended June 28, 2011), 19.

22 Ventura County, *General Plan,* "Goals, Policies and Programs" (last amended June 28, 2011), 19–20.

effects on the county's agricultural economy, and serves in an advisory capacity to the Board of Supervisors.

APAC has also developed a number of policies to reduce land use conflicts between urban and agricultural areas. The County of Ventura Agricultural/Urban Buffer Policy requires that new development constructed adjacent to agricultural land include a 300-foot setback to new structures and sensitive uses on the nonagricultural property unless a vegetative screen is installed. With a vegetative screen, the buffer/setback is a minimum of 150 feet.[23] Additionally, a reinforced 8-foot chain-link fence with top bar is required on applicable urban developments to deter pilferage and vandalism of crops, with placement nearest the agricultural side.[24]

The Ventura County Agricultural Commissioner, as a member of the Board of Supervisors, is responsible for enforcing local ordinances, state laws and regulations, and federal laws and regulations governing the agricultural industry. The Ventura County Agricultural Commissioner administers programs including pest detection, pesticide use enforcement, land use planning, fruit and vegetable standardization, crop inspection, and crop statistics. In addition, the Commissioner is mandated to promote and protect the production, sale, and distribution of food, feed, and horticultural crops while ensuring that a clean environment is conserved, workers' health and safety are protected, and a safe, economical, and abundant food supply is preserved.

Agricultural Commissioner's Office Urban Buffer Guidelines

The Ventura County Agricultural Commissioner's Office has developed guidelines to address the interface between urban development and existing agricultural uses.[25] The purpose of these guidelines is to protect the public health, safety, and welfare of the residents of Ventura County and protect the economic viability and long-term sustainability of the Ventura County agricultural industry.

These guidelines assist in preventing and/or mitigating conflicts that may arise at the agricultural-urban interface. The guidelines should be applied where urban structures or ongoing nonfarming activities are permitted adjacent to land (1) in crop or orchard production, or (2) classified by the California Department of Conservation Important Farmland Inventory as prime, statewide importance, unique, or local importance farmland.

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23 County of Ventura, *Agricultural/Urban Buffer Policy* (July 19, 2006).
24 County of Ventura, *Agricultural/Urban Buffer Policy* (July 19, 2006).
25 Ventura County, Agricultural Commissioner, Agricultural/Urban Buffer Policy, revised July 19, 2006.

Briefly, County of Ventura Agricultural/Urban Buffer Policy includes the following provisions for new development:

- New dwellings, nonagricultural work sites and ongoing outdoor public activities potentially conflict with agricultural operations.
- A buffer/setback and fencing are therefore needed on these sites when they are developed adjacent to the qualifying agricultural land.
- A 300-foot setback to new structures and sensitive uses is required on the nonagricultural property unless a vegetative screen is installed.
- With a vegetative screen the buffer/setback is a minimum of 150-feet.
- A reinforced 8-foot chain-link fence with top bar is required on applicable urban developments to deter pilferage and vandalism of crops. Placement is nearest the agricultural side. If the agricultural field has a fence, the requirement may be satisfied.
- A mature height of 15 feet or more is required for trees.

The following uses are acceptable within 300 feet of agriculture:

- Parking lots and garages
- Landscaping/hardscape
- Storage sheds or open storage
- Greenhouse structures with venting away from the nonagricultural area
- Wooden or chain-link fencing
- Some types of livestock, such as range cattle or sheep (other livestock only as approved by APAC)
- Roads and drainage facilities
- Farmworker dwelling where notification between farmer and occupants can easily occur prior to spraying
- Low human-intensity uses as approved by APAC
- The following uses are acceptable within 150 feet of agriculture with a vegetative screen (shelter belt):
- All uses acceptable within 300 feet
- Front yard setbacks
- Hiking, bike, or bridle paths

Agriculture preservation has been integrated into the Country's overall land use planning strategy and is a reciprocal beneficiary of many interagency regional land use planning and resource conservation

programs. The principal interagency programs include the Guidelines for Orderly Development, several existing greenbelt agreements between cities and the County, and the various regional water programs.[26]

Greenbelt Agreements

Nine of Ventura County's 10 cities, the Ventura LAFCo, and the County have adopted greenbelt agreements between jurisdictions to further the objectives of the County's Guidelines for Orderly Development by preserving agriculture and open space between urban areas. The underlying purpose of a greenbelt is to establish a mutual agreement between cities regarding the limit of urban growth for each city. Annexation is discouraged within a greenbelt. Any change to those boundaries would require mutual consent between the cities and LAFCo. LAFCo will not approve a proposal from a city that is in conflict with any greenbelt agreements unless exceptional circumstances are shown to exist.[27]

Santa Paula has a greenbelt agreement with the neighboring Santa Clara River Valley cities of Ventura and Fillmore. As previously mentioned, the Santa Paula–Ventura Greenbelt—the first greenbelt in Ventura County—was adopted in 1967 to maintain the land generally between the Franklin Barranca and Adams Barranca in agricultural production. However, no northern or southern boundaries were established under this agreement. In accordance with Ventura County Ordinance No. 4338 (adopted February 2006), the amended boundaries of the Santa Paula–Ventura Greenbelt consist of approximately 27,884 acres of unincorporated territory. The greenbelt is bound on the north and south by the Areas of Interest boundaries for the Cities of Ventura and Santa Paula; on the east by the City of Santa Paula's SOI and parcel lines; and on the west by the City of Ventura's SOI and the eastern boundary of the Hillside Voter Participation Area, and parcel lines.[28] To ensure consistency, these greenbelt boundaries would be adjusted accordingly in the event of any approved expansions or reductions of the City of Santa Paula or City of Ventura SOIs.[29]

Ventura Local Agency Formation Commission

The Ventura LAFCo was formed and operates under the provisions of state law, specifically what is now known as the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 et seq.).[30] State law provides for LAFCos to be formed as independent agencies in each county in California. LAFCos implement state law requirements and state and local policies relating to boundary changes for cities and most special districts, including SOIs; incorporations;

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26 Ventura County, Agricultural Commissioner, Agricultural/Urban Buffer Policy, revised July 19, 2006.
27 Ventura Local Agency Formation Commission, "Commissioner's Handbook: Policies of the Ventura LAFCo" (November 2013).
28 Ventura County Board of Supervisors, Ordinance No. 4338 (February 2006).
29 Ventura County Board of Supervisors, Ordinance No. 4338 (February 2006).
30 Ventura Local Agency Formation Commission, "About Us" (2014). http://www.ventura.lafco.ca.gov/about-us/.

annexations; reorganizations; and other changes of organization. In this capacity, the Ventura LAFCo is the boundary agency for cities and most special districts in Ventura County.

LAFCo will approve a proposal for a change of organization or reorganization which is likely to result in the conversion of prime agricultural or open space land use to other uses only if the Commission finds that the proposal will lead to planned, orderly, and efficient development. A proposal for a change of organization or reorganization leads to planned, orderly, and efficient development only if all the following criteria are met:[31]

(a) The territory involved is contiguous to either lands developed with an urban use or lands that have received all discretionary approvals for urban development.

(b) The territory is likely to be developed within 5 years and has been prezoned for nonagricultural or open space use. In the case of very large developments, annexation should be phased wherever possible.

(c) Insufficient nonprime agricultural or vacant land exists within the existing boundaries of the agency that is planned and developable for the same general type of use.

(d) The territory involved is not subject to voter approval for the extension of services or for changing general plan land use designations. Where such voter approval is required by local ordinance, such voter approval must be obtained prior to LAFCo action on any proposal unless exceptional circumstances are shown to exist.

(e) The proposal will have no significant adverse effects on the physical and economic integrity of other prime agricultural or open space lands.

4.2.2.3 City of Santa Paula

General Plan

The Conservation and Open Space Element[32] notes that agriculture has historically been important to the economy of Santa Paula, and this importance continues today. As the area urbanizes, commercial agriculture is very slowly being replaced by other land uses. The presence of prime agricultural soils in the planning area is a natural resource that must be conserved to provide opportunities for ongoing and expanded agricultural operations.

The Conservation and Open Space Element[33] provides the following goals, objectives, and policies that are applicable to agricultural lands within the Project area:

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31 Ventura Local Agency Formation Commission, "Commissioner's Handbook: Policies of the Ventura LAFCo" (November 2013).
32 Santa Paula General Plan, Conservation and Open Space Element, p. CO-4.
33 Santa Paula General Plan, Conservation and Open Space Element, p. CO-45.

Agriculture and Soils

Goals

Goal 3.1	Preserve and protect viable agricultural lands and operations within the City and the expansion areas.
Goal 3.2	Development should be compatible with and have minimal adverse impacts upon agriculture and natural resources and should not be wasteful of scarce land.
Goal 3.3	Urban expansion should be directed away from the most productive agricultural areas.

Objectives

Objective 3(a)	Encourage low-intensity land uses and/or barriers near agricultural lands.
Objective 3(b)	Encourage the use of land for agricultural operations.
Objective 3(c)	Include areas for agriculture in the City's land use plan.

Policies

Policy 3.a.a	Preserve viable agriculture and prime agricultural lands as a greenbelt and buffer around the City.
Policy 3.b.b	Erosion of soils should be controlled and prevented during agricultural use, during storms and especially during the construction phase of new development.
Policy 3.c.c	Develop a transfer of development rights program that provides for easements for the preservation of agricultural land areas within the City's Area of Interest.

4.2.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, CEQA identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the CEQA Guidelines (Environmental Checklist Form) lists the following thresholds under which a project may be deemed to have a significant impact on agricultural resources if it would:

- 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?
- Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- Result in the loss of forestland or conversion of forestland to non-forest use?
- 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?

4.2.4 PROJECT IMPACTS

Threshold: **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?**

The City of Santa Paula follows the CDC's FMMP in identifying the conversion of state-defined prime soils and soils of statewide importance as an impact to agricultural resources. The FMMP Important Farmland Map for Ventura County identifies a total of 44.20 acres of prime farmland and 4.88 acres of farmland of statewide importance on the site (total of 49.08 acres). The Project Site is currently farmed by two organizations, Bender Farms and McGrath Farms. Bender Farms grows avocados on approximately 9.2 acres of land, and herbs on approximately 12.3 acres. McGrath Farms grows a variety of row crops on approximately 27.5 acres of land. Other areas contain the agricultural ancillary uses, such as packing facilities and equipment storage and maintenance yards, and are designated as developed.

Implementation of the Specific Plan would result in the conversion of the 49.08 acres of both prime farmland and important farmland to urbanized uses.

The loss of 49.08 acres of farmlands is considered a significant and unavoidable impact.

Threshold: **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

The County zoning designation for the Project area is Agricultural Exclusive (A-E) Urban Reserve for land currently in agricultural use. The Specific Plan area would be zoned Commercial/Light Industrial and Light Industrial in accordance with the Specific Plan's Zoning Implementation Plan and consistent with the City's Municipal Code for these designations. The development of a variety of manufacturing, research and development, office, and commercial uses that would be allowed under the Specific Plan would be

compatible with the proposed City's General Plan designations. There are no Williamson Act contracts preserving agricultural that govern any parcels within the Project area.

The Project does not include any new residential dwellings or outdoor public activities that would be directly adjacent to ongoing agricultural activities, or would front on active agricultural uses. Additionally, Adams Barranca, which contains steep slopes and a thicket of vegetation, provides a separation buffer between land containing agricultural land use and zoning designations to the west and the Project allowed light industrial and commercial uses.

The Project would not conflict with existing land use and zoning designations and would provide appropriate buffers to the west along the Adams Barranca along the Santa Paula/San Buenaventura Greenbelt. Therefore, potential impacts related to consistency with zoning and Williamson Act contracts would be less than significant.

Threshold: **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

Forest land is defined as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

"Timberland" is defined as land, other than land owned by the federal government and land designed by the board as experimental forest land, that is available for and capable of growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species must be determined by the board on a district basis.

"Timberland production zone" (TPZ) is defined as an area that has been zoned pursuant to Government Code Section 51112 or Section 51113[34] and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in Government Code Section 51104(h). With respect to the general plans of cities and counties, "timberland preserve zone" means "timberland production zone."

34 Government Code, ch. 6.7,Timberland, sec. 51112 and 51113.

The Project Site would be zoned C/LI (Commercial Light Industrial) and LI (Light Industrial) for areas that would be developed under the Specific Plan. The Adams Barranca and related detention basin used for flood control would be preserved with an Open Space/Passive zoning designation.

The Project Site is not zoned as forestland or timberland, and there is no timberland production within the vicinity of the Proposed Project. Therefore, there would be no impacts related to timberland.

Threshold: Result in the loss of forestland or conversion of forestland to non- forest use?

As described previously, the Project does not include any loss of forestland or conversion of such forestland to any other designations. No impacts would occur.

Threshold: Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forestland to non-forest use?

On-Site Agriculture

As stated previously, approximately 49 acres of the 54-acre Project Site are under agricultural cultivation and would be taken out of production as a result of implementation of the Specific Plan. This includes approximately 9.2 acres of avocados, 12.3 acres of herbs, and 27.5 acres of other miscellaneous row crops. These areas would be developed with an office/industrial/business park that includes a variety of manufacturing, research and development, professional office, and limited commercial uses. Development under the Specific Plan would result in the loss of 49 acres of land currently under agricultural cultivation, of which 44 acres consists of prime farmland, and approximately 5 acres consists of farmland of statewide importance This farmland conversion is considered a significant and unavoidable impact.

Adjacent Agriculture

As stated previously, existing agricultural lands producing avocados, citrus fruits, and a variety of row crops are located south of the Specific Plan area, south of State Route (SR) 126, and near the western boundary of the Specific Plan area, west of Adams Barranca. Agricultural operations to the south are separated from the Project Site by SR 126. SR 126 includes a transportation corridor that is approximately 160 feet wide and is raised above the existing grades of the Project Site and agricultural land to the south. There is no land use connectivity between the Project Site and these agricultural lands. Furthermore, portions the agricultural lands south of SR 126 are also within the City's CURB and the West Area 2 Expansion area, which would allow for future planning for similar light industrial uses as would occur under the Santa Paula West Specific Plan.

The Santa Paula/San Buenaventura Greenbelt, which consists predominantly of Agriculture land, is located to the west of the Project area outside of the existing City limits. At the interface of the Project and this greenbelt, the Specific Plan Open Space designation of 3.8 acres includes a linear open space area along the west boundary that would be used as a greenway for biological protection, passive recreation, and flood control. In addition, a vegetative screen, based on standards established by the Agricultural Commissioner's County of Ventura Agricultural/Urban Buffer Policy (as revised on July 19, 2006), will be implemented as part of the Specific Plan to further separate the Specific Plan development from the agricultural uses to the west. The Project does not include any new residential dwellings or outdoor public activities that would be directly adjacent to ongoing agricultural activities, nor would it front on active agricultural uses. This separation would reduce the potential for incidents of vandalism, pilferage, trespassing, and complaints against standard legal agricultural practices to adjacent agricultural uses. Furthermore, the light industrial and commercial uses that serve the light industrial facilities are not considered sensitive uses as the occupants would be within enclosed structures and typically on-site during working hours only. The Specific Plan would not readily accommodate outdoor recreational activities for the general public or provide residential habitation components. As such, residents and general public exposure to dust, noise, and odors associated with nearby farming activities is considered less than significant. Therefore, based on the nature of the Project and design features to reduce any conflicts with adjacent agricultural land, potential impacts related to the conversion of off-site farmland to nonagricultural uses would be less than significant.

4.2.5 CUMULATIVE IMPACTS

Cumulative and growth-inducing impacts will likely result from the conversion of farmland to urban uses countywide as the increase in the number of dwelling units, population, and employment continues to 2020. Within the unincorporated area of Ventura County, any project that would result in the direct and/or indirect loss of agricultural soils is considered as having a contribution to a significant cumulative impact. Although the Ventura County General Plan contains policies and programs that serve to partially mitigate the cumulative impact, the impact cannot be reduced to a less than significant level. Therefore, the loss of prime farmland within the Project area and within Ventura County is considered a significant and unavoidable impact.

Implementation of the Project would reduce avocado, herb, and row crop production locally and within the County. The loss of approximately 49.08 acres would represent a fraction of a percent of the 93,376 acres of agricultural land harvested in the County in 2014. Of the 23,012 acres of avocado and cilantro harvested in the County in 2014, the Project would represent approximately 0.20 percent. However, the Project would contribute to the conversion of agricultural lands in the County to nonagricultural uses.

Implementation of the General Plan would result in a long-term commitment to nonagricultural uses in areas that currently support prime soils, particularly within the flatland expansion areas (West Area 2 and East Area 2). Since developed of proposed land uses within the expansion areas would occur over most prime and statewide important farmland, it is assumed that all prime soils within these areas could be impacted or rendered infeasible for further agricultural production. The loss of high-quality agricultural soils, while only a small percentage of the total prime and statewide importance agricultural land in Ventura County, is considered both individually and cumulatively significant.

4.2.6 MITIGATION MEASURES

The City of Santa Paula does not propose to require implementation of agricultural mitigation for projects within the Santa Paula West Business Park Area. This determination is made based on the following reasons:

1. The City of Santa Paula recognized the loss of this agricultural land with the designation of the site for development in the General Plan. The Project Site is identified in the General Plan as a part of the West Area 2 Expansion Area. The City's General Plan Land Use Element currently designates the Project Site for Mixed-Use Commercial/Light Industrial uses.

2. The preservation of other existing agricultural land through purchase of conservation easements does not mitigate the loss of the land in question. The only way to mitigate the loss would be to preserve the land in question by preventing development.

3. The City has neither an established program under which agricultural mitigation fees could be collected and dispersed nor any policy to require such a program.

4. The cost of such agricultural mitigation is not considered economically feasible. This impact has been found to be significant and unavoidable, and a statement of overriding considerations will be adopted for approval of the Project.

4.2.7 RESIDUAL IMPACTS AFTER MITIGATION

Implementation of the Santa Paula West Specific Plan would result in the conversion of Prime Farmland and Important Farmland, and cultivated farmland. The conversion of these lands cannot be fully mitigated with conservation elsewhere and would result in significant and unavoidable adverse impacts to agricultural resources. Other agricultural impacts would be less than significant.

4.3 AIR QUALITY

This section evaluates potential air quality impacts of the Project. The ambient air quality of the local and regional area is provided along with the federal, state, and local air pollutant standards. Various federal, state, regional, and local programs and regulations related to anticipated air quality impacts are also discussed in this Section. Emission calculations and air quality modeling completed for the Project are contained in **Appendix 4.3, Air Quality and Greenhouse Gas Emissions Model Output.**

4.3.1 EXISTING CONDITIONS

Air Pollutants

Air pollutant emissions within Ventura County are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack at a facility. Area sources are widely distributed and include sources such as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, parking lots, and some consumer products.

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as on road or off road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircrafts, ships, trains, and self-propelled construction equipment.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles. The main sources of pollutants near the Project Area include mobile emissions generated from on-road vehicles. Traffic-congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). Localized areas where ambient concentrations exceed state and/or federal standards are termed CO “hotspots.”

The US Environmental Protection Agency (USEPA) is the federal agency responsible for setting the National Ambient Air Quality Standards (NAAQS). The air quality of a region is considered to be in attainment of the NAAQS if the measured ambient air pollutant levels are not exceeded more than once per year, except for ozone, particulate matter (PM10), and fine particulate matter (PM2.5) and those based on annual averages or arithmetic mean. The NAAQS for ozone, PM10, and PM2.5 are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The California Air Resources Board (CARB) is the state agency responsible for setting the California Ambient Air Quality Standards (CAAQS). Air quality of a region is considered to be in attainment of the CAAQS if the measured ambient air pollutant levels for ozone, CO, nitrogen dioxide (NO2), sulfur dioxide (SO2), PM10, PM2.5, and lead are not exceeded, and all other standards are not equaled or exceeded at any time in any consecutive 3-year period.

While volatile organic compounds (VOCs) are not considered to be criteria pollutants, they are widely emitted from land use development projects and participate in photochemical reactions in the atmosphere to form O3. Therefore, VOCs are relevant to the Project and are of concern in the Air Basin. The criteria air pollutants relative to the Project and of concern in the Air Basin are briefly described as follows:

- **Ozone (O3).** O3 is a gas that is formed when VOCs and nitrogen oxides (NOx), both byproducts of internal combustion engine exhaust and other sources, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- **Volatile organic compounds (VOCs).** VOCs are compounds comprised primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Adverse effects on human health are not caused directly by VOCs, but rather by reactions of VOCs to form secondary air pollutants, including ozone. VOCs are also referred to as reactive organic compounds (ROCs) or reactive organic gases (ROGs). VOCs themselves are not "criteria" pollutants, however, they contribute to the formation of O3.
- **Nitrogen dioxide (NO2).** NO2 is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO). NO2 is also a byproduct of fuel combustion. The principle form of NOx produced by combustion is NO, but NO reacts quickly to form NO2, creating the mixture of NO and NO2 referred to as NOx. NO2 acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NOx is only potentially irritating. NO2 absorbs blue light, the result of which is a brownish-red cast to the atmosphere and reduced visibility.
- **Carbon monoxide (CO).** CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, and motor vehicles operating at slow speeds are the primary source of CO in the Air Basin, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- **Sulfur dioxide (SO2).** SO2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high-sulfur–content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO2 oxidizes in the atmosphere, it forms sulfates (SO4).
- **Respirable particulate matter (PM10).** PM10 consists of extremely small, suspended particles or droplets 10 microns or smaller in diameter. Some sources of PM10, like pollen and windstorms, are naturally occurring. However, in populated areas, most PM10 is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.
- **Fine particulate matter (PM2.5).** PM2.5 refers to particulate matter that is 2.5 microns or smaller in size. The sources of PM2.5 include fuel combustion from automobiles, power plants, wood burning,

industrial processes, and diesel-powered vehicles such as buses and trucks. These fine particles are also formed in the atmosphere when gases such as SO2, NOx, and VOCs are transformed in the air by chemical reactions.

- **Lead (Pb).** Pb occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles, so most such combustion emissions are associated with off-road vehicles such as racecars that use leaded gasoline. Other sources of Pb include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters.

The NAAQS and CAAQS for each of the monitored pollutants and effects on health are summarized in **Table 4.3-1, Ambient Air Quality Standards.**

Table 4.3-1
Ambient Air Quality Standards

Air Pollutant	Concentration/Averaging Time State Standard (CAAQS)	Concentration/Averaging Time Federal Primary Standard (NAAQS)	Most Relevant Health Effects
Ozone	0.09 ppm, 1-hour 0.070 ppm, 8-hour	0.075 ppm, 8-hour	(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage
Nitrogen dioxide	0.18 ppm, 1-hour 0.030 ppm, annual	100 ppb, 1-hour 0.053 ppm, annual	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric discoloration
Carbon monoxide	20 ppm, 1-hour 9.0 ppm, 8-hour	35 ppm, 1-hour 9 ppm, 8-hour	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) Possible increased risk to fetuses

Air Pollutant	Concentration/Averaging Time State Standard (CAAQS)	Federal Primary Standard (NAAQS)	Most Relevant Health Effects
Sulfur dioxide	0.25 ppm, 1-hour 0.04 ppm, 24-hour	75 ppb, 1-hour 0.14 ppm, 24-hour	Bronchoconstriction accompanied by symptoms, which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma
Respirable particulate matter	50 µg/m^3, 24-hour 20 µg/m^3, annual	150 µg/m^3, 24-hour 50 µg/m^3, annual	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature birth
Fine particulate matter	12 µg/m^3, annual	35 µg/m^3, 24-hour 15 µg/m^3, annual	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature birth
Lead	1.5 µg/m^3, 30-day	0.15 µg/m^3, 3-month rolling	(a) Learning disabilities; and (b) Impairment of blood formation and nerve conduction
Visibility-reducing particles	In sufficient amount such that the extinction coefficient is greater than 0.23 inverse kilometers at relative humidity less than 70 percent, 8-hour average (10 AM–6 PM)	N/A	Visibility impairment on days when relative humidity is less than 70 percent
Sulfates	25 µg/m^3, 24-hour	N/A	(a) Decrease in lung function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardiopulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; and (f) Property damage
Hydrogen sulfide	0.03 ppm, 1-hour	None	Odor annoyance
Vinyl chloride	0.01 ppm, 24-hour	None	Known carcinogen

Source: SCAQMD, 2012 Air Quality Management Plan, (2012, Table 2-1, p. 2-3). California Air Resources Board, California Ambient Air Quality Standards (CAAQS), http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm.
Notes: µg/m^3 = microgram per cubic meter; NAAQS = National Ambient Air Quality Standards; ppm = parts per million by volume.

The EPA and CARB designate air basins where ambient air quality standards are exceeded as "nonattainment" areas. If standards are met, the area is designated as an "attainment" area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered

"unclassified." Federal nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

The status of the Ventura County portion of the Air Basin pertaining to NAAQS attainment is summarized in **Table 4.3-2, National Ambient Air Quality Standard Designations—Ventura County.**

Table 4.3-2
National Ambient Air Quality Standard Designations—Ventura County

Pollutant	Designation/Classification
Ozone 8-hour (O3)	Nonattainment
Carbon monoxide (CO)	Unclassified/Attainment
Nitrogen dioxide (NO2)	Unclassified/Attainment
Sulfur dioxide (SO2)	Attainment
Respirable particulate matter (PM10)	Unclassified
Fine particulate matter (PM2.5)	Unclassified/Attainment
Lead (Pb)	Unclassified/Attainment

Source: USEPA, "Region 9: Air Programs, Air Quality Maps," (December 2015), https://www3.epa.gov/region9/air/maps/.

The status of the Air Basin pertaining to attainment with the CAAQS is summarized in **Table 4.3-3**, **California Ambient Air Quality Standards Designations—Ventura County.**

Table 4.3-3
California Ambient Air Quality Standard Designations – Ventura County

Pollutant	Designation/Classification
Ozone (O3)	Nonattainment
Carbon monoxide (CO)	Attainment
Nitrogen dioxide (NO2)	Attainment
Sulfur dioxide (SO2)	Attainment
Respirable particulate matter (PM10)	Nonattainment
Fine particulate matter (PM2.5)	Attainment
Lead (Pb)	Attainment
Sulfates (SO4)	Attainment
Hydrogen sulfide (H2S)	Unclassified
Visibility-reducing particles	Unclassified

Source: California Air Resources Board, "Area Designations Maps/State and National" (December 2015), https://www3.epa.gov/region9/air/maps/.

Ambient air quality is determined by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The South Central Coast Air Basin ("Basin") has low mixing heights and light winds, which help to accumulate air pollutants. The average daily emissions inventory for the entire Basin and the Ventura County portion of the Basin is summarized in **Table 4.3-4, Regional Average Emissions in 2012**. As shown, exhaust emissions from mobile sources generate the majority of ROGs, oxides and nitrogen (NOx), and CO in Ventura County. Area-wide sources generate the most airborne particulates (i.e., PM10 and PM2.5).

Table 4.3-4
Regional Average Emissions in 2012

	Emissions in Tons per Day					
Emissions Source	**ROG**	**CO**	**NOx**	**SOx**	**PM10**	**PM2.5**
			Ventura County			
Stationary Sources	6.8	3.4	2.1	0.2	0.6	0.4
Area-wide Sources	10.9	14.4	1.4	0.1	13.4	3.8
Mobile Sources	15.4	124.0	26.3	0.3	2.2	1.5
Natural Sources	40.4	150.6	2.3	1.2	15.2	12.9
Total Emissions	**73.5**	**292.4**	**32.2**	**1.8**	**31.3**	**18.5**
			South Central Coast Air Basin			
Stationary Sources	19.2	12.0	8.4	1.5	2.0	1.1
Area-wide Sources	26.9	31.8	3.1	0.1	36.9	9.0
Mobile Sources	31.1	285.0	59.1	0.5	4.4	2.9
Total Emissions	**77.1**	**328.8**	**70.6**	**2.2**	**43.3**	**13.0**

Source: California Air Resources Board, Published 2013, www.arb.ca.gov/app/emsinv/emseic1_query.php.
Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOX = sulfur oxide.

Measurements of ambient concentrations of the criteria pollutants are used by the USEPA and the CARB to assess and classify the air quality of each regional air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and state standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in "attainment" for that pollutant. If the pollutant concentration meets or exceeds the standard (depending on the specific standard for the individual pollutants), the area is classified as being in

"nonattainment."[1] If not enough data is available to determine whether the standard is exceeded in an area, the area is designated "unclassified."

The USEPA and the CARB use different standards for determining whether an air basin or county is an attainment area. Under national standards, Ventura County is currently classified as nonattainment area for 8-hour ozone concentrations. Ventura County is in attainment or designated as unclassified for all other pollutants under national standards. Under state standards, Ventura County is designated as a nonattainment area for ozone (O3) and PM10, and an attainment area for all other pollutants.

Existing Local Air Quality

The Ventura County Air Pollution Control District (VCAPCD) monitors ambient air pollutant concentrations through a series of monitoring stations located throughout the County. These stations are located in Thousand Oaks, El Rio, San Buenaventura (two stations), Piru, Ojai, Simi Valley, and on Anacapa Island. In addition, the CARB operated a monitoring station in western Ventura County. The City of Santa Paula is located between El Rio and Piru monitoring stations. The El Rio station measures ambient concentrations of O3, PM10, PM2.5, and NO2. Ambient concentrations of ozone and PM2.5 are measured at the Piru station.

Table 4.3-5, Local Ambient Air Quality—El Rio and Piru Monitoring Stations, identifies the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at the El Rio and Piru monitoring stations during the period 2012 through 2014, which the most recent data available from CARB.

1 National Ambient Air Quality Standards (other than ozone, particulate matter, and those based on annual averages or annual mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average above the standard is less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. California Ambient Air Quality Standards for ozone, CO, sulfur dioxide (SO2) (1- and 24-hour), nitrogen dioxide (NO2), PM10, PM2.5, and visibility reducing particles are values that are not to be exceeded. Standards for all other pollutants are not to be equaled or exceeded.

Table 4.3-5
Local Ambient Air Quality—El Rio and Piru Monitoring Stations

Pollutant	Standards	Year 2012	2013	2014
El Rio Monitoring Station				
Ozone (O3)				
Maximum 1-hour concentration monitored (ppm)		0.082	0.067	0.112
Maximum 8-hour concentration monitored (ppm)		0.065	0.063	0.077
Number of days exceeding state 1-hour standard	0.09 ppm	0	0	1
Number of days exceeding state 8-hour standard	0.070 ppm	0	0	2
Number of days exceeding federal 8-hour standard	0.075 ppm	0	0	1
Nitrogen Dioxide (NO2)				
Maximum 1-hour concentration monitored (ppb)		57.0	40.0	39.0
Annual average concentration monitored (ppb)		7	7	6
Number of days exceeding state 1-hour standard	0.18 ppm	0	0	0
Respirable Particulate Matter (PM10)				
Maximum 24-hour concentration monitored (µg/m^3)		56.9	46.7	51.3
Annual average concentration monitored (µg/m^3)		21.0	24.3	*
Number of samples exceeding state standard	50 µg/m^3	0	0	0
Number of samples exceeding federal standard	150 µg/m^3	0	0	0
Fine Particulate Matter (PM2.5)				
Maximum 24-hour concentration monitored (µg/m^3)		30.8	22.2	22.2
Annual average concentration monitored (µg/m^3)		8.7	9.4	9.3
Number of samples exceeding federal standard	35 µg/m^3	0	0	0
Number of samples exceeding state standard	12 µg/m^3	0	0	0
Piru Monitoring Station				
Ozone (O3)				
Maximum 1-hour concentration monitored (ppm)		0.082	0.067	0.112
Maximum 8-hour concentration monitored (ppm)		0.076	0.082	0.082
Number of days exceeding state 1-hour standard	0.09 ppm	0	0	1
Number of days exceeding state 8-hour standard	0.070 ppm	14	3	9
Number of days exceeding federal 8-hour standard	0.075 ppm	1	2	5
Fine Particulate Matter (PM2.5)				
Maximum 24-hour concentration monitored (µg/m^3)		23.8	23.6	23.8
Annual average concentration monitored (µg/m^3)		—	7.5	9.6
Number of samples exceeding federal standard	35 µg/m^3	0	0	0
Number of samples exceeding state standard	12 µg/m^3	0	0	0

Source: California Air Resources Board, Air Quality & Emissions, http://www.arb.ca.gov/adam/topfour/topfour1.php
Notes: µg/m^3 = micrograms per cubic meter of air; ppm = parts per million by volume of air.
El Rio station measures ambient concentrations of O3, PM10, PM2.5, and NOx. Piru station measures ambient concentrations of O3 and PM2.5.
**Insufficient data available to determine the value.*

Valley Fever

The San Joaquin Valley Fever is an infectious disease caused by the fungus *Coccidioides immitis*. San Joaquin Valley Fever, commonly known as Valley Fever, manifests itself as an infection that enters the body through inhalation of the *Coccidioides immitis* spores that have become airborne when dry, dusty soil or dirt is disturbed by wind, construction farming, or other activities. The Valley Fever fungus tends to be found at the base of hillsides' undisturbed soil. It usually grows in the top few inches of soil, but can grow down to 12 inches. Infection from the fungus is most frequent during summers that follow a rainy winter or spring, especially after wind and dust storms. Valley Fever infection commonly occurs in arid and semiarid areas of the western hemisphere. In Ventura County, the Valley Fever fungus is most prevalent in the County's dry, inland regions.

In its progressive form, Valley Fever may cause a chronic infection of many organs, including the skin, lymph glands, spleen, liver, bones, kidneys, and brain. In its primary form, symptoms appear as a mild upper respiratory infection, acute bronchitis, or pneumonia. The most common symptoms are fatigue, cough, chest pain, fever, rash, headache, and joint aches. In the remaining 40 percent, symptoms range from mild to severe. Individuals most vulnerable to Valley Fever are agricultural workers, construction and road workers, and archeologists, because they are exposed to the soil where the fungus might be just below the surface.

Sensitive Receptors

Some population groups, such as children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases, are considered more sensitive to air pollution than are others. Sensitive receptors within a 1-mile radius of the Project Site include schools, daycare facilities, recreational parks and places of worship. Sensitive receptors in the vicinity of the Project Site include single-family residences to the north across Telegraph Road, and scattered residences to the immediate west.

Aside from residential units, the following sensitive receptors in the surrounding area were also identified:

Schools

- Blanchard Elementary School, 115 North Pack Road, Santa Paula, 0.46 miles
- Westside Baptist Preschool, 673 West Santa Paula Street, 0.8 miles
- Glen City Elementary School, 141 South Steckel Drive, Santa Paula, 0.89 miles

Daycare Facilities

- Tolley Family Daycare, 15257 West Telegraph Road, Santa Paula, 0.41 miles

Recreational Parks

- Mountain View RV Park, 714 West Harvard Boulevard, Santa Paula, 0.43 miles
- Teague Park, 484 W Harvard Blvd, Santa Paula, 0.74 miles

Places of Worship

- Life Way Baptist Church, 673 West Santa Paula Street, Santa Paula, 0.78 miles
- Church of Christ, 276 West Santa Paula Street, Santa Paula, 1.0 mile

Existing Annexation Area Emissions

The Santa Paula West Business Park Specific Plan (Specific Plan) area is located within the Ventura County LAFCo Sphere of Influence (SOI) for the City of Santa Paula and the City of Santa Paula CURB with frontage along State Route (SR) 126 and Telegraph Road and is bisected by the railroad right-of-way. While it is just west of the Santa Paula City limits (as of 2008), the area is within the City of Santa Paula SOI, and is outside of the Santa Paula – Ventura Greenbelt. Annexation of the Santa Paula West Business Park into the City is planned to occur as part of the Specific Plan approval process.

The Specific Plan area is located west of the City of Fillmore, and east of the City of Buenaventura in the Santa Clara River Valley. It is bound by agriculture to the south, existing industrial and commercial development in the existing City limits to the east, and the Adams Barranca to the west. Regional access to Santa Paula West is provided by SR 126, with local access provided by Telegraph Road, Beckwith Road, Clow Road, and Todd Lane.

4.3.2 REGULATORY SETTING

Federal

The USEPA is responsible for the implementation of portions of the Clean Air Act (CAA) of 1970, which regulates certain stationary and mobile sources of air emissions and other requirements. Charged with handling global, international, national, and interstate air pollution issues and policies, the USEPA sets national vehicle and stationary source emission standards, oversees the approval of all state Implementation Plans,[2] provides research and guidance for air pollution programs, and sets NAAQS.[3] NAAQS for the six common air pollutants (ozone, PM10 and PM2.5, NO2, CO, Pb, and SO2) are identified in the CAA.

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2 A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards (NAAQS).

3 The NAAQS were established to protect public health, including that of sensitive individuals; for this reason, the standards continue to change as more medical research becomes available regarding the health effects of the criteria pollutants. The primary NAAQS defines the air quality considered necessary, with an adequate margin of safety, to protect the public health.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA that are most applicable to the Project include Title I, Nonattainment Provisions, and Title II, Mobile Source Provisions.

The NAAQS were also amended in July 1997 to include an 8-hour standard for ozone and to adopt a NAAQS for PM2.5. The NAAQS were amended in September 2006 to include an established methodology for calculating PM2.5, as well as to revoke the annual PM10 threshold. The CAA includes the following deadlines for meeting the NAAQS within the South Coast Air Basin: (1) PM2.5 by the year 2014; and (2) 8-hour ozone by the year 2023. Although the deadline for federal 1-hour ozone standard has passed and the South Coast Air Basin has yet to attain those standards, it is continuing to implement the 2007 Air Quality Management Plan (AQMP) to attain these standards as soon as possible.

State

California Air Resources Board

The California CAA, signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practicable date. The CARB, a part of the California EPA, is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, the CARB conducts research, sets State ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. The CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. **Table 4.3-1** includes the CAAQS currently in effect for each of the criteria pollutants as well as other pollutants recognized by the state. As shown in **Table 4.3-1**, the CAAQS includes more stringent standards than the NAAQS.

The Project Site is located within the SOI and the CURB boundary of the City of Santa Paula with frontage along SR 126, a major east–west route travelled by heavy duty, diesel-fueled vehicles, as well as other motor vehicles, as well as Telegraph Road and is bisected by the railroad right-of-way. Diesel-fueled vehicles are a source of diesel exhaust particulate matter (DPM), which CARB has designated as a toxic air contaminant (TAC). In addition, motor vehicles are a source of other TACs that can contribute to health effects. CARB has determined that health effects are generally elevated near heavily traveled roadways. The CARB *Air Quality and Land Use Handbook* states, “Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with

regional air pollution in urban areas."[4] The *Air Quality and Land Use Handbook* cites several studies linking adverse respiratory health effects (e.g., asthma) to proximity to roadways with heavy traffic densities, where the distances between the roadway and the receptors were 300 to 1,000 feet. Other studies suggest that such impacts diminish with distance, and a substantial benefit occurs if the separation distance is greater than 300 to 500 feet.

The *Air Quality and Land Use Handbook*, which is intended to serve as a general reference guide for planning agencies to evaluate and reduce air pollution impacts associated with new projects that go through the land use decision-making process, contains general recommendations that may reduce potential health impacts by establishing a buffer zone or setback between sensitive land uses and sources of TACs. Specifically, with respect to land uses located near freeways and other heavily traveled roadways, CARB recommends that lead agencies avoid citing new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.

Local

Ventura County Air Pollution Control District

The City of Santa Paula is located within the South Central Coast Air Basin (Basin), which includes all of Ventura, Santa Barbara, and San Luis Obispo Counties. The VCAPCD is the agency principally responsible for comprehensive air pollution control in the Ventura County portion of the Basin. To that end, the VCAPCD, a regional agency, works directly with the Southern California Association of Governments (SCAG), the Ventura County Transportation Commission, and local governments, and cooperates actively with all State and federal government agencies. The VCAPCD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

Air Quality Management Plan

The VCAPCD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the VCAPCD in 2008. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high pollutant levels of pollutants in the Basin, to meet federal and state air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It identifies the control measures that will be implemented to reduce major sources of

4 California EPA, California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, (2005, 8).

pollutants. These planning efforts have substantially decreased the population's exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the County.

The future air quality levels projected in the 2007 AQMP are based on several assumptions. For example, the VCAPCD assumes that general new development within the County will occur in accordance with population growth and transportation projections identified by County staff.

VCAPCD Rule Rules and Regulations

As stated above, the VCAPCD develops rules and regulations and establishes permitting requirements for specific pollutant sources. These rules and regulations implement the air pollution control strategies of the AQMP. A number of rules, which govern the existing uses within the Santa Paula West site, will also be applicable to the development allowed under the Santa Paula West Business Park Specific Plan. Mainly, VCAPCD Rule 55 for the control of fugitive dust associated with man-made conditions such as disturbed surface areas, bulk material handling, earth moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations. VCAPCD Rule 50, Opacity, and VCAPCD Rule 51, Nuisance, are applicable to emissions generated by construction-related and operational activities. VCAPCD Rules, 50, 51, and 55 are applicable to all development under the Santa Paula West Business Park Specific Plan. Other rules would be applicable to the individual operational sources (such as light industrial use operators) that could occur within the Project Site.

Ventura County Air Quality Assessment Guidelines

Although the VCAPCD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with plans and new development projects within the County. Instead, the VCAPCD has used its expertise and prepared the Ventura County Air Quality Assessment Guidelines to indirectly address these issues in accordance with the projections and programs of the AQMP. The purpose of the Ventura County Air Quality Assessment Guidelines is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin. Specifically, the Ventura County Air Quality Assessment Guidelines explains the procedures that the VCAPCD recommends be followed during environmental review processes required by CEQA. The Ventura County Air Quality Assessment Guidelines provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. The VCAPCD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the County, and adverse impacts will be minimized.

City of Santa Paula

Local jurisdictions, such as the City of Santa Paula, have the authority and responsibility to reduce air pollution through its police powers and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Santa Paula is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals.

General Plan

Conservation and Open Space Element

Pursuant to the Government Code, the Santa Paula General Plan Conservation and Open Space Element identified and plans for the open space and natural resources that are available in the Santa Paula planning area and addresses the legal mandates and requirements for natural resources. Air quality is considered a natural resource and goals, objectives, and policies for the protection of air quality are included within the Conservation and Open Space Element.

Municipal Code

The City of Santa Paula Municipal Code (SPMC)[5] provides regulations to control air emissions by transportation control measures that save vehicle miles driven through alternative modes of transportation that will aid in reducing pollution. This ordinance requires employers of 50 to 99 people to provide information on alternative transportation to work instead of the single occupant vehicle used by most people. Employers of 100 or more workers will have to provide the aforementioned information plus other more substantial measures, such as reserved vanpool spaces, bike lockers, showers, etc.

4.3.3 THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines (Environmental Checklist Form), a project may have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of the air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- 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 that exceed quantitative thresholds for ozone precursors)?

5 SPMC § 16.108.

- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting substantial number of people?

In accordance with CEQA and the CEQA review process, the City of Santa Paula assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits and monitors, and enforces implementation of such mitigation. However, the City does not have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards. Instead, the City relies upon the expertise of the VCAPCD and utilizes the Ventura County Air Quality Assessment Guidelines as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

The thresholds discussed below are currently recommended by the VCAPCD in the Ventura County Air Quality Assessment Guidelines to translate the State CEQA Guidelines thresholds into numerical values or performance standards.

Criteria to Determine Consistency with the AQMP

For general development projects, the VCAPCD recommends that consistency with the current AQMP be determined by comparing the population generated by the project to the population projections used in the development of the AQMP. Inconsistency with these projections could jeopardize attainment of the air quality conditions projected in the AQMP and is considered a significant impact.

Criteria to Identify a Violation of Air Quality Standards or a Substantial Contribution to an Air Quality Violation

Construction Period Emissions

Construction–related activities are generally short-term in duration, and the VCAPCD does not recommend any thresholds of significance for their associated emissions. Instead, the VCAPCD bases the determination of significance on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended by the Ventura County Air Quality Assessment Guidelines are implemented for a project, then construction emissions are not considered significant.

Operational Emissions – Daily Regional Emissions of ROG and NOx

The VCAPCD currently recommends that projects located everywhere in Ventura County outside of the Ojai Planning Area with operational emissions that exceed any of the following emissions thresholds should be considered significant:

- 25.0 pounds per day of ROG
- 25.0 pounds per day of NOx

Criteria to Identify a Cumulatively Considerable Net Increase in Criteria Pollutants

The VCAPCD recommends that any operational emissions from individual projects that exceed the project-specific thresholds of significance identified above be considered cumulatively considerable. These thresholds apply to individual development projects only; they do not apply to the emissions generated by related projects. The VCAPCD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

Criteria to Evaluate the Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

The VCAPCD currently recommends that impacts to sensitive receptors be considered significant when localized CO concentrations at sensitive receptors located near congested intersections exceed the national or state ambient air quality standards. These thresholds would also apply to the contribution of emissions associated with cumulative development.

Toxic Air Contaminants

The VCAPCD significance thresholds for cancer risk is greater than 10 in one million and for noncarcinogenic toxic air pollutants, including chronic (long term) and acute (short term) being greater than 1 in the Hazard Index. Since noncriteria pollutants do not have ambient standards, impacts from TACs may be estimated by conducting a health risk assessment (HRA) to determine if people might be exposed to those types of pollutants at unhealthy levels. The risk assessment process identifies the types and amounts of hazardous substances the project could emit to the environment, estimate worst-case concentrations of project emissions using air dispersion modeling, estimate potential pollutant exposure through inhalation, ingestion, and dermal contact, and characterize potential health risks by comparing worst-case exposure with established significance levels.

San Joaquin Valley Fever

There is no recommended threshold for a significant San Joaquin Valley Fever impact. However, listed below are factors that may indicate a project's potential to create significant Valley Fever impacts:

- Disturbance of the top soil of undeveloped land (to a depth of about 12 inches)
- Dry, alkaline, sandy soils

- Virgin, undisturbed, nonurban areas
- Windy areas
- Archaeological resources probable or known to exist in the area (Native American midden sites)
- Special events (fairs, concerts) and motorized activities (motocross track, all-terrain vehicle activities) on unvegetated soil (nongrass)
- Nonnative population (i.e., out-of-area construction workers)

The lead agency should consider the factors above that are applicable to the project or the project site. The likelihood that the Valley Fever fungus may be present and impact nearby land uses (or the project itself) increases with the number of the above factors applicable to the project or the project site. Based on these or other factors, if a lead agency determines that project activities may create a significant Valley Fever impact, the District recommends that the lead agency consider the "Valley Fever Mitigation Measures," of the VCAPCD Guidelines. These mitigation measures focus on fugitive dust control to minimize fungal spore entrainment, as well as minimizing worker exposure.

Odors

A qualitative assessment indicating that a project may reasonably be expected to generate odorous emissions in such quantities as to cause detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or property (see California Health and Safety Code, Division 26, §41700) will have a significant adverse air quality impact.

4.3.4 PROJECT IMPACTS

Threshold: Conflict with or obstruct implementation of the applicable air quality plan?

The 2007 AQMP, discussed previously, was prepared to reduce the high levels of pollutants within Ventura County, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because there were included in the projections utilized in the formulation of the AQMP.

According to the VCAPCD Guidelines, to be consistent with the AQMP, a project must conform to the local general plan and must not result in or contribute to an exceedance of the City's projected population growth forecast. The proposed Project does not include any new residential uses and would not result in the direct growth of population within the Santa Paula Growth Area.

The VCAPCD's AQMP considers regional population forecasts developed by the Southern California Association of Governments (SCAG). SCAG's most recent population forecast was adopted in 2016 as part of the *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy.* The 2016 SCAG growth forecast projects a SCAG's population projection increase from 29,800 in 2012 to 38,800 by year 2040, and employment increase 7,800 jobs in 2012 to 11,700 jobs by the year 2040.[6] The proposed Project will not increase the amount of housing within the Specific Plan area because no residences are planned to be built. The project employment increase would be approximately 1,510 employees[7] and would not result in SCAG projections being exceeded. Therefore, as growth under the Specific Plan is not expected, the Project would not conflict with the 2007 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in Ventura County. Therefore, impacts regarding consistency with applicable air quality are considered less than significant.

Threshold: Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Emissions

The estimated maximum daily emissions during Project construction are listed in **Table 4.3-6, Construction Emissions.** These estimates are based on the expected location, size, and development of the Project. While the project would be developed over a 10-year period, the years modeled represent the worst-case construction years, which would include mass grading and construction of structures on the Project site. The analysis assumes that all the construction equipment and activities would occur continuously over the day and that activities would overlap. In reality, this would not occur, as most

6 Southern California Association of Governments, *2012–2035 Regional Transportation Plan/Sustainable Communities Strategy,* April 2016.

7 US Green Building Council, Building Area Per Employee By Business type, May 13, 2008, http://www.usgbc.org/Docs/Archive/General/Docs4111.pdf, accessed August 24, 2016.

equipment operates only a fraction of each workday and many of the activities would not overlap on a daily basis.

Table 4.3-6
Construction Emissions

	Pollutant (pounds/day)					
Source	**ROG**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Year 2017						
Unmitigated Maximum	11.59	158.70	118.39	0.26	21.16	13.07
VCAPCD threshold	25	25	—	—	—	—
Threshold Exceeded?	**No**	**Yes**	**—**	**—**	**—**	**—**
Mitigated Maximum	6.63	113.66	107.20	0.26	11.59	5.34
Threshold Exceeded?	**No**	**Yes**	**—**	**—**	**—**	**—**
Year 2018						
Unmitigated Maximum	10.64	144.59	112.72	0.26	35.10	13.14
VCAPCD threshold	25	25	—	—	—	—
Threshold Exceeded?	**No**	**Yes**	**—**	**—**	**—**	**—**
Mitigated Maximum	6.06	104.78	103.86	0.26	27.45	9.11
Threshold Exceeded?	**No**	**Yes**	**—**	**—**	**—**	**—**
Year 2019						
Unmitigated Maximum	235.41	33.62	42.50	0.08	4.82	2.41
VCAPCD threshold	25	25	—	—	—	—
Threshold Exceeded?	**Yes**	**Yes**	**—**	**—**	**—**	**—**
Mitigated Maximum	234.11	24.54	42.78	0.08	4.23	1.91
Threshold Exceeded?	**Yes**	**No**	**—**	**—**	**—**	**—**
Year 2020						
Unmitigated Maximum	235.18	17.01	18.61	0.64	1.55	1.04
VCAPCD threshold	25	25	—	—	—	—
Threshold Exceeded?	**Yes**	**No**	**—**	**—**	**—**	**—**
Mitigated Maximum	234.09	12.66	21.16	0.03	1.31	0.86
Threshold Exceeded?	**Yes**	**Yes**	**—**	**—**	**—**	**—**

Source: Refer to Air Quality and Greenhouse Gas Modeling data sheets in ***Appendix 4.3.***
Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOX = sulfur oxide.

As shown in **Table 4.3-6,** construction activities associated with the construction of uses allowed with the Specific Plan would exceed VCAPCD threshold for ROG and NOx throughout the entire construction period. Emissions of ROG are a precursor for the formation of O3. The primary source of ROG emissions is off-gas emissions associated with architectural coating operations. The primary source of NOx, CO, and SOx emissions is from construction equipment exhaust and on-road haul truck trips while the majority of particulate matter emissions would occur as a result of fugitive dust emissions generated during grading and excavation activities. Primary sources of PM10 and PM2.5 emissions would be clearing activities, excavation and grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed earth surfaces.

Since construction of the Project will exceed the thresholds for ROG and NOx, these impacts are considered potentially significant.

Worst Case Construction Emission

The construction emissions analysis was conducted for Year 2020, which was identified as the worst-case year due to the overlapping construction activities of paving and architectural coating. Results of the construction emissions modeling analysis are presented in **Table 4.3-7, Worst-Case Construction Emissions (2020).** ROG emissions from architectural coating exceeded the significance threshold.

Table 4.3-7
Worst-Case Construction Emissions (2020)

Emission Source	Pollutant (pounds/day)					
	ROG	NOx	CO	SOx	PM10	PM2.5
Paving						
Maximum	2.61	17.16	14.49	0.02	0.94	0.86
VCAPCD threshold	25	25	—	—	—	—
Threshold Exceeded?	**No**	**No**	**—**	**—**	**—**	**—**
Architectural Coating						
Maximum	232.57	2.01	1.85	0.00	0.15	0.15
VCAPCD threshold	25	25	—	—	—	—
Threshold Exceeded?	**Yes**	**No**	**—**	**—**	**—**	**—**

*Source: Refer to Air Quality and Greenhouse Gas Modeling data sheets in **Appendix 4.3.***
Notes: CO = carbon monoxide; NOx= nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOx = sulfur oxide.

Operational Emissions

Operational mobile and area source emissions were calculated using CalEEMod. Mobile source emissions for the increase of daily vehicle trips to and from Project Site were calculated using the trip generation factors specified in the traffic study (**Appendix 4.13**). The model was used to calculate area source emissions from within the light industrial and commercial uses of the Project. Area source emissions would be generated primarily by natural gas combustion by the various land uses of the proposed project. The primary use of natural gas by the proposed land use would be to produce space heating, water heating and other miscellaneous heating, or air conditioning. The area source emissions also take into account the use of gasoline-powered gardening and landscaping equipment for the Project.

The estimated operational emissions are presented in **Table 4.3-8, Operational Emissions.** As shown, the Project would generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD for ROG.

Table 4.3-8
Operational Emissions

Source	Pollutant (pounds/day)					
	ROG	NOx	CO	SOx	PM10	PM2.5
Maximum	29.71	22.93	103.64	0.41	29.44	8.33
VCAPCD threshold	25	25	—	—	—	—
Threshold exceeded?	**Yes**	**No**	**—**	**—**	**—**	**—**

*Source: Refer to Air Quality and Greenhouse Gas Modeling data sheets in **Appendix 4.3**.*
Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOX = sulfur oxide.

Many of the measures that the VCAPCD recommends to reduce the significant operational impacts are features of the Project. Most of these measures also address area source and energy source emissions. Mobile and area sources are the primary source of emissions associated with the proposed uses and area source (from generation of energy) are a relatively small component of these emissions.

The off-site transportation demand management (TDM) fund is a mitigation measure that can be used by project proponents for projects and program that exceed the ROG and NOx significance thresholds. This measure applies to commercial, industrial, institutional, and residential projects, and calls for contributing to a city or county mobile source emission reduction fund established specifically to reduce emissions from transportation sources. The amount of funding is commensurate with the amount of emissions that need to be mitigated. Mitigation programs that could be funded through such an off-site TDM fund include (but are not limited to) public transit service, vanpool programs/subsidies, rideshare assistance programs, and off-site TDM facilities. The City of Santa Paula utilizes this program to mitigate the significant air quality impacts of projects with its jurisdiction. While impacts will be reduced with mitigation, they will remain significant and unavoidable.

Threshold: **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)?**

According to the VCAPCD, if an individual project results in air emissions of criteria pollutants that exceed VCAPCD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. By applying VCAPCD's cumulative air quality impact methodology, implementation of the Project would result in an increase of ROG, an ozone precursor, and NOx, such that significant cumulative impacts would occur. Accordingly, cumulative impacts would be potentially significant.

Threshold: **Expose sensitive receptors to substantial pollutant concentrations?**

Local Carbon Monoxide Hotspots

Motor vehicles are a primary source of pollutants within the Specific Plan area. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed state and/or federal standards are termed CO "hotspots." Such hot spots are defined as locations where the ambient CO concentrations exceed the state or federal ambient air quality standards. CO is produced in greatest quantities from vehicle combustion and is usually concentrated at or near ground level because it does not readily disperse into the atmosphere. As a result, potential air quality impacts to sensitive receptors are assessed through an analysis of localized CO concentrations. Areas of vehicle congestion have the potential to create CO hotspots that exceed the state ambient air quality 1-hour standard of 20 ppm or the 8-hour standard of 9 ppm. The federal levels are less stringent than the state standards. Thus, an exceedance condition would occur based on the state standards prior to exceedance of the federal standard.

As provided in **Section 4.13, Transportation and Traffic,** all but one study-area intersection is projected to operate at LOS D or better with the addition of the traffic generated by the Specific Plan. The only intersection that would require further analysis based on VCAPCD standards would be Intersection 10 at Peck Road/SR-126 and On/Off-Ramps/Acacia Way. This intersection is expected to operate at LOS E during the PM peak hour. In addition, this intersection is a freeway ramp and there are no sensitive receptors located within close proximity so as to be affected by vehicle emissions at this intersection. The closest residence is located approximately 200 feet east of the freeway ramp. Consequently, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Toxic Air Emissions

Construction

An HRA was prepared to determine whether diesel particulate emissions from construction under the Santa Paula West Specific Plan will cause significant impacts to nearby sensitive receptors. PM10 exhaust serves as a surrogate for diesel particulate emissions from off-road construction equipment. Emission estimates and associated construction year were generated from the CalEEMod output data files (provided in **Appendix 4.3**) for the mitigated exhaust PM10 pollutant category. **Table 4.3-9, PM10 Exhaust Emissions by Calendar Year,** lists the maximum daily PM10 exhaust emissions for each calendar year of construction.

Table 4.3-9
PM10 Exhaust Emissions by Calendar Year (pounds)

2017	2018	2019	2020
144.2	290.6	273.8	18.8

*Source: Refer to **Appendix 4.3***

To assess the impact of diesel particulate matter (DPM) emissions on local air quality, dispersion modeling was performed utilizing AERMOD, the preferred regulatory model for simulating near-field Gaussian plume dispersion. The model offers the flexibility of allowing the user to assign initial vertical and lateral dispersion parameters for equipment sources representative of a localized construction fleet. Source treatment outlined in SCAQMD's Localized Significance Threshold methodology was utilized as a guide whereby exhaust emissions from construction equipment were treated as a set of side-by-side elevated volume sources uniformly spaced at 20 meters with a release height of five meters and an initial vertical dimension of 1.4 meters. Meteorological data from the nearby Camarillo Airport Station was used to represent local weather conditions and prevailing winds. To obtain an estimate of chronic exposure, maximum ground level concentrations were produced by incorporating all five years of available data (i.e., 2009–2013). To accommodate a Cartesian grid format, direction dependent calculations were obtained by identifying the universal transverse mercator (UTM) coordinates for each source location. Off-site receptors were uniformly placed along the fence line and at 10- and 50-meter buffers to provide a comprehensive evaluation of the fate and transport of DPM toward sensitive receptor locations.

Carcinogenic

Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration; the cancer risk is typically expressed in potential excess cancers per million. The Ventura County Air Quality

Assessment Guidelines have established a significance threshold of 10 excess cancers per million for project-level analysis in a health risk assessment (HRA). The California Air Pollution Control Officer's Association (CAPCOA) published a guidance document that provides methodologies that are appropriate for evaluating cancer risks in the context of this HRA.[8]

Carcinogenic risk is estimated using several exposure parameters, including the concentration of the air pollutant, the cancer slope factor, the daily breathing rate, and frequency and duration of exposure. For residential receptors, it is assumed that exposure will occur 350 days per year. As recommended by CAPCOA, a daily breathing rate of 302 L/kg per day was utilized in the cancer risk calculations. Average daily DPM emissions during the 2.55 years of construction were calculated from the CalEEMod output. **Table 4.3-10, Diesel Particulate Carcinogenic Risk** presents the maximum ground-level concentration at the maximum exposed individual receptor (MEIR) location directly west, adjacent to the Project Site, as well as the calculated cancer risk during construction.

Table 4.3-10
Diesel Particulate Carcinogenic Risk

Years	Sensitive Receptor		Concentration	Carcinogenic Risk	
	X Location (m)	Y Location (m)	µg/m³	Value	Cancers per Million
2017–2020	307259.33	3801127.37	0.07455	8.65097E-07	0.87

The carcinogenic risk estimate was predicted to be 8.7 x 10^{-7} (0.86 in 1 million) at the MEIR location. In comparison to the 10 in 1 million threshold level referenced above, carcinogenic risks do not exceed the level posing no significant risk. Therefore, impacts are less than significant.

Noncarcinogenic

An evaluation of the potential noncarcinogenic effects was also conducted. Under the point estimate approach promulgated in the Ventura County *Air Quality Assessment Guidelines*, adverse health effects are evaluated by comparing the pollutant concentration to its identified Reference Exposure Level (REL). The REL presented in the Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values for diesel particulate was utilized in the assessment. To quantify noncarcinogenic impacts, the hazard index approach was used.

The hazard index assumes that sub threshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). The respiratory endpoint is identified as the only target organ associated

8 California Air Pollution Control Officer's Association, *Health Risk Assessments for Proposed Land Use Development Projects* (July 2009).

with diesel particulate exposure. To calculate the hazard index, the pollutant concentration or dose is divided by its toxicity value and summed for compounds affecting the same toxicological endpoint. Where the total equals or exceeds one (i.e., unity), a health hazard is presumed to exist. For chronic exposures, the REL was converted to units expressed in mg/kg/day.

Table 4.3-11, Diesel Particulate Noncarcinogenic Risk present the ground-level concentration at the MEIR, the REL value for DPM, and calculated Hazard Index for chronic noncarcinogenic exposure throughout duration of Project construction.

Table 4.3-11
Diesel Particulate Noncarcinogenic Risk

MEIR Concentration (µg/m^3)	REL(µg/m^3)	Chronic Hazard Index
0.07455	5.0	0.015

The Hazard Index calculated for the MEIR during Project construction is 0.015. This value does not exceed the Hazard Index threshold of 1 established by the VCAPCD. Results of the analysis demonstrate that construction of the Project will not generate any significant air quality impacts with regards to emissions of toxic air contaminants.

Valley Fever

Grading will include earth-moving activities during the grading phase that will cut soil and use as fill at the Project site. These activities could be considered conducive to disturbing the *Coccidioides immitis* spores if they are present. The Valley Fever fungus tends to be found at the base of hillsides in undisturbed soil and usually grows in the top few inches of soil. However, due to the historical use of the Project Site for agriculture purposes, involving periodic grading, ripping, excavation, and soil preparation (such as fertilizing) for planning, the soils over most of the Project Site has been disturbed over the top several feet of the soil. Additionally, the fungus is not likely to be found in soil that has been or is being cultivated and fertilized. This is because man-made fertilizers, such as ammonium sulfate, enhance the growth of the natural microbial competitors of the Valley Fever fungus. As such, the likelihood of causing previously undisturbed *Coccidioides immitis* spores to become airborne and cause infection from inhalation is considered minimal.

Furthermore, the construction activities will be required to conform to Rule 403 to control fugitive dust, along with other rules, that will prevent significant dust. Dust control measures are required for all construction activities as standard conditions on grading permits. Use of enhanced dust control procedures such as continual soil wetting, use of supplemental binders, early paving, etc. can achieve a

significant improvement in PM10 control efficiency. However, impacts related to exposure of people of Valley Fever during construction may be potentially significant.

Operations

The uses allowed within Specific Plan area are not anticipated to use hazardous or acutely hazardous materials in appreciable quantities. Any quantifiable stationary source health risks will generally occur within facility boundaries. TACs typically exist at industrial operations or commercial facilities, such as gasoline stations or dry cleaners. However, the airborne release of such TAC emissions from such facilities would be sufficiently small enough. Hazardous substances are regulated under the California Accidental Release Prevention (CalARP) Program. The CalARP Program satisfies the requirements of the Federal Risk Management Plan Program, and contains additional state requirements. The CalARP Program applies to regulated substances in excess of specific quantity thresholds. The majority of the substances have thresholds in the range of 100 to 10,000 pounds. Moreover, significant amounts of hazardous substances will typically be expected at industrial, manufacturing, and complex water or wastewater treatment plant land uses. The uses allowed by the Santa Paula West Business Park Specific Plan do not include any operations that require large amounts of hazardous materials. Accordingly, the Project will not result in a significant impact with respect to use of hazardous materials during long-term operations.

Threshold: Create objectionable odors affecting a substantial number of people?

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. Commercial and light industrial uses are not typically associated with objectionable odor complaints. Some restaurants may generate odors that nearby residents consider objectionable, but this is largely dependent upon the cooking products that are used, the design of the restaurant ventilation and filtration system, and the sensitivity of the nearby residents. The restaurant kitchen design characteristics are evaluated at the time that the operator of the restaurant is requesting approval of permits from the VCAPCD. The types of industrial activities that would occur with the Project are not known at this time, but would be evaluated at the time that permits to construct and operate are applied for from the APCD. Therefore, the potential impacts associated with objectionable odors will be less than significant.

4.3.5 CUMULATIVE IMPACTS

Cumulative development in the Santa Paula Growth Area is not expected to result in a significant impact in terms of conflicting with or obstructing implementation of the 2007 AQMP. The 2007 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within Ventura County, to return clean air to the region, and to minimize the impact on the economy. Growth considered consistent

with the 2007 AQMP would not interfere with attainment since this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Santa Paula Growth Area is within the projections for growth identified in the AQMP, implementation of the 2007 AQMP will not be obstructed by such growth. As growth in the Santa Paula Growth Area has not exceeded these projections, this impact would not be cumulatively considerable. Additionally, since the proposed project is consistent with growth projections under the 2007 AQMP, the Project would not have a cumulatively considerable contribution to this impact with respect to conflicting with or obstructing the implementation of the applicable air quality plan.

Cumulative development activity within the City of Santa Paula would continue to implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development within the city is not expected to cause a significant impact associated with construction activities. Since the proposed project would implement regional mitigation measures during construction, the contribution of the Project to any cumulative air quality impact would not be considerable.

Because Ventura County is currently in nonattainment for ozone, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the proposed project contribution, the VCAPCD neither recommends quantified analyses of cumulative operational emissions nor provides methodologies or thresholds of significance to be used to assess cumulative construction or operational impacts. Instead, the VCAPCD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, this EIR assumes that individual development projects that generate operational emissions that exceed the VCAPCD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As discussed previously, operational daily emissions associated with the Project would exceed VCAPCD significance thresholds for ROG and NOx. Therefore, the emissions generated by the Project would be cumulatively considerable and are a significant and unavoidable impact.

4.3.6 MITIGATION MEASURES

The following measures have been identified to mitigate the identified impacts:

Construction Emissions

Grading and Excavation

AQ-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust-preventative measures using the following procedures, as specified by the VCAPCD (including without limitation, to VCAPCD Rule 50 (Opacity) and Rule 51 (Nuisance):

- On-site vehicle speed shall not to exceed 15 miles per hour (the Project Site will contain posted signs with the speed limit).
- All on-site construction roads with vehicle traffic shall be watered periodically;
- Streets adjacent to the Project reach shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust.
- All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day.
- All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust (contact the VCAPCD meteorologist for current information about average wind speeds).
- All material transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.

These control techniques shall be indicated on Project grading plans. The Applicant and/or its contractor shall be responsible for implementing these measures and compliance with this measure will be subject to periodic site inspections by the City.

AQ-2: Project grading plans shall show that for the duration of construction, ozone precursor emissions from construction equipment vehicles must be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Compliance with this measure will

be subject to periodic inspections of construction equipment vehicles by the Public Works Department.

AQ-3: All trucks that will haul excavated or graded material on site shall comply with California Vehicle Code Section 23114 with special attention to subsections 2311(b)(F), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.

AQ-4: A comprehensive Fugitive Dust Control Plan shall be developed by the Applicant and approved by the VCAPCD before the applicant commences grading and excavation operations. The Plan shall include all feasible, but environmentally safe, dust control methods. If a particular dust control method is determined or believed not to be feasible, or if it would conflict with other regulations, justification for not including the subject method shall be provided at the time the Fugitive Dust Control Plan is submitted to the VCAPCD. The Plan shall identify all fugitive dust sources, the means by which fugitive dust from each identified source will be minimized, and the schedule of frequency that each dust control method will be applied for each identified source.

Building Construction

AQ-5: The construction contractor shall adhere to VCAPCD Rule 74.2 (Architectural Coatings) for limiting volatile organic compounds from architectural coatings. This rule specifies architectural coatings storage, clean up, and labeling requirements.

Operational Emissions

Area Source Emissions

The Specific Plan would result in significant and unavoidable impacts with regard to ROG. VCAPCD recommends that feasible area source mitigation measures be included in all projects that have been determined to have a significant air quality impact. Consequently, the following measures shall be incorporated or imposed upon the Project.

AQ-6: Use low emission water heaters for residential, retail, and commercial water heating (Emissions reduction of 11 percent for ROG and 9.5 percent for NOx).

Mobile Source Emissions

AQ-7: Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, and bikeways and or lanes. Sidewalks and bikeways should be landscaped with trees (an approximately 4 percent emissions reduction).

AQ-8: Provide shuttle/minibus service between the Project commercial and industrial land uses and the Project retail land uses and the Santa Paula downtown area during the lunchtime period (11:00 AM to 2:00 PM).

Valley Fever

AQ-9: To the extent feasible, construction employees shall be hired from local populations, since it is more likely that they have been previously exposed to the fungus and are therefore immune. An individual is quite likely to be affected by valley fever if he or she lives in an area where the fungus is prevalent. A person (or animal) with a positive test has had a valley fever infection and has developed immunity to the fungus and therefore, will never contract valley fever again.

AQ-10: During periods of high dust in the grading phase, crews must use respirators in accordance with California Department of Occupational Safety and Health regulations.

AQ-11: The operator cab of area grading and construction equipment must be enclosed and air-conditioned.

Long-Term Operations

AQ-12: The Applicant and/or its contractor must plant and maintain shade trees to reduce heat build-up on structures.

AQ-13: The Applicant and/or its contractor shall prepare a TDM for review and approval by the City and VCAPCD, before the City issues building permits. The plan shall incorporate reasonable and feasible measures to reduce Project-related traffic and vehicle miles traveled. At minimum, the TDM Program shall include the following measures:

- Provision of connections to identified adjacent City or regional trails.
- Provision of adequate way-finding features to direct pedestrians and bicyclists to nearby Project and City destinations, such as school, retail, and civic facilities.
- Provision of homeowner information packets prior to close of escrow, identifying local and regional nonvehicular transportation options, and providing homeowners with basic information regarding telecommuting options.
- Provision of adequate setbacks and design features such that the proposed future enhancement of commuter rail opportunities is not hindered by Project design.

- Construction of pedestrian- and transit-friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeways, or lanes. Sidewalks and bikeways should be landscaped with trees.
- Perform a traffic light synchronization study on streets impacted by Project development to reduce vehicle queuing time.

The Project shall offset the increase in daily emission over the 25 pounds of reactive organic compounds and nitrogen oxides per day either through the purchase of emission offsets or through the in-lieu fees shall be paid to fund off-site TDM facilities or services, if such a program has been established at that time. These fees can reduce emissions from non-Project-generated motor vehicle trips by funding programs to promote ridesharing, public transit, and bicycling. The amount of this financial contribution should be calculated on a pro-rate basis as determined to be equitable by the VCAPCD, and in accordance with the VCAPCD Guidelines. These fees should be paid prior to the issuance of building permits by the County. The applicant shall demonstrate the availability of the offsets or contribution to fund off-site TDM services to the VCAPCD through a contract or other agreement with the offset source(s), which binds the reduction to the Project.

AQ-14: The Applicant and/or its contractor shall install EPA-certified wood-burning stoves or fireplace inserts. If this is not feasible, then the installation of a ceramic coating on the honeycomb inside a catalytic combustor must be utilized or the use of natural gas fireplaces may be used as a feasible alternative.

4.3.7 RESIDUAL IMPACTS AFTER MITIGATION

Impacts related to the consistency with regional plans, such as AQMP, and potential impacts from Valley Fever, are less than significant.

Impacts from the emissions of ROG and NOx for both construction and operation would still exceed the regional construction emissions thresholds, and impacts at both the Project level and cumulative level will remain significant and unavoidable after mitigation.

4.4 BIOLOGICAL RESOURCES

This section describes the existing biological resources present on the Project Site and assesses the Project's impacts on those resources. The analysis is based on previous regional and area biological studies, the California Natural Diversity Database (CNDDB), California Native Plant Society Electronic Inventory (CNPS), US Fish & Wildlife Service (USFWS), standard biological literature, field reconnaissance, and focused surveys for sensitive biological resources conducted within the survey area, including identification of jurisdictional drainage features.

4.4.1 EXISTING CONDITIONS

This existing conditions discussion describes the regional setting, Project Site conditions, and the existing and potentially occurring biological resources at the Project Site. Biological resources within the surrounding area are also discussed, when relevant.

Citywide Setting

The natural biological environment within the City of Santa Paula ("City") has generally been highly modified, although some areas still retain significant biological resource value. Much of the region around the City that is available for expansion has not been disturbed by urban development and still supports a diversity of plant and animal life. The canyons and hillsides provide habitats that are distinct from those found in the river valley. The creeks and barrancas that traverse the City lands contribute small, partially natural spaces to urbanized neighborhoods.

The following is a description of the biological communities and species within the City of Santa Paula's Area of Interest—that is, within the City's planning area—that are considered sensitive by recognized resource agencies.

Habitats

Vegetation communities within the planning area include agriculture (primarily citrus and avocado orchards), riparian (Santa Clara River, Santa Paula Creek, and other large drainages), sage scrub (South Mountain and within canyon areas), oak woodland (scattered patches mostly on north-facing slopes at lower elevations) and grassland (primarily grazed lands).

Sensitive habitats that have been reported to occur or have the potential to occur within the planning area are discussed below. The following habitats are considered to be sensitive by the California Department of Fish and Wildlife (CDFW) Natural Diversity Database due to their limited extent and potential for loss:

- southern willow scrub;
- coast live oak riparian forest;
- cottonwood-willow riparian forest; and
- southern walnut woodland.

Southern willow scrub occurs within most intermittent streams and larger drainages such as Santa Paula Creek and the Santa Clara River in locations that are frequently scoured by flood flows. Coast live oak riparian forest occurs in patches along drainages with deep soils and dependable groundwater. Cottonwood-willow riparian forest occurs within Santa Paula Creek and the Santa Clara River (and possibly other larger drainages) in areas of dependable groundwater and less frequent flood scouring. Southern walnut woodland is limited in the planning area to the north-facing slopes along State Route (SR) 150 near Sulfur Springs.

Wildlife

The following summary information, as presented in the Conservation and Open Space Element, is intended to indicate the general habitat preferences of sensitive species that could potentially occur in the Santa Paula vicinity, where suitable habitat is present.

Southern California Steelhead, a federally endangered species, are known to migrate up the Santa Clara River to spawn in Sespe Creek, north of the planning area. Santa Paula Creek historically supported a run of Southern California Steelhead, but channelization of lower Santa Paula Creek and loss of the fish ladder at the Santa Paula diversion site has resulted in the loss of this run.

Other sensitive fish species found in the Santa Clara River include the arroyo chub, which is present throughout the Santa Clara River system, and the Santa Ana sucker, which is limited to the Santa Clara River upstream of Santa Paula. Both of these species were introduced to the Santa Clara River system.

Several sensitive amphibian species have the potential to occur in the Santa Paula area, including the western spadefoot toad, arroyo southwestern toad (a federally endangered species), and the California red-legged frog (a federally threatened species). Suitable California red-legged frog habitat is generally limited to those portions of the Santa Clara River and Santa Paula Creek with dense, shrubby or emergent riparian vegetation closely associated with deep still or slow-moving water. Adult frogs become inactive during the summer (aestivate) when stream flows cease or the creeks dry up. Aestivation habitat may include any landscape feature within 300 feet of riparian habitat, including natural riparian corridors, rocks, downed trees, and thick leaf litter; under structures; and in agricultural features, such as drains, watering troughs, and spring boxes that provide cover and moisture during the dry season.

The southwestern pond turtle is an aquatic reptile that occurs in vegetated, shallow pools within the Santa Clara River and possibly Santa Paula Creek. Other sensitive reptiles include the coast horned lizard, which typically occurs in open areas with sandy, loose soil and abundant ant prey. Horned lizards are most commonly found along drainages and washes.

Many birds of prey (raptors) have experienced population declines associated with the loss of suitable nesting habitat (large trees) due to disturbance by human activity. As a result of the loss of nesting habitat and the notable decreases in population levels, many hawks are listed as sensitive species by the CDFW. The sharp-shinned hawk and northern harrier may forage within the planning area during the winter and during migration, but they are not known to nest in Ventura County.

The loggerhead shrike is a small, predatory bird that prefers open habitats with scattered shrubs, trees, and fences for use as perches. This species feeds primarily on large insects generally found in grasslands, such as grasshoppers. The loss of grasslands and natural perches has resulted in the concentration of loggerhead shrikes along fence lines. This species may occur in the planning area in grasslands and open scrub in the vicinity of fence lines.

The loss of riparian habitats due to channelization for flood control, diversion of water, and conversion to other uses has caused significant declines in the populations of small perching birds that are dependent on riparian habitat for breeding and foraging. The yellow warbler and yellow-breasted chat generally breed in riparian thickets such as southern willow scrub and cottonwood-willow riparian forest. Both of these species have been reported breeding along the Santa Clara River upstream of Santa Paula, and may also breed along Santa Paula Creek, upper Orcutt Canyon, and other larger drainages.

The City's General Plan has historically identified Least Bell's vireo breeds along the Santa Clara River, maintaining about 15 to 20 breeding pairs).[1] This species has been documented to occur in three populations within the planning area: the vicinities of Saticoy Street, Briggs Road, and Timber Canyon Road. However, Least Bell's vireo could be found anywhere along larger rivers and streams within the City's Area of Interest.

Throughout Southern California, the conversion of open grasslands to other uses has led to a decrease in the population of the animals closely associated with this habitat. The San Diego black-tailed jackrabbit prefers open shrub and tree habitats with abundant grasses and forbs. This species could potentially occur within the City's planning area in dense grassy and brushy areas north of Santa Paula and in the vicinity of South Mountain.

1 City of Santa Paula, *General Pan,* "Conservation and Open Space Element" (1998), p. CO-15.

Literature and Database Review

Prior to implementing biological surveys, standard database searches were conducted and reports from previous surveys of the area were reviewed to obtain pertinent information regarding potential special-status species, as well as sensitive natural communities that occur within the Project vicinity. The results of these preliminary database searches provided a basis for addressing the appropriate special-status species within the Project area.

Information about documented special-status plant and animal species that occur within the Project vicinity was obtained from the California Natural Diversity Database (CNDDB).[2] The CNDDB search included the following US Geological Survey (USGS) 7.5-minute quadrangles: Ojai, Santa Paula Peak, Fillmore, Saticoy, Santa Paula, Moorpark, Oxnard, Camarillo, and Newbury Park.

Additional literature and databases referenced include:

- California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants of California containing species-specific habitat requirements for plant species;[3]
- *The Jepson Manual: Vascular plants of California,* 2nd ed.;[4]
- A Manual of California Vegetation, 2nd ed.;[5] and
- eBird website.[6]

Field Surveys

On May 20, 2015, BRC conducted a reconnaissance-level survey of the Project Site and surroundings. The area was methodically surveyed to document the existing conditions, wildlife and plant species present, and plant communities. It is not usually not possible to schedule all needed field surveys during the optimum survey period for all the special-status plant and wildlife species known to occur in the region. Therefore, the objective of the field survey was to determine the likelihood of occurrence of any special-status plant or wildlife species based on the presence/absence of suitable habitat and other natural history elements that might predict their occurrence.

The survey conditions and timing of the survey were deemed suitable for determining potential biological constraints for the Project. The biologists recorded all dominant plant species encountered during the

2 California Natural Diversity Database, *Rarefind 5.* Internet. California Department of Fish and Wildlife.

3 California Native Plant Society CNPS. *Inventory of Rare and Endangered Plants of California,* online ed., v8-02. California Native Plant Society, Sacramento, CA. http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi. Accessed May 2015.

4 Baldwin, B. G., D. H. Goldman, D. J. Keil, R. Patterson, T. J. Rosatti, and D. H. Wilken, eds., *The Jepson Manual*: *Vascular Plants of California*, 2nd ed. (Berkley, University of California Press, 2012).

5 Sawyer, J., T. Keeler-Wolf, and J Evens. 2009. *A Manual of California Vegetation*, 2nd ed. (Sacramento: California Native Plant Society).

6 Cornell Lab of Ornithology and National Audubon Society, Inc., *eBird,* http://ebird.org/content/ebird. Accessed May 2015.

field surveys. Scientific nomenclature follows the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California.[7]

Surveys for wildlife species included searching for and identifying species' diagnostic signs (i.e., audible calls, prints, scat, nests, skeletal remains, burrows, etc.) and habitat features (i.e., rock or debris piles, cavities, and rock outcrops) that may attract and/or support special-status species. Taxonomy and nomenclature for wildlife for amphibians and reptiles generally follows the *Standard Common & Current Scientific Names for North American Amphibians, Turtles, Reptiles, and Crocodilians,*[8] the American Ornithologists Union identification for birds,[9] and the Revised checklist of North American mammals north of Mexico for mammals.[10]

Project Site Conditions

Vegetation Communities and Observed Plants

Vegetation communities were determined by identifying the dominant and codominant plant species. Once the dominant and codominant species were determined, the community boundary was delineated and mapped within the Project area. The delineated boundary was hand-drawn on field maps, and representative GPS coordinates were taken along the boundary to provide reference points for GIS mapping of vegetation community polygons. The vegetation communities were defined to an alliance and association level based on the guidelines within the *Manual of California Vegetation*, second edition.[11]

The Project Site is characterized as agricultural row crops with occurrences of ornamental planted trees and drainage features. The Project Site lacks the dominance of native plant assemblages it is dominated by ruderal nonnative and native species found within the agricultural fields and on the perimeter of the agricultural fields. Disturbed or developed areas include graded maintained roads and agricultural-related processing facilities, buildings and work areas.

Ornamental planted trees include Brazilian pepper tree (*Schinus terebinthifolius*) and blue gum eucalyptus (*Eucalyptus globulus*).

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7 Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California, The Jepson Herbarium, the Jepson Flora Project, http://ucjeps.berkeley.edu/jepson_flora_project.html, accessed June 2015.

8 Collins, Joseph T. and Travis W. Taggart, *Standard Common & Current Scientific Names for North American Amphibians, Turtles, Reptiles, and Crocodilians,* 6th ed. (Lawrence, KS: Center for North American Herpetology, 2009), http://www.cnah.org/index.asp.

9 Cornell Lab of Ornithology and the American Ornithologists Union, "The Birds of North American Online," http://bna.birds.cornell.edu/bna/home/. Accessed: May 2015.

10 Baker, Robert, et al., *Revised Checklist of North American Mammals North of Mexico* (Lubbock: Museum of Texas Tech University, December 2003).

11 Sawyer, J., T., et al., *A Manual of California Vegetation* (2009).

Adams Barranca is along the western boundary of the Project Site. Adams Barranca is an intermittent drainage characterized as a mixed willow riparian community. An agricultural ditch bisects the Project Area and flows north to south to SR 126.

To identify vegetation communities that would be directly affected by implementation of the Project, the Project's boundary was evaluated and overlain on a map of the vegetation communities within the Project Site. Total existing and affected acreage for each community is provided in **Table 4.4-1**, **Existing Vegetation Communities**. On-site vegetation communities are shown in **Figure 4.4-1, Existing Vegetation**. In addition, within these vegetation communities numerous individual plant species were observed on the Project Site. Individual Plant species observed are listed in **Table 4.4-2**, **Plant Species Observed**.

Table 4.4-1
Existing Vegetation Communities

Vegetation Communities	Acres
Adams Barranca Mixed Willow Riparian	0.51
Agricultural Avocado Orchard	8.06
Agricultural Ditch	0.18
Agricultural Row Crops	38.46
Developed	6.60
Total	**53.81**

Table 4.4-2
Plant Species Observed

Species Observed Plants (*Scientific Name*)	Common Name	Family	Native or Nonnative
Ambrosia psilostachya var. *californica*	Western ragweed	Asteraceae	Native
Anagallis arvensis	Scarlet pimpernel	Myrsinaceae	Nonnative
Arundo donax	Giant cane	Poaceae	Nonnative
Baccharis pilularis	Coyote brush	Asteraceae	Native
Baccharis salicifolia	Mulefat	Asteraceae	Native
Brassica nigra	Black mustard	Brassicaceae	Nonnative
Bromus diandrus	Ripgut grass	Poaceae	Nonnative
Bromus hordeaceus	Soft chess	Poaceae	Nonnative
Bromus rubens	Red brome	Poaceae	Nonnative
Carduus pycnocephalus	Italian thistle	Asteraceae	Nonnative
Centaurea melitensis	Tocalote	Asteraceae	Nonnative
Chenopodium sp.	Goosefoot	Chenopodiaceae	Nonnative
Datura wrightii	Jimsonweed	Solanaceae	Native
Erodium cicutarium	Redstem filaree	Geraniaceae	Nonnative
Eucalyptus globulus	Blue gum eucalyptus	Myrtaceae	Nonnative
Helminthotheca echioide	Bristly ox tongue	Asteraceae	Nonnative
Hirschfeldia incana	Summer mustard	Brassicaceae	Nonnative
Juglans californica	Southern California black walnut	Juglandaceae	Native
Lactuca serriola	Prickly wild lettuce	Asteraceae	Nonnative
Malva parviflora	Cheeseweed	Malvaceae	Nonnative
Marrubium vulgare	Horehound	Lamiaceae	Nonnative
Melilotus albus	White sweet clover	Fabaceae	Nonnative
Nicotiana glauca	Tree tobacco	Solanaceae	Nonnative
Pinus sp.	Pine	Pinaceae	Nonnative
Quercus agrifolia	Coast live oak	Fagaceae	Native
Raphanus sativus	Wild radish	Brassicaceae	Nonnative
Ricinus communis	Castor bean	Euphorbiaceae	Nonnative
Salix lasiolepis	Arroyo willow	Salicaceae	Native
Salsola tragus	Russian thistle	Chenopodiaceae	Nonnative
Silybum marianum	Milk thistle	Asteraceae	Nonnative
Schinus molle	Peruvian peppertree	Anacardiaceae	Nonnative
Schinus terebinthifolius	Brazilian peppertree	Anacardiaceae	Nonnative
Sonchus oleraceus	Common sow-thistle	Asteraceae	Nonnative
Tribulus terrestris	Puncture vine	Zygophyllaceae	Nonnative
Xanthium strumarium	Cocklebur	Asteraceae	Native

SPECIAL-STATUS PLANT SPECIES

Using information from the various listed sources and floral and faunal surveys of the area, the potential for special-status species to occur within the Project area was assessed as high, medium, low, or none based on the following criteria:

- High: CNDDB or other documented occurrences have been recorded within 1 mile of the Project, and suitable habitat is present (suitable nesting or roosting habitat for bird and bat species). Individuals were observed during field surveys, or the species could be present.
- Medium: CNDDB or other documented occurrences have been recorded within 5 miles of the Project Area and suitable habitat is present (suitable nesting or roosting habitat or high quality foraging areas for bird and bat species). Individuals were not observed during field surveys; however, the species could be present.
- Low: Suitable or marginal habitat may occur in the Project Area, but no CNDDB records of the species have been recorded within recent years; records of the species within 5 miles of the Project Area are suspected to be now extirpated or potentially misidentified with other species; or individuals were not observed during field surveys and are not anticipated to be present. For bird and bat species, this category may be used for species that are documented, but likely to be only transient through the area during foraging or migratory movements, no suitable nesting or roosting habitat is present.
- None: Suitable habitat not present in the Project Area; no CNDDB records of the species have been recorded within recent years and individuals were not observed during field surveys.

The results of the records and database review for the potential for special-status species to occur within the Project area are provided in **Table 4.4-3**, **Special-Status Plant Species**.

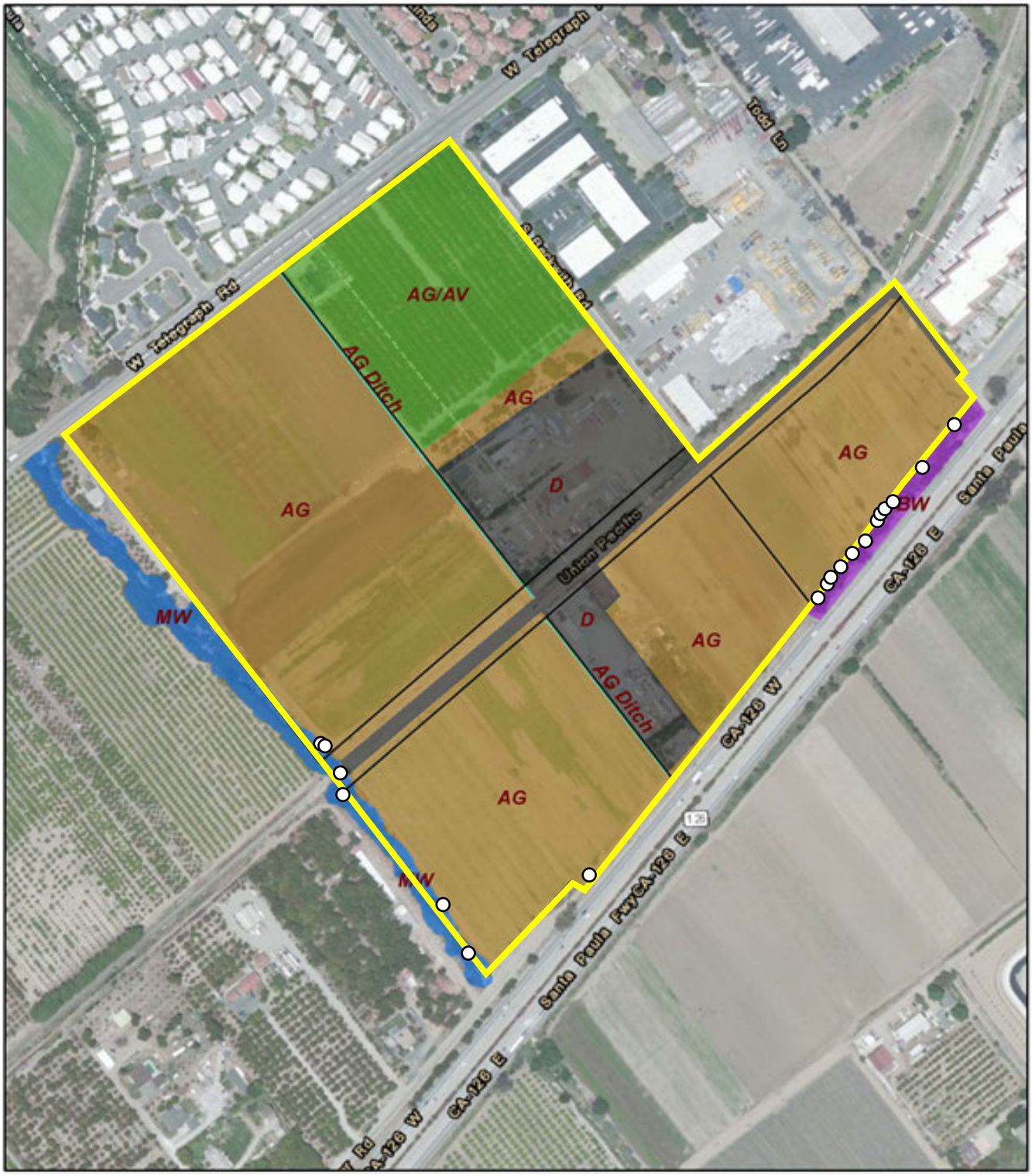
Table 4.4-3
Special-Status Plant Species

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Abrams' oxytheca (*Acanthoscyphus parishii* var. *abramsii*)	1B.2	Occurs on sandy or shale soils in chaparral habitats at elevations of 1143–2057 meters. Blooming period June–August.	None	Outside of elevation range of species.
Miles' milk vetch (*Astragalus didymocarpus* var. *milesianus*)	1B.2	Occurs on clay soils within coastal sage scrub habitats at elevations of 20–90 meters. Blooming period March–June.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Ventura Marsh milk vetch (*Astragalus pycnostachyus* var. *lanosissimus*)	FE, SE, 1B.2	Occurs in coastal dunes, coastal scrub, and marshes and swamps at elevations of 1–35 meters. Blooming period June–October.	Low	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Davidson's saltscale (*Atriplex serenana* var. *davidsonii*)	1B.2	Occurs in coastal bluff scrub and coastal sage scrub habitats at elevations of 10–200 meters. Blooming period April–October.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Late-blooming mariposa lily (*Calochortus fimbriatus*)	1B.2	Occurs in chaparral, cismontane woodland, and riparian woodland habitats with serpentine soils at elevations of 275–1905 meters. Blooming period June–August.	None	Outside of elevation range of species.
Plummer's mariposa lily (*Calochortus plummerae*)	4.2	Occurs in chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland habitats with rocky or granitic soils at elevations of 100–1700 meters. Blooming period May–July.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*)	FE, SE, 1B.2	Occurs in coastal dunes, marshes, and swamp habitats at elevations of 0–30 meters. Blooming May–October.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Dune larkspur (*Delphinium parryi* ssp. *blochmaniae*)	1B.2	Occurs in maritime chaparral and coastal dune habitats at elevations of 0–200 meters. Blooming period April–June.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Umbrella larkspur (*Delphinium umbraculorum*)	1B.3	Occurs in chaparral and cismontane woodland habitats at elevations of 400–1600 meters. Blooming period is April–June.	None	Outside of elevation range of species.
Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*)	1B.1	Occurs in rocky, often clay, or serpentine soils within coastal bluff scrub, chaparral, coastal scrub, and valley and foothill grassland habitats at elevations of 5–450 meters. Blooming period April–June.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Verity's dudleya (*Dudleya verity*)	FT, 1B.1	Occurs in volcanic, rocky areas within chaparral, cismontane woodland, and coastal scrub habitats at elevations of 60–120 meters. Blooming period May–June.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Conejo buckwheat (*Eriogonum crocatum*)	SR, 1B.2	Occurs in Conejo volcanic outcrops within chaparral, coastal scrub, and valley and foothill grassland habitats at elevations of 50–580 meters. Blooming period April–July.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Ojai fritillary (*Fritillaria ojaiensis*)	1B.2	Occurs in rocky areas of broadleaved forest, chaparral, and cismontane woodland habitats at elevations 225–998 meters. Blooming period February–May.	None	Outside of elevation range of species.
mesa horkelia (*Horkelia cuneata* var. *puberula*)	1B.1	Occurs in sandy or gravely areas of maritime chaparral, cismontane woodland, and coastal scrub at elevations of 70–810 meters. Blooming period February–September.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
California black walnut (*Juglans californica*)	4.2	Occurs in a variety of habitats including riparian, chaparral, and coastal sage scrub.	High	Observed within the Project area.
Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*)	1B.1	Occurs in coastal marshes and swamps, playas, and vernal pool habitats at elevations of 1–1,220 meters. Blooming period February–June.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Ross' pitcher sage (*Lepechinia rossii*)	1B.2	Occurs in chaparral habitats at elevations of 305–790 meters. Blooming period May–September.	None	Outside of elevation range of species.
Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)	4.3	Occurs in chaparral and coastal scrub habitats at elevations of 1–885 meters. Blooming period January-July	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Mexican malacothrix (*Malacothrix similis*)	1A	Occurs in coastal dune habitats at elevations of 0–40 meters. Blooming period April–May.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
White-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*)	1B.3	Occurs in chaparral and cismontane woodland habitats at elevations of 50–1525 meters. Blooming period April–December.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Southern curly-leaved monardella (*Monardella sinuata* ssp. *sinuata*)	1B.2	Occurs in sandy soils within chaparral, cismontane woodland, coastal dunes, and coastal scrub habitats. Blooming period April–September.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Ojai navarretia (*Navarretia ojaiensis*)	1B.1	Occurs in openings of chaparral, coastal scrub, and valley and foothill grassland habitats at elevations of 275–620 meters. Blooming period May–July.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Chaparral ragwort (*Senecio aphanactis*)	2B.2	Occurs in chaparral, cismontane woodland, and coastal scrub habitats at elevations of 15–800 meters. Blooming period January–April.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Woven-spored lichen (*Texosporium sancti-jacobi*)	3	Occurs on soil, small mammal pellets, and dead twigs, and on *Selaginella* spp. within chaparral openings.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.



Adams Barranca Mixed Willow Riparian [MW] (2.76 Acres)
Agricultural Avocado Orchard [AG/AV] (8.06 Acres)
Agricultural Ditch [AG Ditch] (0.18 Acres)
Agriculture [AG] (39.96 Acres)
Developed [D] (8.82 Acres)
Offsite Southern California Black Walnut [BW] (0.79 Acres) Community
Individual Black Walnut Trees (19)
Parcel Boundaries
Project Boundary

N
0 150 300 600
APPROXIMATE SCALE IN FEET

SOURCE: BioResource Consultants, Inc. – June 2015

FIGURE **4.4-1**

Meridian Consultants

Existing Vegetation

050-002-13

Several special-status plant species are documented to occur in the vicinity of the Project Site. Only one special-status plant species, Southern California black walnut (*Juglans californica*) was documented or determined to have a high likelihood of occurring within the Project Site. The species is found in the CNPS 4.2 Listing.

Southern California black walnut is a perennial deciduous tree. It is found in a variety of habitats including mixed woodlands, riparian and on slopes where conditions are favorable. This species generally blooms between March and August.

This species was observed within Adams Barranca and just off site in the southeastern section of the Project area, immediately adjacent to SR 126.

Wildlife Species

During field spring surveys conducted in 2015, field biologists observed the presence of wildlife and documented observations. The wildlife was either observed within the Project Site boundaries or flying overhead, as is the case with birds. A summary of all wildlife documented during field surveys is provided in **Table 4.4-4**, **Wildlife Species Observed**.

Table 4.4-4
Wildlife Species Observed

Scientific Name	Common Name
Reptiles	
Sceloporus occidentalis bocourtii	Coast range fence lizard
Birds	
Cathartes aura	Turkey vulture
Charadrius vociferus	Killdeer
Columba livia	Rock pigeon
Streptopelia decaocto	Eurasian collared-dove
Zenaida macroura	Mourning dove
Calypte anna	Anna's hummingbird
Picoides pubescens	Downy woodpecker
Empidonax difficilis	Pacific-slope flycatcher
Sayornis nigricans	Black phoebe
Tyrannus verticalis	Western kingbird
Corvus brachyrhynchos	American crow
Corvus corax	Common raven
Hirundo rustica	Barn swallow
Petrochelidon pyrrhonota	Cliff swallow
Tachycineta bicolor	Tree swallow
Psaltriparus minimus	Bushtit

Scientific Name	Common Name
Mimus polyglottos	Northern mockingbird
Bombycilla cedrorum	Cedar waxwing
Sturnus vulgaris	European starling
Cardellina pusilla	Wilson's warbler
Oreothlypis celata	Orange-crowned warbler
Melozone crissalis	California towhee
Pipilo maculatus	Spotted towhee
Melospiza melodia	Song sparrow
Icterus bullockii	Bullock's oriole
Haemorhous mexicanus	House finch
Spinus psaltria	Lesser goldfinch
Spinus tristis	American goldfinch
Passer domesticus	House sparrow
Mammals	
Otospermophilus beecheyi	California ground squirrel
Sylvilagus bachmani	Brush rabbit
Thomomys bottae	Botta's pocket gopher

Special-Status Wildlife Species

Sensitive wildlife species known to occur in the region that could potentially occur on site or in the vicinity are summarized below in **Table 4.4-3**, **Special-Status Wildlife Species**. Review of the CNDDB included all recorded species occurrences within the 7.5-minute USGS quadrangle map for the Project Site (Santa Paula) and the surrounding eight quadrangle maps. Based on the database search, a total of 39 special-status wildlife species have been documented in the region.

Sensitive wildlife species known to occur in the region including the Project Site are summarized below in **Table 4.4-5, Special-Status Wildlife Species**.

Table 4.4-5
Special-Status Wildlife Species

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Invertebrates				
Sandy beach tiger beetle (*Cicindela hirticollis gravida*)	None	Sand-colored beetle that occurs on sandy beaches.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Globose dune beetle (*Coelus globosus*)	None	Occurs within the California coastal dune system.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
monarch—California overwintering population (*Danaus plexippus* pop. 1)	None	Winter roosts found in wind-protected groves of eucalyptus, Monterrey pine, and cypress with sources of water and nectar nearby. Winter roosts are protected by CDFW.	Low	No winter roost sites were documented within the Project Area.
Santa Monica grasshopper (*Trimerotropis occidentiloides*)	None	Only known form the Santa Monica Mountains.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Mimic tryonia (California brackish water snail) (*Tryonia imitator*)	None	Occurs in brackish marsh and estuarine habitats.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Fish				
Santa Ana sucker (*Catostomus santaanae*)	FT	Habitat generalists but prefer gravel/ rubble/boulder river bottoms with cool, clear flowing water and algae.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Tidewater goby (*Eucyclogobius newberryi*)	FE,	Occurs within brackish lagoons of streams along the coast of California.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*)	FE, SE	Weedy pools, backwaters, and among emergent vegetation at the stream edge in small Southern California streams.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Arroyo chub (*Gila orcuttii*)	None	Slow-water stream sections with mud or sand bottoms. They feed heavily on aquatic vegetation and associated invertebrates.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Southern Steelhead—Southern California DPS (*Oncorhynchus mykiss irideus*)	FE	Spawn in freshwater streams and rivers; adapted to seasonally dry streams in Southern California.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Amphibians				
Foothill yellow-legged frog (*Rana boylii*)	SSC	Partly shaded, shallow streams and riffles with a rocky substrate in a variety of habitats.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Western spadefoot (*Spea hammondii*)	SSC	Occurs primarily in grassland, scrub, and chaparral habitats, but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Reptiles				
Silvery legless lizard (*Anniella pulchra pulchra*)	SSC	Sandy or loose, loamy soils with moisture content under sparse vegetation in live oak woodland.	Low	Potentially suitable habitat present. No CNDDB occurrences near the Project site.
Coastal whiptail (*Aspidoscelis tigris stejnegeri*)	None	Found in a variety of habitats, primarily hot and dry open areas with sparse foliage in chaparral, woodland, and riparian areas.	Low	Potentially suitable habitat present. No CNDDB occurrences near the Project site.
Western pond turtle (*Emys marmorata*)	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation. Suitable upland habitat and basking areas are needed.	Low	Potentially suitable habitat present, and occurrences near the Project site.
Coast horned lizard (*Phrynosoma blainvillii*)	SSC	Uses a wide variety of habitats, including coastal sage scrub. Most common along sandy washes with friable soils and scattered low bushes.	Low	Marginally suitable habitat and CNDDB records in vicinity of Project.
Two-striped garter snake (*Thamnophis hammondii*)	SSC	Highly aquatic; found in or near permanent fresh water, often along streams with rocky beds and riparian growth.	Low	Potentially suitable habitat present, and occurrences near the Project site.
South coast garter snake (*Thamnophis sirtalis* ssp.)	SSC	Marsh and upland habitats near permanent water with good strips of riparian vegetation in the Southern California coastal plain, from sea level to about 2,800 feet.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Birds				
Golden eagle (*Aquila chrysaetos*)	CDFW: FP	Uses rolling foothills and mountain terrain; wide arid plateaus deeply cut by streams and canyons; open mountain slopes; and cliffs and rock outcrops.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Burrowing owl (*Athene cunicularia*)	SSC	Found mainly in grassland and open scrub from the seashore to foothills. Strongly associated with ground squirrel burrows.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Western snowy plover (*Charadrius alexandrinus nivosus*)	FT, SSC	In fall and winter, common on sandy marine and estuarine shores. Nests locally in these habitats from April through August, but the major nesting habitat now appears to be on salt pond levees.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	FT, SE	Riparian forest nester; found along the broad, lower flood-bottoms of larger river systems.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
White-tailed kite (*Elanus leucurus*)	CDFW: FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland.	Low	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Southwestern willow flycatcher (*Empidonax traillii extimus*)	FE, SE	Breeds in dense riparian habitats along rivers, streams or other wetlands. The vegetation is dominated by dense growths of willows or other shrubs and medium-size trees.	Medium	Potentially suitable habitat located on site and CNDDB occurrences within 0.5 miles of the site.
California horned lark (*Eremophila alpestris actia*)	CDFW: WL	Occurs in a variety of open habitats, usually where trees and large shrubs are absent. Found from grasslands along the coast and deserts near sea level to alpine dwarf-shrub habitat above tree line.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Prairie falcon (*Falco mexicanus*)	CDFW: WL	Found in annual grasslands to alpine meadows, but associated primarily with perennial grasslands, savannahs, rangeland, some agricultural fields, and desert scrub areas. Requires sheltered cliff ledges for cover and nesting.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
California condor (*Gymnogyps californianus*)	FE, SE, CDFW: FP	Permanent resident of the semiarid, rugged mountain ranges surrounding the southern San Joaquin Valley, including the Coast Ranges from Santa Clara County south to Los Angeles County, the Transverse Ranges, Tehachapi Mountains, and the southern Sierra Nevada. Forages over wide areas of open rangelands; roosts on cliffs and in large trees and snags. Occurs mostly between sea level and 2700 meters, and nest from 610–1372 meters	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Belding's savannah sparrow (*Passerculus sandwichensis beldingi*)	SE	Found in grassland, saline emergent wetlands, and wet meadow habitats.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Coastal California gnatcatcher (*Polioptila californica californica*)	FT, SSC	Found in coastal sage scrub habitats from sea level to 2,500 feet in elevation. Within its range, it associates strongly with California sagebrush (*Artemisia californica*) dominant.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Bank swallow (*Riparia riparia*)	ST	Nest in steep slopes of riverbanks composed of compacted sand. Forages generally over riparian and grassland habitats.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
California least tern (*Sternula antillarum browni*)	FE, SE, CDFW: FP	Nests in open, sandy areas of beaches and lagoons. Generally forages in marine habitats along coastlines and lagoons.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes
Le Conte's thrasher (*Toxostoma lecontei*)	SSC	Occurs in open desert wash, desert scrub, alkali desert scrub, and desert succulent shrub habitats; also occurs in Joshua tree habitat with scattered shrubs.	None	No suitable habitat present within the Project area. No CNDDB records in vicinity of Project.
Least Bell's vireo (*Vireo bellii pusillus*)	FE, SE	Typically found in early- to mid-successional willow riparian habitats	Medium	Suitable habitat located on site and CNDDB occurrences within 0.5 miles of the site.
Mammals				
Pallid bat (*Antrozous pallidus*)	SSC	Found in grassland, shrublands, woodlands, and forest sea level up to mixed conifer forest. Typically found in dry, open areas with rocky areas for roosting.	Medium	Potentially suitable habitat present and occurrences near the Project site.
Dulzura pocket mouse (*Chaetodipus californicus femoralis*)	SSC	Found on slopes in chaparral with sandy or loamy soils.	Low	Potentially suitable habitat present. No occurrences near the Project site.
Hoary bat (*Lasiurus cinereus*)	None	Found in all forested habitat types with medium- or large-size trees and dense foliage from sea level to 4,125 meters.	Medium	Potentially suitable habitat present and occurrences near the Project site.
San Diego desert woodrat (*Neotoma lepida intermedia*)	SSC	Found in rocky areas of Joshua tree woodland, pinyon-juniper woodland, and chaparral habitats from sea level to 2,600 meters.	Low	Potentially suitable habitat present. No occurrences near the Project site.
Desert bighorn sheep (*Ovis canadensis nelson*)	CDFW: FP	Typically found in rough, rocky, and steep terrain as well as springs and plateaus above desert floors.	None	Outside of range. Unsuitable habitat present on site.
American badger (*Taxidea taxus*)	SSC	Found in coastal sage scrub, mixed chaparral, grassland, oak woodland, chaparral, mixed conifer, pinyon-juniper woodland, desert scrub, desert wash, montane meadow, and open areas with sandy soils.	Medium	Potentially suitable habitat present and occurrences near the Project site.

Common Name (Scientific Name)	Listing	Habitat Description	Potential to Occur	Notes

Notes:
BLM = Bureau of Land Management listed as Sensitive
USFS = United States Forest Service Sensitive
FE = Federally listed as Endangered
FT = Federal listed as Threatened
FC = Federal candidate for listing under the Endangered Species Act
FD = Federally delisted
FPE = Federally proposed for listing as Endangered
FPT = Federally proposed for listing as Threatened
SC = State proposed for listing
SE = State-listed as Endangered
ST = State-listed as Threatened
SWL= California Department of Fish and Game (CDFW) Watch List Species
SSC = California Department of Fish and Game (CDFW) Species of Special Concern
SFP = California Department of Fish and Game (CDFW) Fully Protected Species
SR = State Rare
BCC= United States Fish and Wildlife Service_ Birds of Conservation Concern

Special-Status Wildlife Species

Five special-status wildlife species were determined to have a medium likelihood of occurring within the Project Area.

Southwestern Willow Flycatcher (*Empidonax traillii extimus*)—Listing: Federally Endangered, State Endangered

The southwestern willow flycatcher is a small passerine bird measuring about 5.75 inches in length. The flycatcher's appearance is overall greenish or brownish gray above, with a white throat that contrasts with a pale olive breast. The belly is pale yellow. Two white wing bars are visible, but the eye ring is faint or absent. The upper mandible is dark, and the lower mandible light.

The species breeds in dense riparian habits along rivers and streams. The vegetation is typically dominated by dense growths of willows or other shrubs and medium-size trees. Almost all southwestern flycatchers breeding habitat is within close proximity of water or saturated soils.

This species was not observed during the Project surveys; however, Adams Barranca provides marginal habitat for the species. The Southwestern willow flycatcher is not expected to breed/nest in Adams Barranca but may use the habitat for foraging. While nesting is not expected for the species, recent CNDDB records indicate nesting pairs within 0.5 miles, within willow riparian habitats of the Santa Clara River.

Least Bell's Vireo (*Vireo bellii pusillus*)—Listing: Federally Endangered, State Endangered

The least Bell's vireo is a small, olive gray, migratory songbird that nests and forages almost exclusively in river-related riparian woodlands. It is typically found in early- to mid-successional willow riparian habitats.

This species was not observed during the Project surveys; however, Adams Barranca provides marginal habitat for the species. Least Bell's vireo is not expected to breed/nest in Adams Barranca but may use the habitat for foraging. While nesting is not expected for the species, recent CNDDB records indicate nesting pairs within 0.5 miles, within willow riparian habitats of the Santa Clara River.

Pallid Bat (*Antrozous pallidus*)—Listing: CA Species of Special Concern

The Pallid bat has yellowish-brown- to cream-colored fur on its back and white fur on its belly. The most notable feature of the species is its large ears. which are almost half as long as the total length of the head and body. Also, its eyes are larger than most species of North America. The pallid bat is a locally common species of low elevations in California. It occurs throughout California except for the high Sierra Nevada from Shasta to Kern Counties and the northwestern corner of the state from Del Norte and western Siskiyou Counties to north Mendocino County. The species is found in grassland, shrublands, woodlands, and forest sea level up to mixed conifer forest for foraging, and is typically found in dry open and rocky areas for roosting.

This species was not observed during the Project surveys; however, Adams Barranca provides foraging and roosting habitat for the species. The pallid bat is not expected to breed in Adams Barranca but it may use habitat for roosting and the Project Area for foraging.

Hoary Bat (*Lasiurus cinereus*)—Listing: CA Species of Special Concern

The hoary bat is about the size of a mouse and weighs about 20 to 35 grams. The length from the tip of the nose to the end of the tail is 13 to 15 centimeters, and the wing span is 43 cm. These bats have blunt, rounded noses and small beady eyes. The ears are short, thick, broad and rounded. Thick, long, soft hair covers the back extending to the elbow. The coloring of the back is a mixed brown-gray. The hoary bat is the most widespread North American bat. It may be found at any location in California, although distribution is patchy in the southeastern deserts. This common, solitary species winters along the coast and in Southern California, breeding inland and north of the winter range. The hoary bat is found in all forested habitat types with medium- or large-size trees and dense foliage from sea level to 4,125 meters.

This species was not observed during the Project surveys; however, Adams Barranca provides foraging and roosting habitat for the species. The hoary bat is not expected to breed in Adams Barranca but may use the habitat for roosting and the Project Area for foraging.

American Badger (*Taxidea taxus*)—Listing: CA Species of Special Concern

The American badger has a stocky and low-slung body with short, powerful legs; they are identifiable by their large foreclaws (measuring up to 5 cm in length) and distinctive head markings. It preys

predominantly on pocket gophers (*Geomyidae*), ground squirrels (*Spermophilus*), woodrats (*Neotoma*), kangaroo rats (*Dipodomys*), deer mice (*Peromyscus*), and voles (*Microtus*), often digging to pursue prey into their dens. American badgers also prey on ground-nesting birds and on lizards. The species is primarily nocturnal (USFWS 2014).

In California, American badgers are most abundant in drier open stages of most shrub, forest, and herbaceous habitats with friable soils. Badgers use abandoned burrows of other animals, such as foxes or animals of a similar size. American badger dens are used for concealment and as natal dens; dens are up to 30 feet (10 m) long and 10 feet (3 m) deep.

The avocado orchard and the ecotone between the agricultural fields and Adams Barranca provides forging habitat for this species.

Nesting Birds—Listing Migratory Bird Treaty Act (MBTA)

No active bird nests were observed at the time of survey, however, suitable nesting habitat is present within the avocado orchard, ornamental trees within the Project area, and adjacent trees to the Project Site and within Adams Barranca.

Wildlife Movement

Wildlife corridors are pathways or habitat linkages that connect discrete areas of natural open space otherwise separated or fragmented by topography, changes in vegetation, and other natural or human-induced factors, such as urbanization. Corridors allow animals to move between open space areas and provide escape routes from fire, predators, and human disturbances and provide travel paths for individual animals moving throughout their home range.

Adams Barranca, along the western border of the site, contains a channelized bed that may facilitate the movement of terrestrial wildlife from the foothills of the Topatopa Mountains to the Santa Clara River. This portion of Adams Barranca located adjacent to the Project Site contains marginal habitat for movement purposes in that it has been confined by past agricultural grading activities, contains culverts, and is bordered by developed areas along various reaches. However, it does provide vegetative cover and serves as a pathway for small mammals between historically connected habitat and natural areas, thereby facilitating wildlife movement between these natural areas. The corridor is viable due to ease of travel, native vegetation, and connection with the Santa Clara River.

Jurisdictional Wetlands and Water of the US and State

Two drainage courses traverse the Project Site. As provided previously, Adams Barranca is an ephemeral to intermittent drainage to a mixed southern willow riparian woodland along the southwest boundary.

An agricultural ditch bisects the Project Site and flows north to south from Telegraph Road near the north boundary to SR 126 near the south boundary.

Adams Barranca

Adams Barranca is considered an ephemeral to intermittent drainage that runs generally north–south, originating from Adams Canyon in the foothills north of the City and is tributary to the Santa Clara River south of the Project Site. The limits of the Barranca have been modified by past agricultural grading activity that abuts both sides over most of the Barranca between the foothills and SR 126. The Barranca has also been modified with a concrete culvert that allows it to flow under Telegraph Road and by SR 126, which intersects the Barranca flows to the south. Most stretches of the Barranca contain well vegetated canopies.

The lower reaches of the Adams Barranca run along the southwest boundary of the Project Site. In the area of the Project Site, the Barranca supports a mixed southern willow riparian woodland vegetation community with trees and shrubs within the banks and along the channel within the ordinary high water mark (OHWM). The mixed southern willow riparian community is considered a sensitive natural community by the CDFW. The CDFW jurisdictional boundary includes the channel OHWM, banks, and the extent of riparian vegetation.

Adams Barranca has a reliable OHWM, a defined channel with bed and bank and other physical indicators of flow. Therefore, Adams Barranca is considered "State Waters." State Waters are regulated under the jurisdiction of the CDFW, per Section 1602 of the Fish and Game Code, and the RWQCB under the Porter-Cologne Water Quality Act, division 7 and Section 13260 of the California Code.

Adams Barranca is considered non–relatively permanent water (Non-6) that flows directly or indirectly into traditional navigable water (TNW). Non-RPWs are drainages in which flows are not continuous, at least seasonally. Adams Barranca flows directly to the Santa Clara River (a TNW) and indirectly to the Pacific Ocean (a TNW). Adams Barranca exhibits channel morphology that would be considered jurisdictional, including bank, scour, sediment deposit, and OHWM. Non-RPWs that flow directly or indirectly into TNWs require a significant nexus to assert jurisdiction over this class of water body under the federal Clean Water Act (CWA). Due to the close proximity and direct hydrologic connection to the Santa Clara River, Adams Barranca is considered to have a significant nexus. Therefore, Adams Barranca, a non-RPW tributary to the Santa Clara River, is considered jurisdictional pursuant to the US Army Corps of Engineers (ACOE) and Section 404 of the CWA and the Regional Water Quality Control Board (RWQCB) under Section 401 of the CWA.

Under the new rule, "tributaries are more precisely defined as waters that are characterized by the presence of physical indicators of flow, bed and banks and ordinary high water mark and that contribute flow directly or indirectly to traditional navigable water, interstate water, or the territorial seas. The rule concludes that such tributaries are "Waters of the United States." Pursuant to the US Environmental Protection Agency (USEPA) and ACOE Final Clean Water Rule—Definition of Waters of the United States (May 26, 2015), Adams Barranca, a tributary to the Santa Clara River, is considered Waters of the United States.

Dredge and fill activities in federally jurisdictional waters (Waters of the United States) that trigger coverage under a Section 404 must also receive water quality certification under Section 401 of the CWA. The State Water Resources Control Board (SWRCB) and its RWQCBs has regulatory oversight over Section 401 water quality certifications in California. Because Adams Barranca is considered Waters of the United States is it subject to Section 401 of the CWA.

Agricultural Drainage Ditch

An unnamed ephemeral drainage/agricultural ditch bisects the Project and flows north to south to SR 126. The agricultural ditch drains into upland agricultural fields with no upstream hydrological connection but outlets to the Santa Clara River to the south. Therefore, this drainage is not considered Waters of the United States. CDFW may consider the agricultural ditch State Waters because it has bed and bank and flows into the Santa Clara River. Therefore, the agricultural ditch may be regulated under Section 1602 of the CDFW Code.

All determinations in this report should be considered preliminary until concurrence through either a Preliminary Jurisdictional Determination, or request for a formal Jurisdictional Determination by the ACOE, Los Angeles District.

Jurisdictional Areas

The total areas of Federal and State jurisdiction for the Adams Barranca and the agricultural ditch are summarized in **Table 4.4-6**, **Jurisdiction Waters**.

Table 4.4-6
Jurisdictional Waters

Feature	Waters of the US (ACOE, RWQCB)				State Waters (CDFW)			
	Acres		Linear Feet		Acres		Linear Feet	
	Total Waters	Within Project Site	Total Waters	Within Project	Total Waters	Within Project	Total Waters	Within Project
Adams Barranca	0.434	0.051	1885	241	2.402	0.430	1885	241
Unnamed agricultural drainage ditch	0	0	0	0	0.117	0.117	1699	1699
Total	**0.434**	**0.051**	**1885**	**241**	**2.519**	**0.547**	**3584**	**1940**

Approximately 0.434 acres of Waters of the United States and 2.519 acres of State Waters were identified as either within or in the immediate vicinity (e.g., portions of Adams Barranca that are west of the Project Site. A total of 0.051 acres of Waters of the United States (consisting of portions of Adams Barranca) and 0.547 acres of State Waters (consisting of portions of Adams Barranca and the agricultural ditch) occur within the Project Site.

4.4.2 REGULATORY SETTING

4.4.2.1 Federal Regulations

Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act[12] makes it unlawful to "take" (kill, harm, harass, etc.) any migratory bird, including their nests, eggs, or products. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many other species that may utilize natural and artificial habitats throughout the area.

Federal Endangered Species Act of 1973

Section 3 of the federal Endangered Species Act (ESA)[13] defines an endangered species as any species or subspecies "in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as any species or subspecies of fish, wildlife, or plant "likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Threatened or endangered species and associated critical habitat are designated through publication of a final rule in the Federal Register. Designated endangered and threatened animal species are fully protected from "take" unless an applicant has an incidental take permit issued by the USFWS under Section 10 or incidental take statement issued under Section 7 of the ESA. Take is defined as the killing, capturing, or harassing of a

12 16 USC 703–712; Ch. 128; July 13, 1918; 40 Stat. 755, as amended, Migratory Bird Act.

13 16 USC 1531–1544, 87 Stat. 884, as amended—Endangered Species Act of 1973, Public Law 93-205 (approved December 28, 1973).

species. Proposed endangered or threatened species include those species for which a proposed regulation has been published in the Federal Register, but a final ruling has not been made.

Final Southern California Steelhead Recovery Plan

Steelhead are the anadromous, or ocean-going, form of rainbow trout *Oncorhynchus mykiss* (*O. mykiss*). One of six Pacific salmon species native to the west coast of North America, steelhead are currently the only species of this group that naturally reproduces within the coastal watersheds of Southern California. Steelhead is one of several related *Oncorhynchus* species that exhibit considerable life history plasticity, including the ability to complete their life cycle entirely in freshwater or migrate to the ocean as juvenile "smolts," returning to spawn in freshwater as adults after 1–3 years at sea. Adding to the complexity of the *O. mykiss* life history is the apparent ability of rainbow trout to produce steelhead offspring (an anecdotally common occurrence in populations within the Santa Clara River watershed), and for steelhead to produce resident rainbow trout offspring. Since steelhead typically remain in freshwater for at least 1 year after hatching, most river habitats are utilized by one or more life stages (egg, fry, fingerling, juvenile, and adult), which provides an indicator of the health of Southern California watersheds. Southern California steelhead populations have declined precipitously, largely due to extensive watershed development.

Based on the results of a comprehensive status review of all West Coast steelhead populations conducted by the National Oceanographic and Aeronautics Administration's (NOAA) National Marine Fisheries Service (NMFS), Southern California steelhead were listed as an endangered species under the ESA on August 18, 1997, with a range extension to the US-Mexico Border in 2002. Following a status review in 2005, a final listing determination was issued on January 5, 2006, for the Southern California Steelhead Distinct Population Segment (DPS); additionally, critical habitat was designated within 32 watersheds known to support this DPS.

The Southern California Steelhead (SCS) Recovery Planning Area extends from the Santa Maria River to the Tijuana River at the US-Mexico border. The SCS Recovery Planning Area includes those portions of coastal watersheds that are at least seasonally accessible to steelhead entering from the ocean, and the upstream portions of watersheds that are currently inaccessible to steelhead due to man-made barriers but were historically used by steelhead. Major steelhead watersheds in the northern portion of the SCS Recovery Planning Area include the Santa Maria, Santa Ynez, Ventura, and Santa Clara Rivers, and Malibu and Topanga Creeks. Major steelhead watersheds in the southern portion of the SCS Recovery Planning Area include the San Gabriel, Santa Margarita, San Luis Rey, San Dieguito, and Sweetwater Rivers, and San Juan and San Mateo Creeks. The Santa Clara River, which drains much of the western Traverse Range, was also included in the critical habitat designation.

The Final Southern California Steelhead Recovery Plan[14] identifies the Monte Arido Highlands Biographic Population Group (BPG), which includes the Santa Clara River, as Core 1 population, with a high priority for recovery.[15] Critical recovery actions identified for the Santa Clara River include implementing operating criteria to:

- Ensure the temporal pattern and magnitude of water releases, including bypass flows from diversions at Vern Freeman, Santa Felicia, Pyramid, and Castaic dams that provide essential habitat functions that support life history and habitat requirements of adult and juvenile steelhead; and
- Provide natural rates of migration for steelhead to upstream spawning and rearing habitats, and passage of smolts and kelts downstream to the estuary and ocean by physically modifying the diversions at Vern Freeman, Harvey, Santa Felicia, and Pyramid dams, and the lower Santa Paula Creek flood control channel.

Clean Water Act

The federal CWA[16] regulates discharges into Waters of the United States. The CWA states:

> *"Waters of the United States" include:*
>
> *1. all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters subject to tidal action;*
>
> *2. all interstate waters, including interstate wetlands;*
>
> *3. all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters;*
>
> *a. which are or could be used by interstate or foreign travelers for recreational or other purposes; or*
>
> *b. from which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or*
>
> *c. which are used or could be used for industrial purpose by industries in interstate commerce;*
>
> *4. all impoundments of waters otherwise defined as waters of the United States under the definition;*
>
> *5. tributaries of waters identified in paragraphs (a) (1) through (4) of this section;*

14 National Marine Fisheries Service, *Southern California Steelhead Recovery Plan*, Public Review Draft Version (Long Beach, CA: Southwest Regional Office, January 2012).

15 National Marine Fisheries Service, *Southern California Steelhead Recovery Plan* (January 2012), Table 9-3.

16 33 USC, sec. 1251 et seq., Federal Clean Water Act (1972).

6. *the territorial seas; and*
7. *wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a)(1) through (6) of this section.*

ACOE jurisdiction in nontidal waters typically extends to the OHWM. The OHWM for intermittent streams, for example, can be determined by the fluctuations of water as indicated by physical characteristics such as clear, natural lines impressed on a water bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas (33 CFR 328.3(e)).

In 2006, the US Supreme Court revisited the issue of jurisdictional scope of Section 404 of the CWA. In *Rapanos vs. US* and *Carabell vs. US,* the court ruled that Waters of the United States are subject to CWA jurisdiction if the water body (1) is relatively permanent or seasonal (typically three months or more); (2) is a wetland that directly abuts a relatively permanent water body; or (3) if the water body and its adjacent wetland has a significant physical, biological, or chemical nexus with a traditionally navigable waterway.

Most impacts to areas delineated as waters of the United States, if determined to be jurisdictional by the ACOE, require approval under the authority of the CWA and its implementing regulations.

Section 401

Section 401 of the CWA authorizes the State of California to certify that federal permits—including ACOE Section 404 permits—and licenses do not violate the state's water quality standards. The state's implementing regulations to conduct certifications are codified under the California Code of Regulations Title 23, "Waters," Sections 3830–3869. Projects qualifying for a ACOE Section 404 permit must submit materials for review to the appropriate RWQCB and request a Section 401 certification. Much of the same information (project description, potential impacts, and mitigation measures) necessary to apply for ACOE Section 404 and California Fish and Game Code Section 1602 permits is required for the Section 401 certification.

In response to certain federal court decisions that limited ACOE jurisdiction, the state issued several directives to the regional boards regarding the regulation of isolated waters no longer regulated by the ACOE. At present, the State Water Quality Control Board and the RWQCBs are to:

- Continue issuing Section 401 certifications for federal permits; and
- Issue Waste Discharge Requirements (WDRs) for dredge or fill discharges to waters deemed by the ACOE as not subject to federal jurisdiction referencing the same regulatory considerations that are used to issue general WDRs.

A Section 401 certification and a WDR application may be made on the same form, but the State Board has issued a model letter to be submitted with the WDR application to clarify that the WDRs are intended to cover "waters of the State" not covered by the Section 401 certification and not subject to the ACOE regulations.

Section 404

The federal CWA was passed in 1972 and regulates discharges into Waters of the United States. Section 404 of the CWA regulates activities including discharge of dredged or fill materials into Waters of the United States.

The discharge of fill material into an area delineated as Waters of the United States, including wetlands, that is determined to be under the ACOE jurisdiction, requires a permit or other approval by the ACOE Regulatory Branch. Fill is broadly defined as anything foreign introduced into the receiving water. This includes most materials (e.g., rock, soil, pilings, concrete, wood, some incidental fallback of soil from earth-moving equipment, and in some cases additional water) that can be discharged into a water or wetland.

Most Section 404 permits require mitigation for reducing overall impacts to wetlands, including Waters of the United States and their functions.

Federal Rivers and Harbors Act

Federal regulations of Waters of the United States stem from Section 10 of the Federal Rivers and Harbors Act of 1899,[17] enacted to regulate activities within navigable waters. Under Section 10 of the act, the building of any wharfs, piers, jetties, and other structures is prohibited without Congressional approval, and excavation or fill within navigable waters requires the approval of the Chief of Engineers. Primary concerns of this act include contamination of sediments associated with dredge or fill projects in navigable waters.

4.4.2.2 State Regulations

California Endangered Species Act

The California Endangered Species Act (CESA)[18] generally parallels the main provisions of the federal ESA and is administered by the CDFW. The CESA ensures that deserving plant or animal species will be given protection by the state based on their ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people of the state. The CESA establishes state policy to conserve,

17 33 USC 403; ch. 425, March 3, 1899; 30 Stat. 1151, Rivers and Harbors Act of 1899.
18 California Fish and Game Code, sec 2050 et seq.

protect, restore, and enhance endangered species and their habitats. Under state law, plant and animal species may be formally designated as rare, threatened, or endangered through official listing by the California Fish and Game Commission. Listed species are provided greater protection during the land use planning process by local governments, public agencies, and landowners than are species that have not been listed.

On private property, endangered plants may also be protected by the Native Plant Protection Act (NPPA) of 1977. State-listed threatened plants are protected by the CESA, and state-listed rare plants are protected by the NPPA. However, the CESA authorizes that "private entities may take plant species listed as endangered or threatened under the ESA and CESA through a federal incidental take permit issued pursuant to Section 10 of the ESA, if the CDFW certifies that the incidental take statement or incidental take permit is consistent with the CESA." In addition, the California Environmental Quality Act (CEQA) requires disclosure of any potential impacts on listed species and alternatives or mitigation that would reduce those impacts.

California Fish and Game Code

Sections 1602–1605

The State of California regulates water resources under Sections 1600–1605 of the Fish and Game Code of California.[19] It is unlawful for any person to divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or to use any material from the streambeds, without first notifying the CDFW of that activity.

The CDFW considers most natural drainages to be streambeds unless it can be demonstrated otherwise. Streams are defined in the California Code of Regulations as follows:[20]

> *A stream is a body of water that flows at least periodically or intermittently through a bed or channel having banks and that supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation.*

The CDFW jurisdiction under Section 1602 includes ephemeral, intermittent, and perennial watercourses, and is often extended to the limit of riparian habitats that are located contiguous to the water resource and that function as part of the watercourse system. The California Fish and Game Code states:[21]

19 California Fish and Game Code, sec. 1600–1605.
20 California Code of Regulations tit. 14, ch. 1, sec. 1.72.
21 California Fish and Game Code, sec. 2785(e).

> *Riparian habitat means lands which contain habitat that grows close to and which depends on soil moisture from a nearby freshwater source.*

Any project that impacts CDFW jurisdictional areas, including fills, vegetation removal, or bridging, requires a Section 1602 Streambed Alteration Agreement (SAA) from the CDFW. Much of the same information (i.e., project description, potential impacts, mitigation measures, etc.) necessary to apply for ACOE Section 404 permits is also required in the SAA application.

Sections 3503, 3503.5, and 3800

The California Fish and Game Code[22] also prohibits the destruction of bird nests and eggs (Section 3503), and the "take" of birds of prey (Section 3503.5) and nongame birds (Section 3800). Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered "take." Such take would also violate federal law protecting migratory birds.

Incidental take permits (i.e., Management Agreements) are required from the CDFW for projects that may result in the incidental take of species listed by the State of California as endangered, threatened, or candidate species. The permits require that impacts to protected species be minimized to the extent possible and mitigated to a level of insignificance.

California Environmental Quality Act—Treatment of Listed Plant and Animal Species

The ESA and CESA protect only those species formally listed as endangered or threatened (or rare in the case of the state list). Section 15380 of the State CEQA Guidelines independently defines "endangered" species of plants or animals as those whose survival and reproduction in the wild are in immediate jeopardy, and "rare" species as those in such low numbers that they could become endangered if their environment worsens. Therefore, a project normally will have a significant effect on the environment if it will substantially affect an endangered or rare species of animal or plant, or the species' habitat. The significance of impacts to a species under CEQA must be based on analyzing the actual threat of extinction or rarity of the species or habitat despite legal status or lack thereof.

4.4.2.3 Local Regulations

City of Santa Paula

General Plan Open Space and Conservation Element

The Santa Paula General Plan Conservation and Open Space Element contains descriptive information related to natural resources and open space that is relevant and of concern to Santa Paula. The purpose

22 California Fish and Game Code, sec. 3503, 3503.5, and 3800.

of the Conservation and Open Space Element is to maintain the overall quality of life for Santa Paula residents through the management and protection of natural resources and open space lands. The goals, objectives, and policies in the Conservation and Open Space Element provide guidelines and mandates for community actions.

The Santa Clara River flows south of the City and, as addressed in the Conservation and Open Space Element, is probably the most important natural resource in the Santa Paula area.[23] Future planning efforts in these areas should emphasize conservation of this extremely important aquatic resource. A few parcels located at the east end of the City (south of the freeway) adjacent to the river, provide opportunities to conserve important riparian/wetland habitat. Additionally, open space buffers should be included between all future development and the river. These buffers may include agriculture, natural open space, parks, or continued aggregate operations, if compatible with proposed development.

The Conservation and Open Space Element identifies the southern willow scrub and cottonwood-willow riparian forest along the Santa Clara River as sensitive habitats.[24] The yellow warbler and yellow-breasted chat, which generally breed in riparian thickets, have been reported breeding along the river upstream of Santa Paula. Least Bell's vireo (listed by both the state and federal governments as endangered) also breeds along the river. To the extent possible, the habitat value of these important riparian resources should be maintained.

The following goals, objectives, and policies of the Conservation and Open Space Element apply to the proposed project:[25]

Municipal Code

Tree Protection Ordinance

The City of Santa Paula includes trees as a significant, historical, aesthetic, and valuable ecological resource. As a result, mature trees on public property, and native oak, sycamore, and heritage and historic trees on public or private property are to be protected and preserved to the greatest extent possible, especially when the trees are associated with proposed urban development.[26] Chapter 56 of the Municipal Code was adopted with the intent to maintain and enhance the general health, safety, and welfare of the residents of the City by preserving and protecting certain trees.

23 City of Santa Paula, *General Pan,* "Conservation and Open Space Element" (1998), pp. CO-32–33.
24 City of Santa Paula, *General Pan,* "Conservation and Open Space Element" (1998), p. CO-35.
25 City of Santa Paula, *General Pan,* "Conservation and Open Space Element" (1998), pp. CO-43–47.
26 City of Santa Paula, Municipal Code, sec. 17.56.010 to 17.56.120, and City Resolution No. 3919, Tree Preservation Ordinance.

No native oak and sycamore tree, heritage or historic tree, where that tree is on public or private property, or any other mature tree on public property, or trees which are on land which is part of a proposal for urban development, shall be removed, cut down, or otherwise destroyed, unless a Tree Removal Permit has been issued by the City. Tree trimming and pruning are exempted from the permitting requirements unless the tree would be destroyed by the trimming or pruning. In no event shall a permit be denied if to do so would eliminate all reasonable economic use of the property.

4.4.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, the CEQA identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guidelines (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on agricultural resources if any of the following occur.

- 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 US Fish and Wildlife Service?
- 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?
- 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?
- 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?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Section 15065(a) of the State CEQA Guidelines also states that a project may have a significant effect on the environment when the project has the potential for any of the following to occur:

- substantially degrade the quality of the environment;
- substantially reduce the habitat of a fish or wildlife species;
- cause a fish or wildlife population to drop below self-sustaining levels;

- threaten to eliminate a plant or animal community; or
- reduce the number or restrict the range of an endangered, threatened, or rare species.

The physical alteration of habitat is not, in itself, a significant impact under CEQA. Significance is determined by comparing physical alteration of habitat against each of the significance threshold criteria defined above. For example, should the alteration of habitat result in the direct or indirect loss or have an otherwise substantial adverse effect on a species identified as a "candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS," impacts would be considered significant.

4.4.4 PROJECT IMPACTS

Threshold: **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 US Fish and Wildlife Service**

The plant communities occurring within the Project Site are shown in **Figure 4.4-1.** The total acreage of each plant community occurring on site was calculated within a GIS database. Total and impacted acreage of each community is provided in **Table 4.4-7, Plant Communities Impacted.**

Table 4.4-7
Plant Communities Impacted

Vegetation Communities	Acres on Site	Acres to Be Developed under the Project
Adams Barranca Mixed Willow Riparian	0.51	0.00
Agricultural Avocado Orchard	8.06	8.06
Agricultural Ditch	0.18	0.18
Agricultural Row Crops	38.46	38.46
Developed	6.60	6.60
Total	**53.81**	

Since the Project includes the dedication of Open Space for the areas identified as Mixed Willow Riparian, and no development would occur within the Mixed Willow Riparian habitat area, potential impacts to vegetation communities are considered less than significant.

Loss of Special-Status Plant Species

No special-status plant species are expected to occur within the impacted agricultural avocado orchard, agricultural ditch, or agricultural row crop communities, or developed areas.

As discussed previously in Existing Conditions, Southern California black walnut (*Juglans californica*) is the only special-status plant species that was documented or determined to have a high likelihood of occurring within the Project Site. A total of 19 individual trees are located along the perimeter of the Project Site, mainly along the southwest boundary within the riparian habitat of the Adams Barranca and along the SR 126 right-of-way along the southeast boundary of the Project Site.

This species was observed within Adams Barranca and just off site in the southeastern section of the Project area, immediately adjacent to SR 126. The Project includes the designation of Open Space over the riparian habitat of the Adams Barranca, including the black walnut trees within; and thus would not grade near the trees or otherwise cause damage to the trees or the soil within the tree driplines. With regard to the black walnut trees along the southern boundary, the Project grading and construction activity could avoid the trees because many are just outside the Project boundary or are on the outermost fringe of the Project grading limits. While it is possible for these trees to be avoided and remain post development, there is a potential that Project land moving and grading could affect the trees drip line or inadvertently cause damage to the trees. Therefore, impacts to special-status plant species (e.g. black walnut) are considered potentially significant.

Special-Status Wildlife Species

Southwestern Willow Flycatcher (Empidonax trailii extimus)—*Listing: Federally Endangered, State Endangered*

As previously described, the Southwestern willow flycatcher breeds in dense riparian habits along rivers and streams, and almost all southwestern flycatchers breeding habitat is within close proximity of water or saturated soils. While this species was not observed during the Project surveys, Adams Barranca provides marginal habitat for the species. This species is not expected to breed and nest in Adams Barranca but may use the habitat for foraging, and CNDDB records indicate nesting pairs within 0.5 miles within willow riparian habitats of the Santa Clara River. The Project includes construction activity that could result in a temporary impact to the species if members are foraging or in the unlikely event they nest near the Project Site at the time of construction. Therefore, impacts are considered potentially significant.

Least Bell's Vireo (Vireo bellii pusillus)—*Listing: Federally Endangered, State Endangered*

The least Bell's vireo was not observed during the Project surveys; however, Adams Barranca provides potential habitat for the species. This species is not expected to breed and nest in Adams Barranca but may use the habitat for foraging. While nesting is not expected for the species, recent CNDDB records indicate nesting pairs within 0.5 miles within willow riparian habitats of the Santa Clara River. Given the location in close proximity to the Project Site and the potential for foraging habitat within the Project Site, impacts are considered potentially significant in the unlikely event this species nests on site or in the immediate vicinity and is subject to disturbance from construction activity.

*Pallid Bat (*Antrozous pallidus)—*Listing: CA Species of Special Concern*

Although the Pallid bat was not observed during the Project surveys, Adams Barranca provides foraging and roosting habitat for the species. This species is not expected to breed in Adams Barranca but may use habitat for roosting, and the agricultural and row crops areas of the Project Site for foraging. Construction under the Specific Plan could result in potentially significant impacts to pallid bats.

Hoary Bat (Lasiurus cinereus)—*Listing: CA Species of Special Concern*

This species was not observed during the Project surveys, however, Adams Barranca provides foraging and roosting habitat for the species. This species is not expected to breed in Adams Barranca but may use the habitat for roosting, and the agricultural areas of Project Area for foraging.

American Badger (Taxidea taxus)—*Listing: CA Species of Special Concern*

The avocado orchard within the Project Site and the ecotone between the agricultural fields and Adams Barranca provides forging habitat for the American badgers, as they are most abundant in the drier, open stages of most shrub, forest, and herbaceous habitats with friable soils. Badgers use abandoned burrows of other animals such as foxes or animals of a similar size. Development under the Specific Plan could result in the loss of American badger habitat. Impacts are considered potentially significant.

Nesting Birds—Listing Migratory Bird Treaty Act (MBTA)

No active bird nests were observed at the time of survey; however, suitable nesting habitat is present within the avocado orchard, ornamental trees within the Project area, and adjacent trees to the Project Site and within Adams Barranca. However, there is the potential for nesting birds during the breeding season and thus impact may be potentially significant.

Threshold: **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service**

Development under the Specific Plan would include removal of existing vegetation within the Project Site; grading to reach finished grades to support structures; installation of storm drains to carry surface runoff; and construction of buildings, driveways, and parking lots. This would require the removal of the agricultural drainage ditch that bisects the Project Site and is considered State Waters pursuant to the Fish and Game Code and the Clean Water Act. Other state and federal jurisdictional waters (i.e., those within Adams Barranca) would be preserved through an Open Space dedication and prevention of construction activities within the Barranca. **Table 4.4-8**, **Impacts to Jurisdictional Waters**, provides a breakdown of the acres and linear feet of impacts of the Project.

Table 4.4-8
Impacts to Jurisdictional Waters

	Waters of the US (ACOE, RWQCB)				State Waters (CDFW)			
	Acres		Linear Feet		Acres		Linear Feet	
Feature	Within Project Site	Area Impacted by Project	Within Project	Area Impacted by Project	Within Project Site	Area Impacted by Project	Within Project	Area Impacted by Project
Adams Barranca	0.051	0.00	241	0.00	0.430	0.00	241	0
Unnamed agricultural drainage ditch	0.00	0.00	0	0.00	0.117	0.117	1699	1699
Total	**0.051**	**0.00**	**241**	**0.00**	**0.547**	**0.117**	**1940**	**1699**

As shown in **Table 4.4-8**, development under the Specific Plan would result in the loss of approximately 0.117 acres and 1,699 linear feet of state jurisdictional waters. The Applicant would be required to obtain a 1602 Agreement (SAA) from the CDFW for these impacts. A 401 permit from the RWQCB will also be required. Each of the agencies will require mitigation for impacts.

While all Project impacts to ACOE and CDFW jurisdictional areas are considered potentially significant, they would be mitigated to a less than significant level through the conditions imposed pursuant to the Project's 404, 401, and 1602 permits/agreement as well as by mitigation measures imposed by this EIR.

Increases in Light and Glare

The development of the Project Site would increase the number of nighttime light and glare sources on the site. Light and glare can "spill over" into adjacent open space areas, increasing the level of light currently experienced there. Nighttime illumination is known to adversely affect some species of animals

in natural areas. Nighttime light can disturb breeding and foraging behavior and can potentially alter foraging and breeding behavior of nocturnal birds, mammals, and invertebrates, which is considered a potentially significant impact.

Increase in Human Presence

The close proximity of the Project to Adams Barranca could result in adverse edge effects that could adversely impact riparian habitats and associated wildlife, and compromise its value as a wildlife corridor. Although Adams Barranca is already significant affected by human and pet encroachment from residential areas to the north, development under the Project can be expected to increase human activity near Adams Barranca, which could result in an increase in the frequency of human encroachment into the Barranca when compared to existing conditions. Human encroachment has the potential to disturb riparian vegetation in the Barranca. Also, human encroachment and noise could result in disturbance, harassment, capture, removal, and/or mortality of wildlife, including nesting birds. Excessive noise and light trespass and glare from artificial night lighting associated with the development could disturb wildlife and cause some species to avoid the area; however, the Adams Barranca is already significantly disturbed by human presence and by noise and light trespass from vehicular traffic and nearby urban uses, including glare from artificial night lighting.

The Open Space designation of the Specific Plan, upland buffers from the riparian area and development under the Project, and the Project characteristics that would provide predominantly indoor daytime work areas would minimize any potential for increase human disturbance to the Adams Barranca. Therefore, indirect impacts from human encroachment would be less than significant.

Increase in Nonnative Plants

Plants typical of an urban environment already occur to some degree in the region due to the presence of development in the immediate vicinity. Because nonnative and exotic plants are commonly included in landscaping plans of both common areas and private lots of new development projects, the Project could increase nonnative and exotic plant populations.

Invasive exotic species introduced as landscaping could be dispersed by stormwater, wind, or wildlife, or by various other means to natural habitats in the area, including Adams Barranca and other downstream waterbodies, such as the Santa Clara River. Invasive species could outcompete native plants and disrupt normal ecological processes, reducing biological diversity and potentially threatening the quality of natural habitats. Impacts from the introduction of invasive exotic landscape plants could be potentially significant.

The plant palettes of the Preliminary Landscape Plan and plant palette and any landscape plans included with future development under the Specific Plan must be compared with the then-current version of the California Invasive Plant Inventory, as well as an invasive plant list compiled by the CNPS.

Urban Runoff

The Specific Plan is designed to include stormwater infiltration and treatment (refer to **Section 4.9 Hydrology** and **Appendix 4.9** of this EIR for a more detailed discussion). This includes low-impact development (LID) best management practices (BMPs) to ensure that the Project does not result in adverse effects to water quality in the Adams Barranca or the Santa Clara River. The Santa Paula West Business Park Specific Plan Drainage Master Plan will provide storm drains and runoff directed to an on-site detention basin for passive treatment of runoff from the Project driveways and other hard surfaces. The detention basins will be designed using flow-based criteria (e.g., 10 percent of the 50-year design flow rate) from the storm drain system, consistent with the Ventura County Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) guidelines. The slopes of the detention basins will be planted with various plant species as outlined in the County of Ventura *Technical Guidance Manual.* Flow rates through the basin will be reduced due to the plants that are inundated in the stormwater to allow for contact time with the vegetation, which will maximize infiltration and sediment settling and reduce flows. All runoff will be routed through stormwater BMPs treatment facilities; only the later-stage flows of the larger rainfall events will be allowed to discharge off site. The BMPs will moderate the storm runoff such that peak flows from the Project Site to the off-site drainages will be no higher than under current conditions. In addition, the BMPs will treat flows by allowing particulates and pollutants to settle out and be retained on site, thereby substantially improving the water quality of the stormwater, compared to existing pre-Project discharge conditions. Vegetation in the flow detention features will further reduce concentrations of metals in runoff through natural metabolic uptake and sorption processes.

Overall, the BMPs and the Project Design Features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all applicable federal, state, and local water quality rules and regulations in order to effectively minimize the Project's impact on water quality. Accordingly, impacts would be less than significant.

Threshold: **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**

As discussed previously, surveys identified approximately 0.117 acres and 1116 linear feet of agricultural ditch represents an ephemeral drainage are generally subject to the jurisdiction of the ACOE under the Clean Water Act, Section 404 the RWQCB pursuant to the Clean Water Act, Section 401 and the California Porter-Cologne Act; and the CDFW under California Fish and Game Code, Section 1602.

As such, a formal determination of jurisdictional wetlands and waters would be required during the applicable permitting phase and prior to any ground disturbance that may impact these features.

ACOE review and certification of a jurisdictional delineation would be required to confirm the above estimated jurisdictional areas and to verify ACOE jurisdictional area.

Fill in areas determined by the ACOE to fall under its jurisdiction would be subject to a Clean Water Act Section 404 Nationwide Permit (NWP). Additionally, areas determined to be federally protected by the ACOE would also be subject to the jurisdiction of the RWQCB, and a Clean Water Act Section 401 Water Quality Certification (401 Certification).

Alteration of state-protected waters and associated riparian vegetation would require the acquisition of a Fish and Game Code Section 1602 SAA from the CDFW. Due to the high habitat value that drainages and swales are known to provide for wildlife and because these areas are under the jurisdiction of the CDFW, the proposed removal of these waters is considered a potentially significant impact.

Threshold: **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**

As described previously, Adams Barranca, located along the western border of the Project Site is could provide a wildlife movement corridor with linkage between the foothills of the mountains north of the City and the Santa Clara River. The Project would not include construction within the Adams Barranca and would not otherwise hamper or block the existing wildlife movement corridor because the Barranca itself is the corridor of travel. The Project would not result in potentially significant impacts to the movement of resident or migratory fish or terrestrial wildlife species.

As previously noted, no historical or active raptor nests or communal roosts exist at the Project Site or within 100 feet of any area that is or will be subject to development within the Project Site. Several species of raptors could potentially nest within the riparian habitats of Adams Barranca or in the eucalyptus or black walnut trees along the western and southern boundaries. Although the quality of these areas as raptor nesting habitat is relatively low due to surrounding agriculture, SR 126, development, noise, and human activities. For this reason, development of the Project within the West Area 2 Expansion Area (as defined in the City's General Plan) would not substantially reduce or eliminate the quantity or quality of raptor nesting or communal roosting areas and would have a less than significant impact.

On an incremental basis, the development of the Project would result in the permanent loss of marginally suitable foraging habitat for raptors, but the foraging habitat at this site is predominantly agricultural land and not essential for the successful breeding of raptors nesting in the region and is not designated as a conservation are for this purpose. The mixed riparian and native vegetation along Adams Barranca would be preserved through an Open Space designation; as such, development impacts to that area would be avoided. The nonnative vegetation that would be removed by the Project (i.e., agricultural and developed areas) is of less importance to raptors than the habitat available in the larger and more diverse natural habitats within the general Santa Clara River Valley area. Because raptors are mobile species with generally large home ranges, they are capable of compensating for the loss of small acreages of foraging habitat in a local area by moving to other suitable foraging habitats. Therefore, development of the Project would not eliminate significant raptor foraging areas or limit raptors' access to food resources, making potential impacts to raptors due to the development of the Project less than significant.

Threshold: **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan**

The goals, objectives, and policies in the Conservation and Open Space Element guide the protection of natural resources, open space, and sensitive biological resources. The Conservation and Open Space Element identifies Adams Barranca as a natural resource preservation area. The Project includes the dedication of approximately 4.9 acres (9.1 percent) of the Project Site as Open Space along the western boundary to preserve and provide a buffer area from the Adams Barranca. Therefore, the Project is consistent with the City General Plan Conservation and Open Space Element because it provides for the protection the City's natural resources, and impacts would be less than significant.

The USFWS has prepared Recovery Programs for both the least Bell's vireo and Southwestern willow flycatcher. As noted under the Existing Conditions discussion, neither of these species was found on the Santa Paula West Business Park Project areas or within the nearby areas. The Santa Paula West Business

Park Project is consistent with criteria of the recovery plans for the least Bell's vireo and southwestern willow flycatcher in that habitat located on site will not be permanently impacted. Implementation of the Open Space dedication would provide stable habitat for individuals in the Santa Clara River Watershed by providing additional nesting and foraging opportunities. Therefore, implementation of the Project would result in less than significant impacts to the recovery of these species.

Final Recovery Plan for the Least Bell's Vireo

The Project is consistent with the recovery plan for this species because the least Bell's vireo habitat present on the site would not be impacted. The Project would result in potentially significant impacts to the least Bell's vireo. However, mitigation measures are included within this EIR, and the Project would include an Open Space dedication along the western boundary to avoid impacts to habitat for least Bell's vireo individuals in the Santa Clara River Watershed.

Final Recovery Plan for the Southwestern Willow Flycatcher

The Project is consistent with the recovery plan for this species because if southwestern willow flycatchers are located on site, they would not be permanently impacted. Although, the Project would result in potentially significant impacts to the southwestern willow flycatcher, mitigation measures are included within this EIR, and the Project includes an Open Space dedication along the western boundary to avoid impacts to habitat for southwestern willow flycatcher individuals in the Santa Clara River Watershed.

4.4.5 CUMULATIVE IMPACTS

Cumulative impacts are defined in CEQA as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Stated in another way, "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing relating impacts" (CEQA Guidelines Section 15130 (a)(1)).

The development of approximately 49 acres of already disturbed agricultural lands and 4.48 acres of urban developed land on the Project Site would have limited adverse effects on the diversity and abundance of native flora and fauna either locally or in the region. Natural habitat areas containing suitable habitat for special-status animal and plant species is proposed to be preserved. The impacted area of the Project Site supports only marginally suitable habitat for a few special-status animals, and has no potential to support a high diversity of native plants. Most wildlife species that could be expected to use the Project Site are species that are adapted to the disturbance that is caused by human-induced activities. Because of the present condition of the Project Site and the surrounding lands, it is unlikely that development of the site would contribute significantly to cumulative adverse impacts to regional flora and fauna. The loss of

habitat associated with development of the Project area would contribute to the overall cumulative loss of biological resources in the Santa Paula region. However, given that the impacted habitat within the Project area consists primarily of agricultural and urban developed land, and the impacted waters are small (less than 1 acre), the incremental contribution of the Project to this habitat loss is not cumulatively considerable and, therefore, not significant.

4.4.6 MITIGATION MEASURES

BR-1 Before issuance of a grading permit, the Applicant must identify on grading plans, the locations of any protected trees (such as the Southern California black walnut, *Juglans californica*) and must include a report pertaining to preserving the tree(s) that could be affected by the grading activity. The report shall be prepared by a tree expert and shall evaluate the subdivider's proposals for protected tree preservation, including avoiding grading, land movement, or other activity within the drip line of any protected tree. Prior to grading, the drip line must be fenced to prevent earthmoving equipment from inadvertently entering the drip line. In the event protected tree cannot be avoided, then the Applicant must provide a tree report in accordance with the City's Tree Protection Ordinance and must provide for the replacement or relocation of any protected trees that are to be removed, or would be subject to landmoving or grading within its drip line.

BR-2 Before issuance of a grading permit for development within the 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.

Nonnative 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.

For areas adjacent to Adams Barranca riparian corridors, the plan must provide for adequate landscaping to reduce indirect impacts including attenuation of noise and reduction of nighttime lighting and glare.

BR-3 To avoid impacts to native nesting birds, the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct nest surveys in potential nesting habitat within the Project Site prior to construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Wildlife Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. Surveys for special-status bird species can be conducted concurrently with general nesting bird surveys. Because birds known to use the Project area nest during the late winter, breeding bird surveys shall be carried out both during the typical nesting/breeding season (mid-March through September) and in January and February. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than 3 days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees, shrubs, and the ground within grassland for nesting birds, as several bird species known to occur in the area and are shrub or ground nesters, including burrowing owl, California horned lark, and mourning dove.

BR-4 If active nests are found, clearing and construction activities within 300 feet of the nest (500 feet for raptors) shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the qualified biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts to these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

BR-5 The Applicant shall retain a qualified biologist (approved by the City of Santa Paula) to survey the Project Site for the presence of the American badger no earlier than 1 day prior to any grading activity. In particular, the survey shall include an examination of the fallow agricultural field in the eastern portion of the site that will be impacted during project implementation.

If American badger is located on site, potential loss of individual animals shall be mitigated through one of the following: (1) an on-site passive relocation program, through which badgers are excluded from occupied burrows by installation of a one-way door in burrow entrances, monitoring of the burrow for 1 week to confirm badger usage has been discontinued, and hand excavation and collapse of the burrow to prevent reoccupation; or (2) active trapping and relocation of badgers to suitable off-site habitat by a qualified biologist and in coordination with the CDFW, as approved by the City and CDFW.

BR-6 To avoid impacts to the Pallid bat (*Antrozous pallidus*) and the Hoary Bat (*Lasiurus cinereus*), the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct roosting bat surveys within the Specific Plan area prior to site preparation activities. Thirty days before ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys in accordance with standard protocols to determine if roosting western red bats are present in the construction zone or within 300 feet of the construction zone. Roosting bat surveys shall be carried out from March through September. Surveys for special-status bat species may be conducted concurrently with nesting bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than three days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees and large shrubs in which this species is known to roost. Any bats found outside of the breeding season (May through August) shall be relocated by having a qualified biologist remove the bat from the roost. If roosting female bats are found with young during the breeding season (May through August) clearing and construction activities within 300 feet of the roost, shall be postponed or halted until the roost is vacated and juveniles have been weaned, as determined by the biologist. Limits of construction to avoid an active roost site shall be established in the field with flagging, fencing, or other appropriate barriers. Construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as

a construction monitor during those periods when construction activities will occur near active roost areas to ensure that no inadvertent impacts on these roosts will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of these bat species.

BR-7 Before issuance of a grading permit for areas that require state permits, the applicant shall coordinate with the CDFW to verify the impact to state-protected waters and associated vegetation on the Project Site. A Streambed Alteration Agreement (SAA) must be obtained, and mitigation measures recommended by the CDFW as part of the SAA shall be implemented. The SAA shall be provided to the City prior to issuance of a grading permit.

The Applicant must mitigate for impacts to jurisdictional waters as administered by the CDFW jurisdiction by restoring habitats within those jurisdictions acceptable to the resource agency. Habitat must be mitigated onsite or within the same watershed, if feasible.

- The mitigation site(s) shall have been evaluated and selected on the basis of their suitability for use as riparian mitigation areas.
- The mitigation area shall provide procedures to prepare soils in the mitigation area, provide detailed seeding/planting mixtures, provide seeding/planting methods, and other procedures that will be used for successful re-vegetation.
- Impacts to jurisdictional waters shall be avoided to the extent feasible in the design phase of the Project.
- Maintenance and monitoring requirements shall be established, including quarterly and annual monitoring reports to CDFW.

BR-8 Prior to the issuance of a grading permit for areas that require state or federal permits, the applicant and/or its contractor shall coordinate with the Army Corps of Engineers (ACOE) to verify the impact to federally regulated waters on the Project Site. A Nationwide Permit (NWP) shall be obtained and mitigation measures recommended by the ACOE, and National Marine Fisheries, as part of the NWP shall be implemented. The NWP shall be provided to the City prior to initiating construction of the bridge crossing Santa Paula Creek.

- Areas determined to be federally regulated by the ACOE shall also fall under the jurisdiction of the Regional Water Quality Control Board (RWQCB), and a Clean Water Act Section 401 Water Quality Certification (401 Certification) will be required from the RWQCB for impacts to those areas.

BR-9 For impacts to Regional Board jurisdiction, the Applicant shall:

- Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio) on site; or
- Provide a one-time in-lieu fee to a Regional Board–approved mitigation bank and/or in-lieu fee program within the Santa Clara River Watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1.27 acres of Regional Board jurisdiction; or
- A combination of on-site and/or off-site compensatory mitigation options, as described above

BR-10 As mitigation impacts to CDFW jurisdiction, the Applicant shall:

- Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio acres of CDFW jurisdiction for loss of State Waters; or
- Provide a one-time in-lieu fee to a CDFW-approved mitigation bank and/or in-lieu fee program within the Santa Clara River watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1:1 CDFW jurisdiction area; or
- A combination of on-site and/or off-site compensatory mitigation options, as described above.

4.4.7 RESIDUAL IMPACTS AFTER MITIGATION

Through the implementation of the above mitigation measures, all potentially significant adverse impacts to biological resources would be avoided or reduced to less than significant.

4.5 CULTURAL RESOURCES

This section discusses cultural resources, including historical, archaeological, and paleontological resources. Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. For purposes of this analysis, historical resources include buildings, other structures, and surface (aboveground) features and landforms of historical significance. Archaeological resources are buried resources from either historic or prehistoric periods. This section evaluates the potential for implementation of the proposed Project to impact cultural resources within the Project Site and in the immediate surrounding area.

The analysis in this section is derived from the *Santa Paula West Specific Plan Area Paleontological Resource Investigation,* prepared by the San Diego Natural History Museum, dated October 13, 2014; the *Phase I Archaeological Survey of the Santa Paula West Specific Plan Area, Santa Paula, Ventura County, California*, prepared by ASM Affiliates, dated June 2, 2015; and the *Historic Resources Evaluation Report 15258 W. Telegraph Road Santa Paula, Ventura County, California, prepared by Meridian Consultants, dated September 2015.* These reports are provided in **Appendix 4.5, Cultural Resources.**

4.5.1 EXISTING CONDITIONS

In 2014, site reconnaissance and a records review were conducted to determine whether the existing conditions have changed with respect to cultural resources within the Project Site. The review was conducted to fulfill the regulatory requirements for project review in compliance with Section 106 of the National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA). The adequacy of previous cultural resources studies, including architectural historical assessment and Phase I and II archaeological studies, were examined with respect to those land use actions proposed for the Santa Paula West Business Park Specific Plan ("Specific Plan"). Additionally, in 2015, at the request of the City of Santa Paula, a historic resources assessment (HRA) for 15258 W. Telegraph Road was conducted. This investigation was also part of the environmental review process required under CEQA for the proposed annexation of the Project Site to the City of Santa Paula, adoption of the Santa Paula West Business Park Specific Plan, and amendment to the City of Santa Paula's Sphere of Influence (SOI) to include this expansion area. The HRA evaluated the eligibility of the property at 15258 W. Telegraph Road for inclusion in the NRHP or the CRHR, or designation as a local landmark, to assess the impacts the Project would have on the property if considered eligible for any of these.

As discussed below, this section is concerned with the following types of historic and cultural resources:

- **Paleontological Resources:** Remains or traces of past life, including body fossils (e.g. bones, teeth, shells, leaves, wood), trace fossils (e.g. burrows, tracks, footprints, feeding traces), and any impressions (e.g. molds or casts) of these fossils.[1] Generally, these fossil resources date to the Pleistocene epoch (older than about 10,000 years), but prehistoric organic remains that date back to the Holocene age (less than about 10,000 years ago) can also be considered fossils. A paleontological resource investigation was conducted for the Project Site (see **Appendix 4.5**).
- **Archaeological Resources:** Remnants of human activity from an earlier time.

  Historic Resources: Buildings, structures, improvements, and remnants associated with a significant historic event or person(s) and/or have a historically significant style, design, or achievement. Generally, any resource more than 50 years old has the potential to be considered a historic resource. An HRA for 15258 W. Telegraph Road was conducted for the Project Site.

Paleontological Resources

The Project Site is located directly west of the City of Santa Paula within unincorporated Ventura County. The Project Site lies within the Transverse Ranges Geomorphic Province of the Santa Clara River Valley, which itself are defined by mountains to the north and south. The Project Site consists of Holocene-age alluvial deposits that are primarily composed of sands, gravels, and cobbles created by the Santa Clara River located to the south.[2] Pleistocene alluvial deposits are presumed to underlie the Holocene deposits, however, at an unknown depth.[3]

Paleontological resources are valued for the information they yield about the history of the earth and its past ecological settings. Paleontological data was collected from the Natural History Museum of Los Angeles County (NHM).[4] Research of these records did not determine the presence of any LACM recorded fossils within vicinity of the Project Site, nor any known Holocene- or Pleistocene-age fossils within the entire Santa Clara River Valley.[5] However, significant paleontological resources have been documented throughout Ventura County, specifically within the Pleistocene-aged alluvial deposits found in Simi Valley and Thousand Oaks.[6]

Archaeological Resources

The archaeological basis for the regional prehistoric sequence in Ventura County lies ultimately in the research of David Banks Rogers (1929), who worked on the Channel Islands and along Santa Barbara coastline. William J. Wallace (1955) subsequently modified the terminology of Roger's scheme and

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1 San Diego Natural History Museum, *Paleontological Resource Investigation, Santa Paula West SPA* (October 2014).
2 San Diego Natural History Museum, *Paleontological Resource Investigation* (October 2014).
3 San Diego Natural History Museum, *Paleontological Resource Investigation* (October 2014).
4 San Diego Natural History Museum, *Paleontological Resource Investigation* (October 2014).
5 San Diego Natural History Museum, *Paleontological Resource Investigation* (October 2014).
6 San Diego Natural History Museum, *Paleontological Resource Investigation* (October 2014).

improved it with additional and more detailed data and radiocarbon dates, with further refinements by Chester King (1981).[7]

Wallace's chronology includes four prehistoric time periods for coastal California, including Ventura County. These time periods are the Early Man/Big Game Hunting Period (12,000–7000 before present [BP]), Early Millingstone Period (7000–3500 BP), Intermediate Period (3500 BP–1000 Common Era [CE]), and the Late Prehistoric Period (1000–1769 CE). Below is a brief discussion of each time period.[8]

Figure 4.5-1, Archaeological Sensitivity Map, Ventura County (South Half), portrays generalized archaeological site sensitivity areas based on known or suspected prehistoric use areas. The map indicates that the Specific Plan area lies outside of areas designated as "sensitive" or "very sensitive."

Early Man/Big Game Hunting Period

The occupation of the southern California coastal regional is believed to have begun during the 12,000– to 7000 BP interval (Terminal Pleistocene Period), or the Early Man/Big Game Hunting Period, although to date the only evidence of such has been limited to a few discoveries of fluted projectile points found in isolated locales. However, the characteristic geomorphological instability of the California coastline, combined with the major change in erosional/degradational regimes that occurred at the end of the Pleistocene, does not favor the preservation of remains from this or an earlier period.[9]

Early Millingstone Period

Most sites of the 7000–5000 BP interval, or Early Millingstone Period (Early Horizon), date between 8,500 and 3,500 years in age and are dominated by assemblages containing large numbers of groundstone artifacts, along with crude choppers and other core/cobble tools. These are thought to represent an adaptation to gathered foods, particularly a reliance on hard-shelled seeds.[10] In addition, J. Erlandson has shown that the native inhabitants of the area were generalized foragers who, during the beginning of this period, relied on a variety of different kinds of terrestrial, coastal, and marine resources. Erlandson proposes an early adaptation to estuarine embayments, during which shellfish and other marine

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7 Whitley D. S., *Phase I Archaeological Survey of the Santa Paula West Specific Plan Area, Santa Paula, Ventura County, California* (ASM Affiliates, June 2. 2015).

8 Whitley D.S., *Phase I Archaeological Survey* (ASM Affiliates, June 2, 2015).

9 Whitley, D.S. and R.I. Dorn, "New Perspectives on the Clovis vs. Pre-Clovis Controversy," *American Antiquity*, 58 (1993): 626–47.

10 Whitley D.S., *Phase I Archaeological Survey* (ASM Affiliates, June 2, 2015).

resources were consumed as primary protein sources.[11] Erlandson's evidence suggests that the adaptation to the seashore is an ancient and long-lived strategy in local prehistory.[12]

Intermediate Period

The Intermediate (or Middle) Period occurred about 3,500 years ago and is believed to have lasted until about 1000 CE. This time period is marked on the coast by a growing exploitation of marine resources, the appearance of the hopper mortar and stone bowl/mortar, and a diversification and increase in the number of chipped stone tools.[13] Projectile points, in particular, are more common at sites than previously, while artifacts such as fishhooks and bone gorges also appear. Moreover, substantial evidence exists indicating that inland sites were first established and occupied at the beginning of this time period, and that a movement of coastal sites down toward the beaches occurred, suggesting the exploitation of more varied environments and perhaps an increase in population.[14]

Late Prehistoric Period

The introduction of the bow and arrow technologies to the region marked the beginning of the Late Prehistoric Period in Southern California coastal regions, dating from about 1500 BP (500 CE) to the time of formal Spanish contact (approximately 1769–1770 CE). Coastal sites dating to this period are numerous and contain diagnostic artifacts, such as an increase in projectile points, mortars and pestles, steatite ornaments and containers, perforated stones, circular shell fishhooks, and numerous and varied bone tools, as well as bone and shell ornamentation. A considerable increase of craft specialization during this period, an example being standardized micro drills to mass produce shell beads, serves as a reliable indication of a rise in social complexity and organization.[15] The transition to the Late Prehistoric Period was thus marked by the evolution and eventual dominance of a sophisticated maritime economy.[16] More important, the use of ethnographic resources provides evidence to correlate local prehistory with Chumash cultural groups that occupied the Santa Clara River Valley prior to and during Spanish colonization.[17]

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11 Erlandson, J. and R. Colton, Eds. "Hunter-Gatherers of the Early Holocene Coastal California." *Perspectives in California Archaeology,* vol. 1. (Los Angeles: Inst. of Archaeology, Univ. of California, 1991).

12 Whitley D.S., *Phase I Archaeological Survey* (ASM Affiliates, June 2, 2015).

13 Whitley D.S., *Phase I Archaeological Survey* (ASM Affiliates, June 2, 2015).

14 Whitley D.S., and M.P. Beaudry. "Chiefs on the Coast: Developing Chiefdoms in the Tiquisate Region in Ethnographic Perspective," in *The Formation of Complex Societies in Southeastern Mesoamerica*, W. Fowler, ed. Boca Raton, FL: CRC Press, 1991).

15 Arnold, J. *Craft Specialization in the Prehistoric Channel Islands, California*. University of California Publications in Anthropology, vol. 18. (Berkeley: University of California Press, 1987).

16 Whitley D.S., *Phase I Archaeological Survey* (ASM Affiliates, June 2, 2015).

17 Whitley D.S., *Phase I Archaeological Survey* (ASM Affiliates, June 2, 2015).

SOURCE: Ventura County General Plan, Resources Appendix, Figure 1.8.1 - 2011

FIGURE **4.5-1**

Meridian Consultants

Archaeological Sensitivity Map, Ventura County (South Half)

050-002-13

Ethnographic Resources

The City of Santa Paula, including the Project Site, lies within the historic territory of the Ventureño dialect of the Chumash Native American group.[18] The Ventureño occupied most of the area of present-day Ventura County and southwest corner of Los Angeles County.[19] Centered around the capital village of Muwu (known today as Point Mugu), the Chumash chiefdom Lulapin covered the territories of the Santa Clara River Valley.[20] The inhabited and inhabitable areas of the City of Santa Paula and along the Santa Clara River are considered to be areas of high archaeological sensitivity. Thus, the General Plan indicates that site-specific surveys would be required to determine the presence of such potential resources.[21]

Historic Resources

The term "historical resources" refers to the material and nonmaterial expressions of human adaptations that characterized the postcontact or historic period. These resources primarily include historic event or activity sites, historic archaeological sites, standing architecture and other significant properties, documents and other sources of historical information, and objects of material culture; secondarily, they include more intangible cultural qualities, such as folklore, social organization, and value systems, that are associated with these properties.

The 53.81-acre Project Site is currently developed for the agricultural production of row crops and avocado and citrus orchards. It is estimated that the Project Site has been used as agricultural land as far back as 1938, which is the date of the last aerial photograph of the site.[22] Various structures are located on the Site for the use of agricultural operations, including maintenance storage facilities, offices, and other ancillary uses, such as parking facilities and related farming materials. There are three wind machines located on the Project Site, two of which are electric powered and one that is an abandoned gasoline power tower. Additionally, the Project Site contains one single-family residence and a storage shed on the northwest corner. The single-family residence on the northwest corner of the Project Site dates back to between the years 1947 and 1959.[23]

Furthermore, Ventura County maintains an inventory of historical landmarks and points of interest that reflects the diversity of sites, buildings, and natural features that have been recognized by the Cultural

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18 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998).
19 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998).
20 David S. Whitley and C. William Clewlow, Jr, "The Organizational Structure of the Lulapin and Humaliwo," in *The Archaeology of Oak Park, Ventura County, California.* vol. 3, Institute of Archaeology, Monograph 11 (Los Angeles: University of California Los Angeles, 1979); and Whitley and Beaudry, "Chiefs on the Coast" (1991).
21 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998).
22 PW Environmental, *Environmental Case Review—Santa Paula West Business Park* (October 2014).
23 PW Environmental, *Environmental Case Review—Santa Paula West Business Park* (October 2014).

Heritage Board for their outstanding historical character.[24] Included are Chumash archaeological sites, Spanish and Mexican adobes, Victorian-era mansions, banks, trees, and innumerable other points of interest. No sites listed on the Ventura County inventory are located within the Project Site.

General Historical Context of the Santa Clara Valley

The Santa Clara Valley was originally part of several land grants; Rancho Santa Paula y Saticoy, Rancho Sespe, Rancho Ex-Mission San Buenaventura, and Rancho San Francisco. In addition, portions of the valley not included within rancho boundaries were considered public lands. The area located east of Santa Paula and west of Fillmore has been referred to as the Sespe region because the majority of the land was originally part of Rancho Sespe. The remaining lands were public lands, and settlers used both the Preemption Act of 1841 and the Homestead Act of 1862 to acquire these lands once the Rancho Sespe boundaries were settled.

Rancho Sespe was granted by Governor Figueroa to Carlos Antonio Carrillo in 1833. The rancho encompassed all of the Santa Clara Valley between Piru and Santa Paula Creeks and was bounded on each side by the mountains, a total of 6 square leagues or 26,000 acres. Carrillo did not take possession of his land until 1842, when a survey was conducted and an adobe house built. Carrillo had attained a high degree of prominence in the Mexican government, having been elected to the assembly and eventually appointed governor in 1837. The Carrillo family lived in Santa Barbara and occasionally traveled to the ranch, which was run by the majordomo (ranch manager). Carrillo died 10 years later, in 1852, and his wife died the following year. His adobe house, located near Hall and Telegraph Roads, was partially destroyed by fire in the 1850s and fell into ruin. In the 1880s, children attending the Santa Clara School across the ravine from the old adobe used to play among the ruins.

Thomas Wallace More and his brothers, Andrew and Henry, purchased 6 square leagues of the rancho in 1854 from the estate of Josefa Carrillo.[25] The California Agriculture Census indicates that by 1860, More had become the largest single landowner in Santa Barbara County, which at the time included all of contemporary Ventura County. T. W. More raised sheep and cattle on the ranchos until the disastrous droughts of the late 1850s and early 1860s forced the brothers to dissolve their partnership and subdivide the rancho land.[26] T. W. More got Rancho Sespe, and he also inherited the difficulties surrounding the actual size of the ranch. These difficulties were to pit the large ranch owner against settlers who had come to California looking for public lands on which to stake a claim using the Pre-emption Act or the Homestead Act as the legal basis for claiming land.

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24 Ventura County, *General Plan,* "Resource Appendix," Figure 1.8.2 (June 2011).
25 Cleland, Robert Glass, *A Place Called Sespe* (Los Angeles: Robert Glass Cleland, 1953).
26 Cleland, Robert Glass, *A Place Called Sespe* (1953).

At the time the More brothers purchased Rancho Sespe in September of 1854, the US Land Commissioners had confirmed in April of that year the Sespe grant as originally petitioned by Carrillo, with the boundaries of the map to include 6 square leagues. The Mores believed they paid for 6 square leagues. However, from the time the grant had been approved, the US government had appealed the approval based on evidence in a different version of the Expediente that said the rancho was 2 square leagues. The Mores' attorney went along with the government's approval of 2 square leagues without the brothers' approval.

The rancho was surveyed in two tracts in 1868 by Surveyor Charles F. Hoffman. The plat was completed and the map drawn in 1871 and in March 1872, the Mores received title to 2 square leagues (8,880.81 acres). The Craven Survey of Public Lands was not filed until December 19, 1874, and the settlers then had 90 days to file declaratory statements for land on which they had settled. It also opened the way for new settlers to come in.

Settlers, or squatters—as they were also referred to—began to arrive in the Santa Clara Valley looking for land following the Civil War in the mid to late 1860s. In 1867, land was subdivided in the Santa Paula y Saticoy Rancho, and many settlers who had money from working in the goldfields in Northern California purchased land in the area west of Santa Paula. Those wanting to take advantage of free land offered by the Homestead Act of 1862 had to locate available public lands; because the Craven Survey wasn't filed until 1874, it was difficult for settlers to know the exact location of nonrancho lands.

A small group of squatters began to settle in the area surrounding T. W. More's Sespe Ranch near the confluence of Sespe Creek and the Santa Clara River, especially after the Craven public land survey was filed.

Disappointed at not receiving the entire 6 leagues, T. W. More filed an application in 1875 to buy the remaining 4 square leagues. It was denied by the Los Angeles Land Office, but before that happened, the Sespe Settlers League had banded together to protect their property. The following years, 1876–1877, were extremely dry years for ranchers in the Sespe, and there was much anxiety over the drought. This anxiety was heightened when the Sespe squatters learned that More had filed claim with the County to build an irrigation ditch on his rancho. Concerned that More would take all the water from the Sespe and Santa Clara Rivers, the settlers believed they would be deprived of water for their crops. More began to trench his ditch before the application was approved, thereby continuing to anger the squatters.

The local newspapers took up the cause of the Sespe Settlers League against the large ranch owner. Between 1872 and 1877, newspaper headlines proclaimed the following: "Land Grabbers of California,"

"Cursed with Land Monopoly," "Doings of the Land Robbers," etc.[27] The continuous inflammatory newspaper articles and the attempt of More to buy back land or take water from land that squatters had begun to settle led to the most famous murder case of the century. On March 24, 1877, Thomas Wallace More was shot and killed while trying to put out a barn fire on his ranch. Although originally seven men were arrested, only one was ever convicted and sent to prison. Frank Sprague was released after serving his 7-year sentence in San Quentin prison.[28]

Following More's death in 1877, the US Land Office overturned the 1875 ruling and said that More's heirs did have the right to buy the disputed land. Once again, however, this was overturned by the final ruling on July 25, 1878, that denied the heirs the rights to buy the remaining 4 leagues.

The majority of residents who settled in the Sespe region of the Santa Clara Valley had homesteaded their land. The exception would be those who purchased land from the heirs of Rancho Sespe when they began to subdivide their property in the 1880s. A partial listing of homestead patents included Miles and William Balcom, George W. Cook, Henry T. Cook, James A. Culp, Thomas O. Toland, Joseph Bath, William Brock, Eben Moore, Albert Miles Tanner, John Hall Orcutt, Nickolas J. and Mary Schieferle, George M. Richardson, J.W. Rosenburg, and Charles H. Willard.

Santa Paula Historical Context

George G. Briggs purchased approximately 15,000 acres of Rancho Santa Paula y Saticoy from T. W. More in 1861. Earlier that year, Briggs, together with his nephew Jefferson Crane, had visited More at his adobe residence. All three men had known one another in Ohio, where they had lived previously. After purchasing the land from More, Briggs used the 2-story adobe built for More by W. D. Hobson as the center of his ranching operations. Briggs, formerly a horticulturist in Marysville, believed he could successfully raise fruit on the land and planted a 160-acre orchard near the adobe. Discouraged by the continuing drought conditions and disheartened by the death of his wife, Briggs in 1867 authorized land agent E. B. Higgins to begin subdividing the rancho into 150-acre parcels. These parcels were sold primarily to farmers emigrating from the Northern California gold fields, the East, and Midwest.[29] The survey was prepared by W. H. Norway in 1867.

In 1872, Nathan Weston Blanchard and his silent partner, E. L. Bradley, purchased 2,700 acres of Rancho Santa Paula y Saticoy from Higgins, and 3 years later recorded the town site of Santa Paula on a portion of it. Blanchard, generally considered the founder of Santa Paula, was born in Madison, Maine, in 1831.

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27 Outland, Charles F, *Sespe Gunsmoke: An Epic Case of Rancher versus Squatters* (Ventura, CA: Ventura County Museum of History and Art, 1991).

28 Outland, *Sespe Gunsmoke* (1991).

29 Sheridan, E. M. "The Narrative of Jefferson Crane." *Ventura County Historical Society,* 1 (1955).

He arrived in northern California in 1854, during the Gold Rush. He gained financial success in the meat butchering business and the lumber trade in Dutch Flat, a Sierra Nevada gold-mining boomtown. He married Ann Elizabeth Hobbs in 1864. Following the death of their first child, Dean, they moved to Ventura County in 1872. The Santa Paula town site, surveyed in 1873 and recorded by Blanchard and Bradley in 1875, was bounded on the north by Santa Paula Street, on the south by Ventura Street, on the east by Twelfth Street and on the west by Mill Street. Blanchard planted seedling orange trees in 1874 and, during the late 1880s, constructed the first packinghouse, located adjacent to the railroad.

In addition to the development of agriculture, oil exploration was occurring in portions of the Santa Clara Valley as early as the 1860s. Some of the first oil explorations in the Santa Paula area occurred in Adams Canyon, where tunnels were drilled horizontally into the hillsides. Sulphur Mountain was also cited in early geology reports as being one of the major oil-prospecting regions in California. Thomas Bard, representing Thomas Scott of the Pennsylvania Railroad, arrived in Ventura in 1867 with the intent of purchasing land for this purpose.

By the early 1880s, Santa Paula had become the base of operations for Pennsylvania oil developers Wallace L. Hardison and Lyman Stewart. They established the Hardison and Stewart Oil Company offices on Mupu (Main) Street in 1886. In 1890, several small oil companies owned by Hardison, Stewart, and Bard joined forces to become the Union Oil Company.

Despite these pioneering efforts, the growth of Santa Paula's agriculture and oil industries was restrained by transportation considerations until the Southern Pacific railroad arrived in the Santa Clara Valley in 1887. Soon afterwards, citrus cooperatives were established to provide the ranchers with efficient methods of shipping and marketing. Agriculture as an industry (as differentiated from traditional family farming) began in 1893, with the founding of the Limoneira Company west of Santa Paula, followed by the Teague-McKevett Ranch east of the city in 1905. Both companies built their own packinghouses and warehouses adjacent to the railroad. By 1890, several other large subdivisions had been added to the original 1875 Santa Paula town site: the McKevett Tract in 1891, the Hardison-Irwin Tract in 1887, the Barkla Tract in 1888, and the Orcutt-Moore Tract in 1892.

Rapid growth of the community followed the establishment of viable oil and agriculture industries, culminating in the incorporation of the city in 1902. The first two decades of the 20th century were marked by both the maturation of the citrus industry and the opening of the highly productive South Mountain oil fields. The growing profitability of these industries produced Santa Paula's third building wave, the expansive era of the 1920s. Numerous new schools, banks, offices, and commercial buildings were built or remodeled. The development of new residential tracts for both the affluent and the working class rapidly transformed Santa Paula's previously rough appearance to one of modernity and respectability.

Agricultural Context

Development resulted from experimentation with the cultivation and marketing of agricultural products, and each successive wave left a distinct mark on the land. As was the case throughout much of the West, the earliest American settlers in the Santa Clara Valley engaged primarily in dry farming, carrying on essentially in the tradition of the Californios. Lacking reliable sources of irrigation and transportation, this thinly populated frontier region supported primarily low-intensity sheep and cattle ranching, grain production, and, to a limited extent, the more drought-tolerant forms of fruit cultivation.

The first fruit-growing efforts in the western end of the valley were apricots, deciduous fruits, lemons, and walnuts. Other crops commonly grown during these early decades were grains—wheat, barley, flax, and corn—and lima beans.

The advent of greatly improved transportation and irrigation systems, including the construction of wharves at Hueneme (1871) and Ventura (1872), and the Southern Pacific Railroad line (1887), combined with the development of the Atmore Ditch (1879), the Interurban Land and Water Company (1906), and other smaller ditches bringing water from the Sespe Creek and Santa Clara River, permitted valley property owners to realize the economic potential of the local soil and climate. Groundwater development also occurred in the area with the establishment of the Hardscrabble Mutual Water Company (1920), the Community Mutual Water Company (1920), and the Citrus Mutual Water Company (1929). Reliable water sources and transportation resulted in the gradual displacement of grain crops by walnuts, olives, and apricots. But it was citrus ranching, in both myth and reality, that was to become thoroughly enmeshed with every aspect of the region's economy, culture, and popular image.

The earliest plantings of commercial citrus in the western Santa Clara Valley were accomplished by Nathan W. Blanchard in 1874, with the first profitable orange harvest arriving fourteen years later. This shift to citrus crops accelerated rapidly in the 1890s through the 1910s, with the establishment of the Limoneira in 1893, Teague-McKevett in 1905, and the Newhall Land and Farming Company's Orchard Farm in 1912. Citrus cultivation progressed in successive waves, from oranges to lemons and later to avocados, with each of these tree crops wholly or partially replacing the previous one. The increasing sophistication of the citrus industry also led to the development of new tree varieties, and these improved types gradually superseded the earlier species.

During the period of 1920–1945, the citrus industry sustained an unprecedented era of expansion, increasing the total volume of production in California nearly 150 percent. This growth engendered the profound transformation of the entire economic, social, and physical character of the Southern California

region to an extent described by historian Carey McWilliams as "difficult to emphasize sufficiently."[30] The establishment of the verdant "citrus belts" along the foothills helped to firmly establish an almost utopian image of Southern California in the national consciousness. This depiction, although it contrasted decidedly with the natural aridity of the area, became thoroughly integrated into the regional mystique, having been championed tirelessly by development interests and the citrus industry. It is virtually impossible to separate the economic, social, and physical impacts of this industry from other influences present during this period because virtually the entire urban and rural form taken on by the Southern California foothills region can reasonably be attributed either directly or indirectly to citrus production.

Because citrus cultivation is a highly capital-intensive industry, it attracted well-established farmers and businesspeople, frequently from other parts of the country. This factor, together with the ability of the cooperative associations to manage virtually all aspects of the growing, packing, shipping, and marketing of the fruit, validated the Southern California citrus grower's "gentlemen farmer" reputation: a refined agriculturalist whose hands needn't touch soil. At the same time, a variety of ethnic groups, including at various times large numbers of Chinese, Japanese, and Mexican immigrants, characterized the labor force. A significant number of Dust Bowl refugees of the 1930s and 1940s, especially women, came to work in the packinghouses, particularly after the labor turmoil of 1941 and the relocation of the Japanese-American population in 1942.

The rapid suburbanization of the Southern California region taking place during the two decades following the end of World War II placed heavy pressure on agriculture to turn land over to development interests. This trend was abetted by the "highest and best use" scheme of property taxation in effect prior to the implementation of the California Land Conservation (Williamson) Act of 1965. Further, the root stock planted during the industry's peak years of expansion had by this time become less productive, and in particular had become widely infected with the citrus diseases. Balancing the imminent need to reinvest in new trees against increasing taxation and the new development value of their property, growers in large numbers chose to remove their land from cultivation.

These convergent events taking place during the mid to late 1950s led to a steady decline in the citrus industry in Los Angeles and Orange Counties, and in Riverside and San Bernardino Counties somewhat later. The Santa Clara Valley of Ventura County, by virtue of geography, largely escaped these events, however, and retained its citrus landscape largely intact until the 1970s, when strict planning guidelines for the protection of agricultural areas countywide were adopted. Accordingly, the Santa Clara Valley represents one of the best preserved examples of a mature Southern California citriculture landscape.

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30 McWilliams, Carey. *Southern California Country: An Island on the Land* (New York: Duell, Sloan & Pearce, 1946).

Architectural Context, Building Arrangement, and Types

The architectural styles present in the valley reflect both the changing tastes and the steadily increasing affluence of its residents, as well as technological innovations and transportation improvements. By 1910, classically derived architectural styles had almost entirely given way to the California Bungalow style. This style persisted well into the 1930s, when it blended almost seamlessly into the ranch style. The bungalow form proved especially adaptable and can be seen in buildings ranging from modest agricultural worker's cottages to costly, large-scale residences.

Labor housing was provided on both the family farms and agribusiness ranches. Farm labor was both seasonal-itinerant and year-round, and provided by a wide variety of ethnic groups. Bunkhouses were constructed for the use of single men. Labor camps, consisting of a large number of small dwellings, housed families, while individual detached dwellings provided housing for ranch foremen and labor supervisors. Homes built for ranch employees varied in size but were usually smaller than the homes built for family farmers, and were more modest in design and materials.

Packinghouses were an essential feature of the citrus landscape. Only the largest agricultural concerns maintained private packinghouses on their own properties. Smaller growers were dependent on the association packinghouses within the nearby communities of Santa Paula and Fillmore. The specific procedures for preparing oranges, lemons, and walnuts for market were reflected in the design and locations of these buildings. Barns were associated with all farming and ranching operations, and depending on the nature of the operation, were used for the storage of farm equipment and feed, and for the housing of farm animals, such as horses and mules.

A variety of purpose-built and generic outbuildings related to ranching operations were constructed throughout the agricultural areas of the Santa Clara Valley. Secondary processing buildings, such as walnut dehydrators, remain as artifacts of this antecedent commercial crop, which faded in importance in the 20th century. Box sheds were often constructed for the storage of orchard heaters, and field lug boxes used to transport citrus from the fields to the packinghouses. Garages and sheds were constructed in large numbers for various purposes, such as the storage of farm equipment and vehicles.

Agricultural Structures

Irrigation provided the essential ingredient required to realize the agricultural potential of the valley. Unlike many areas of Southern California, the Santa Clara Valley featured the relatively reliable, year-round surface water flows of the Santa Clara River and Sespe and Santa Paula Creeks. Property owners began in 1879 to construct the water delivery system known as the Atmore Ditch, which diverted runoff from near the juncture of the Sespe Creek and Santa Clara River, eventually extending the system to the

western edge of the valley. Other small private ditches were constructed to bring water from the Santa Clara River to individual ranches.

Open ditches and flumes were employed initially, but the system was eventually converted to buried pipes, although roadside ditches remain in use to collect rain and irrigation runoff. Some of these ditches were constructed with the abundant river rock available in the area. The irrigation system employed weirs, penstocks, reservoirs, and pump houses as integral elements. Water towers and cisterns were common features of the historic landscape, and were used primarily in connection with the storage and supply of domestic water. Almost none of these structures remain today.

Transportation systems in the valley are represented by roads and railroads. Preliminary surveys for the construction of a railroad line through the valley were undertaken by the early 1860s, but it was not until 1887 that the Southern Pacific Railroad completed its connection between Los Angeles and Ventura, spawning the towns of Fillmore and Piru in the eastern Santa Clara Valley, and ensuring the survival of Santa Paula, Saticoy, and Ventura in the west county. The railroad right-of-way imposed the logic of Southern Pacific's surveyors on the valley, cutting diagonally across the public land survey and Rancho Sespe survey but paralleling the highway. Having split numerous earlier parcels of land, this new boundary gradually came to alter land ownership patterns. At least one railroad siding was developed to serve the Teague-McKevett Company's packing operations.

Sites and Field Patterns

The most visually striking features defining the historic landscape of the Santa Clara Valley are direct products of the development of the land for agriculture, particularly tree crops. The orchards as they are seen today echo the historic techniques of citriculture: trees are planted in regularly spaced rows, with shallow irrigation ditches running between, a system designed to permit gravity flood irrigation and drainage. Wider rows are introduced on regular intervals to permit access to the orchards by picking and spraying equipment. The trees themselves have been subjected to a constant process of replacement as improved varieties were developed, older trees became unproductive due to age, or trees were damaged by infestations or one of the area's periodic freezes.

Description of Potential Historic Resource

The employee residence at 15258 W. Telephone Road is a rectangular-massed building of no discernable architectural style, save for one Craftsman-style, three-over-one wooden-sash window present on the front façade. The house consists of a front-gabled core with flanking side projections. A shed-roofed room projects off the kitchen on the east elevation, which provides rear access to the house through a notched porch at the southeast corner. The west elevation features a shed-roofed projection and a side-gabled projection, each corresponding to a bedroom. The symmetrical façade of the house is characterized by a

hipped-roof, partial-width front porch. The porch roof is supported by 4-by-4 posts and has a beadboard ceiling. A vertical-slat porch railing encloses the space, save for the front entrance, which is accessible via cast concrete steps. The house is clad in wide shiplap- or novelty-board siding; is capped by a medium-pitched, asphalt-shingle roof; and sits on a crawlspace. The perimeter foundation appears to be cast concrete. Fenestration is a mixture of one-over-one wooden- and vinyl-sash windows, with one vinyl-sliding window on the east elevation and, as noted previously, a three-over-one sash window on the façade. The house has enclosed eaves and louvered gable vents in each of the three gable ends. An exterior brick chimney is located on the east elevation of the house, toward the front, and corresponds to a fireplace in the front living room.

Two ancillary structures are directly behind and to the south of the employee residence. The first is a small manufactured shed south of the house. The second is a front-gabled garage clad in corrugated metal sheets.

The immediate setting around the employee residence is characterized by mature fruit trees, a small fenced yard, and a brick-paver path leading from the front of the house to dirt parking areas.

4.5.2 REGULATORY SETTING

Federal

National Historic Preservation Act

The NHPA protects archaeological, cultural, and historic resources of national importance in the United Sates.[31] The Act established the National Register of Historic Places (NRHP), an official list of resources that are identified as worthy of protection. A resource is eligible for listing in the NRHP if it:

- Is associated with events that have made a significant contribution to the broad patterns of our history;
- Is associated with the lives of persons significant in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and
- Has yielded, or may be likely to yield, information important to the prehistory.

31 United States Code, National Historic Preservation Act, tit. 16, sec. 470 et seq. (1966).

American Indian Religious Freedom Act

The American Indian Religious Freedom Act, passed by a joint resolution of Congress in 1978, establishes that the policy of the United States is to protect and preserve for Native Americans their inherent right of freedom to believe, express, and exercise their traditional religions.[32] Executive Order No. 13007 directs all federal agencies to enact procedures to protect sacred Native American sites.[33]

State

California Environmental Quality Act

CEQA and the CEQA Guidelines provide a framework for the analysis of impacts to historical and archaeological resources.[34]

To be considered a historic resource under CEQA, a resource must be listed in or determined eligible to be listed in the California Register of Historical Resources[35] included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code; or identified as significant in a historic resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code.

Impacts to "unique archaeological resources" and "unique paleontological resources" are also considered under CEQA, as described under the Public Resources Code, Section 21083.2.[36] A unique archaeological resource implies an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge there is a high probability that it meets one of the following criteria:

1. The archaeological artifact, object, or site contains information needed to answer important scientific questions, and there is a demonstrable public interest in that information.
2. The archaeological artifact, object, or site has a special and particular quality, such as being the oldest of its type or the best available example of its type.
3. The archaeological artifact, object, or site is directly associated with a scientifically recognized important prehistoric or historic event or person.

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32 United States Code, American Indian Religious Freedom Act, tit. 42, sec. 1996 (1978).
33 61 Federal Register, Executive Order 13007, Sacred Sites (2011).
34 Public Resources Code, California Environmental Quality Act, sec. 2100 et seq.
35 Public Resources Code, sec. 5024.1; 14 California Code of Regulations, sec. 4850 et seq.
36 Public Resources Code, Section 21083.2.

Section 15064.5 of CEQA also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed under Public Resources Code Section 5097.98.

Under Public Resources Code Section 15064.5, a project would potentially have significant impacts if it would cause substantial adverse change in the significance of one of the following:

- A historical resource
- An archaeological resource
- A unique paleontological resource or unique geologic feature
- Human remains

Furthermore, California Senate Bill (SB) 18 requires cities and counties to notify and consult with California Native American tribes about proposed local land use planning decisions to protect Traditional Tribal Cultural Places.[37,38] Cities and counties must obtain a list from the Native American Heritage Commission (NAHC)of the California Native American tribes whose traditional lands within the agency's jurisdiction may be affected by a proposed adoption or amendment of a general plan or specific plan. Before the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes of the opportunity to conduct consultations on the proposed project. Before the adoption or substantial amendment of the general plan or specific plan, a local government must refer the proposed project to those tribes on the Native American contact list that have traditional lands within the agency's jurisdiction.

Sites that may contain human remains important to Native Americans must be identified and treated in a sensitive manner, consistent with the California Health and Safety Code and Public Resources Code as reviewed below:[39]

> *In the event that human remains are encountered during project development and in accordance with the Health and Safety Code Section 7050.5, the County Coroner must be notified if potentially human bone is discovered. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with Public Resources Code Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains. The MLD then has the opportunity to recommend to the property owner or the person responsible for the*

37 California Government sec. 65040.2, 65092, 65351, 65352, and 65560; and California Civil Code, sec 815.3.
38 California Senate Bill 18, ch. 905, Statutes of 2004.
39 California Health and Safety Code, sec. 7050.5 and 5097.98.

excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods.

Regional and Local

City of Santa Paula

General Plan

The City of Santa Paula's General Plan Conservation and Open Space Element contains descriptive information related to natural resources and open space that is relevant and of concern to Santa Paula, including specific goals, policy statements, and implementation measures that carry out the goals. Lands throughout the City and the surrounding Area of Interest contain a wide variety of resources that are significant in the area's local history, regional architecture, archaeology, and culture. The resources considered significant usually meet the following criteria:

- The resource is associated with events that made a significant contribution to the broad patterns of our history; or
- The resources are associated with the lives of persons significant in our past; or
- The resources embody the distinct characteristics of a type, period or method of construction, or represent the work of a master, or possess high artistic values, or represent a significant distinguishable entity; or
- The resources have yielded or may likely yield information on history or prehistory.

Development Code

City of Santa Paula Ordinance No. 816 provides for the designation of City landmarks and establishes the criteria for designating a landmark nomination: "Any structure, property, or area that meets one or more of the above criteria shall also have sufficient integrity of location, design, materials, construction and workmanship to make it worthy of preservation, restoration or rehabilitation." City of Santa Paula Ordinance No. 816 provides for the designation of Historic Districts.

4.5.3 THRESHOLDS OF SIGNIFICANCE

Based on CEQA Guidelines, the proposed Project would result in significant adverse environmental impacts on cultural resources if it would:

- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries?
- Cause a substantial adverse change in the significance of a historical resource as defined in Government Code Section 15064.5?

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Government Code Section 15064.5?

Section 15064.5(b) of the CEQA Guidelines provides that a project with an effect that may cause a substantial adverse change in the significance of a historical resource may also have a significant effect on the environment. A substantial adverse change in the significance of a historical resource is defined as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

4.5.4 PROJECT IMPACTS

The Project would alter the ground surface of the Project Site during grading; construction and subsurface construction of structural foundations; utility trenching; stormwater infrastructure; paving; and landscaping. These disturbances to the ground surface would not extend beyond the boundaries of the Specific Plan, or the areas of the Master Vesting Tentative Map.

Threshold: **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Older Alluvium

While a majority of the Project Site consists of younger Holocene alluvial soils, older Pleistocene alluvial deposits are presumed to underlie these younger soils. Because these depths of older alluvial soils are unknown, there is a moderate to high potential for development-related earthmoving activities and unauthorized fossil collecting within older alluvium on the Project Site to result in the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data. Implementation of **Mitigation Measure (MM) CUL-1** would reduce any potential impacts to paleontological resources to a level of less than significance.

Younger Alluvium

The Project Site consists in majority of younger alluvial soils, which are considered to have low potential of containing significant paleontological resources. At shallow depths, the younger alluvium is considered too young to contain remains old enough to be considered fossilized. As a result of the unlikelihood of significant fossil resources being found within these younger soils, ground-disturbing activities of less than 10 feet below the current grade of the Project Site are anticipated to have low potential to impact any paleontological resources. However, given that occurrences of significant paleontological resources have been found in the nearby cities of Simi Valley and Thousand Oaks, there is potential for the Project Site to contain resources of similar significance. Therefore, implementation of **MM CUL-1** would reduce any potential impacts to paleontological resources to a level of less than significance.

Threshold: Disturb any human remains, including those interred outside of formal cemeteries?

The nearest formal cemetery to the Project Site is the Pierce Brothers Santa Paula Cemetery, which is located approximately 1.4 miles northeast of the Site at 380 Cemetery Road. No known sites containing human remains exist within the Project area. However, currently unknown human remains potentially could be discovered during the construction of future projects within the Specific Plan. Project construction would require ground-disturbing activities, including grading and excavation, and the presence of construction equipment. These construction activities could potentially result in the discovery of previously unrecorded human remains, including Native American burials. Impacts related to construction would be limited to the construction area for each individual project within the Specific Plan.

As required by SB 18, consultation with the NAHC and tribal representatives was conducted during preparation of the cultural resources report (see **Appendix 4.5**). No responses regarding the presence of Native American sites, including burial sites, were received. Furthermore, there is no record of human remains in any archaeological record within the Specific Plan area. Ground-disturbing activities could potentially uncover previously unknown resources, including human remains. In the event that human remains are uncovered during subsurface excavation activities, implementation of **MM CUL-2** would require notification of the County coroner within 24 hours of the discovery to handle and identify the human remains.

Threshold: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Government Code Section 15064.5?

A majority of the Project Site has been extensively farmed with various row crops and orchards, which has continually disturbed the surface of the soils. As noted earlier, **Figure 4.5-1** portrays generalized archaeological site sensitivity areas based on known or suspected prehistoric use areas within Ventura County. The map indicates that the Project Site lies outside of areas designated as “sensitive” or “very sensitive.” While the Project Site does not contain any known sensitive archaeological resources within the disturbance area, the general Santa Clara River Valley is considered sensitive, and there is potential for unknown resources to be uncovered by activities, such as grading, that disturb the ground surface. In the event of the discovery of unknown archaeological resources, the implementation of **MM CUL-3** would ensure that the proper evaluation of the potential archaeological resources would not result in a significant impact on historical resources.

Threshold: Cause a substantial adverse change in the significance of a historical resource as defined in Government Code Section 15064.5?

The development of the Project Site in accordance with the Santa Paula West Business Park Specific Plan would result in the demolition of the employee residence at 15258 W. Telegraph Road and the loss of agricultural fields associated with the former Atmore Ranch.[40] The residence and fields are elements that contribute to the significance of the Santa Clara Valley Rural Historic District, which is considered a historical resource under CEQA. According to Public Resource Code 21084.1, "a project that may cause a substantial change in the significance of an historical resource is a project that may have a significant effect on the environment." The Public Resources Code broadly defines a threshold for determining if the impacts of a project on an historic property will be significant and adverse. By definition, a substantial adverse change means, "demolition, destruction, relocation, or alterations," such that the significance of an historical resource would be impaired. For purposes of NRHP eligibility, reductions in a property's integrity (the ability of the property to convey its significance) should be regarded as potentially adverse impacts. However, the on-site residence, located within the County of Ventura, caught fire in September 2016 and suffered major structural damage beyond repair.

The historic resource evaluation report concludes that while the development of the Project would result in an adverse impact by eliminating elements that contribute to a historic district, this impact would not cause a substantial change in the significance of the Santa Clara Valley Rural Historic District. Given the large size and complex nature of the historic district, the loss of a single employee residence and associated fields would not reduce the integrity of the historic district such that it could no longer convey historic significance. The Santa Clara Valley Rural Historic District would remain eligible for the NRHP and the CRHR. Therefore, the impact resulting from the Project would be less than significant.

4.5.5 CUMULATIVE IMPACTS

Previous development within Ventura County has resulted in the loss of much of the evidence of the prehistoric occupation and use of the area. As discussed in **Section 3.0, Related Projects**, current development projects within the City of Santa Paula include a number of projects ranging from relatively small residential developments to larger residential development, commercial and industrial developments, and mixed-use developments. Other Specific Plan projects that would likely have similar potentially significant impacts to paleontological, archaeological, and historic resources include the remainder of West Area 2, Adams Canyon, Fagan Canyon, and the recently approved East Area 1 Specific Plan Amendment area. The Specific Plan, in combination with other currently planned projects, would

40 The on-site residence, located within the County of Ventura, caught fire in September 2016 and suffered major structural damage beyond repair.

result in the potential for a significant cumulative impact. Mitigation measures would reduce the potentially significant cumulative contribution to paleontological, archaeological, and historical resources. Therefore, impacts are not considered cumulatively considerable and potentially significant.

4.5.6 MITIGATION MEASURES

MM CUL-1: Should unexpected paleontological resources be discovered during any ground-disturbance activities greater than 10 feet below existing grade of Project Site, work in the immediate area of the discovery shall be halted and the City shall require an assessment by a qualified paleontologist to determine the significance of the find.

MM CUL-2: 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).

MM CUL-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.

4.5.7 RESIDUAL IMPACTS AFTER MITIGATION

With implementation of existing regulations and standards identified above along with mitigation measures, would reduce potential impacts associated with cultural resources to a level that would be less than significant.

Implementation of **MM CUL-1, CUL-2, and CUL-3** would mitigate any potentially significant impacts with respect to any possible occurrence of archaeological or historical resources on the Project Site to less than significant.

4.6 GEOLOGY AND SOILS

This section analyses the potential impacts of development of the Santa Paula West Business Park Specific Plan with regard to existing geology and soils conditions. It assesses the Project's potential to result in, or expose people or property to, adverse geologic and seismic conditions or hazards. This analysis is based primarily on the *Geologic and Geotechnical Study, Santa Paula West Industrial Park Specific Plan* ("Geotechnical Report"), prepared by Leighton and Associates, dated June 2015, and provided in **Appendix 4.6**.

4.6.1 EXISTING CONDITIONS

4.6.1.1 Regional Geologic Conditions

The Specific Plan area is within the Transverse Ranges Geomorphic Province,[1] a mountainous region characterized by an east-to-west-trending geologic grain, meaning that its primary faults, folds, mountains, and valleys are all aligned in an east–west direction. This portion of the Transverse Ranges is underlain by Tertiary and Quaternary sedimentary and volcanic rocks, with steeply dipping compressional faults. The Transverse Ranges are a tectonically active region with high rates of uplift, folding, and sedimentation. This deformation is driven by north–south compression associated with interaction of the North American Plant and the Pacific Plate. Young geologic structures characterize the area as a result of the region's active seismicity.

Physiography and Topography

The Specific Plan area is approximately 2,600 feet north of the Santa Clara River and is generally bounded by Telegraph Road to the north, the Santa Paula Freeway (State Route [SR] 126) to the south, Beckwith Road and Todd Road to the east, and the lower reaches of the Adams Barranca. The Adams Barranca is an improved channel that runs generally north–south, and generally about 60 feet wide from bank to bank along the Project Site. The topography of the Project Site is relatively flat or gently slopes from north to south. Elevations range from a high of approximately 250 feet above mean sea level (amsl) near Telegraph Road to a low of approximately 226 feet amsl near the boundary with SR 126.

The Project Site has undergone extensive surface grading and leveling as part of the ongoing agricultural operations. There are several unpaved roads throughout the Project Site providing access to the existing agricultural operations. As noted elsewhere, the Ventura County Transportation Commission (VCTC) railroad right-of-way, containing railway tracks, bisects the Project Site.

1 California Geological Survey, Note 36, *California Geomorphic Provinces* (December 2002).

Surface and Subsurface Geologic Units

The surface geologic units within and near the Project Site are shown on **Figure 4.6-1**, **Geologic Map**. The geologic unit on-site is classified as Quaternary alluvium of the Santa Clara River, and has been mapped in the areas surrounding the Site as well. The alluvial soil is expected to consist of silts, sands and gravel, which extend to unknown depths below the ground surface. The Geotechnical Report indicates that in areas close to creeks, the thicknesses of the alluvial formations can be 50 feet. Although not shown on available geologic maps, it is likely that nonengineered (uncertified) artificial fill, colluvium, and topsoil materials are present within the Project Site.

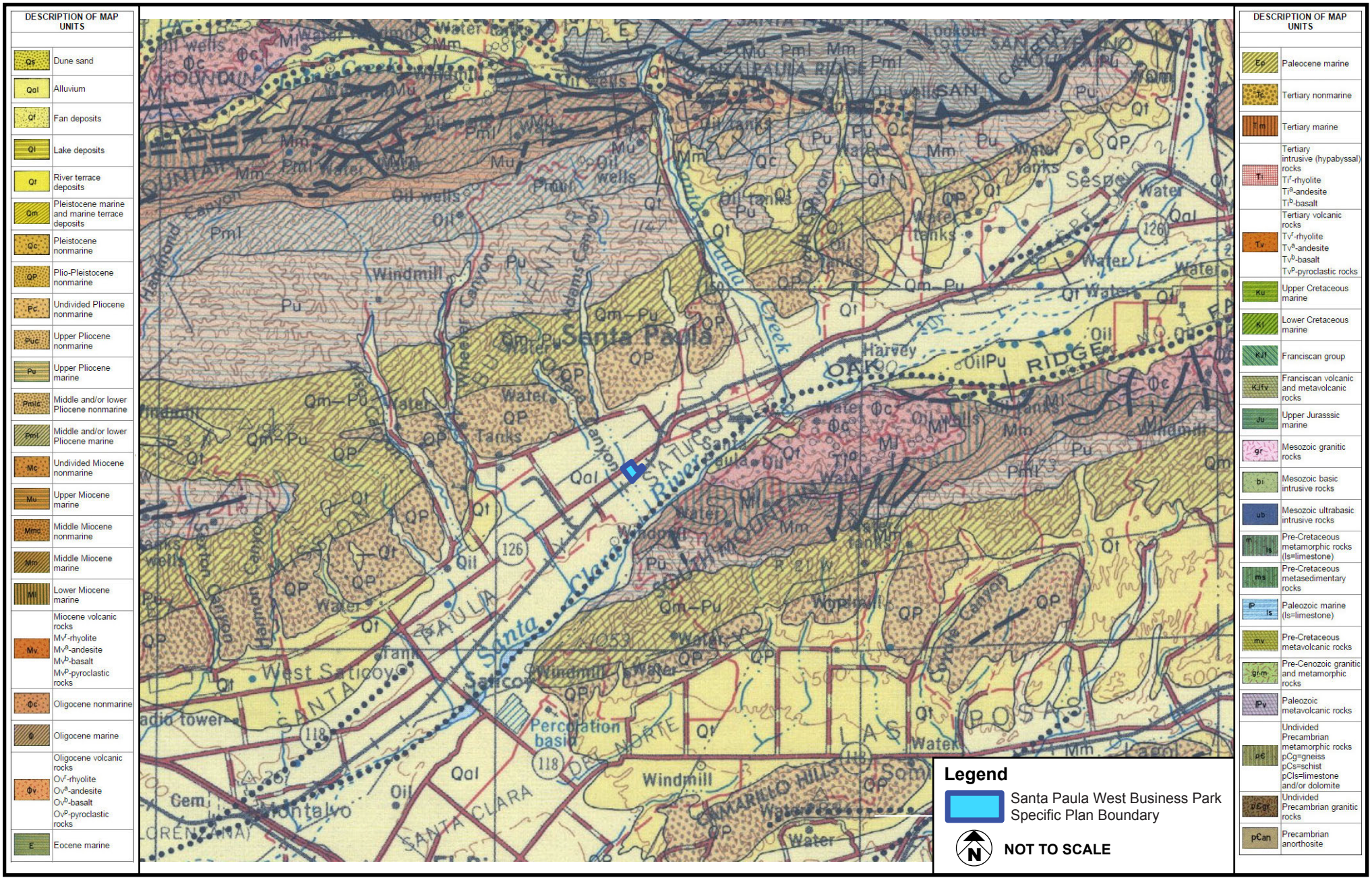
4.6.1.2 Groundwater

The Project Site is underlain by the Santa Paula Groundwater Basin (Santa Paula Basin). The Santa Paula Basin is located along the Santa Clara River, extending from approximately Kimball Road and the town of Saticoy in the west (west of the Project Site) to Santa Paula Creek in the east (east of the Project Site). The Santa Paula Basin is bounded by the Sulphur Mountain foothills to the north and South Mountain to the south; it is generally aligned in a northeast–southwest direction, and is about 10 miles long and as much as 3.5 miles wide. Groundwater elevations range between 270 feet amsl near Santa Paul Creek to 130 feet amsl near Saticoy.[2] Historically, the groundwater beneath the area was as shallow as 20 feet below ground surface (bgs) at the south end of the Project Site and greater than 40 feet bgs at the northern end of the Project Site. The California Geologic Survey indicates estimated historically shallowest groundwater depths (i.e., historically high groundwater levels) in the Santa Clara River valley (see **Figure 4.6-2, Historically Shallowest Groundwater Depth Contours**), including the Project Site.[3] Current water levels/depths may vary from these shallowest measurements; however, analysis of potential impacts must consider these very likely more conservative (shallower) values. Borings near the Project Site indicate that groundwater depth is variable and has been encountered as shallow as 20 feet bgs in some borings while not encountered within 40 feet in others. Locations where geologic units have shallow clay-rich layers (e.g., Qht and Qhf), perched groundwater may be encountered at shallower depths.

Modified maps from California Geological Survey) in the Santa Paula vicinity. This data suggests historically shallow groundwater depths of greater than forty feet below the ground surface (bgs) for the Project Site.

2 United Water Conservation District, Groundwater and Surface Water Conditions Report—2013, Open-File Report 2014-02, by the Groundwater Resources Department, May 2014.

3 California Geological Survey, Seismic Hazard Evaluation of the Santa Paula 7.5-minute quadrangle, Ventura County, California: California Department of Conservation, Division of Mines and Geology Open-File Report 02-61, 2002, Plate 1.2.



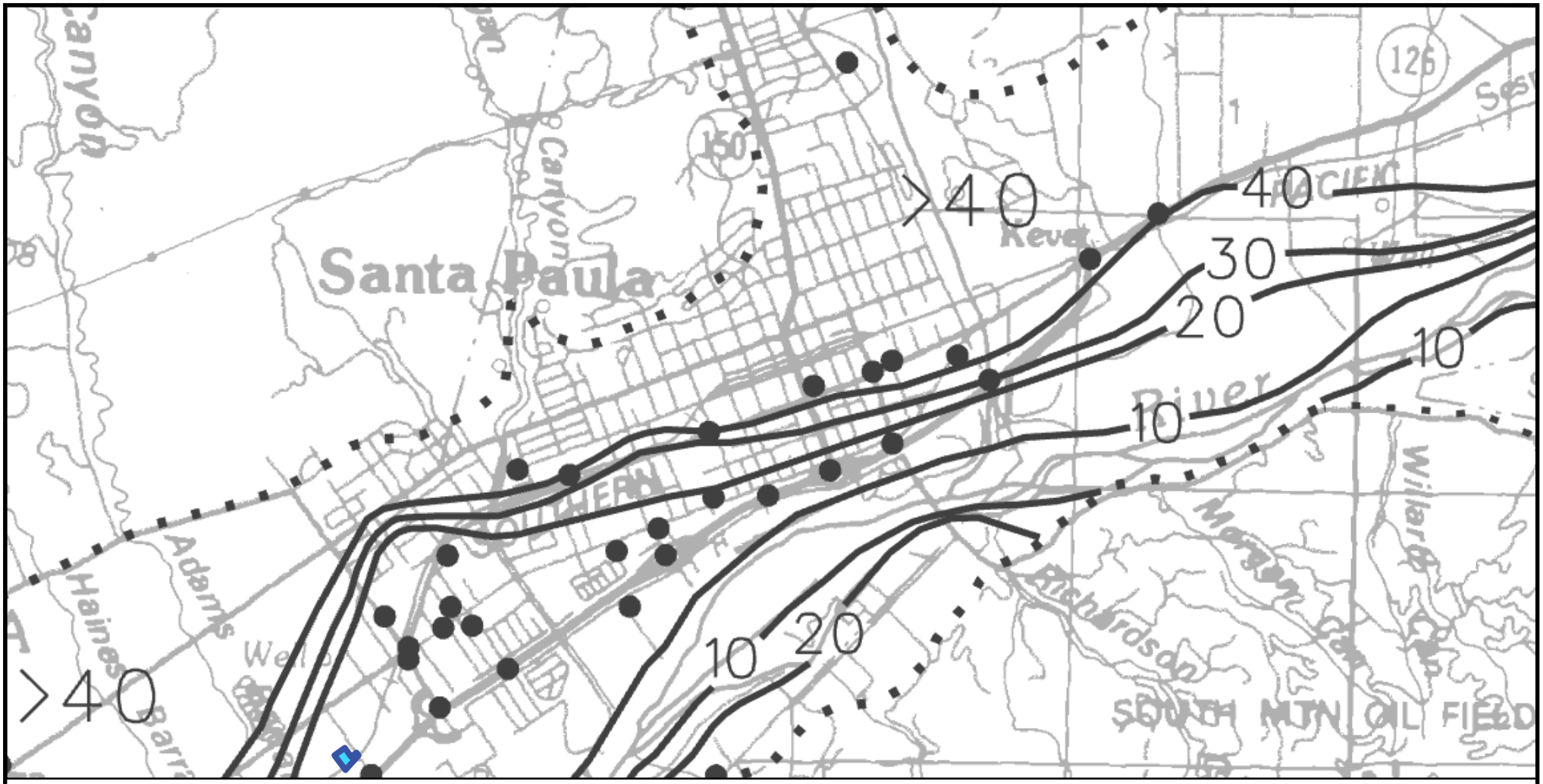
SOURCE: California Geological Survey, 2010

FIGURE **4.6-1**

Meridian Consultants

Geologic Map

050-002-13



Legend

Santa Paula West Business Park Specific Plan Boundary

0 0.25 0.5 1

APPROXIMATE SCALE IN MILES

Monitoring Well Locations

Approximate Basin Boundaries

20 Historically shallowest ground–water depth contours (in feet)

>40 Historically shallowest ground–water depth greater than 40 feet over a broad area

SOURCE: California Geological Survey 2002

FIGURE **4.6-2**

Meridian Consultants

Historically Shallowest Groundwater Depth Contours

050-002-13

4.6.1.3 Faulting and Seismicity

Faults

A geologic fault is a discontinuity in the earth's crust along which earth materials on one side of the fault have moved vertically or horizontally relative to the other side. Based on criteria established by the State Mining and Geology Board (SMGB) in 14 California Code of Regulations §§ 3600, et seq., and as summarized in the Special Publication 42 Fault Rupture Hazard Zones in California, published by the State of California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive.[4]

The State of California Alquist-Priolo Earthquake Fault Zoning Act (2007), Public Resources Code Sections 2621, et seq., defines an active fault as one with surface displacements within Holocene time, or approximately within the last 11,000 years. A fault is deemed sufficiently active if there is evidence of Holocene surface displacement. A fault is considered well defined if its trace is clearly detectable by a geologist as a physical feature at or just below the ground surface. Inactive faults have no evidence of movement within the last 1.6 million years. The term non-active fault is sometimes used for faults with no evidence of Holocene movement and that are considered unlikely to move during the life of an engineered structure.

Major structural features to the north include the Orcutt Fault, the Timber Canyon Fault, the Sisar Fault, the Cayetano Fault, the Santa Paula Ridge Anticline, the Pine Canyon Anticline, the Echo Canyon Anticline, and numerous other onshore and offshore faults[5] (see **Figure 4.6-3, Regional Fault Map**).[6] The Specific Plan area is not located within an active fault zone.[7] The nearest active fault zones occur over 9,000 feet to the north of the Specific Plan area, and no mapped faults or fault zones have a trajectory toward the Specific Plan area.

Fault rupture hazards occur when regional earth movements change the surface configuration of the earth. The movement may be in response to an earthquake (seismically induced) or without any earthshaking (aseismic). These vertical or horizontal changes in the earth can damage structures, utilities, and transportation corridors. Fault rupture/displacement may also alter natural drainage and ground water flow direction.

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4 The California Geological Survey was formerly called the California Division of Mines and Geology (CDMG).

5 Dibblee, T.W., 1990, Geologic Map of the Santa Paula Peak Quadrangle, Ventura County, California, Dibblee Geological Foundation.

6 California Geological Survey, 2010 Fault Activity Map of California, 2010, http://www.quake.ca.gov/gmaps/FAM/faultactivitymap.html.

7 California Division of Mines and Geology (CDMG), 1998, State of California Earthquake Fault Zones Map, Santa Paula 7.5-minute Quadrangle Map, May 1, 1998.

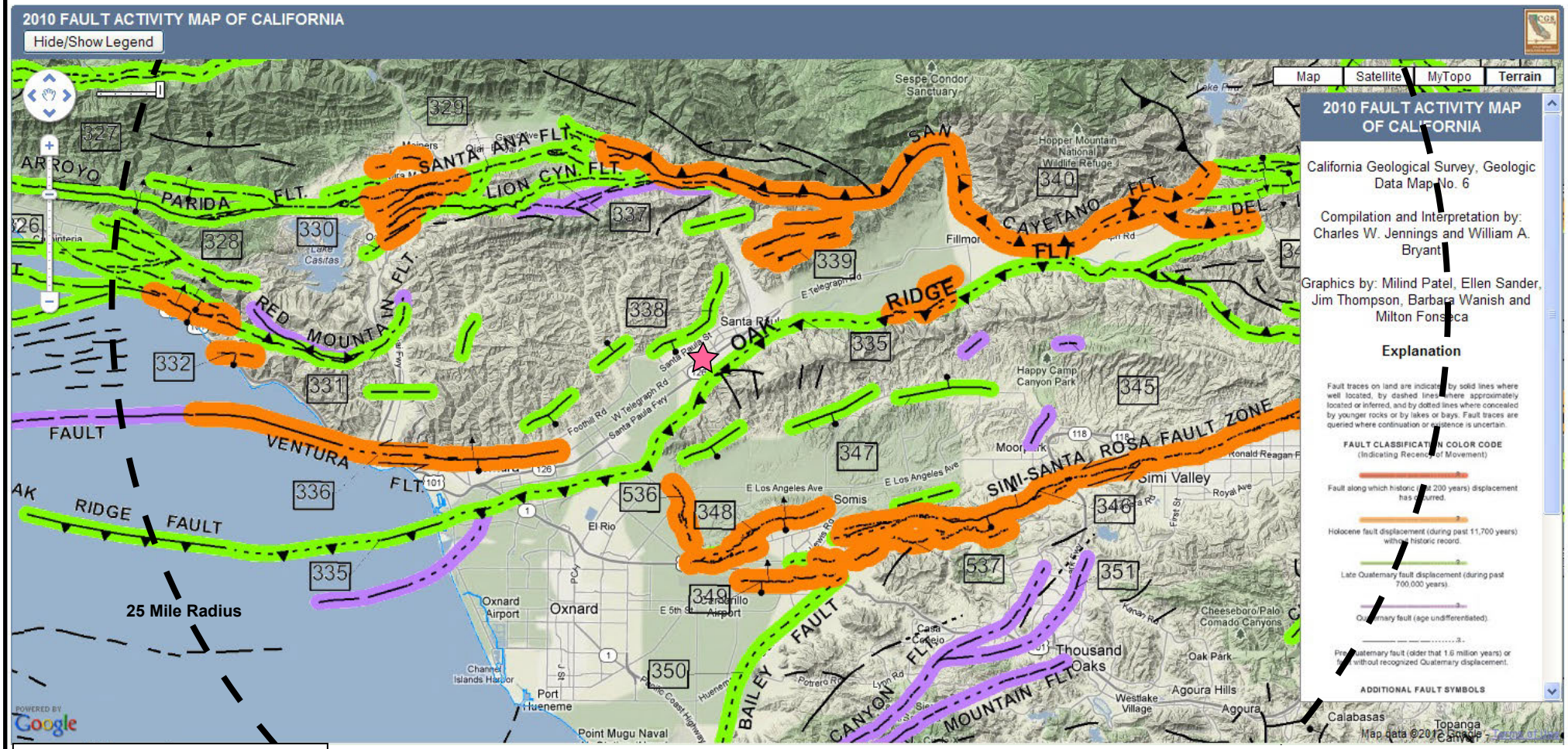
Active or potentially active faults near the Project Site are listed in **Table 4.6-1, Active and Potentially Active Faults within 25 Miles of the Project Site.**

Table 4.6-1
Active and Potentially Active Faults within 25 Miles of the Project Site

Fault	Maximum Moment Magnitude	Distance from the Project Site
Oak Ridge (onshore)	6.9	1.0
San Cayetano	6.8	5.4
Simi-Santa Rosa	6.7	5.6
Ventura–Pitas Point	6.8	5.3
Mission Ridge–Arroyo Parida–Santa Ana	6.7	10.1
Santa Ynez, East	6.7	12.2
Red Mountain	6.8	13.7
Montalvo–Oak Ridge Trend	6.6	15.0
Santa Susana	6.6	16.1
Channel Islands Thrust	7.4	16.5
Oak Ridge (blind thrust offshore)	6.9	17.7
Anacapa-Dume	7.3	18.6
Northridge (East Oak Ridge)	6.9	18.7
Malibu Coast	6.7	21.4
San Gabriel	7.0	23.7

Source: California Division of Mines and Geology (CDMG), 1998, State of California Earthquake Fault Zones Map

The San Cayetano and Oak Ridge Faults to the north and south of the Project Site, respectively, are the most important controlling faults in the region. The Oak Ridge Fault is an active, mostly south-dipping reverse fault that trends to the northeast along the south side of the Santa Clara River Valley (CGS, 2002). The San Cayetano Fault is an active north-dipping reverse fault that trends east to west. Several secondary active normal and reverse faults associated with folding of the Santa Clara syncline are to the south of the San Cayetano Fault. These features have been mapped as short strands approximately 2 to 10 miles in length. These faults are relatively short compared to the Oak Ridge and San Cayetano Faults, which are mapped as laterally continuous strands that extend for tens of miles.



SOURCE: California Geological Survey, 2010

FIGURE **4.6-3**

Meridian Consultants

Regional Fault Map

050-002-13

The Ventura County Geographic Information System website identifies a fault east of the Specific Plan area that trends along the southernmost foothills of Santa Paula Ridge toward the site but ends east of Haun Creek. The source documents for the Ventura County Geographic Information System website depicts the same feature (an inferred fault) to trend across the site. Subsurface investigation of this previously mapped fault did not confirm the existence of the purported feature on site.

Seismicity

The principal factors determining the level of seismic ground-shaking risk at a location are (1) the distance to the active and potentially active faults capable of causing a moderate to large earthquake; (2) the maximum and probable earthquake magnitudes for each fault; (3) the recurrence interval for, or average time between, each earthquake; and (4) the type of geologic or man-made materials (e.g., artificial fill, alluvium, or bedrock) underlying the location. Significant ground-shaking levels can cause damage to structures, utilities and transportation corridors; cause landslides, rockfalls and embankment failures and induce liquefaction failure in certain cohesionless soils.

The faults listed in **Table 4.6-1** are estimated to be capable of generating a peak ground acceleration of approximately 0.96 g and a Modified Mercalli Intensity of at least VIII. Although the San Andreas fault is not on the list it is considered in ground shaking estimates due to the potential for very large earthquakes and the relatively high probability of occurrence. Other inactive or poorly studied faults may be present within 25 miles of the Specific Plan area, but would not generate ground acceleration capable of affecting the Specific Plan development area.

The principal factors determining the level of seismic ground-shaking risk at a location are (1) the distance to the active and potentially active faults capable of causing a moderate to large earthquake; (2) the maximum and probable earthquake magnitudes for each fault; (3) the recurrence interval (average time between each) earthquake (slip rate); and (4) the type of geologic or man-made materials (e.g., artificial fill, alluvium, or bedrock) underlying the location. Significant ground shaking levels can cause damage to structures, utilities and transportation corridors; cause landslides, rockfalls, and embankment failures and induce liquefaction failure in certain cohesionless soils.

Ground shaking is the primary hazard most likely to affect the Project Site, based upon its proximity to active or potentially active faults. Active or potentially active faults near the Project Site are listed in **Table 4.6-1**, and shown on **Figure 4.6-3**. These faults are estimated to be capable of generating a peak ground acceleration of greater than 0.10 g and a Modified Mercalli Intensity of at least VIII. Although the San Andreas fault is not on the list it is considered in ground shaking estimates due to the potential for very large earthquakes and the relatively high probability of occurrence. Other inactive or poorly studied faults

may be present within 25 miles of the proposed site; however, the faults listed in **Table 4.6-1** are considered representative of earthquake sources potentially impacting the Project Site.

The probabilistic seismic hazard analysis (PSHA) of the East Area 1 Specific Plan area is provided in **Table 4.6-2, Probabilistic Seismic Hazard Analysis**.

Table 4.6-2
Probabilistic Seismic Hazard Analysis

	Design Basis Earthquake (10% in 50 years)		Upper Bound Earthquake (10% in 100 years)	
Attenuation Relationship	**PHGA(g)**	**PHGA (g) (Mw=7.5)**	**PHGA(g)**	**PHGA (g) (Mw=7.5)**
Boore et al. (1997): 310 m/s	0.85	0.65	1.06	0.82
Campbell (1997,2000) Alluvium	0.87	0.62	1.04	0.75
Sadigh et al. (1997): Deep Soil	0.92	0.65	1.12	0.80
Average Estimated PHGA	**0.88**	**0.64**	**1.07**	**0.79**

Source: Leighton and Associates, Inc., Geologic and Technical Study the Santa Paula West Industrial Park Specific Plan (June 2015).

The computer program EQSEARCH17 was used to evaluate past documented seismic activity near the annexation area. This program performs an automated search of a catalog of historic Southern California earthquakes, and computes the distance from a project site to each of the earthquake epicenters within a specified search radius of 62 miles (approximately 100 kilometers). From the computed distances, the program also estimates (using an appropriate attenuation relationship) the peak horizontal ground acceleration that may have occurred at the site due to each earthquake. A database of recorded earthquakes with magnitudes of 4.0 or larger between 1800 and 2014 was used in the analysis.

The Geotechnical Report considered ground motions with both a 10 percent probability of exceedance in 50 years (standard construction and an average 475-year return period) and a 10 percent probability of exceedance in 100 years (critical facilities and a 950-year return period). The PSHA considered various magnitudes of earthquakes that major active or potentially active faults within a 100kilometer radius of the site could produce along their respective fault lengths. The results are believed to be reasonable for the project area due to its immediate proximity to their study area and the very regional nature of the data used. Leighton and Associates agree with the CGS20 PSHA showing the project area within a range of 0.8–0.9 g for the 10 percent probability of exceedance in 50 years in alluvium.

The largest historical earthquake within the 62-mile radius of the Project Site was the 1952, magnitude 7.7 Arvin-Tehachapi Earthquake that occurred on the White Wolf Fault approximately 51 miles to the northeast. It is estimated to have produced a horizontal ground acceleration of 0.1 g at the site. A 1904,

magnitude 4.6 earthquake occurred approximately 0.5 mile from the annexation area and resulted in an estimated horizontal ground acceleration of 0.16 g within the annexation area, which is the earthquake event believed to have produced the highest-estimated horizontal ground acceleration at the site.

4.6.1.4 Geohazards

Liquefaction-induced ground failure can involve a complex interaction in soils when strong cyclic ground shaking during an earthquake causes soil mass to turn from a solid to a liquid state. Failures can include ground fissures, sand boils, ground settlement, loss of bearing strength, buoyancy effects, ground oscillation, flow failure, and complex lateral spread landslides.[8] These, in turn, can affect surface and subsurface structures. Lateral spread is a liquefaction-induced landslide of a fairly coherent block of soil and sediment deposits that moves laterally (along the liquefied zone) by gravitational force, sometimes on the order of 10 feet, often toward a topographic low such as a depression or a valley area. The three key factors that indicate whether an area is potentially susceptible to liquefaction are the capacity for severe cyclic ground motions, shallow groundwater, and low-density granular deposits (mainly finer-grained sands). In these areas, where alluvium is sufficiently loose and groundwater is sufficiently shallow that strong earthquake shaking could cause sediments to lose bearing capacity, severe settlement of surface facilities and in some cases uplift of buried structures (e.g., large pipelines) could occur.

The Seismic Hazard Maps for the Santa Paula quadrangle, as shown in **Figure 4.6-4, Liquefaction and Earthquake-Induced Landslides**,[9] indicate that the Specific Plan area is within a zone identified for as a potential liquefaction hazard. These are indicative of potential liquefaction in loose sands. Therefore, based on the State hazard mapping program and the subsurface exploration data and test results for the Project Site, the potential for liquefaction affecting the Project Site is considered to be high.

Lateral Spreading

Lateral spreading is a phenomenon where large blocks of intact, nonliquefied soil move downslope on a liquefied substrate of relatively large aerial extent. The mass moves toward an unconfined area, such as a descending slope or stream-cut bluff, or is known to move on slope gradients as gentle as 1 degree. The land in the vicinity of the Site is essentially flat; no slopes are present. Therefore, the potential for lateral spreading to occur at the site may be low, but this will need to be studied on a case-by-case basis.

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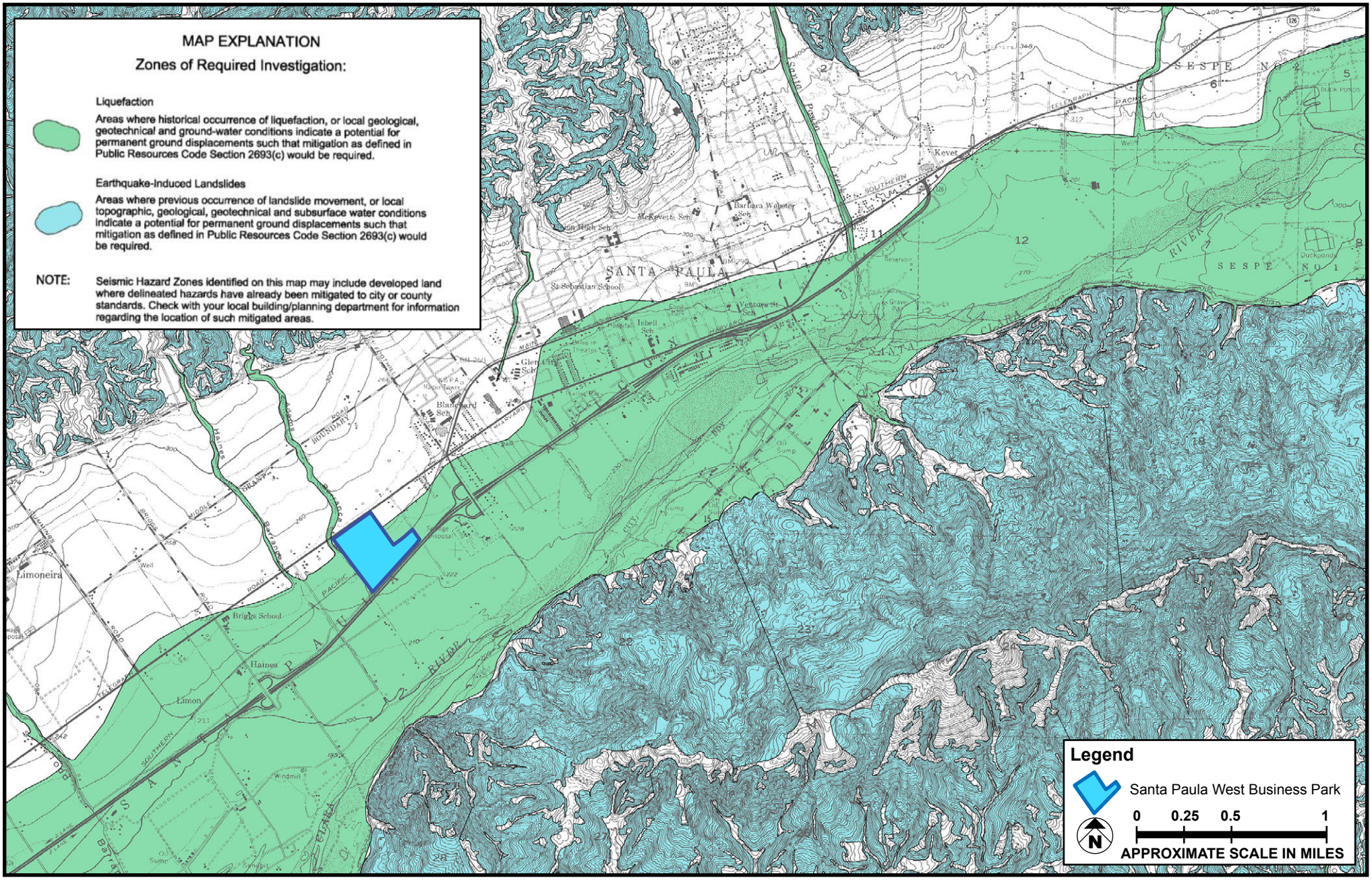
8 Bartlett, S. F., and T. L. Youd, 1992, "Case Histories of Lateral Spreads Caused by the 1964 Alaska Earthquake," in *Case Studies of Liquefaction and Lifeline Performance During Past Earthquakes*, vol. 2, United States Cases, Technical report NCEER-92-0002, Hamada, Masanori, and T. D. O'Rourke, eds. (Buffalo, NY: National Center for Earthquake Engineering Research, 1992), pp. 2-1–2-127.

9 California Geological Survey, "Seismic Hazard Zone Map—Santa Paula Quadrangle," 1:24000 (June 21, 2002).

Liquefaction-induced lateral spread failures are more prevalent adjacent to topographic depressions or valley areas that form unsupported slopes or “free faces.” The potential for lateral spread landslides are more of a concern in the areas adjacent to the Santa Clara River channel. Such failures have occurred in areas with very low topographic slope gradients.



SOURCE: California Geological Survey, 2002

FIGURE **4.6-4**

Meridian Consultants

Liquefaction and Earthquake-Induced Landslides

007-002-12

Seismically Induced Settlement

Strong ground shaking can cause settlement by allowing sediment particles to become more tightly packed, thereby reducing pore space. Unconsolidated, loosely packed granular alluvial deposits are especially susceptible to this phenomenon. Poorly compacted artificial fills may also experience seismically induced settlement. Settlement caused by ground shaking is often nonuniformly distributed, which can result in differential settlement. If settlement occurs, it could result in damage to improvements. The potential exists for seismically induced settlement to occur in areas underlain by alluvial deposits.

Seismically Induced Landslides

Marginally stable slopes may be subject to landsliding caused by seismic shaking. In most cases, this is limited to relatively shallow soil failures on steeper natural slopes, although deep-seated failures of oversteepened slopes are also possible. The Project area is located on flat land and thus, the potential for seismically induced landslides is considered to be low.

Subsidence

Subsidence is the gradual downward settling of the land surface with little or no horizontal movement. It can be caused by many different factors, including natural causes such as consolidation of recently deposited sediment or by man induced changes such as extracting large volumes of subsurface fluids (e.g. water, oil, and gas).

There are several active water wells within the Project Site area, which are used for irrigation and potable water.[10] As noted above, dewatering of an aquifer can result in subsidence. However, the geotechnical analysis **(Appendix 4.6)** determined that the area is not experiencing subsidence, nor is the water extraction contributing to any evidence of subsidence in the general area. Furthermore, in their latest districtwide report, United Water Conservation District (UWCD) modeling has produced no evidence of subsidence in the Santa Paula Basin or Fillmore Basin.

There are no active oil wells on or near the Specific Plan area. The South Mountain oil field lies as close as a few thousand feet to the south, within consolidated bedrock formations being pumped from 5000 to 10000 feet below South Mountain and a portion of the Santa Clara River south of the Project area.[11] No reports of surface subsidence were noted.

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10 United Water Conservation District, Groundwater and Surface Water Conditions Report – 2011, Open-File Report 2012-02, by the Groundwater Resources Department, May 2012.

11 Davis, T. L. and J. S. Namson, Role of Faults in California Oilfields PTTC Field Trip August 19, 2004, Davis and Namson Consulting Geologists, 39 pages.

Slope Stability

Areas of potential slope instability are shown on the Seismic Hazards Zone Map for the Santa Paula 7.5-Minute Quadrangle, Ventura County, California[12] or the City of Santa Paula General Plan, Safety Element at or adjacent to the site.[13]

The Project Site is located on flat terrain, and no significant slopes are present in or immediately surrounding the area. No areas of potential slope instability are shown on the Seismic Hazards Zone Map for the Santa Paula 7.5-Minute Quadrangle, Ventura County, California or the City of Santa Paula General Plan, Safety Element at or adjacent to the site.

Furthermore, manufactured slopes and walls, if any, from developments within the area should be designed in accordance with current codes and standards, and the design should be reviewed from a geotechnical perspective. When so designed, the risk of slope instability is considered to be very low.

Slope Instability and Erosion

Slope instability under non-earthquake (static) conditions hazards occur in hillside and artificial cut/fill slope areas. Landslides, mudslides, debris flows, and soil-slips/surficial material failures affect both the area where the material originates and the downslope "runout" areas where the landslide debris accumulates. Damage to structures can be severe in either location, with structures being dislocated from a few to many tens of feet.

The Specific Plan area is in an area of low topographic slope and is not adjacent to hillside areas where slope failures would be likely emanate. None of the Specific Plan area is within areas identified by the CGS as requiring investigation to address the potential for seismically induced landslides.[14]

Erosion is the process by which the earth's surface is worn by wind or water. Susceptibility to erosion is increased in soils and geologic formations that are poorly consolidated, and where topographic relief is high.

The unconsolidated alluvial deposits exposed on potential cut slopes or other excavations in the area are expected to be susceptible to erosion. Manufactured slopes composed of compacted fill are also expected to be moderately to highly susceptible to erosion.

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12 California Geological Survey, 2002, Seismic Hazard Zones, Santa Paula Quadrangle, Official Map, Released June 21, 2002, Scale of 1 inch = 2,000 feet.

13 City of Santa Paula, General Plan, Safety Element, 1998.

14 California Geological Survey, Seismic Hazard Zone Map—Santa Paula Quadrangle, June 21, 2002, 1:24000.

The unconsolidated alluvial deposits exposed on potential cut slopes or other excavations in the area are expected to be susceptible to erosion. Manufactured slopes composed of compacted fill are also expected to be moderately to highly susceptible to erosion.

The Project Site soils are poorly consolidated, but the local topographic relief is low, and storm water infrastructure is in place to convey overland flow from the north to the outlets in the Santa Clara River. Therefore, erosion potential is considered low.

Expansive Soils

Ground surface settlement may occur soils are susceptible to expansion/contraction (very clay rich soils) and possibly hydroconsolidation (fine-grained granular soils). When present, moderate to high expansion indices indicate that there is a substantial amount of clay in the soils, and repeated episodes of wetting and drying will cause distress to structures in contact with such soils. Consolidation (and long-term settlement) is most prominent in clay-rich and silt-rich soils, resulting from loading pressure created by overlying structures, including buildings or artificial fill. This added weight could collapse internal void spaces within the soils, causing overlying structures to settle and possibly experience damage. This consolidation and settlement can be much more dramatic under severe seismic shaking (dynamic settlement). Hydroconsolidation will also lead to settlement but includes the addition of water into the soil structure, causing more rapid and more substantial settlements.

The following findings are based on a review of existing data and conditions in the Santa Paula area. Geotechnical investigations would be conducted for individual improvement projects within the Specific Plan area to provide recommendations for grading, overexcavation, and removal of compressible soils, fill placement, wall design, and other specific measures to address geotechnical aspects of proposed improvements.

Compressible and Collapsible Soil

Soil compressibility refers to a soil's potential for settlement when subjected to increased loads, such as from a fill surcharge. Based on our experience in the area, topsoil and the upper portion of the young alluvial soil are generally expected to be slightly to moderately compressible. Uncontrolled fill would be considered compressible throughout the entire depth.

Collapse potential refers to the potential settlement of the alluvial soil under existing stresses (loads) upon being wetted. The alluvial soil underlying the area is expected to have a slight to moderate collapse potential.

Expansive Soils

The upward pressures induced by expansive soils can have significant effects on structures and other surface improvements. Shrinkage of these soils during drying can also cause damage as structural support is removed. Based on soil information from the Santa Paula area, the alluvial soils present within the site vicinity are expected to exhibit a low expansion potential. Soils with a higher expansion potential (medium or greater) may be encountered locally. Testing to evaluate the expansion potential of the soil should be conducted in areas where improvements are planned.

Corrosive Soils

Corrosive soils contain chemical constituents that may cause damage to construction materials such as concrete and ferrous metals. One such constituent is water-soluble sulfate, which, if high enough in concentration, can react with and damage concrete. Electrical resistivity, chloride content, and pH level are indicators of the soil's tendency to corrode ferrous metals. The soil in the area is expected to be corrosive to ferrous metals. Testing of the soils should be conducted to identify the corrosive potential of the earth materials in the area. If concrete structures are planned, sulfate testing should also be conducted to determine if special concrete would be required to withstand sulfate attack.

Rippability and Oversized Rock

The alluvial soils in the area are expected to be readily excavated using conventional earthmoving methods. Oversized material could be generated depending on the design, specific site conditions and depth of excavation into the alluvial soils. Development designs should consider the presence of oversized materials such as cobbles and boulders at depth. If oversized materials are encountered, the design should be reviewed and additional geotechnical recommendations should be provided for oversized material placement.

Suitability as Fill Material

The soils underlying the annexation area are generally suitable for use as compacted fill, provided they are free of debris, significant organic material, and oversized material. Moisture conditioning (either moistening or drying) will generally be needed to obtain the proper moisture content needed for compaction.

4.6.2 REGULATORY SETTING

Federal

International Building Code

The model building code that is predominantly adopted in the United States is the International Building Code (IBC) from the International Code Council (ICC), a nongovernmental organization. The ICC produces other model codes, such as the International Residential Code (IRC). The IBC and its companion ICC documents form the basis of the building codes in most states and have been adopted by local governments within all states.

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program (NEHRP) supports the development of seismic provisions in building codes. The NEHRP "Recommended Provision for Seismic Regulations for New Buildings and Other Structures"[15] presents the state of the art of earthquake engineering research and practice in a form usable by the engineering community, and provides a nationally applicable resource document for all model codes and standards. A 2012 series of National Seismic Hazard Maps by the USGS shows the severity of expected earthquake shaking for a particular level of probability; for example, levels of earthquake shaking that have a 2 in 100 chance of being exceeded in a 50-year period. The time period of 50 years is commonly used because it represents a typical building's lifetime, while the 2 percent probability level is usually considered an acceptable hazard level for the building codes. Maps also show seismic-shaking levels using a number of different measures that apply to designing earthquake-resistant buildings of different heights, which respond to different frequencies of ground motion.

State

Building Codes

Development in the State of California is governed by the 2016 California Building Code (CBC).[16] These regulations include provisions for site work, demolition, and construction, which include excavation and grading, as well as provisions for foundations, retaining walls, and expansive and compressible soils. The 2013 County of Ventura Building Code is based on the CBC, the International Building Code, and others. CBC amendments and building regulations were adopted by Ordinance 4422.[17] Standard residential,

15 Building Seismic Safety Council (BSSC), 2009, NEHRP (National Earthquake Hazards Reduction Program) Recommended Seismic Provisions for New Buildings and Other Structures (FEMA P-750) 2009 Edition, prepared for the Federal Emergency Management Agency by the of the National Institute of Building Sciences. Washington, D.C.

16 California Building Standards Commission, 2016 California Building Code, http://www.bsc.ca.gov/default.htm and International Code Council, 2015, Chapters 16 and 16A, Site Class definition, http://codes.iccsafe.org/app/book/content/2015-I-Codes/2015%20IBC%20HTML/Chapter%2016.html. .

17 Ventura County, Building Code, Articles 1 through 10, Ordinance 4422 effective on January 1, 2011.

commercial, and light industrial construction is governed by the CBC, which the County may amend. The 2016 CBC[18] includes additions to the previous building code that make it more stringent, particularly with regard to seismic and earthquake conditions for critical structures such as essential facilities, public schools, and hospitals.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Geologic Hazards Zone Act[19] was enacted to address the hazard and damage caused by surface fault rupture during an earthquake. The act, which has been amended ten times and named the Alquist-Priolo Earthquake Fault Zoning Act (APEFZA), defines an active fault as one that has had surface displacements within Holocene time (about the last 11,000 years). Initially, faults were defined in the Alquist-Priolo Act as "potentially active" and were zoned if they showed evidence of surface displacement during Quaternary time (last 1.6 million years).[20] Beginning in 1977, evidence of Quaternary surface displacement was no longer used as a criterion for zoning. Since 1975, the State of California has defined the terms "sufficiently active" and "well defined" for application in zoning faults. These two terms constitute the present criteria used by the State Geologist in determining if a given fault should be zoned under the Alquist-Priolo Act, and are defined as follows:

Sufficiently active. A fault is deemed sufficiently active if there is evidence of Holocene surface displacement along one or more of its segments or branches. Holocene surface displacement may be directly observable or inferred; it need not be present everywhere along a fault to qualify that fault for zoning.

Well-defined. A fault is considered well defined if its trace is clearly detectable by a trained geologist as a physical feature at or just below the ground surface. The fault may be identified by direct observation or by indirect methods (e.g., geomorphic evidence). The critical consideration is that the fault, or some part of it, can be located in the field with sufficient precision and confidence to indicate that the required site-specific investigations would meet with some success.

The act requires the State Geologist to establish "earthquake fault zones" along known active faults in the State. Cities and counties that include earthquake fault zones are responsible for regulating most development projects within the Earthquake Fault Zones (EFZ), as described in the act, but may enact regulations that are more stringent. Certain smaller residential developments can be exempt.

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18 California Administrative Code CCR Part 2 of Title, 2013 California Building Code.

19 California Public Resources Code, Sections 2621-2630, 1972 as amended.

20 Bryant, W. A. and E.W. Hart, 2007, Fault Rupture Hazard Zones in California, Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zone Maps, California Division of Mines and Geology Special Publication 42.

Seismic Hazards Mapping Act

The Seismic Hazard Mapping Act (SHMA) of 1990[21] was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under this act, the State Geologist is assigned the responsibility of identifying and mapping seismic hazards zones.

The State of California Geologic Survey (CGS) has also adopted seismic design provisions in Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards in California,* on March 13, 1997 (revised 2008).[22] The CGS provides guidance with regard to seismic hazards under the Seismic Hazards Mapping Act; seismic hazard zones are to be identified and mapped to assist local governments with respect to planning and development purposes. The intent of this publication is to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and other hazards caused by earthquakes. Lead agencies with the authority to approve development projects shall ensure the following:

> *The geotechnical report 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.*
>
> *Prior to approving the project, the lead agency shall independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures and to determine the requirements of Section 3724(a), above, are satisfied. Such reviews shall be conducted by a certified engineering geologist or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation.*

The County of Ventura and City of Santa Paula have been mapped pursuant to the SHMA, and there are zones of required investigation for liquefaction and earthquake-induced landslide hazards in and adjacent to the Project Area.

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21 California Public Resources Code, Chapter 7.8, Sections 2690-2699.6, Seismic Hazards Mapping Act of 1990.

22 California Geological Survey, 2008, Special Publication 117 Guidelines for Evaluating and Mitigating Seismic Hazards in California, http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf.

National Hazards Disclosure Act

The Natural Hazards Disclosure Act[23] requires:

> *That sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone.*

The Natural Hazards Disclosure Act specifies two ways in which this disclosure can be made:

In all transactions that are subject to Section 1103 of the Civil Code, the disclosure required by subdivision (a) of this section shall be provided by either of the following means:

1. The Local Option Real Estate Transfer Disclosure Statement as provided in Section 1102.6a of the Civil Code.

2. The Natural Hazard Disclosure Statement as provided in Section 1103.2 of the Civil Code.

The Local Option Real Estate Disclosure Statement can be substituted for the Natural Hazards Disclosure Statement if it contains substantially the same information and substantially the same warning as the Natural Hazards Disclosure Statement. Both the APEFZA and the SHMA require that real estate agents, or sellers of real estate acting without an agent, disclose to prospective buyers that the property is located in an Alquist-Priolo fault zone or seismic hazard safety zone.

City of Santa Paula

Building and Safety Department

The Building and Safety Department ensures that all laws pertaining to the construction or alteration of buildings and structures are enforced to ensure the health and safety of the community. It conducts inspections and issues all appropriate permits for building, plumbing, electrical and mechanical work, and various other permits.

General Plan

Safety Element

The City of Santa Paula General Plan Safety Element was prepared in 1975 and updated in 1998. The focus of the Safety Element is to adopt policies that will "reduce death, injuries, property damage, and the economic and social dislocation resulting from natural hazards."[24]

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23 California Civil Code, Section 1103, Natural Hazards Disclosure Act, effective June 1, 1998.

24 City of Santa Paula, G*eneral Plan,* Safety Element, 1998.

As described in the Safety Element, it is the intent of the City to provide for balanced planning decisions based on the recognition of the importance of public safety and on the need to integrate safety concerns with other local issues. Depending on the degree of hazard within a given area, the Safety Element is integrated with the other elements, for example, when addressing landsides (Housing and Conservation and Open Space Elements), decisions on where to locate habitable or critical structures (for hazard avoidance and emergency services), and provision of emergency response in the event of a disaster (Circulation Element).

Development Code

The City of Santa Paula Municipal Code (SPMC) includes the city zoning and development regulations. The chapters directly applicable to geology and soils issues are Grading and Erosion Control[25] and Subdivision Regulations.[26] Per the SPMC, the City Engineer or Building Official shall issue grading permits based on the appropriate submittal, including geotechnical and engineering geology reports.

4.6.3 THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines (Environmental Checklist Form) a project would have a significant impact on the environment if it:

- Exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map issued by the State Geologist from the area or based on other substantial evidence of a known fault.
    b. Strong seismic ground shaking.
    c. Seismic related ground failure, including liquefaction.
    d. Landslides.
- Results in substantial soil erosion or the loss of topsoil.
- Is located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an off-site landslide, lateral spreading, subsidence liquefaction, or collapse.
- Is located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risk to life or property.

25 City of Santa Paula, Municipal Code, Title 16, and Erosion Control, Chapters 16.96-=–16.99.
26 City of Santa Paula, Municipal Code, Title 16, and Erosion Control, Subdivision Regulations, Chapter 16.80.

4.6.4 PROJECT IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant with mitigation incorporated; or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP who made a reasonable argument that the issue was potentially significant (see Responses to NOP, **Appendix 1.0**). No issues arose during the NOP process that are not already covered by Appendix G of the State CEQA Guidelines (Environmental Checklist Form) for Geology and Soils.

Threshold: **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

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?

The Specific Plan area is neither located within an established Alquist-Priolo Earthquake Fault Zone, nor is it crossed by a known active fault. The nearest active fault is the Oak Ridge Fault, located approximately 1 mile south of the Specific Plan boundary. As no faults are known to occur through the Project Site, no setbacks from fault or other avoidance measures are necessary. However, given the seismic activity of the region, the CBC requires that structures be constructed to address the seismic nature of the region-based seismic stability factors established within the Code. The Project will not increase the intensity of the development on the Project Site beyond what was considered at the time the City's General Plan was adopted. The risk of loss, injury, or death associated with surface rupture of a known earthquake fault is considered very low, and impacts will be less than significant.

Threshold: **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

b. Strong seismic groundshaking

The Specific Plan area could be subject to strong ground shaking in the event of an earthquake originating along one of the faults listed in **Table 4.6-1** (or another active or potentially active in the Southern California area, such as the San Andrea Fault). Strong seismic ground-shaking potential hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects (e.g., severe structural damage and building collapse). All structures shall be designed in accordance with the then-current CBC and applicable City codes to ensure safety in the event of an earthquake.

Similar to most of Southern California and the County of Ventura, the Project Site is subject to some level of damaging ground shaking as a result of movement along the major active and potentially active fault zones that characterize this region. Strong seismic ground-shaking potential hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects (e.g., severe structural damage and building collapse).

As part of the preparation of the Project Site for future development, additional subsurface explorations will be performed to establish required removal depths and delineate any areas that may be susceptible to seismically induced settlement. The Geotechnical Report determined that the Project Site is suitable to support the development allowed by the Specific Plan, and specific geotechnical engineering will determine design specification to address settlement.

Seismic design standards contained in the CBC include coefficients and factors for lateral force design. These coefficients and factors may change periodically because the CBC is amended approximately every 3 years. Construction allowed by the Specific Plan will be required to comply with the version of the CBC in effect at the time individual building permits are obtained. The Project will not expose residents to unknown safety issues associated with seismicity (including ground shaking), and potential impacts are less than significant.

Threshold: **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

c. Seismic-related ground failure, including liquefaction

Generally, liquefaction potential is greatest where the groundwater level is shallow and submerged loose, fine sands occur within a depth of about 50 feet or less below the ground surface. Most of the Project Site lies within a liquefaction hazard zone, an area where the historic occurrence of liquefaction or groundwater conditions indicate a potential for ground displacements as a result of liquefaction, as designated by the State of California and the City of Santa Paula. Historically highest groundwater levels beneath the affected areas are at depths up to 20 feet below the existing ground surface. If liquefaction were to occur at the Project Site, the repercussions would likely be in the form of dynamic settlement; loss of bearing is not anticipated. As described above, up to 6 feet of compacted fill material would be placed on top of the existing soils in the western portion, and other areas would undergo overexcavation, recompaction, and fill as needed. The thickness of the potentially liquefiable soil would be significantly reduced from the estimated value, or possibly eliminated altogether. Specific geotechnical recommendations would be made to reduce the effects of dynamic settlement to an acceptable level of risk per Title 14 of the California Code of Regulations. Until specific design parameters are established

based on future building and utility infrastructure designs to reduce magnitude of dynamic settlement, impacts are considered potentially significant.

Strong ground shaking can cause settlement by allowing sediment particles to become more tightly packed, thereby reducing pore space. Unconsolidated, loosely packed granular alluvial deposits are especially susceptible to this phenomenon. Poorly compacted artificial fills may also experience seismically induced settlement. Settlement caused by ground shaking is often non-uniformly distributed, which can result in differential settlement. If settlement occurs, it could result in damage to improvements. Seismic settlement could occur on the site and is thus considered a potentially significant impact.

Threshold: **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

d. Landslides

Landslides involve the vertical and lateral movement of large earth masses by gravity (and possible initiated by earthquake forces). If landslides encroach into areas with structures, these structures can be severely damaged or destroyed, and occupants can be seriously injured if such failures (e.g., slope cracking and/or structural deformation) were to occur without some advanced warning.

No areas of potential slope instability on the site are shown in the Seismic Hazard Zone Report[27] or the City of Santa Paula Safety Element.[28] The topography of the project area is relatively flat and has no landforms where a landslide could form, except for possible lateral spread landslides, as discussed above. Therefore, the potential for impacts from earthquake-induced landslides or other landslides (except lateral spread landslides) is considered less than significant.

Threshold: **Result in substantial soil erosion, or the loss of topsoil**

The native topsoil and alluvial soils in the annexation area may be moderately susceptible to erosion. Construction activity associated with even moderate-scale grading can result in wind, gravity, and water driven erosion of earth materials (soils and geologic units) if soil is disturbed, exposed, or stockpiled. After construction and covering the sites with pavement and landscaping, this potential impact is substantially reduced. Due to the extent of grading and the materials present, there could be a substantial loss of topsoil on the proposed Specific Plan development area, which would convert the site agricultural land to urban use, necessitating topsoil removal as part of geotechnical remediation, and covering the land with

27 California Geological Survey, Seismic Hazard Zone Map—Santa Paula Quadrangle, June 21, 2002, 1:24000.
28 City of Santa Paula, General Plan, Safety Element, 1998.

roadways, parking areas, and buildings. Long-term operations would include the infrastructure to control runoff through the use of an on-site detention basin. The Project would also include improvements that would involve filling the western portion of the Project Site to above flood elevations of the Adams Barranca and would allow the flow from Adams Barranca to continue south toward its outlet with the Santa Clara River.

Construction activities would comply with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, each construction project permitted under the Specific Plan would be required to comply with City's necessary permits, plans, plan checks, and inspections to reduce the effects of sedimentation and erosion. In addition, as discussed in **Section 4.9**, **Hydrology and Water Quality**, the Project would be required to have a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, best management practices (BMPs) would be implemented during construction to reduce soil erosion and pollutant levels to the maximum extent possible.

After construction, the project may result in a limited degree of soil erosion effects from vegetated areas. However, in accordance with NPDES requirements, the project would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of each development within the Specific Plan, which would include BMPs that would reduce on-site erosion from vegetated areas and basins on the Project Site. While BMP design features would be developed with more refined engineering for each development prior to implementation of the above requirements, impacts associated with erosion and sedimentation are considered potentially significant.

Threshold: **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; and be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property.**

The potential impacts from landslides and liquefaction are discussed in the subsections above.

The alluvial soils present in the annexation area are expected to exhibit a low expansion potential. However, soils with a higher expansion potential (medium or greater) may be encountered locally. Depending on the improvements planned for the area, expansive soils could pose a risk to property. However, as previously noted, geotechnical studies should be conducted to evaluate the potential for expansive soil to impact individual improvements.

Lateral spread potential may be present if liquefaction in shallow layers is determined, even with the relatively flat natural slopes toward the Santa Clara River and Adams Barranca. To minimize effects of lateral spreading, the geotechnical investigations include design specifications for footing and foundations to resist any lateral spreading impacts to the structural integrity of developments. Through compliance with the 2016 CBC and recommendations of the geotechnical investigations, effects could be addressed via specific design project design features for individual developments in accordance with the Specific Plan. Without site-specific geotechnical investigations to analyze lateral spread landslide potential in accordance with the 2016 CBC and Special Publication 117, impacts related to lateral spread landslides would be potentially significant.

Quaternary alluvial deposits consisting of silt, sand, and gravel (or larger-size) clasts, and possibly clay-rich soils and miscellaneous artificial fill, underlie the Project Site. As noted earlier, there are four alluvial geologic units within the Specific Plan development area. Without engineering modification, the surficial units would be consolidation prone and erodible, and would make poor foundation materials. These conditions could lead to damage for any structures placed over these materials. Expansive soils units may be found in the Qht deposits that could cause damage to foundations and walls due to repeated drying and wetting (shrink and swell). Therefore, geologic, soils, and geotechnical impacts would be potentially significant.

4.6.5 CUMULATIVE IMPACTS

Geologic impacts are typically confined to a project site or within a localized area and do not affect off-site areas associated with the related projects identified in **Section 3.0, Related Projects,** or other growth in the City. At a minimum, all development occurring within the City of Santa Paula would be subject to CBC and construction standards relative to seismic and other geologic conditions that are prevalent within the region. Also, individual project geotechnical investigation reports would provide recommendations to account for site-specific design requirements to avoid subjecting on- and off-site properties to geologic hazards, in accordance with the CBC. With regard to erosion and sedimentation, development under the Santa Paula West Specific Plan and related projects are required to implement a SWPPP during construction, as required by the NPDES permit, to minimize impacts to off-site properties from the effects of erosion. Therefore, based on the Santa Paula West Specific Plan design (including recommendations within the geotechnical reports), and compliance with applicable regulations and plan review, the Project will meet the applicable standards and will sufficiently reduce its incremental cumulative geology and soil impacts to a less than significant cumulative impact.

4.6.6 MITIGATION MEASURES

G-1: Additional explorations must be performed at the tentative tract map and grading plan review stages of the development planning. The purpose of the explorations would be to establish required removal depths and delineate any portion of the Project Site deemed susceptible to seismically induced settlement.

G-2: Detailed, design-level geotechnical investigation reports for all future subdivision and other discretionary development approvals must be submitted to the Public Works Director, or designee, for approval. In addition, grading plans and geotechnical reports prepared by a licensed Engineering Geologist (approved by the Public Works Director) must be provided to the Public Works Director, or designee, before the City issues grading building permits for individual development projects within the Project Site. Requirements for the geotechnical reports and compliance are described below.

- The Engineering Geologist must make recommendations to address any seismically induced settlement within portions of the Project Site. In particular, seismically induced settlement must be addressed in the western parts of the Project Site, where preliminary geotechnical investigations determined that the area may experience up to several inches of seismically induced settlement in the event of strong ground motion.

- The Engineering Geologist must inspect and certify that any expansive soils underlying individual building pads and all roadway subgrades have been either removed or amended in accordance with construction specifications, and make site-specific recommendations for grading, drainage installation, and foundation design, as appropriate.

- The Public Works Director, or designee, must ensure that all soils and engineering report recommendations are incorporated into the project engineering and construction plans, including soils tests to ensure that it meets the soil classifications assumed in the soils reports, and that soils meet the CBC requirements.

- All Project plans as determined necessary by the Public Works Director, or designee, including Grading and Construction Plans, must be reviewed and stamped by a Project soils engineer and submitted to the Public Works Director, or designee, for review and verification that all requirements are incorporated before the City issues grading or construction permits.

- The Applicant and/or contractor must retain a licensed soils engineer acceptable to the Public Works Director, or designee, to review all construction plans for

consistency with the soils reports and to monitor on-site grading and construction to ensure the conditions at the Project Site do not substantially change the requirements of report recommendations for design-level geotechnical investigations. The project soils engineer must monitor grading and construction activity and report observations to the Public Works Director, or designee. The Public Works Director, or designee, will conduct field inspections as needed.

G-3: The final grading and erosion control plan shall be designed to minimize erosion. The plan shall include, but not be limited to, the following:

- Best management practices (BMPs), such as temporary berms and sedimentation traps (such as silt fencing, straw bales, and sand bags), shall be installed in association with project grading. The BMPs shall be placed at the base of all cut/fill slopes and soil stockpile areas where potential erosion may occur and shall be maintained to ensure effectiveness. The sedimentation basins and traps shall be cleaned periodically, and the silt shall be removed and disposed of in a location approved by the City.

- Nonpaved areas shall be revegetated or restored (i.e. geotextile binding fabrics) immediately after grading and installation of utilities to minimize erosion and to re-establish soil structure and fertility. Revegetation shall include drought-resistant, fast-growing vegetation that would quickly stabilize exposed ground surfaces. Alternative materials rather than reseeding (e.g., gravel) may be used, subject to review and approval by the City.

- Runoff shall not be directed across exposed slopes. All surface runoff shall be conveyed in accordance with the approved drainage plans.

- Energy dissipaters or similar devices shall be installed at the end of drainpipe outlets to minimize erosion during storm events.

- Grading shall occur during the dry season (April 15 to November 1) unless a City-approved erosion control plan is in place and all erosion control measures are in effect. Erosion control measures shall be identified on an erosion control plan and shall prevent runoff, erosion, siltation, and tracking of mud and soil onto City streets. All exposed graded surfaces shall be reseeded with ground cover vegetation to minimize erosion. Graded surfaces shall be reseeded within four (4) weeks of grading completion, with the exception of surfaces graded for the placement of structures. These surfaces shall be reseeded if construction of structures does not commence within four (4) weeks of grading completion.

- Site grading shall be completed such that permanent drainage away from foundations and slabs is provided and so that water shall not pond near proposed structures or pavements.

4.6.7 RESIDUAL IMPACTS AFTER MITIGATION

All potential impacts related to geologic characteristics, faulting, seismic shaking, soils, and slope stability will be mitigated to less than significant by implementation of Mitigation Measures G-1 and G-2. To control erosions and sedimentation Mitigation Measure G-3 would reduce impacts to less than significant. In addition, the Project Site is not susceptible to impacts related to subsidence, flooding, tsunami affects, and/or dam inundation. As such, all impacts related to geology and soils conditions are considered less than significant.

4.7 GREENHOUSE GASES

This section evaluates the significance of the greenhouse gas (GHG) emissions that would be generated by the Santa Paula West Business Park Specific Plan (SPWBPSP), referred to as the Specific Plan. A quantified estimate of these GHG emissions is provided for both construction and operation of the Project. The input assumptions for operational GHG emissions calculations and the GHG conversion from consumption to annual regional CO2 equivalency (CO2e) emissions are summarized in the CalEEMod output files found in **Appendix 4.3, Air Quality and Greenhouse Gas Emissions Model Output.**

The Project GHG emissions are considered within the context of the Statewide and Local GHG reduction laws, plans, and policies. The Project's sustainable design features to reduce GHG emissions are provided. Analysis years for all construction phases and total Project operational years are provided to determine the total estimated maximum emissions of the Project.

4.7.1 EXISTING CONDITIONS

Greenhouse Gas

Climate change is a change in the average climatic conditions on earth that may be measured by changes in wind patterns, storms, precipitation, and temperature. These changes are assessed using historical records of temperature changes that have occurred in the past, such as during previous ice ages. Many of the concerns regarding climate change use this data to extrapolate a level of statistical significance, specifically focusing on temperature records from the last 150 years (the Industrial Age), which differ from previous climate changes in rate and magnitude.

The United Nations Intergovernmental Panel on Climate Change (IPCC) considered six alternative future GHG scenarios that would stabilize global temperatures and climate change impacts. The IPCC predicted that global mean temperature change from 1990 to 2100 for the six scenarios considered could range from 1.5 degrees Celsius (°C) to 2.0°C. Global average temperatures and sea levels are expected to rise under all scenarios.[1]

In California, climate change may result in consequences such as the following:

- A reduction in the quality and supply of water to the State from the Sierra snowpack
- Increased risk of large wildfires
- Reductions in the quality and quantity of certain agricultural products

1 Intergovernmental Panel on Climate Change, "Summary for Policymakers," in *Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change,*. (Cambridge University Press: Cambridge, UK and New York, 2013).

- Exacerbation of air quality problems
- A rise in sea levels resulting in the displacement of coastal businesses and residences
- Damage to marine ecosystems and the natural environment
- An increase in infections, disease, asthma, and other health-related problems
- A decrease in the health and productivity of California's forests

GHGs are gases that trap heat in the atmosphere; the effect is analogous to the way a greenhouse retains heat. Common GHGs include water vapor, carbon dioxide (CO2), methane (CH4), nitrous oxides, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, ozone, and aerosols. The presence of these GHGs in the atmosphere affects the earth's surface temperature. Both natural processes and human activities emit GHGs. However, it is believed that emissions from human activities, such as electricity production and vehicle use, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

The global warming potential (GWP) is the potential of a gas or aerosol to trap heat in the atmosphere. The GWP compares the amount of heat trapped by a certain mass of the gas in question to the amount of heat trapped by a similar mass of carbon dioxide. A GWP is calculated over a specific time interval, commonly 20, 100, or 500 years. GWP is expressed as a factor of carbon dioxide (whose GWP is standardized to 1). For example, the 100-year GWP of methane is 28, which means that if the same mass of methane and carbon dioxide were introduced into the atmosphere, that methane will trap 28 times more heat than the carbon dioxide over the next 100 years.[2] A summary of the atmospheric lifetime and GWP of selected gases is presented in **Table 4.7-1, Atmospheric Lifetimes and Global Warming Potentials of GHGs.** As indicated, GWP ranges from 1 to 23,500.

2 Working Group, *Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2013.

Table 4.7-1
Atmospheric Lifetimes and Global Warming Potentials of GHGs

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon dioxide (CO2)	100–300	1
Methane (CH4)	12 (+/-3)	28
Nitrous oxide (N2O)	121	265
CFC-11 (CCL3F)	45	4,660
CFC-12 (CCL2F2)	100	10,200
CF-113 (CCL2CCIF2)	85	5,820
HCFC-22 (CHCIF2)	11.9	1,760
HCFC-141b (CH3CCl2F)	9.2	782
HCFC-142b (CH3CCIF2)	17.2	1,980
Halon 1211 (CBRCIF2)	16	1,750
Halon 1301 (CBrCIF3)	65	6,290
HFC-134a (CH2FCF3)	13.4	1,300
Carbon tetrachloride (CCl4)	26	1,730
Sulfur hexafluoride (SF6)	3,200	23,500

Source: Intergovernmental Panel on Climate Change, IPCC Fifth Assessment Report: Climate Change 2013.

Individual GHG compounds have varying GWP and atmospheric lifetimes. The calculation of the carbon dioxide equivalent (CO2e) is a consistent methodology for comparing GHG emissions, since it normalizes various GHG emissions to a consistent metric. Methane's warming potential of 28 indicates that methane has a warming effect that is 28 times greater than carbon dioxide on a molecule-per-molecule basis. A carbon dioxide equivalent is the mass emissions of an individual GHG multiplied by its GWP.

The GHGs of most concern are identified in **Table 4.7-2, Greenhouse Gases.** Of the two primary sources of GHG in CO2 and methane, CO2 would be generated by sources associated with the Project, while methane would not be generated in any substantial amount.

Table 4.7-2
Greenhouse Gases

Greenhouse Gas	Description and Physical Properties	Sources
Carbon dioxide (CO2)	Carbon dioxide is an odorless, colorless, natural GHG. GWP = 1.	Carbon dioxide is emitted from natural and anthropogenic sources. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The concentration in 2005 was 379 ppm, which is an increase of about 1.4 ppm per year since 1960.
Haloalkanes	Haloalkanes (also known as halogenoalkanes or alkyl halides) are colorless, relatively odorless, and hydrophobic.	Haloalkanes are mostly human-produced such as flame retardants, fire extinguishants, refrigerants, propellants, solvents, and pharmaceuticals. Nonartificial-source haloalkanes do occur, mostly through enzyme-mediated synthesis by bacteria, fungi, and especially sea microalgae (seaweeds).
Methane (CH4)	Methane is a flammable gas and is the main component of natural gas. GWP = 21.	A natural source of methane is from the anaerobic decay of organic matter. Methane is extracted from geological deposits (natural gas fields). Other sources are from landfills, fermentation of manure, and cattle.
Nitrous oxide (N2O)	Nitrous oxide is also known as laughing gas and is a colorless GHG. GWP = 310.	Microbial processes in soil and water, fuel combustion, and industrial processes.
Perfluorocarbons (PFCs)	Perfluorocarbons liquids are colorless with high density, up to more than twice that of water. It is also an odorless, nonflammable, unreactive gas.	Man-made compounds containing just fluorine and carbon. They are used mainly in the electronics sector in semiconductor manufacture, with significant usage as refrigerants.
Sulfur hexafluoride (SF_6)	Sulfur hexafluoride is an inorganic, colorless, odorless, nonflammable, extremely potent GHG that is an excellent electrical insulator. GWP = 23,900	Sulfur hexafluoride emissions are virtually all of anthropogenic origin including electricity sector, magnesium industry, electronics industry, and adiabatic property.

Source: Intergovernmental Panel on Climate Change, IPCC Fifth Assessment Report: Climate Change 2013 .
Notes: ppm = parts per million; ppt = parts per trillion (measure of concentration in the atmosphere); GWP = global warming potential.

Emissions Inventory and Trends

GHG emissions are presented in units of metric tons of carbon dioxide equivalent (MTCO2e) per year, which allows emissions of other GHGs, such as CH4, N2O, and high GWP GHGs, to be normalized to a single unit of measure. In 2012, California produced 458.68 million metric tons of carbon dioxide

equivalents (MMTCO2e),[3] including imported electricity and excluding combustion of international fuels and carbon sinks or storage. The major source of GHGs in California is transportation, contributing to 37 percent of the State's total GHG emissions.[4] Electricity generation (both in and out of State) is the second largest source, contributing to 21 percent of the State's GHG emissions.[5] The statewide inventory of GHGs by sector is shown in **Table 4.7-3, California GHG Inventory 2004–2012.**

Table 4.7-3
California GHG Inventory 2004–2012

	Emissions MMTCO2e								
Main Sector	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**
Transportation[a]	186.88	189.08	189.18	189.27	178.02	171.47	170.46	168.13	167.38
Electric power	115.20	107.86	104.54	113.94	120.15	101.32	90.30	88.04	95.09
Commercial/Residential	42.90	41.24	41.89	42.11	42.44	42.65	43.82	44.32	42.28
Industrial[b]	94.48	92.29	90.28	87.10	87.54	84.95	88.51	88.34	89.16
Recycling and waste	7.57	7.75	7.80	7.93	8.09	8.23	8.34	8.42	8.49
High GWP[c,d]	9.56	10.36	11.08	11.78	12.87	13.99	15.89	17.35	18.41
Agriculture	36.26	36.54	37.75	37.03	37.99	35.84	35.73	36.34	37.86
Total Emissions	**492.86**	**485.13**	**482.52**	**489.16**	**487.10**	**458.44**	**453.06**	**450.94**	**458.68**

Source: CARB 2014.California Greenhouse Gas Inventory for 2004–2012, http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-12_2014-03-24.pdf
[a] Includes equipment used in construction, mining, oil drilling, industrial, and airport ground operations.
[b] Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions.
[c] These categories are listed in the Industrial sector of CARB's GHG Emission Inventory sectors.
[c\d] This category is listed in the Electric Power sector of CARB's GHG Emission Inventory sectors.

4.7.2 REGULATORY SETTING

International

Kyoto Protocol

In 1988, the United Nations established the IPCC to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (FCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The Plan currently consists of more than 50 voluntary programs.

3 CARB, California Greenhouse Gas Inventory for 2000-20012 by Category as Defined in the 2008 Scoping Plan (March 24, 2014) http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-12_2014-03-24.pdf.
4 California Energy Commission (December 2006).
5 California Energy Commission (December 2006).

Paris Agreement

The Paris Agreement is an agreement within the United Nations Framework Convention on Climate Change (UNFCCC) dealing with GHG mitigation, adaptation, and finance. As of October 2016, 191 UNFCCC members have signed the treaty, 85 of which have ratified it. After the European Union ratified the agreement in October 2016, there were enough countries that had ratified the agreement, and that produce enough of the world's greenhouse gases, for the agreement to enter into force. The agreement will take effect on November 4, 2016.

Federal

The US Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO2 and other GHGs are pollutants under the federal Clean Air Act (CAA), which the US Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare. The Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the court found that the USEPA could avoid taking action if it found that GHGs do not contribute to climate change or if it offered a “reasonable explanation” for not determining that GHGs contribute to climate change.

On April 17, 2009, the USEPA released a proposed finding that determined climate change poses a risk to public health. The USEPA held a 60-day public comment period, which ended June 23, 2009, and received over 380,000 public comments. On December 7, 2009, the USEPA Administrator (Administrator) signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- **Endangerment Finding**: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs—carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6)—in the atmosphere threaten the public health and welfare of current and future generations.

- **Cause or Contribute Finding**: The Administrator finds that the combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas pollution which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action is a prerequisite to finalizing the proposed USEPA GHG standards for light-duty vehicles. These were jointly proposed by the USEPA and the Department of Transportation’s National Highway Traffic Safety Administration (NHTSA) on September 15, 2009. The two findings were published in Federal Register Docket ID No. EPA-HQ-OAR-2009-0171. The final rule was effective January 14, 2010.

The USEPA has issued the Final Mandatory Reporting of Greenhouse Gases Rule that requires reporting of GHG emissions from large sources and suppliers in the United States. Under the rule (effective December 29, 2009), suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions are required to submit annual reports to the USEPA. The gases covered by the proposed rule are CO2, CH4, N2O, HFC, PFC, SF6, and other fluorinated gases including nitrogen trifluoride (NF3) and hydrofluorinated ethers (HFEs).

On September 15, 2009, the USEPA and the NHTSA proposed a new national program to reduce greenhouse gas emissions and improve fuel economy for all new cars and trucks sold in the United States. The USEPA proposed the first-ever national GHG emissions standards under the CAA, and NHTSA proposed Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. This proposed national program would allow automobile manufacturers to build a single light-duty national fleet that satisfies all requirements under both federal programs and the standards of California and other states.

On July 20, 2011, the EPA published its final rule deferring GHG permitting requirements for carbon dioxide emission from biomass-fired and other biogenic sources until July 21, 2014. Environmental groups have challenged the deferral. In September 2011, EPA released an "Accounting Framework for Biogenic CO2 Emissions from Stationary Sources," which analyzes accounting methodologies and suggests an implementation for biogenic carbon dioxide emitted from stationary sources.

On April 4, 2012, EPA published a proposed rule to establish, for the first time, a new source performance standard for GHG emissions. Under the proposed rule, new fossil fuel-fired electric generating units larger than 25 MW would be required to limit emissions to 1,000 pounds CO2/MWh on an average annual basis, subject to certain exceptions.

On April 17, 2012, EPA issued emission rules for oil production and natural gas production and processing operations.

State

Assembly Bill 1493

AB 1493 (Pavley), enacted on July 22, 2002, requires the California Air Resources Board (CARB) to adopt regulations that reduce GHGs emitted by passenger vehicles and light-duty trucks. The CARB estimates that the regulation would reduce climate change emissions from the light-duty passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030.[6] On June 30, 2009, the USEPA granted a

6 California Air Resources Board, Fact Sheet, Climate Change Emission Control Regulations, (December 10, 2004).

waiver of CAA preemption to California for the state's GHG emission standards for motor vehicles beginning with the 2009 model year. The waiver was published in the Federal Register on July 8, 2009.

Executive Order S-3-05 and the Climate Action Team

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established the following total GHG emission targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be an aggressive but achievable midterm target. To meet these targets, the governor directed the secretary of the California Environmental Protection Agency to lead a Climate Action Team made up of representatives from the Transportation, Agency; the Department of Food and Agriculture; the Resources Agency; the CARB; the Energy Commission; and the Public Utilities Commission. The Climate Action Team's Report to the Governor in 2006 contains recommendations and strategies to help ensure that the targets in Executive Order S-3-05 are met.[7]

Executive Order S-01-7

Former governor Arnold Schwarzenegger signed Executive Order S-01-07 on January 18, 2007. The order mandated that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. It also established a Low Carbon Fuel Standard for transportation fuels for California.

California Air Resources Board

On October 24, 2008, the CARB released the first preliminary draft of recommended approaches for setting interim significance thresholds for GHG under the California Environmental Quality Act (CEQA). The draft approach seeks to establish GHG thresholds and/or performance standards based on sector-types, as defined in the 2008 Scoping Plan. Sectors identified in the 2008 Scoping Plan are Transportation,

7 State of California, Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the California Legislature, http://www.climatechange.ca.gov/climate_action_team/reports/index.html#catreports, (March 2006), accessed August 24, 2016.

Electricity, Industrial, Commercial and Residential, Agricultural, High Global Warming Potential, and Recycling and Waste. CARB has not yet finalized the proposed thresholds/performance standards.

Assembly Bill 32

In 2006, the California State Legislature enacted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing GHG emissions in California. GHGs, as defined under AB 32, include CO2, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. CARB is the state agency charged with monitoring and regulating sources of emissions of GHGs that cause global warming as part of an effort to reduce emissions of GHGs.

The CARB Governing Board approved the 1990 GHG emissions level of 427 MMTCO2e on December 6, 2007. Therefore, by 2020, emissions in California are required to be at or below 427 MMTCO2e.

Under the current "business as usual" scenario, statewide emissions are increasing at a rate of approximately 1 percent per year as noted below.

- 1990: 427 MMTCO2e
- 2004: 480 MMTCO2e
- 2008: 495 MMTCO2e
- 2020: 596 MMTCO2e

Under AB 32, the CARB published its *Final Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California*.[8] The CARB has 44 early action measures that apply to the transportation, commercial, forestry, agriculture, cement, oil and gas, fire suppression, fuels, education, energy efficiency, electricity, and waste sectors. Of those early action measures, 9 are considered discrete early action measures;[9] that is, they were adopted by the CARB and enforceable by January 1, 2010. The CARB estimates that the 44 early action measures will result in reductions of at least 42 MMTCO2e by 2020, representing approximately 25 percent of the 2020 target.

CEQA is only discussed once in the Early Action Measures report. The California Air Pollution Control Officer's Association suggested that CARB work with local air districts on approaches to review GHG

8 California Air Resources Board, *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration* http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf (October 2007), accessed August 24, 2016.

9 Discrete early actions are regulations to reduce greenhouse gas emissions adopted by the CARB Governing Board and enforceable by January 1, 2010.

impacts under the CEQA process, including significance thresholds for GHGs for projects and to develop a process for capturing reductions that result from CEQA mitigations. CARB's response to this recommendation in the report is as follows:

> *The Governor's Office of Planning and Research is charged with providing statewide guidance on CEQA implementation. With respect to quantifying any reductions that result from project-level mitigation of GHG emissions, we would like to see air districts take a lead role in tracking such reductions in their regions.*[10]

The CARB approved the Climate Change Proposed Scoping Plan (Scoping Plan) in December 2008. The Scoping Plan

> *proposes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.*[11]

As noted in the approved 2008 Scoping Plan, the projected total business as usual emissions for year 2020 (estimated as 506.8 MMTCO2e) must be reduced by approximately 16 percent to achieve the CARB's approved 2020 emission target of 427 MMTCO2e. CARB updated the 2008 Scoping Plan in May 2014 (Updated 2014 Scoping Plan).[12] The Updated 2014 Scoping Plan adjusted the 1990 GHG emissions level to 431 MMTCO2e and the updated 2020 GHG emissions forecast is 509 MMTCO2e, which took credit for certain GHG emission reduction measures already in place (e.g., the Renewable Portfolio Standard). As revised in 2014, the projected total business as-usual emissions for year 2020 must be reduced by approximately 15 percent to achieve the CARB's approved 2020 emission target of 431 MMTCO2e. The Updated 2014 Scoping Plan also recommend a 40 percent reduction in GHG emissions from 1990 levels by 2030 and a 60 percent reduction in GHG emissions from 1990 levels by 2040.

The 2008 Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the 2008 Scoping Plan, the key elements of the strategy for achieving the 2020 GHG target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards

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10 California Air Resources Board, *Expanded List of Early Action Measures* (October 2007).

11 California Air Resources Board, *Climate Change Scoping Plan*: *A Framework for Change* (December 2008), http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed June 10, 2013.

12 CARB, *First Update to the Climate Change Scoping Plan* (May 2014) http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

- Achieving a statewide renewable energy mix of 33 percent
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the state's long-term commitment to AB 32 implementation

In addition, the Scoping Plan differentiates between "capped" and "uncapped" strategies. "Capped" strategies are subject to the proposed cap-and-trade program.[13] The 2008 Scoping Plan states that the inclusion of these emissions within the cap-and-trade program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. "Uncapped" strategies include additional reductions that will not be subject to the cap-and-trade emissions requirements. They are provided as a margin of safety to help achieve required GHG emission reductions.

Renewable Portfolio Standard

In 2002, Senate Bill (SB) 1078 required electric utilities to increase procurement of power generated by eligible renewable energy sources to 20 percent of total generation by 2017. In 2006, SB 107 accelerated the timetable to require 20 percent renewable energy by 2010. Then, in 2008, the Governor signed Executive Order S-14-08, which increased the required renewables content to 33 percent by 2020. In September 2009, the Governor signed Executive Order S-21-09, which directed the CARB to adopt regulations consistent with the 33 percent renewable energy target in Executive Order S-14-08 by July 31, 2010.

Title 24 Energy Efficiency Standards

Although not originally intended to reduce greenhouse gases, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a distinction for energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2013 Title 24 standards (effective as of July 1, 2014) were adopted to respond, amongst other reasons, to the

13 The cap-and-trade program is a central element of AB 32 and covers major sources of GHG emissions in the state such as refineries, power plants, industrial facilities, and transportation fuels. The regulation includes an enforceable GHG cap that will decline over time. CARB will distribute allowances, which are tradable permits, equal to the emission allowed under the cap.

requirements of AB 32. The 2013 Building Energy Efficiency Standards focus on several key areas to improve energy efficiency of newly constructed buildings and additions and alterations to existing buildings, and include requirements that would enable both demand reductions during critical peak periods and future solar electric and thermal system installations.[14] Specifically, new development projects constructed within California are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards ("CALGreen") Code (California Code of Regulations, Title 24, Part 11).

Senate Bill 97

SB 97 was passed in August 2007, and added Section 21083.05 to the *Public Resources Code*. Section 21083.05 states:

> *(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a).*

CEQA Amendments

As required by SB 97, the Governor's Office of Planning and Research (OPR) prepared and transmitted recommended Amendments to the *CEQA Guidelines* for GHG emissions to the California Natural Resources Agency on April 13, 2009. The Office of Administrative Law reviewed the Adopted Amendments and the Natural Resources Agency's rulemaking file. The Adopted Amendments were filed with the Secretary of State, and became effective March 18, 2010.

The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing *CEQA Guidelines* to reference climate change.

A new section, *CEQA Guidelines* Section 15064.4, was added to assist agencies in determining the significance of GHG emissions. The new section allows agencies the discretion to determine whether a quantitative or qualitative analysis is best for a particular project. This section does not provide guidance to public agencies on how to determine whether the project's estimated GHG emissions are significant or cumulatively considerable.

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14 California Energy Emission, *2013 Building Energy Efficiency Standards for Residential and Nonresidential Buildings,* http://www.energy.ca.gov/2012publications/CEC-400-2012-004/CEC-400-2012-004-CMF-REV2.pdf

Also amended were *CEQA Guidelines* Sections 15126.4 and 15130, which address mitigation measures and cumulative impacts, respectively. GHG mitigation measures are referenced in general terms, but no specific measures are identified or required. The revision to the cumulative impact guideline directs public agencies to analyze GHG emissions in an EIR when the incremental contribution of emissions from a project being reviewed may be cumulatively considerable. However, the determination of when emissions are cumulatively considerable is left to the discretion of the public agency reviewing a proposed project.

The Amendments also added Section 15183.5, which permits programmatic GHG analysis and allows for project-specific analysis to tier off this program level analysis, and the preparation of GHG reduction plans for a city or county. Compliance with a GHG reduction plan can then be used to support a determination that an individual project's contribution to GHG impacts is not cumulatively considerable.

In addition, the Amendments revised Appendix F of the *CEQA Guidelines*, which focuses on Energy Conservation, and Appendix G, which includes the sample Environmental Checklist Form.

SB 1368

In 2006, the State Legislature adopted Senate Bill 1368, which was subsequently signed into law by the Governor. SB 1368 directs the California Public Utilities Commission (CPUC) to adopt performance standards for GHG emissions for the future power purchase of California utilities. In an effort to limit carbon emissions associated with electrical energy consumed in California, this bill prohibits purchase arrangements for energy for periods of longer than 5 years from resources that exceed the emissions of a relatively clean, combined-cycle natural gas power plant. A coal-fired plant cannot meet this standard because such plants emit roughly twice as much carbon as combined-cycle natural gas power plants. Accordingly, the new law will effectively prevent California's utilities from investing in, financially supporting, or purchasing power from new coal plants located in or out of the state. Thus, SB 1368 will lead to lower GHG emissions associated with California's energy demand, by effectively prohibiting California utilities from purchasing power from out-of-state producers that cannot satisfy the required performance standard for GHG emissions.

SB 375

SB 375 was signed into law by the Governor on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which contributes up to 40 percent of the total GHG emissions in California. Automobiles and light trucks alone contribute almost 30 percent. SB 375 indicates that GHGs from automobiles and light trucks can be reduced by new vehicle technology but significant reductions from a change in land use patterns and improved transportation are necessary. SB 375 states, "Without improved land use and transportation policy, California will not be able to achieve

the goals of AB 32." SB 375 does the following: (1) it requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) it aligns planning for transportation and housing, and (3) it creates specified incentives for the implementation of the strategies.

Non-Legislative

CAPCOA. On January 8, 2008, the California Air Pollution Control Officers Association (CAPCOA) released a paper to provide a common platform of information and tools for public agencies. The disclaimer states that it is not a guidance document, but rather a resource to enable local decision makers to make the best decisions they can in the face of incomplete information during a period of change. The paper indicates that it is an interim resource and does not endorse any particular approach. It discusses three groups of potential thresholds, including a no significance threshold, a threshold of zero emissions, and a non-zero threshold.[15] The nonzero quantitative thresholds as identified in the paper range from 900 to 50,000 metric tons of CO2 per year. The CAPCOA paper also identified non-zero qualitative thresholds.[16]

Attorney General. The Office of the California Attorney General maintains a list of CEQA Mitigations for Global Warming Impacts on its website.[17] The Attorney General's Office has listed some examples of types of mitigations that local agencies may consider to offset or reduce global warming impacts from a project. The Attorney General's Office states that the lists are examples and not intended to be exhaustive, but instead are provided as measures and policies that could be undertaken. Moreover, the measures cited may not be appropriate for every project, so the Attorney General suggests that the lead agency should use its own informed judgment in deciding which measures it would analyze, and which measures it would require, for a given project. The mitigation measures are divided into two groups: generally applicable measures and general plan measures. The Attorney General presents "generally applicable" measures in the following areas:

- Energy efficiency
- Renewable energy
- Water conservation and efficiency

15 California Air Pollution Control Officers Association, *CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (January 2008), http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf/, accessed August 24, 2106.

16 A non-zero threshold could minimize the resources spent reviewing environmental analyses that do not result in real GHG reductions or to prevent the environmental review system from being overwhelmed.

17 California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures* (August 2010), http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, accessed August 24, 2016.

- Solid waste measures
- Land use measures
- Transportation and motor vehicles
- Carbon offsets

Local

Neither the Ventura County Air Pollution Control District (VCAPCD) nor the City of Santa Paula has adopted any regulations addressing the generation of GHG emissions. The issue of GHG emissions is not addressed in the current City of Santa Paula General Plan.

4.7.3 THRESHOLDS OF SIGNIFICANCE

In order to assist in determining whether a project would have a significant effect on the environment, the *California Environmental Quality Act (CEQA)* identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantially adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guidelines (Environmental Checklist Form) lists the following thresholds, under which a project may be a deemed to have a significant on greenhouse gases if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Criteria to Determine a Significant Generation of GHG Emissions

For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon “threshold of significance” by which to measure an impact. While the CARB published some draft thresholds several years ago, they were never adopted and the CARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

As discussed in **Section 4.3, Air Quality**, the City of Santa Paula relies upon the expert guidance of the VCAPCD regarding the methodology and thresholds of significance for the evaluation of air quality impacts within Ventura County. GHG emissions are air pollutants that are subject to local control by the VCAPCD. As such, the City looks to the VCAPCD for guidance in the evaluation of GHG impacts.

In September 2011, the VCAPCD requested that its staff report back on possible GHG significance thresholds for evaluating GHG impacts of land use projects in Ventura County under CEQA. VCAPCD staff responded to this request by preparing a report titled *Greenhouse Gas Thresholds of Significance Options*

for Land Use Development Projects in Ventura County.[18] This report presents a number of options for GHG significance thresholds and summarizes the most prominent approaches and options either adopted or being considered by all other air districts throughout California. Similar to other air districts, VCAPCD staff members are considering a tiered approach; the main components involve consistency with a locally adopted GHG reduction plan, followed by a bright-line threshold for land use projects that would capture 90 percent of project GHG emissions. VCAPCD staff members are also exploring an efficiency-based metric (e.g., GHG emissions per capita) for land use projects and plans. The South Coast Air Quality Management District (SCAQMD) is also considering these strategies for land use projects.

Given that Ventura County is adjacent to the SCAQMD jurisdiction and is a part of the Southern California Association of Governments (SCAG) region, VCAPCD staff believes it makes sense to set local GHG emissions thresholds of significance for land use development projects at levels consistent with those set by the SCAQMD and the SCAG region. VCAPCD believes that adopting harmonized regional GHG emission thresholds would help streamline project review and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout most of Southern California.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, the SCAQMD staff convened an ongoing GHG CEQA Significance Threshold Working Group. The last proposed significance GHG threshold under discussion by the Working Group, in December 2008, was a screening threshold of 10,000 MTCO2e per year for industrial sources, and 3,000 MTCO2e per year for residential and commercial sources. If the amount of GHG emissions generated by a proposed project were under this screening threshold, the impact would not be considered significant. If the project were to exceed the screening threshold, then the impact would be considered potentially significant, and additional analysis would need to be completed to determine significance. The most recent approach being considered by the SCAQMD, in September 2010, is a tiered approach as follows:

Tier 1: Does the project qualify for any applicable statutory or categorical exemption under CEQA? If yes, no further action is required, and climate change impacts would be less than significant.

Tier 2: Is the project consistent with a GHG reduction plan? (The plan must be consistent with CEQA Guidelines Sections 15064(h)(3), 15125(d), or 15152(s).) If yes, there is a presumption of less than significant impacts with respect to climate change.

Tier 3: Is the project's incremental increase in GHG emissions below or mitigated to less than the significance screening level (10,000 MTCO2e per year for industrial projects; 3,000 MTCO2e

18 *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County,* http://www.vcapcd.org/pubs/Planning/GHGThresholdReportRevised.pdf

for residential projects/commercial projects; 3,500 MTCO2e for mixed-use projects)? If yes, there is a presumption of less than significant impacts with respect to climate change.

Tier 4: Does the project meet one of the following performance standards? If yes, there is a presumption of less than significant impacts with respect to climate change.

Option #1: Achieve some percentage reduction in GHG emissions from a base case scenario, including land use sector reductions from AB 32 (e.g., 16 percent reduction as recommended by the CARB Scoping Plan).

Option #2: For individual projects, achieve a project-level efficiency target of 4.8 MTCO2e per service population by 2020 or a target of 3.0 MTCO2e per service population by 2035. For plans, achieve a plan-level efficiency target of 6.6 MTCO2e per service population by 2020 or a target of 4.1 MTCO2e per service population by 2035.

Option #3: Early compliance with AB 32 through early implementation of CARB's Scoping Plan Measures. The intent of this option is to accelerate GHG emission reduction from the various sectors subject to CARB's Scoping Plan to eliminate GHG emission.

Tier 5: Projects should obtain GHG emission offsets to reduce significant impacts. Offsets in combination with any mitigation measures should achieve the target thresholds for any of the above Tiers. Otherwise, project impacts would remain significant.

The SCAQMD has not announced when a final version of these draft thresholds will be presented to the SCAQMD Governing Board for consideration for adoption.

The SCAQMD has also adopted Rules 2700, 2701, and 2702, which establish a GHG reduction program within the SCAQMD; however, GHG emission reduction protocols pursuant to these rules have only been established for boilers and process heaters, forestry, and manure management reduction projects.

Pursuant to CEQA Guidelines Section 15064.4, the methods suitable for analysis of GHG emissions are:

1. Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The Lead Agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The Lead Agency should explain the limitations of the particular model or methodology selected for use.

2. Rely on a qualitative analysis or performance-based standards.

GHG emissions were modeled using the CARB-approved California Emissions Estimator Model 2013.2.2 (CalEEMod) computer program as recommended by the SCAQMD.[19] CalEEMod is designed to model construction emissions for land use development projects and allows for the input of project-specific information. CalEEMod allows land use selections that include project location specifics and trip generation rates. CalEEMod accounts for area-source emissions from the use of natural gas, landscape maintenance equipment, and consumer products and from mobile-source emissions associated with vehicle trip generation.

GHG emissions were modeled using the CalEEMod computer program and emission factors from California Climate Action Registry (CCAR), as recommended by SCAQMD, which estimates construction and operations emissions of carbon dioxide, among other air pollutants. Project-generated emissions were modeled based on proposed land uses and general information provided in **Section 2.0, Project Description**.

The following assumptions were made in the CalEEMod computer program:

Land Uses

- 187,373-square-foot general light industry
- 219,695-square-foot general light industry
- 276,105-square-foot general light industry
- 2,836-square-foot shopping center
- 5,347-square-foot shopping center
- 10,222-square-foot shopping center
- 13.3-acre parking lot
- 3.65-acre park

19 California Emissions Estimator Model (CalEEMod). http://www.caleemod.com/.

Construction

- Construction for each year would occur over six phases: (1) Demolition, (2) Site Preparation, (3) Grading, (4) Building Construction, (5) Paving, and (6) Architectural Coating
- Construction would occur 5 days per week, with 8-hour work days

Operation

The Project trip generation rate was derived from the Traffic Impact Study.[20] Direct emissions of CO2 emitted from operation of the Specific Plan include area source emissions (from natural gas consumption) and mobile source emissions. Area source emissions were calculated using CalEEMod and default assumption for other asphalt surfaces, parking lot, and city park. Mobile source emissions were calculated using CalEEMod, based on the Institute of Transportation and Engineering, 8th edition, trip generation rates. The Specific Plan would also result in indirect GHG emissions due to electricity demand. The emission factor for CO2, due to electrical demand from Southern California Edison, the electrical utility serving the Specific Plan, was selected in the CalEEMod model. Emission factors for CO2 are based on CARB's Local Government Operations Protocol. Emission factors for CH4 and N2O are based on E-Grid values. The cited factors in the CARB report are based on data collected by the CCAR. The emission factors take into account the current mix of energy sources used to generate electricity and the relative carbon intensities of these sources, and includes natural gas coal, nuclear, large hydroelectric, and other renewable sources of energy. Electricity consumption was adjusted according to the CalEEMod User's Tips by factoring in the type of land and energy use associated with the Specific Plan.

In addition to electrical demand, the Specific Plan would also result in indirect GHG emissions due to water consumption, wastewater treatment, and solid waste generation. Demand values were based on land use type, subtype, lot acreage, square feet, and population growth. GHG emissions from water consumption are due to the electricity needed to convey, treat, and distribute water. The annual electrical demand factors for potable water were obtained from the California Energy Commission (CEC). The default CalEEMod assumptions, based on land uses and project characteristics, were used for GHG emissions from water consumption, wastewater production, and solid waste generation.

As previously discussed, the SCAQMD provides a tiered approach for GHG analysis for all proposed projects. The first tier of analysis indicates if a project qualifies for any applicable statutory or environmental analysis exemption. The Specific Plan does not qualify for an environmental analysis exemption. The second tier indicates if a project is consistent with a GHG reduction plan. The third tier requires quantification of the Project's GHG emissions; if it exceeds 10,000 MTCO2e per year for industrial projects; and 3,000 MTCO2e for residential projects/commercial projects then the next tier of analysis is

20 Fehr & Peers, *Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan* (March 2015).

required. The fourth tier of analysis provides three options to determine if a project results in a potentially significant amount of GHG emissions. The first option requires that the project achieve a 16 percent reduction in GHG emissions from a base-case scenario. The second option sets an efficiency target per service population, while the third option determines if the project complies with AB 32 through implementation of CARB's Scoping Plan Measures.

4.7.4 PROJECT IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant with mitigation incorporated, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see Responses to NOP, **Appendix 1.0**).

Threshold: **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Construction

Construction activities for the Specific Plan would include the use of heavy-duty construction equipment. The vast majority of construction equipment (e.g., backhoes, rubber-tire loaders, scrapers, and haul trucks) rely on fossil fuels, primarily diesel, as an energy source. The combustion of fossil fuels in construction equipment results in GHG emissions of CO2 and smaller amounts of CH4 and N2O. Emissions of GHG would also result from the combustion of fossil fuels from haul trucks and vendor trucks delivering materials, and from construction worker vehicles commuting to and from the Project. Typically, light-duty and medium-duty automobiles and trucks would be used for worker trips and heavy-duty trucks would be used for vendor trips. The vast majority of motor vehicles used for worker trips rely on gasoline as an energy source while motor vehicles used for vendor trips would primarily rely on diesel as an energy source. The Specific Plan would result in short-term emissions of GHGs during construction—that is, the emissions would occur only during active construction and would cease after the Specific Plan is built. The GHG emissions were estimated using the CalEEMod model and are located in **Appendix 4.3**.

As presented in **Table 4.7-4, Construction GHG Emissions,** construction activities associated with the Project would generate 2,387.71 MTCO2e GHG emissions. The SCAQMD recommends annualizing construction-related GHG emissions over a project's lifetime, defined as a 30-year period, in order to include these emissions as part of the annual total operational emissions. Therefore, construction-related GHG emissions have been annualized over this period and included in the annual operational emissions later in this section.

Table 4.7-4
Construction GHG Emissions

	CO2e Emissions (Metric Tons)
Total Construction GHG Emissions*	**2,387.71**
Annualized over Project Lifetime	**79.59**

*Source: CalEEMod Emissions calculations are provided in **Appendix 4.3.***
Notes: MTCO2e = metric tons of carbon dioxide emissions.
Totals in table may not appear to add exactly due to rounding in the computer model calculations.

**N2O emissions account for 0.10 MTCO2e/year.*

Operation

The Specific Plan is anticipated to be fully completed and in operation by 2020. Once in operation, the Specific Plan would result in GHG emissions, primarily CO2, CH4, and N2O, as a result of fuel combustion from building heating systems, landscaping equipment, and motor vehicles. Building and motor vehicle air conditioning systems may use HFCs (and HFCs and chlorofluorocarbon [CFCs] to the extent that they have not been completely phased out at later dates); however, these emissions are not quantified because they would occur through accidental leaks. It is not possible to estimate the frequency of accidental leaks without some level of speculation.

The annual net GHG emissions associated with the operation of the Specific Plan are provided in **Table 4.7-5, Operational Greenhouse Gas Emissions (No Project Design Features).** As shown in **Table 4.7-5,** the Specific Plan would emit 7,969.71 MTCO2e/year with respect to GHG emissions. This scenario does not include the incorporation of project design features.

Table 4.7-5
Operational Greenhouse Gas Emissions (No Project Design Features)

GHG Emissions Source	Emissions (MTCO2e/year)
Construction	79.59
Operational (mobile) sources*	4,008.64
Area sources	0.01
Energy	2,676.93
Waste	394.31
Water	810.23
Annual Total	**7,969.71**

Source: CalEEMod
Notes: MTCO2e = metric tons of carbon dioxide emissions.
*Emissions calculations are provided in **Appendix 4.3.** Totals in table may not appear to add exactly due to rounding in the computer model calculations. The emissions of the Project represent the net difference between the existing greenhouse generated uses that would be removed and the Project greenhouse gas emissions.*
**N2O emissions account for 0.16 MTCO2e/year*

The following is a list of project design features that would reduce GHG emissions:

- Energy Efficiency: The Specific Plan would be designed to meet the requirements of Title 24.
- Water Conservation: The Specific Plan would be designed to reduce water consumption compared to conventionally designed projects of similar size and scope. Such features would include low flow faucets, toilets, shower, and water-efficient irrigation systems.
- Solid Waste Reduction: The Specific Plan would be designed to reduce solid waste generation by including a recycling and compositing program per City of Santa Paula Municipal Code requirements.

The annual net GHG emissions associated with the operation of the proposed Project assuming the project design features are provided in **Table 4.7-6, Project Design Feature Operational Greenhouse Gas Emissions.** The estimates represent emissions with incorporation of the design features during operation of the Project.

Table 4.7-6
Project Design Feature Operational Greenhouse Gas Emissions

GHG Emissions Source	Emissions (MTCO2e/year)
Construction	79.59
Operational (mobile) sources*	3,584.99
Area Sources	0.01
Energy	2,181.46
Waste	197.15
Water	631.63
Annual Total	**6,674.83**
Percentage Reduction	**16.2**

Source: CalEEMod
Notes: GHG = greenhouse gas; MTCO2e = metric tons of carbon dioxide emissions. Emissions calculations are provided in ***Appendix 4.3.*** *Totals in table may not appear to add exactly due to rounding in the computer model calculations.*
**N2O emissions account for 0.15 MTCO2e/year.*

As noted earlier, the SCAQMD has developed draft significance thresholds for GHG sources within its jurisdiction. All industrial land use projects that exceed 10,000 MTCO2e per year would be considered potentially significant under the screening threshold. As shown in **Table 4.7-6,** the estimated Project operational GHG emissions with project design features would be 6,674.83 MTCO2e per year, which would not exceed the screening threshold. In addition, the proposed Project would generate approximately 1,510 job opportunities[21] and would achieve a project-level efficiency target of 4.4 MTCO2e per service population. This would be below the 4.8 MTCO2e per service population. Potential impacts would be less than significant based on the screening threshold.

Threshold: **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

The goal of AB 32 is to reduce statewide GHG emissions to 1990 levels by 2020. In December 2008, CARB adopted the Climate Change Scoping Plan ("Scoping Plan"), which details strategies to meet that goal. The Scoping Plan instructs local governments to establish sustainable community strategies to reduce GHG emissions associated with transportation, energy, and water, as required under SB 375. Planning efforts that lead to reduced vehicle trips while preserving personal mobility should be undertaken in addition to programs and designs that enhance and complement land use and transit strategies. The Climate Change Scoping Plan also recommends energy-efficiency measures in buildings such as maximizing the use of

21 US Green Building Council, Building Area Per Employee By Business type, May 13, 2008, http://www.usgbc.org/Docs/Archive/General/Docs4111.pdf, accessed August 24, 2016.

energy efficient appliances and solar water heating as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes. In addition, the Scoping Plan encourages the use of solar photovoltaic panels and other renewable sources of energy to provide clean energy and reduce fossil-fuel based energy. The CARB 2014 Updated Scoping Plan, which was updated in May 2014, adjusted the statewide GHG emissions reduction goals to achieve 1990 levels.

In addition to the measures listed in the 2008 Scoping Plan, other state offices have provided recommended measures that would assist lead agencies in determining consistency with the state's GHG reduction goals. The California Attorney General's Office (AGO) has stated that lead agencies can play an important role in "moving the State away from 'business as usual' and toward a low-carbon future."[22] The AGO has released a guidance document that provides information to lead agencies that may be helpful in carrying out their duties under CEQA with respect to GHGs and climate change impacts. Provided in the document are measures that can be included as project design features, required changes to the project, or mitigation measures at the project level and at the general-plan level. The measures are not intended to be exhaustive and may not be appropriate for every project or general plan. The AGO affirms that "the decision of whether to approve a project—as proposed or with required changes or mitigation—is for the local agency, exercising its informed judgment in compliance with the law and balancing a variety of public objectives."

The Specific Plan would incorporate measures that reduce GHG emissions compared to a conventional project of similar size and scope. The Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of a building's life cycle. These designs would increase the structures energy efficiency, water efficiency, and overall sustainability. These measures and features are consistent with existing recommendations to reduce GHG emissions. In addition, the Project would result in less than significant impact. Therefore, the Specific Plan would not conflict with the 2008 Scoping Plan and the 2014 Updated Scoping Plan.

4.7.5 CUMULATIVE IMPACTS

Although the Specific Plan is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. However, currently there are no significance thresholds, specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative level. Additionally, there is currently no general accepted methodology to determine whether

22 California Office of the Attorney General, The California Environmental Quality Act: Addressing Global Warming Impacts at the Local Agency Level, 2008.

GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Implementing the project design features and GHG-reducing measures would result in a net decrease in GHG emissions. The Project's design features and GHG reduction measures make the Specific Plan consistent with the goals of AB 32.

Given the Specific Plan's consistency with state and county GHG emission reduction goals and objectives, the Specific Plan's contribution to the cumulative impact of greenhouse gas emissions would not be cumulatively considerable; and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (i.e., the 2014 Updated Scoping Plan). Similarly, related projects would also be anticipated to comply with these same emissions reduction goals and objectives. Therefore, cumulative impacts with respect to greenhouse gas emissions would be less than significant.

4.7.6 MITIGATION MEASURES

Potential impacts will be less than significant and no mitigation measures are required. Mitigation Measures provided in **Section 4.3, Air Quality,** will also reduce GHG emissions along with reductions in air pollutant emissions.

4.7.7 RESIDUAL IMPACTS AFTER MITIGATION

Impacts are less than significant.

4.8 HAZARDS AND HAZARDOUS MATERIALS

This section addresses risks to human health and safety associated with potential exposure to hazardous materials. The analysis considers existing and historical land uses within the Santa Paula West Business Park Specific Plan ("Specific Plan") area ("Project Site"). It also evaluates potential incidents of upset (e.g., accidental spills) involving hazardous materials and their potential impact on area residents and businesses. This section identifies local hazardous materials sites on state or federal agency databases. In addition, an analysis of potential safety hazards associated with wildland fires and the Santa Paula Airport is provided.

The information and analysis provided in this section is largely derived from the *Phase I Environmental Site Assessment [ESA] for the Bannon Ranch, Santa Paula, California,* report by Applied Environmental Technologies, Inc., dated May 2006; a governmental database search report prepared by PW Environmental and Environmental Data Resources, Inc., dated October 31, 2014; and field visits conducted in 2014. Both reports are included in **Appendix 4.8**, **Phase I Environmental Site Assessment**.

4.8.1 EXISTING CONDITIONS

Definitions

Hazardous Material

A substance is considered hazardous based on factors such as toxicity, ignitability, corrosivity, or reactivity. According to Title 22 of the California Code of Regulations, a hazardous material is defined as "a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating irreversible illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed."[1] Hazardous materials often appear on a list of hazardous materials prepared by a federal, state, or local regulatory agency, or have characteristics defined as hazardous by such an agency.

Hazardous Waste

The California Health and Safety Code defines a hazardous waste as "any hazardous material that is abandoned, discarded or recycled."[2] In addition, hazardous wastes occasionally may be generated by

1 22 California Code of Regulations (CCR), sec. 66084
2 California Health and Safety Code (HSC), sec. 25124.

actions that change the composition of previously nonhazardous materials. The same criteria that render a material hazardous make a waste hazardous: toxicity, ignitability, corrosivity, or reactivity

Recognized Environmental Conditions

The term "recognized environmental conditions" refers to the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into the structures on the property or into the ground, groundwater, or surface water of the property.

Historical Recognized Environmental Condition

The term historical recognized environmental condition is defined as "environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently." The American Society for Testing Materials (ASTM) further defines a historical recognized environmental condition by stating "If a past release of any hazardous substances or petroleum products has occurred in connection with the property and has been remediated, with such remediation accepted by the responsible regulatory agency… this condition shall be considered a historical recognized environmental condition."

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are man-made organic chemicals that were formerly manufactured for use in various industrial and commercial applications due to of their nonflammability, chemical stability, high boiling point, and electrical insulating properties. While the manufacture of PCBs was banned in 1979, these hazardous materials may be found in products associated with transformers, electrical equipment, motor oil, hydraulic systems, cable and thermal insulation, adhesives and tapes, oil-based paint, caulking, plastics, and floor finish.[3]

Asbestos-Containing Material (ACM)

Asbestos, a naturally occurring fibrous material known for its useful thermal properties and tensile strength, was used in many commercial products, particularly building materials, manufactured from the 1940s until the 1970s. Asbestos-containing materials (ACMs) can include building materials such as spray acoustic ceilings, acoustic tiles, various plasters, duct wrap, paper backing of linoleum, non-bituminous roofing felt, wallboard, joint compound (joint "mud"), and thermal insulation for pipes and boilers. Use of

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3 US Environmental Protection Agency (USEPA), "Polychlorinated Biphenyls," http://www.epa.gov/wastes/hazard/tsd/pcbs/about.htm, accessed January 2015.

asbestos in the manufacturing of building materials was banned by 1978, although some products remained on the shelf and were used in the construction of buildings and homes for several years thereafter. In general, buildings constructed before 1979 have the greatest potential to contain ACMs. Some of the on-site buildings were constructed before 1979.

Asbestos is a known carcinogen, and there is no known threshold level of exposure at which adverse health effects are not anticipated. The USEPA has identified asbestos as a hazardous air pollutant pursuant to Section 112[4] of the Federal Clean Air Act Additionally, the California Air Resources Board (CARB) has identified asbestos as a Toxic Air Contaminant (TAC), pursuant to the California Health and Safety Code[5] A potential for exposure exists when the ACM becomes damaged to the extent that asbestos fibers become airborne and are inhaled. If inhaled, asbestos fibers can result in serious health problems. Applicable regulations pertaining to the removal or disturbance of ACMs are described below under the section "Regulatory Setting."

Based on the Ventura County Air Pollution Control District (APCD) standards, materials are considered ACMs if, when tested, one or more samples contain greater than 1 percent asbestos. Asbestos can become airborne if it is friable, meaning it can be crumbled, pulverized, or reduced to powder by hand pressure when dry. ACMs can become friable if pulverized during demolition activities. Even if not friable, the removal and disposal of ACMs is regulated by the APCD.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Lead-based paint (LBP) is of concern both as a source of exposure and as a major contributor to lead in interior dust and exterior soil.

Potential for Hazardous Materials on Site

The Project Site has been used for agricultural production from at least 1938, including orchard and row crop cultivation, along with ancillary uses for processing operations and farmworker housing.[6] Substances identified by many State and federal agencies as hazardous are routinely used as part of the on-site agriculture. Agricultural operations use pesticides and herbicides to control pests and weeds. No banned pesticides are currently used on site and there is no storage of acutely hazardous materials on site. The

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4 40 Code of Federal Regulations [CFR], sec. 61.01

5 HSC sec. 39657 et seq.

6 PW Environmental, *Environmental History Review—Santa Paula West Business Park* (October 2014).

structures and buildings on site, such as the farmworker housing and ancillary structures, may contain items such as cleaners and solvents, which may be considered hazardous substances. These materials are stored on site within appropriate covered and/or enclosed structures. Additionally, fuels, diesel, and oils are stored on site to provide for the various vehicles and equipment that support the agricultural operations.

Historically, the Project Site contained two aboveground storage tanks (ASTs) and one underground storage tank (UST).[7] In December 2005, one 15,000-gallon and one 20,000-gallon ASTs were abandoned on the Project Site. Total petroleum hydrocarbon (TPH) contamination was identified beneath these former AST locations. Remedial excavation activities were initiated in January 2006, of which TPH contamination decreased on the site. However, further assessments identified sources of diesel and oil contamination originating on the site. The excavated contaminated soil was treated and remediated on site and three groundwater monitoring wells were installed in April 2006.[8] Results from the groundwater sampling determined that groundwater was not impacted above state maximum contaminant levels (MCLs).[9]

The former 500-gallon UST, which was located in the center of the Project Site, was removed in December 2005.[10] Testing conducted after the removal of the UST indicated that there were no major releases from the UST and that samples were below MCLs; as such, the case has been deemed closed as of May 2007.[11]

The Project Site currently contains power poles and three wind machines. Two of the wind machines are electric powered, and the third is an abandoned gasoline-powered tower. Soil sampling conducted beneath the gasoline-powered wind machine determined that the tower would not represent an environmental concern.[12] Areas around the transformer locations associated with the on-site power poles may contain PCBs.

Furthermore, given that the Project Site historically has been used for agricultural production for more than 75 years, shallow soils may contain residual legacy pesticides, such as DDT, chlordane, and lead arsenate.[13] The Project Site currently utilizes spraying of pesticides, but there is no existing occurrence of pesticide storage. Site reconnaissance did not identify any unusual conditions that could potentially

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7 Applied Environmental Technologies, Inc. (AET), *Phase I Environmental Site Assessment [ESA] for the Bannon Ranch, Santa Paula, California* (2006).

8 PW Environmental, *Environmental History Review—Santa Paula West Business Park* (October 2014).

9 PW Environmental, *Environmental History Review—Santa Paula West Business Park* (October 2014).

10 PW Environmental, *Environmental History Review—Santa Paula West Business Park* (October 2014).

11 State Water Resources Control Board, *GeoTracker,* Bannon Ranch–T0611116855, http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0611116855, accessed May 2015.

12 AET, *Phase I ESA for the Bannon Ranch* (2006).

13 PW Environmental, *Environmental History Review—Santa Paula West Business Park* (October 2014).

represent an environmental liability, with the exception of potential residual pesticides.[14] As the historic storage and use of pesticides on the Project Site is unknown, a limited Phase II ESA was conducted to determine the presence of residual pesticides around the onsite storage buildings and orchards. All pesticide concentrations measured across the site were below the respective preliminary remediation goals (PRGs), which are used to screen sites for potential environmental concerns prior to development. Therefore, the Phase II ESA determined no impacts related to those onsite residual pesticides.

The single-family residence on the northwest corner of the Project Site dates back to between the years 1947 and 1959.[15] As this residence was constructed prior to year 1970, it is possible that PCBs, ACMs, and LBPs were utilized.

Aircraft and Airport Hazards

The Santa Paula Airport (the Airport) is located approximately 1.5 miles east of the Project Site. The Santa Paula Airport is located south of State Route (SR) 126, in the south-central part of the City. The Airport is bound by Palm Avenue on the west, by Ojai Street on the east, and by the Santa Clara River on the south. The Airport is privately owned but is a public-use airport operated by the Santa Paula Airport Association. The Airport encompasses a total of 38 acres and provides a single asphalt runway (Runway 4/22). The runway is 2,650 feet long and 40 feet wide, and runs generally in an east–west alignment.

The runway is used by piston-and-propeller-, single-, and twin-engine planes. No commercial aircraft use this Airport. The Airport operates under visual flight rule conditions only, indicating that approaches to the runway are only made in weather conditions where cloud cover is greater than 1,000 feet in height and visibility is greater than 3 miles.

The State of California has defined air safety zones in the California Airport Land Use Planning Handbook. Santa Paula Airport has adopted the State of California air safety zones, which include the Inner Safety Zone, the Outer Safety Zone, and the Traffic Pattern Zone. A fourth air safety zone, the Extended Runway Centerline Zone, was not applied by the Ventura County Airport Land Use Commission to Santa Paula Airport because of the lack of both historical aircraft accident data in Ventura County and instrument approaches at the Airport. Only the Traffic Pattern Zone has the potential to overlap the Project Site.

The Traffic Pattern Zone is the area beneath the outer edge of aircraft flight paths. Review of the City's Airport Zone Map indicates that the Project Site is not within an Airport-Influenced Overlay Zone (KI), which corresponds to the Ventura County Airport Land Use Plan's Traffic Pattern Zone. The property is

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14 AET, *Phase I ESA for the Bannon Ranch* (2006).

15 PW Environmental, *Environmental Case Review—Santa Paula West Business Park* (October 2014).

not within the County's Height Restriction Zone for the Santa Paula Airport. The KI Overlay Zone requires less-intense uses and development within the area in which airplane traffic is concentrated.

Wildland Fires

The Specific Plan area, which forms the southwest boundary of the City, is surrounded by urban uses to the north and east and by agricultural lands to the west and south. While this area is considered to be in the less-dense County area with minimal urbanization, it is not located within a vegetated area that could provide fuel for fires to spread and cause structural damage or health hazards. Wildland fires are a common occurrence in Ventura County and can occur on a year-round basis. Wildfires can endanger human life and existing structures.

California Public Resources Code 4201–4204 directs the California Department of Forestry and Fire Protection (CAL FIRE) to map fire hazards within State Responsibility Areas (SRAs) based on relevant factors such as fuel, terrain, and weather. The zones are referred to as Fire Hazard Severity Zones (FHSZs). They provide the basis for the application of various mitigation strategies to reduce risks to buildings associated with wildland fires, and relate to building code requirements designed to reduce the ignition potential to buildings in the Wildland-Urban Interface Zones. Based on the CAL FIRE map for Ventura County, the Project Site is not located within a local responsibility area (LRA) or SRA.[16] The nearest FHZA within the SRA is located just south of the Project Site. The foothills to the south of the Project Site are designated Moderate Severity, while areas further up the South Mountains carry a Very High Severity classification.[17]

The Safety Element of the City of Santa Paula's General Plan currently identifies the West Area Specific Plan area as predominately "Low Range Area."[18] The "High Fire Hazard" areas are located at the foothills along the Topatopa and South Mountains.

City of Santa Paula Hazardous Materials and Emergency Preparedness

The City of Santa Paula Fire Department (SPFD) oversees emergency operations within the City. The SPFD follows the Personnel Training and Emergency Response Plan outlined in the California Code of Regulations, Title 26, Division 19 and 19.1. This includes such information as provisions for informing business personnel and the affected public of safety procedures to follow during a release or threatened

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16 California Department of Forestry and Fire Protection, "Fire and Resource Mapping Program, Ventura County, Fire Hazard Severity Zones in LRA," adopted by Cal Fire on October 2010. http://frap.fire.ca.gov/webdata/maps/ventura/fhszs_map.56.pdf.

17 California Department of Forestry and Fire Protection, "Fire and Resource Mapping Program, Ventura County, Fire Hazard Severity Zones in SRA."

18 City of Santa Paula, *General Plan*¸ "Safety Element" (1998).

release of a hazardous materials, and designation of responsibility for the coordinated release of safety information to the public and to the local Emergency Broadcast System, and the provisions for evacuation plans.

Evacuation centers to be used in the event of disaster vary depending on the location and nature of the disaster. The facilities most likely to be used are the local high schools. These facilities are ideal because they are public facilities and can accommodate lodging, feeding and showering. Other options include junior and elementary schools, churches, community centers, and even commercial lodging facilities.

The seriousness of a hazardous material incident is dependent on a number of factors, including the type and quantity of material involved, the proximity to populated areas, the time of day, weather conditions, and the physical state of the material (i.e., solid, liquid, vapor, or gas). The greater the number of people exposed to the hazardous material, the greater the potential for significant impact. Because of their dispersion characteristics, vapors and gases tend to involve greater hazards. Under a worst-case scenario, an incident could result in mass fatalities and injuries, destruction of private and public improvements, and contamination of the environment.

Although a hazardous materials release could occur anywhere within the City of Santa Paula, certain areas are at greater risk. These include the following:

- SR 126 (which is directly to the south of the Project Site) and SR 150 are major transportation corridors through the Santa Paula area. A hazardous material spill involving transportation would most likely occur along one of these highways.
- Because of the high number of businesses that use or store hazardous materials on Main Street or Harvard Boulevard, these major arterials and adjacent neighborhoods are probably at greater risk than other arterials within the City.
- One facility with acutely hazardous materials is located on Quail Court and poses a higher risk than other facilities within the City. Quail Court is located on the eastern boundary of the City (approximately 2.7 miles from the Project Site), across SR 126 and to the east of the small triangle annexation piece used as a storage area south of SR 126.

Emergency Evacuation

As noted previously, regional access to the Project Site is available via SR 126. Local street access to the Project Site is currently only available through the City of Santa Paula's circulation network via W Telegraph Road. The Ventura County Emergency Response Plan is modeled after the State guidelines for a Multi-Hazard Function Plan (MHFP), which addresses emergency preparedness, response, and evacuation procedures, as well as roles and responsibilities of public safety personnel. The County of

Ventura has an Emergency Response Plan and maintains an Emergency Operations Center, which is administered through the Ventura County Sheriff's Office.[19] The Program is coordinated by a full-time management analyst/emergency preparedness coordinator assigned to the SPFD, which is ultimately responsible for coordinating any evacuations necessitated by an emergency. If delayed during a large disaster, the SPFD chief is responsible for coordinating evacuation efforts in the event of a disaster requiring evacuation.

4.8.2 REGULATORY SETTING

Federal

Comprehensive Environmental Response, Compensation, and Liability Act

Discovery of environmental health damage from disposal sites prompted the US Congress to pass the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or "Superfund"). The purpose of CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat. The Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List (NPL) for cleanup activities.

Hazardous Materials Transport Regulations

The US Department of Transportation (USDOT) regulates transportation of hazardous materials between states. The USDOT Federal Railroad Administration (FRA) enforces the hazardous materials regulations, which are promulgated by the Pipeline and Hazardous Materials Safety Administration for rail transportation. These regulations include requirements that railroads and other transporters of hazardous materials, as well as shippers, have and adhere to security plans and also train employees involved in offering, accepting, or transporting hazardous materials on both safety and security matters. Additionally, the Federal Hazardous Materials Transportation Law is enforced by the USDOT's Federal Highway Administration (FHWA) with the purpose of protecting risks to life, property, and the environment as a result of the transportation of hazardous materials.

Resource Conservation and Recovery Act

Subtitle C of the Resource Conservation and Recovery Act (RCRA) addresses hazardous waste generation, handling, transportation, storage, treatment, and disposal. It includes requirements for a system that uses hazardous waste manifests to track the movement of waste from its point of generation to its ultimate disposition. The 1984 amendments to the RCRA created a national priority for waste minimization. Subtitle D establishes national minimum requirements for solid waste disposal sites and practices. It

19 Ventura County Sheriff's Office, "Office of Emergency Services", http://www.vcsd.org/oes.php, accessed on July 2016.

requires each state to develop plans for the management of wastes within its jurisdiction. Subtitle I requires monitoring and containment systems for underground storage tanks that hold hazardous materials. Owners of tanks must demonstrate financial assurance for the cleanup of a potential leaking tank.

Federal Hazardous Materials Regulations

The Hazardous Materials Regulations (HMR), issued by the Department of Transportation's Pipeline and Hazardous Materials Safety Administration, govern the transportation of hazardous materials by highway, rail, vessel, and air. The HMR address hazardous materials classification, packaging, hazard communication, emergency response information, and training. The transport of hazardous material is covered by Title 49 of the federal code.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) is a program created to implement the Clean Water Act. The State Water Resources Control Board (SWRCB) and the nine regional boards administer NPDES to regulate and monitor discharged waters and to ensure they meet water quality standards.

State

The California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) is the primary hazardous waste statute in the State of California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the State, specifying that generators have the primary duty to determine whether their wastes are hazardous and to ensure their proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning, and furthermore has a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of wastes and waste management activities that are not covered by the federal RCRA.

California Department of Toxic Substances Control

The role of the California Department of Toxic Substances Control (DTSC), a division of the California Environmental Protection Agency (CalEPA), is to protect California and Californians from exposures to hazardous wastes by regulating hazardous waste, cleaning up existing contamination, and looking for ways to reduce the hazardous waste produced in California. The DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code. Other laws that affect hazardous waste include regulations on handling, storage, transportation, disposal,

treatment, reduction, cleanup, and emergency planning. In addition, DTSC reviews and monitors legislation to ensure that the legislation reflects the DTSC's goals. Under these laws, DTSC's major program areas develop regulations and consistent program policies and procedures. The regulations spell out what those who handle hazardous waste must do to comply with the laws. Under RCRA, DTSC has the authority to implement permitting, inspection, compliance, and corrective action programs to ensure that people who manage hazardous waste follow State and federal requirements. The DTSC implements RCRA in California via Unified Program Agencies. In the City of Santa Paula, the Unified Agency is the Santa Paula Fire Department.

California Code of Regulations, Title 22

Most State and federal regulations and requirements that apply to hazardous waste are spelled out in the California Code of Regulations (CCR). Title 22 contains the detailed compliance requirements for hazardous waste generators, transporters, and treatment, storage, and disposal facilities. California is a fully authorized state according to RCRA; therefore, most RCRA regulations have been duplicated and integrated into Title 22. However, because the DTSC regulates hazardous waste more stringently than the USEPA, the integration of California and federal hazardous waste regulations that make up Title 22 do not contain as many exemptions or exclusions as does 40 Code of Federal Regulations (CFR) 260. As with the California Health and Safety Code, Title 22 also regulates a wider range of waste types and waste management activities than do the RCRA regulations in 40 CFR 260. To aid the regulated community, California compiled the hazardous-materials-, waste-, and toxics-related regulations contained in CCR Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 into one consolidated CCR Title 26, "Toxics." However, the California hazardous waste regulations are still commonly referred to as Title 22.

Transportation of Hazardous Materials

The transport of hazardous materials and explosives through the City of Santa Paula is regulated by the California Department of Transportation (Caltrans). The Caltrans Hazardous Waste Management program assists districts statewide with the management of contaminants and wastes encountered on highway projects and Caltrans properties. Technical experts assist or supplement district staff in directing assessment, investigation, or cleanup activities, and develop guidelines for the management of these activities.

Regional and Local

Ventura County Air Pollution Control District

The Ventura County Air Pollution Control District (VCAPCD) regulates asbestos through Rule 62.7, Asbestos – Demolition and Renovation.[20] Rule 62.7 regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and cleanup procedures. Rule 62.7 applies to owners and operators involved in the demolition or renovation of asbestos-containing structures, asbestos storage facilities, and waste disposal sites.

Ventura County Hazard Mitigation Plan

The 2010 Ventura County Hazard Mitigation Plan (Plan) was prepared to meet the Department of Homeland Security's Federal Emergency Management Agency (FEMA) requirements with respect to the Disaster Mitigation Act of 2000 and Interim Final Rule. This rule established the minimum hazard mitigation planning requirements for states, tribes, and local entities. The City of Santa Paula is a participating member of the Plan in cooperation with the Ventura County Office of Emergency Services (OES), which is coordinated through the Ventura County Sherriff's Department.

The Plan addresses four major hazard profiles: earthquakes, flooding, geologic hazards, and wildfires. The Plan is intended to serve many purposes, including the following:

- Enhance Public Awareness and Understanding—to help residents of the county better understand the natural and human-made hazards that threaten public health, safety, and welfare; economic vitality; and the operational capability of important institutions.
- Create a Decision Tool for Management—to provide information that managers and leaders of local government, business and industry, community associations, and other key institutions and organizations need to take action to address vulnerabilities to future disasters.
- Promote Compliance with State and Federal Program Requirements—to ensure that Ventura County and its incorporated cities comply with laws and regulations that encourage or mandate local governments to develop comprehensive mitigation plans.

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20 Ventura County Air Pollution Control District (VCAPCD) Rule 62.7, adopted by the VCAPCD on June 16, 1992, establishes requirements regarding demolition and renovation operations associated with asbestos-containing material (ACM). VCAPCD Rule 62.7 incorporates the federal asbestos requirements found in the Code of Federal Regulations, tit. 40, pt. 61, subpt. M, National Emission Standards for Hazardous Air Pollutants (NESHAP).

- Enhance Local Policies for Hazard Mitigation Capability—to provide the policy basis for mitigation actions that should be promulgated by participating jurisdictions and districts to create a more disaster-resistant future.

- Provide Inter-Jurisdictional Coordination of Mitigation-Related Programming—to ensure that proposals for mitigation initiatives are reviewed and coordinated among the participating jurisdictions within the county.

- Achieve Regulatory Compliance—to qualify for the Pre-Disaster Mitigation (PDM) program, local jurisdictions must have an approved mitigation plan to receive a project grant. Local jurisdictions must have approved plans by November 1, 2004, to be eligible for HMGP funding for presidentially declared disasters after this date. Plans approved at any time after November 1, 2004, will make communities eligible to receive PDM and HMGP project grants.

Santa Paula Fire Department

Prevention of hazardous materials releases and fire prevention are functions of the Santa Paula Fire Department (SPFD). Prevention activities occur both at the engine-company level, as well as through our Code Enforcement and Inspection Services departments. Through active prevention and education activities, the SPFD goal is to prevent hazardous materials spills and fire incidents before they occur. At the engine-company level, firefighters are involved in a number of activities, including:

- Building permit review to ensure compliance with the Uniform Fire Code

- Annual business Inspections

- Hazardous materials surveys and inspections

- Fire extinguisher training

- Education programs

The SPFD is the locally Certified Unified Program Agency (CUPA) that administers the RCRA on behalf of the DTSC.

- The Code Enforcement division implements the housing and health standards relating to building construction in the City, including:

- Investigation of alleged violations

- Building inspections

- Collaborating with responsible parties to resolve code violations

Hazardous Materials Business Plan

A Hazardous Materials Business Plan (HMBP) provides the SPFD (as the CUPA) with information on hazardous materials at businesses (including agricultural operations) that store, use, or handle hazardous materials at or above specified threshold amounts. The SPFD uses the information from the HMBP during hazardous materials emergency responses. A HMBP is required for individual hazardous materials at or above the following threshold amounts:

- 55 gallons of liquid
- 500 pounds of solid
- 200 cubic feet of compressed gas
- Extremely Hazardous Substances over the threshold planning quantities
- Radioactive material in quantities requiring an emergency plan as required in the Code of Federal Regulations, Section 10, Parts 30, 40, and 70.

Operations in Santa Paula are required to file annual HMBPs based on the number and types of materials that they store or utilize. The SPFD conducts regular inspections of these facilities to ensure compliance with the fire code and to prepare a response to any hazardous materials incident.

With respect to fire prevention and suppression services, SPFD is responsible for enforcing the following:

- All aspects of the California Fire Code (as adopted)
- Any City of Santa Paula ordinances and/or amendments pertaining to fire prevention and suppression
- California Health and Safety Code, Division 12, Part 2.7 (Fire District Law) and Part 5 (Abatement of Hazardous Weeds and Rubbish)

City of Santa Paula

General Plan

The City of Santa Paula General Plan Safety Element establishes policies that are intended "to reduce death, injuries, property damage, and the economic and social dislocation resulting from natural hazards."[21] As described in the Safety Element, it is the intent of the City to provide for balanced planning decisions based on the recognition of the importance of public safety, and the need to integrate safety concerns with other local issues. Based on the degree of hazard within a given area, the Safety Element is

21 City of Santa Paula, *General Plan,* "Safety Element," (1998).

integrated with the other elements when addressing where to locate habitable or critical structures (for hazard avoidance and emergency services), and provision of emergency response in the event of a disaster (Circulation Element).

Development Code

The City of Santa Paula's Municipal Code (SPMC) includes the City zoning and development regulations. Title 16, Chapters 96–99, of the City's Development Code establish regulations regarding grading and erosion control for development projects. The purpose of these regulations is to minimize geologic hazards related to slope, erosion, and drainage conditions that would have adverse effects to public safety. The City Engineer or Building Official shall issue grading permits based on the appropriate submittal, including geotechnical and engineering geology reports.

4.8.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, the California Environmental Quality Act (CEQA) identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guidelines (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact from hazards and hazardous materials, if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 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?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- 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?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?
- 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?

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- 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?

4.8.5 PROJECT IMPACTS

Threshold: **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Construction

Construction activities would include the use of machinery and other equipment that may require on-site fueling or maintenance/servicing with other petroleum-based products (e.g., grease, oil). These materials are considered hazardous and could cause temporary localized soil and water contamination in the event of an accidental spill. Incidents of spills or other localized contamination may occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. In addition, during construction of the Project, paints, solvents, and other materials may be used on-site for building treatments (wood and cement sealers, etc.) and other construction-related activities. Construction activity would be subject to compliance with a number of spill prevention, containment, and cleanup measures The amounts of hazardous materials that would be stored on-site at any given time for use during construction would be minimal and temporary and would not rise to the level of requiring a Hazardous Materials Business Plan. Also, the SPFD conducts building permit review and regular inspections of these facilities to ensure compliance with the fire code and ensure preparation to a respond to any hazardous materials incident.

According to the SPMC Section 54.30, all construction activity that requires a grading permit must be undertaken in accordance with any conditions and requirements, including Best Management Practices (BMPs), established by the Ventura County Municipal Stormwater NPDES Permit (Order No. 94-082, NPDES Permit No. CAS 063339). The BMPs identified in the Ventura County Municipal Stormwater NPDES Permit include the stormwater prevention measures described in the Stormwater Pollution Prevention Plan (SWPPP) and which would be required for all phases of construction. Adherence to the SWPPP and the implementation of standard BMPs during construction would reduce the potential for hazardous materials spills.

Construction of the Project would involve deliveries and disposal of hazardous materials such as fuels, oils, solvents, and other equipment maintenance and building materials. Also, hauling trucks traveling on SR 126 and Telegraph Road during construction are likely to pass near residences and schools, such as:

Briggs Elementary School, Blanchard Elementary School, Glen City Elementary School, and Isbell Middle School. Construction activities may also require deliveries near residences located along Telegraph Road and Beckwith Road. Although truck deliveries associated with the construction of the Project would likely only contain construction materials (e.g., wood, pipes) and other nonhazardous materials required for construction, it is possible that these deliveries could also contain hazardous materials destined for the Project Site or other project sites also under construction. Although incidents related to hazardous materials spills are not frequent, accidents along major transportation corridors can occur. As the major transportation corridor through the Santa Clara River Valley, SR 126 is commonly used to transport a variety of hazardous materials via trucking and are required to be secured and permitted for transport in accordance with State laws.

As such, spills or leakages encountered during construction and hauling would be temporary and would be required to be remediated in accordance with the State and local regulations for hazardous waste cleanup. As such, impacts from the use and handling of hazardous materials would be less than significant.

Operations

The Project proposes the development of a business park that would include commercial and light industrial uses with some areas for passive open space. Operation of the Project would involve the use, transport, production, handling, or storage of hazardous materials that have the potential to create a significant hazard to people on the Project Site. These materials may include the use of fuels, grease, solvents, paints, and pesticides and other various landscaping products. The storage and disposal of these hazardous materials on the Project Site would comply with City and SPFD regulations and standards.

Furthermore, the Ventura County Transportation Commission (VCTC) owns the 100-foot-wide railroad corridor that bisects the Project. While the railroad has the capacity to serve as a corridor for the transport of hazardous materials, the railroad is currently out of service and would not pose any dangers to people on the Project Site related to the accidental release of hazardous materials, such as a fire, explosion, or chemical spill. However, if the railroad is commissioned for service within the future, any transport of hazardous materials would comply with US Department of Transportation (USDOT) Federal Railroad Administration (FRA) safety regulations. Therefore, the probability of an accident involving the transport of hazardous materials within proximity to the Project Site is considered to be unlikely. Impacts would be less than significant.

Threshold: **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?**

Construction

During construction of the Project, delivered materials to the site could contain hazardous materials, such fuels, solvents, oils, coatings, etc. The event of a spill or release related to these hazardous materials could cause a short-term threat of exposure to nearby schools and residential areas along SR 126 and W Telegraph Road. Therefore, the Project would have potentially significant impacts related to the transport of hazardous materials during construction activities.

Based on the age of the on-site structures that were built prior to 1970, there is potential for the exposure of ACMs, PCBs, or LBPs at the Project Site. Before the demolition of any additional on-site structures, irrigation pipelines, materials will be tested for any ACMs, PCBs, or LBPs in accordance with standard Ventura County APCD procedures. If any toxic materials are found, they will be removed and disposed of by a contractor licensed to handle such materials. The potential for demolition activities to expose workers to toxic and hazardous materials would be eliminated through standard Federal and State procedures and does not pose a threat to public safety. However, implementation of **Mitigation Measures HM-1** and **HM-2** would ensure that structures on the Project Site would be surveyed for toxic hazardous materials prior to demolition and renovation activities. **Mitigation Measures HM-3** and **HM-4** would ensure that any Pole-mounted transformers, light ballasts or other equipment suspected to contain PCBs must be inspected for the presence of PCBs prior to before any disturbance or removal.

As the Project Site is currently used for agricultural production, approval of the Specific Plan would result in the conversion of agricultural areas to urban uses. As the historical contamination related to the two onsite ASTs and UST have been remediated and closed since 2007, the Project Site currently does not contain any evident soil or groundwater contamination. However, as the Project Site has been historically used for agricultural uses for over 75 years, it is possible that residual pesticides may be exposed during grading and excavation activities. The limited Phase II ESA that was conducted for the Project Site determined that exposure of residual pesticides is considered low. However, soil testing may not always indicate of every condition within the Project and clearing of existing debris or soils could uncover hazardous material contamination not previously known to occur on-site. Therefore, potential impacts related to the presence of hazardous substances would be potentially significant. **Mitigation Measure HM-5** provides for the mitigation of hazardous materials in the unlikely event materials are uncovered during grading or clearing activities.

Operations

The Project Site has historically been used for agricultural production. The Specific Plan would similarly result in the conversion of agricultural areas, including the row crops, orchards, and fallow agricultural land. Testing showed trace amounts of organochlorine pesticides, which are persistent, bio-accumulative pesticides and include DDD, DDE, and DDT. The testing shows that samples were at levels that were not anticipated to result in health consequences from upset or accident conditions.

A government database report (contained in **Appendix 4.8**) of available federal, State, and County agency databases was reviewed to identify government-regulated properties having known recognized environmental conditions and potential environmental concerns on or within the vicinity of the Project Site. Existing sites that may potentially contain hazardous materials in the Project Site include a range of sites with a variety of potential sources of contamination, including various forms of chemical waste, oil and gas, auto-repair facilities, and fueling stations. However, any new development occurring on any of these documented hazardous materials sites would have to be preceded by remediation and cleanup under the supervision of the State DTSC or other regulatory agency (as deemed appropriate) before construction activities could begin, if such actions have not already occurred. In addition, these listed areas are down gradient from the Project Site, so exposure to contaminants from migration through surface water or groundwater flow from the contaminated zones is not expected. Therefore, potential for contamination of the Project Site from off-site contamination sources is considered less than significant.

Threshold: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Project Site is not within 0.25 miles of an existing school. Blanchard Elementary School and Briggs Elementary School are the closest schools to the Project Site at distances of approximately 0.60 miles and 0.65 miles, respectively. No other schools are proposed within the surrounding community. As previously described, construction activities would include the use of potentially hazardous materials, such as fuels, solvents, oils, coatings, etc. for the new buildings and paved areas within the Project Site. As provided in **Section 4.3, Air Quality,** construction activity would emit reactive organic compounds (ROCs), nitrogen oxides, carbon monoxide, sulfur oxides, diesel particulates, and dust particulates. A health risk assessment determined that construction emissions would not cause exposure to pollutants at unhealthy levels at any surrounding sensitive land uses, including schools.

As provided previously, the Project would involve the use of hazardous materials onsite typical of industrial-type uses. The storage and disposal of these hazardous materials on the Project Site would comply with City and SPFD regulations and standards. Therefore, impacts would be less than significant.

Threshold: **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?**

As previously discussed, the Project Site contained two historical ASTs and one UST. These historical tanks have either been abandoned or removed from the Project Site as of 2005. Sources of contamination were identified within the areas of the ASTs and UST; however, these areas on the Project Site have been cleaned up and remediated and are not considered an environmental concern.

The State DTSC maintains a listing of hazardous materials sites compiled pursuant to Government Code section 65962.5. These include the list of Hazardous Waste and Substance Sites from the DTSC EnviroStor database; the list of Leaking Underground Storage Tank (LUST) Sites by County and Fiscal Year from the SWRCB's GeoTracker database; the list of Solid Waste Disposal Sites identified by the SWRCB as having waste constituents above hazardous waste levels outside of the waste management unit; and the list of "active" Cease and Desist Orders and Cleanup and Abatement Orders. The Project Site is listed on the GeoTracker list for groundwater contamination; however, the site has been remediated with a case closure date of May 2007. Also, the Phase I ESA indicates that the Project Site is not located within 1 mile of a federal Superfund site. There are two sites within 0.25 miles east of the Project Site that are LUST sites. The sites, located at 411 Beckwith Road and 560 Todd Lane, received case closures in November 1988 and April 1990, respectively, and thus remediation has already been completed for both sites. It is not expected that contamination from these sites would have migrated to the Project Site. According to the EnviroStor database, four sites in nearby surrounding properties of the Project Site store and use materials classified and hazardous materials. These facilities are currently required to report to the EPA to maintain regulatory compliance, which are designed to prevent spills and provide emergency remediation actions, for the use and handling of hazardous materials. Furthermore, the uses allowed under the Specific Plan are similarly light industrial and commercial in nature, have adequate emergency access and evacuation routes, and are not considered sensitive since the uses would likely be occupied by working adults and for portions of the day only. Due to the regulatory status of hazardous materials incidents at the facility (e.g., closed case), the distance between the facility and the site, or the hydro-geologically cross-gradient location from the site, and since site reconnaissance did not reveal the presence of hazardous chemicals, on-site impacts related to nearby hazardous materials sites are considered less than significant.

Threshold: **For a project located within an airport land use plan or, where such 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?**

The Specific Plan is not located within any of the three Safety Zones as established by the Ventura County Airport Land Use Commission (ALUC) within their Comprehensive Land Use Plan (CLUP).[22] The three Safety Zones are defined as the Inner Safety Zone, Outer Safety Zone, and the Traffic Pattern Zone. As the Project Site is not located within these designated zones, the Project is not subject to land use guidelines for airport safety compatibility. Therefore, the Specific Plan would not conflict with the requirements set forth in the Ventura County ALUC or the City's General Plan. Impacts would be less than significant.

Threshold: **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?**

No portion of the Specific Plan is within a private airstrip other than the Santa Paula Airport. Potential impacts related to the Santa Paula Airport are discussed above. Thus, implementation of the Project would result in less than significant impacts related to the exposure of employees or visitors to hazards from plane accidents due to the proximity of any private airstrips.

Threshold: **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Construction

Construction activities of the Project may require the closure of vehicle travel lanes. In particular, Beckwith Road and Faulkner Road, located to the east and south of the site, respectively, would require a period of partial closures due to the extension of the road to connect with Faulkner Road. This could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. During the construction period (anticipated to be throughout a span of 10 years), construction activities may require temporary road detours and/or closures resulting in localized increase in traffic and circuitous traffic routes. In addition, during certain periods of construction, the transport of oversized materials and equipment will be required, which will necessitate the use of large and often slow-moving vehicles. Combined, these activities could result in short-term adverse and significant impacts on the implementation of an evacuation plan.

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22 City of Santa Paula, *General Plan,* "Safety Element," (1998).

The City requires preparation of a detailed Construction Traffic Management Plan, which would be submitted to the City for review and approvals consistent with the City's existing standards and emergency response plans. The plan would provide notification to the City of Santa Paula Police Department (SPPD), which oversees emergency operations within the City in cooperation with the Ventura County OES.[23] The OES is coordinated through the Ventura County Sherriff's Department and is responsible for countywide disaster planning, mitigation, response, and recovery activities through the implementation of the Ventura County Hazard Mitigation Plan. The City's designated evacuation routes are along SR 126 and SR 150. While, SR 126 runs along the southern boundary of the Project Site, construction activities of the Project are not anticipated to interfere with access to the roadway or interfere with operation of the County's Hazard Mitigation Plan. Emergency access and potential traffic access impacts would less than significant.

Operation

As with much of southern California, the Specific Plan area has the potential for residents and employees to encounter human-made and natural hazards, which could cause undue hardship to residents and employees. Human-made hazards include the potential release of hazardous materials; the potential for biological or chemical attacks from foreign and domestic terrorism; and the potential for fires started by humans. Natural hazards include flooding, seismic activity, extreme weather conditions, and fires that are started naturally.

The City of Santa Paula implements emergency responses for a variety of disasters through the Ventura County Hazard Mitigation Plan. The OES is responsible for organizing and maintaining effective emergency management, mitigation, preparedness, and response and recovery within the County. The OES allocates resources and ensures that the general population would be protected at any time during an emergency. The working population within the Specific Plan would be made aware of such disaster plans through public education and outreach activities. In addition, the Project would comply with the SPFD's recommended standards for emergency accessibility and circulation. Thus, the Project's operational impacts on the implementation of the Ventura County Hazard Mitigation Plan would be considered less than significant.

Threshold: Increased fire hazard in areas with flammable brush?

The Specific Plan is located not within a CAL FIRE designated LRA or SRA. The nearest FHZA within the SRA is located just south of the Specific Plan area. The foothills to the south of the Specific Plan area are

23 City of Santa Paula, *General Plan,* "Safety Element," (1998).

designated Moderate Severity, while areas further up the South Mountains carry a Very High Severity classification. Based on the City of Santa Paula General Plan, the Project Site is located within an area with minimal fire hazard risk. As the Project involves the development of commercial and light industrial uses across the site's estimated 54 acres. Thus, there would be minimal vegetation that could pose a flammable hazard.

Additionally, the Project would be developed in accordance with the City's Building Regulations as stated in Title 15, Chapter 150 of the SPMC. The SPFD must also be consulted prior to new development to ensure fire safety standards are incorporated into the Project design, such as fire hydrant requirements and emergency accessible ingress and egress points to the Project Site. As the Project would not expose employees or visitors to any increased risks to fire hazards on the site, impacts are considered to be less than significant.

4.8.6 CUMULATIVE IMPACTS

The potential for cumulative impacts associated with hazards and hazardous materials was assessed based on consideration of related projects provided in **Section 3.0, Related Projects**. It is anticipated that related projects would result in an overall Citywide incremental increase in the amount of hazardous materials transported, used, treated, stored, and disposed of. Although each related project has potentially unique hazardous materials considerations, it is anticipated that all hazardous materials delivered and hazardous waste removed from the Specific Plan area and each related project would be in accordance with Title 24 of the Code of Federal Regulations.

Related projects may be located on or near a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Development of any of the related projects would be required to comply with applicable laws and regulations pertaining to hazardous wastes, and the risk with identified hazardous material sites would be eliminated or reduced through proper handling, disposal practice, and/or clean up procedures. Accordingly, cumulative impacts to the public or environment associated with development on or near listed contaminated sites would be less than significant.

Businesses would also be required to prepare a HMBP including an annual inventory of hazardous materials used on site and submit a business emergency plan to the City for an annual review, as required by the Emergency Planning and Right-to-Know Act (SARA Title III) and Chapter 6.95 of the California Health and Safety Code. For these reasons, cumulative impacts associated with related projects would be less than significant.

Furthermore, development under the Specific Plan would comply with all applicable laws and regulations related to the transport, use, treatment, storage, and disposal of hazardous materials and fire prevention.

The Specific Plan would not result in a considerable contribution to cumulative hazards and hazardous materials when considered in combination with operations of related projects.

4.8.7 MITIGATION MEASURES

HM-1: Prior to demolition and construction activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that an asbestos survey has been conducted on any buildings and irrigation pipelines that are to be demolished or removed from the Project Site. If asbestos is found, the Applicant shall follow all procedural requirements and regulations of the VCAPCD Rule 62.7 to properly dispose of all on-site ACM's before general demolition activities commence.

HM-2: Prior to demolition and any renovation activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that a lead-based paint survey has been conducted at all existing buildings located on the Project Site. If lead-based paint is found, the Applicant shall follow all OSHA procedural requirements and regulations for its proper removal and disposal before general demolition activities commence.

HM-3: Prior to disposal, all fluorescent light fixtures within the existing buildings shall be inspected for PCB content labels throughout demolition of the Project Site.

HM-4: Pole-mounted transformers, light ballasts, or other equipment suspected to contain PCBs must be inspected for the presence of PCBs prior to before any disturbance or removal. All equipment found to contain PCBs must be removed and disposed in accordance with all applicable local, State and Federal regulations, including but not limited to California Code of Regulations Title 22, 40 CFR Part 261, and EPA 40 CFR. Utility Plans prepared as part of building permit review must include notes requiring inspection and plan for removal and disposal.

HM-5: In the unlikely event that hazardous materials are encountered during grading or excavation activities anywhere on the Project Site, earthwork must be temporarily suspended in order to coordinate investigation/remediation efforts with the oversight of the Santa Paula Fire Department. An environmental professional (e.g. a professional geologist) is recommended to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan must be developed by a professional geologist approved by the City and submitted to the City Planning Director, or designee, for approval as required before continued work in the area.

4.8.8 RESIDUAL IMPACTS AFTER MITIGATION

With implementation of existing regulations and standards identified above along with **Mitigation Measures HM-1, HM-2, HM-3, HM-4, and HM-5** would reduce potential impacts associated with hazards and hazardous materials during demolition to less than significant.

4.9 HYDROLOGY AND WATER QUALITY

This section summarizes information from available hydrology, drainage, and water quality studies addressing the Santa Paula West Business Park Specific Plan ("Specific Plan") area ("Project Site"). This section includes an evaluation of the existing conditions on the Project Site, a comparison of the pre-Project and the post-Project conditions, a determination of the potential impacts of the Project, and recommended mitigation measures. The purpose of this evaluation is to determine the impact of the proposed Project on surface water drainage, stormwater quality, and groundwater resources near the Project Area and within the Santa Clara watershed.

This section incorporates information from several studies, including the *Adams Barranca Existing Condition Hydrology Study* by Jensen Design & Survey, Inc., dated September 2011; and *Preliminary Hydrology Report for Santa Paula West Business Park* by Jensen Design & Survey, Inc., dated February 3, 2011, and updated November 19, 2015. These studies are provided in **Appendix 4.9.**

4.9.1 EXISTING CONDITIONS

4.9.1.1 Surface Hydrology

Watershed Description

The Specific Plan is located in the Santa Paula Creek tributary of the Santa Clara River watershed. The Santa Clara River flows approximately 100 miles from its headwater at Pacifico Mountain in the San Gabriel Mountains toward the Oxnard Plain before discharging into the Pacific Ocean near the Ventura Marina. Approximately 60 percent of the 1,634 square miles (sq. mi.) of the Santa Clara River watershed is located in Los Angeles County, and the remaining 40 percent is in Ventura County. **Figure 4.9-1, Santa Clara River Watershed**, shows the Santa Clara River watershed. The watershed comprises five major subwatersheds: Upper Santa Clara, Piru, Sespe, Santa Paula, and Oxnard Plain. Each of these subwatersheds consists of individual tributaries and reaches, as noted in **Table 4.9-1, Tributaries for Each Subwatershed**, and **Table 4.9-2, Reaches Associated with Each Subwatershed**, respectively.

Table 4.9-1
Tributaries for Each Subwatershed

Subwatershed Name	Associated Tributaries
Oxnard Plain	N/A
Santa Paula	Santa Paula Creek
Sespe	Sespe Creek, Pole Creek
Piru	Piru Creek, Hopper Creek
Upper Santa Clara	Castaic Creek, San Francisquito Creek, Bouquet Canyon Creek, Mint Canyon Creek, South Fork Santa Clara River

Source: Ventura County Watershed Protection Division, Comprehensive Water Quality Monitoring Plan for the Santa Clara River Watershed (March 2006).

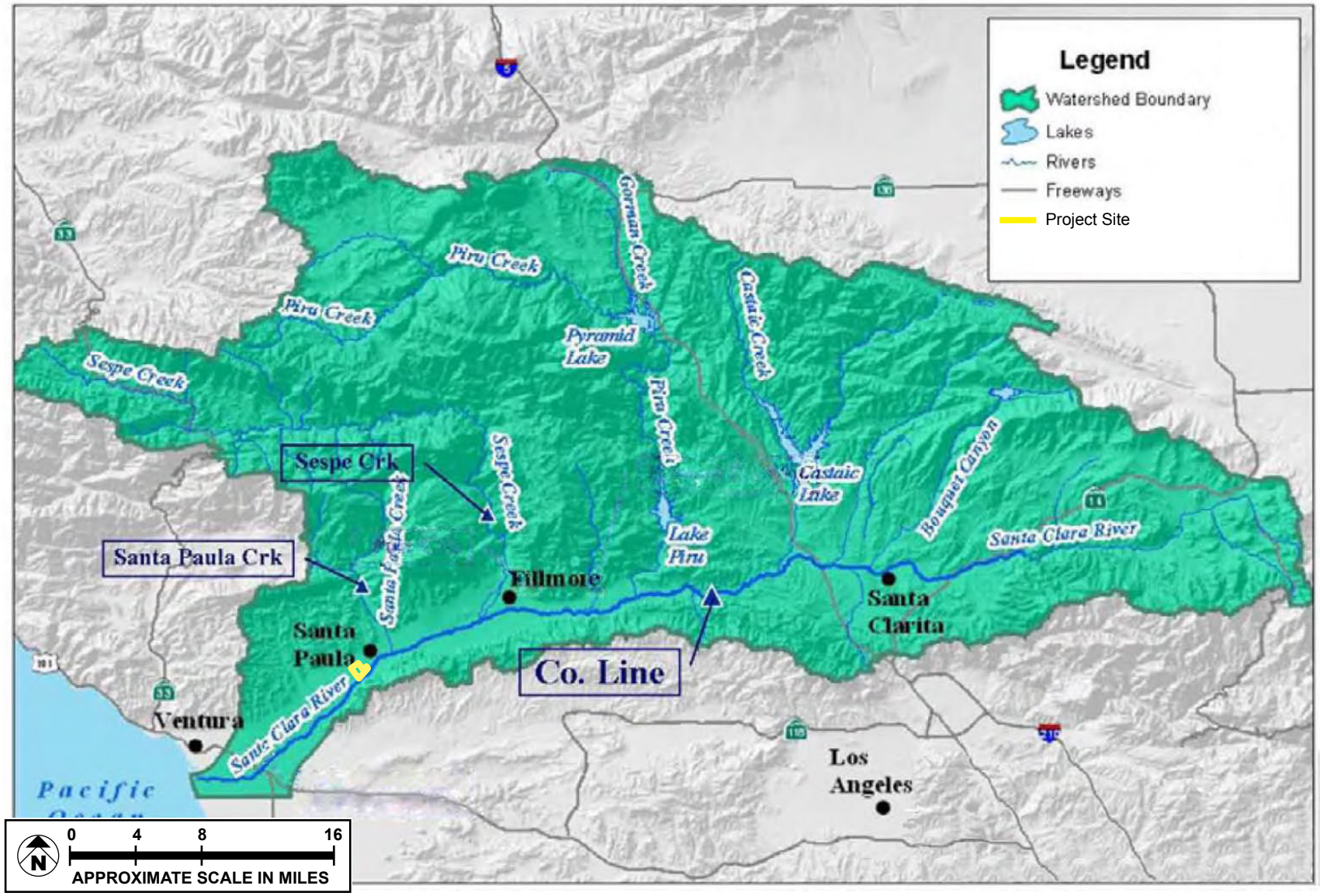
Table 4.9-2
Reach Associated with Each Subwatershed

Reach Number	Reach Description	Subwatershed
1	Between SR 101 Bridge and Santa Clara River Estuary	Oxnard Plain
2	Between Freeman Diversion Dam near Saticoy and SR 101 Bridge	Santa Paula/Oxnard Plain
3	Between A Street, Fillmore and Freeman Diversion Dam near Saticoy	Sespe/Santa Paula
4	Between Blue Cut Gauging Station and A Street, Fillmore	Piru/Sespe
5	Between West Pier Highway 99 and Blue Cut gauging station	Upper Santa Clara/Piru
6	Between Bouquet Canyon Road Bridge and West Pier	Upper Santa Clara
7	Between Lang Gauging Station and Bouquet Canyon Road	Upper Santa Clara
8	Above Lang Gauging Station	Upper Santa Clara
9	Santa Paula Creek above Santa Paula Waterworks Dam	Santa Paula
10	Sespe Creek above gauging station, downstream from Little Sespe Creek	Sespe
11	Piru Creek above gauging station below Santa Felicia Dam	Piru

Source: Ventura County Watershed Protection District, Comprehensive Water Quality Monitoring Plan for the Santa Clara River Watershed, March 2006.

Historic records indicate that the climatic and basin characteristics of the Santa Clara River Watershed generally produce intermittent flows in the river; however, flows can increase rapidly in response to high-intensity rainfall with the potential for severe flooding.[1]

1 Watersheds Coalition of Ventura County, *Integrated Regional Water Management Plan* (2014), p. 3-21.



SOURCE: Santa Clara River Hydrolgy Update, Ventura County Water Shed Protection District (2006) & P&D Consultants, Inc. (2007)

FIGURE **4.9-1**

Meridian Consultants

Santa Clara River Watershed

050-002-13

More specifically, the Santa Paula West Business Park site is located within the greater Santa Clara River watershed. The 53.81-acre Project Site is currently used for agriculture and varies in land gradient, sloping north to south, with the railroad and State Route (SR) 126 being higher than adjacent grade and acting as dams. The on-site drainage is a tributary to the Santa Clara River, which has been divided into four drainage areas: Adams Canyon Barranca (Area A), SR 126 west culverts (Area B), SR 126 east culvert (Area C), and Todd Lane Drain (Area D).

The railroad has two culverts to transport onsite water from the north to the south, not including the crossings for Adams Barranca. These culverts are approximately 50 percent blocked with sediment and currently do not function at full capacity. In addition, four existing culverts of various sizes under SR 126 are blocked with sediment and do not function at capacity, causing ponding north of the highway during storm events. The outlets of the culverts are located on the south side of SR 126 and drain through historic agricultural drainage channels ending in the Santa Clara River, which does not connect to Adams Barranca.

Table 4.9-3, Existing Condition Flow Summary, shows the calculated existing acreage, 10-year (Q10), 50-year (Q50), and 100-year (Q100) storm-event flow for each of these drainage areas at the outlet point for each area. The existing hydrology conditions for the Santa Paula West Business Park were determined according to the Ventura County Watershed Protection District (VCWPD) Manual methodology.

Table 4.9-3
Existing Condition Flow Summary

Existing Watershed	Subarea	Area (acres)	10-Year Q10 (cfs)	50-Year Q50 (cfs)	100-Year Q100 (cfs)
Adams Barranca	A	2.82	2.8	4.8	6.5
West 126 Culverts (2,8)	B1	16.4	14.0	23.5	30.4
	B2	10.88	9.3	15.6	20.2
East 126 Culverts (5,6)	C1a	10.7	7.8	14.5	19.0
	C1b	4.1	3.0	5.5	7.3
	C1c	0.91	0.7	1.2	1.6
	C2	7.6	5.6	10.3	13.5
	D	7.26	7.9	14.0	19.6

Source: Jensen Design & Survey Inc., Preliminary Hydrology Report for Santa Paula West Business Park, February 2011 (updated November 2015).
Note: cfs = cubic feet per second.

As shown in **Table 4.9-3,** a small portion of the Santa Paula West Business Park existing property drains west into Adams Barranca. Adams Barranca is a raised channel; on average, the top of the channel is 2 feet higher than the adjacent grade on the property. This portion of the property is subject to flooding

during a 100-year storm event from Adams Barranca.[2] The SR 126 westerly culverts (Area B) handle the flow from approximately 27 acres. Overflow from pipe inlet blockage travels easterly to two other culverts under SR 126 or farther east to the inlet at the end of Faulkner Road into a 72-inch reinforced concrete pipe (RCP) leading to Todd Lane Drain. The SR 126 easterly culverts (Areas C and D) handle flows from approximately 31 acres. Overflow from pipe inlet blockage travels easterly to the inlet at the end of Faulkner Road into a 72-inch RCP leading to Todd Lane Drain.

Santa Paula Creek

The Santa Paula Creek watershed is an approximately 45-square-mile subbasin of the Santa Clara River watershed. Santa Paula Creek is approximately 15.5 stream miles in length and is a tributary to the Santa Clara River. Santa Paula Creek is characterized by rugged, steeply sloped terrain at the headwaters, which are situated in the Topatopa Mountains. The major tributaries within the lower Santa Paula Creek watershed include (from upstream to downstream) Sisar Creek (11.5-square-mile watershed), Anlauf Canyon (1.4-square-mile watershed), and Mud Creek (2.7-square-mile watershed).[3]

Santa Paula Creek experiences a high degree of annual flow variability, multiyear droughts, and extreme seasonal flooding. Annual precipitation within the watershed ranges from approximately 36 inches within the Topatopa Mountains to approximately 18 inches at the mouth, with over 90 percent of the annual precipitation occurring within 6 months at both locations (November to April).[4]

The 100-year flood[5] along Santa Paula Creek was defined as having a peak flow of 28,000 cubic feet per second (cfs). However, since the completion of the construction of the United States Army Corps of Engineers (USACE) channel modifications in 2002, erosive flood events had caused damage within the channel and the largest flood event recorded along the creek, which had a measured peak flow of 27,500 cfs occurring in January 2005. These events prompted continued evaluation of the hydrology and sediment transport mechanics along Santa Paula Creek by the USACE. In 2009, the VCWPD performed a hydrologic frequency analysis of peak flows along Santa Paula Creek that incorporated the January 2005 flood, which had a measured peak flow of 27,500 cfs. After completing this hydrologic re-analysis, Ventura County determined that the peak flow for the 100-year flood was 38,800 cfs. Following additional hydrologic analysis, including evaluation of recorded peak-flood events, the USACE confirmed in a letter

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2 FEMA Flood Map Service Center (Map Numbers 0611C0778E and 0611C0779E), https://msc.fema.gov/portal/search?AddressQuery=Faulkner%20Road%2C%20Santa%20Paula.

3 Stillwater Sciences, *Santa Paula Creek Watershed Planning Project: Geomorphology and Channel Stability Assessment,* prepared for California Fish and Game, Santa Paula Creek Fish Ladder Joint Powers Authority (2007).

4 Stillwater Sciences, *Santa Paula Creek Watershed Planning Project* (2007).

5 The 100-year flood is alternatively referred to as the 1 percent annual chance flood event and is the flow event used to map the water surface elevation that is shown on FEMA Flood Insurance Rate Maps as the "Base Flood Elevation" (BFE). The 1 percent annual chance flood event represents a flood event with a probability of being equaled or exceeded once every 100 years, on average. The BFE is the water surface elevation of the 100-year flood rounded to the nearest foot.

dated March 14, 2011, to the VCWPD that the 100-year flood for Santa Paula Creek at the confluence of the creek with the Santa Clara River is 39,400 cfs.

In November 2013, the VCWPD issued a draft update of the District's hydrology manual that included new peak flows across the county based on updated National Oceanic and Atmospheric Administration (NOAA) Atlas 14 rainfall data; revised runoff coefficients to better reflect and characterize land use and land cover; and updated hydrologic modeling statistical data. The updated 100-year flood along Santa Paula Creek is identified as 38,400 cfs in this manual.

Santa Clara River

The Santa Clara River is the largest natural river remaining in Southern California. Areas located in the National Forest portion of the watershed are home to California condors and other rare species. The river travels through two counties—Los Angeles and Ventura—and efforts are underway between the two counties to work collaboratively to address issues of mutual concern and benefit, such as water quality improvement.

The majority of the watershed drainage area (approximately 90 percent) consists of the surrounding mountains, which range up to 8,800 feet high, with the remaining portions (approximately 10 percent) lying within the valley floor and coastal plain with the main stem of the Santa Clara River. The watershed is surrounded to the north, east, and south by largely undeveloped hills and canyons; approximately 47 percent of the watershed is located within the Los Padres and Los Angeles National Forests.

In Los Angeles County, the river traverses national forestland, large areas of moderately developed private rural lands, the City of Santa Clarita, and large tracts of rural farmland extending west to the county line. In Ventura County, the river primarily runs through large agricultural tracts, the cities of Fillmore, Santa Paula, Oxnard, and San Buenaventura (Ventura), before discharging into the Pacific Ocean. Major tributaries include Castaic Creek and San Francisquito Creek in Los Angeles County, and Piru Creek, Sespe Creek, and Santa Paula Creek in Ventura County.

The Project Site is located in the Santa Paula Creek tributary and is within Reach Number 9 at Santa Paula Creek, above the Santa Paula Waterworks Dam. More precisely, the Specific Plan area is located approximately 2.9 miles west of Santa Paula Creek. Adams Creek also runs along the western edge of the property.

At certain times of the year, the river may have continuous surface flow to the Pacific Ocean from natural watershed discharge. Controlled releases of water from Lake Piru supplement surface flows in the river reach in Ventura County. Incidental flows are supplied from water reclamation plant discharges and

imported water runoff in the middle reach from the Santa Clarita vicinity to the Los Angeles County and Ventura County lines.

The lower Santa Clara River receives water from winter storm flow runoff from the Santa Clara River watershed and from summer and fall releases from Lake Piru through Santa Felicia Dam. The flows have been highly variable through time, as would be expected during dry and wet years. Since 1995, the water year average annual streamflow is 330,570 acre-feet (af), and the median annual streamflow is 152,222 af.[6] The maximum annual streamflow for the period of record was in 2005 at 1,255,484 af. The minimum annual streamflow for the period of record was in 2007 at 51,084 af.

Santa Clara River streamflow for water year 2011 at 33,044 af is 173 percent of the historical average streamflow from 1995 to 2011 of 19,065 af, and 388 percent of historical median stream flow from 1928 to 2011 of 8,510 af.[7]

Floodplain & Flood Hazards

Floodplain

Santa Paula has historically been susceptible to flood hazards because the City is located at the confluence of Santa Paula Creek and the Santa Clara River. Approximately half of the City is located in the 100-year floodplain of Santa Paula Creek.

As a result of the flooding in the late 1930s and early 1940s, the United States Congress authorized a flood-protection project on Santa Paula Creek in 1948. Over the decades that followed, a variety of flood-control strategies were proposed and funding was appropriated for the construction of infrastructure to provide regional flood hazard protection along Santa Paula Creek and its vicinity.

Beginning in 1990, the USACE, working with Ventura County and the City of Santa Paula, identified new channel improvements that would remove the concrete-lined section of the channel, construct short levees and floodwalls providing protection from the 100-year flood, accommodate the widening of the Santa Paula Branch Line railroad bridge, modify the channel at Telegraph Road, and construct a fish ladder at the northern edge of the improved section of the channel to facilitate fish migration. Channel modifications were completed in 1999, and the fish ladder construction was completed in the summer of 2002. These channel improvements were designed to provide protection for the 100-year flood event with a magnitude of 28,000 cfs and accumulation of 120,000 cubic yards of sediment (25 percent of the total 100-year flood event sediment volume of 480,000 cubic yards).

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6 United Water Conservation District, *2011 Santa Paula Basin Annual Report,* Professional Paper 2012-001 (September 2103), 7.

7 United Water Conservation District, *2011 Santa Paula Basin Annual Report* (September 2013), 7.

As shown in **Figure 4.9-2**, **Current FEMA Flood Insurance Map**, the western portion of the Specific Plan site located adjacent to Adams Creek is currently located within a FEMA-designated 100-year floodplain area, the result Adams Creek overtopping its banks during a 100-year storm event.[8] However, a review of historic flooding, existing contours, and site features concludes the Flood Zone limit shown on the FIRM maps is inaccurate.

4.9.1.2 Groundwater Resources

Santa Paula Basin

The Specific Plan lies within the Santa Paula Groundwater Basin (SPGWB). The SPGWB surface elevation ranges from 140 to 280 feet mean sea level (amsl), although the maximum drainage basin elevation reaches 2,750 feet amsl on Sulphur Mountain. The SPGWB covers an area of approximately 13,000 acres, extending 10 miles from northeast to southwest and 2 miles from northwest to southeast. Water-bearing geologic formations include Recent Alluvium, Older Alluvium and San Pedro Formation. Recent Alluvium consisting of sands and gravels occurs in the southern part of the SPGWB along the Santa Clara River and has a typical thickness of 60 to 80 feet. Older Alluvium lies beneath Recent Alluvium and is exposed at the surface in the north part of the SPGWB. The Older Alluvium has a typical thickness of approximately 200 feet. The upper part of the Older Alluvium is predominantly clay, whereas the lower part consists of gravel. The San Pedro Formation is of Pleistocene age, consisting of gravels, sands and clays, and extends as deep as 4,000 feet.[9]

The groundwater system is considered to be mostly confined to semiconfined, although areas of unconfined conditions exist in the Recent Alluvium. The average specific yield of the uppermost saturated zone has been estimated at 10 percent. The total groundwater storage capacity of the SPGWB has been estimated at 800,000 af, based on an area of 13,500 acres, an aquifer depth of 365 feet, and a specific yield of 15 percent.[10]

Regional groundwater flow in the SPGWB is generally northeast to southwest. Groundwater can move out of the SPGWB and into Mound Basin, located to the west, as underflow in the Recent Alluvium. The SPGWB is in hydraulic connection with and receives underflow from the up-gradient Fillmore Groundwater Basin (FGWB).

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8 A floodplain is the area adjacent to a watercourse or other body of water that is subject to recurring floods. Floodplains may change over time due to natural processes, changes in the characteristics of a watershed, or human activity, such as construction of bridges or channels. In areas where flow contains a high sediment load, such as along the Santa Clara River in Ventura County, the course of a river or stream may shift dramatically during a single flood event.

9 Panaro, D., Fox Canyon Groundwater Management Agency, written communication to R.R. Davis (DWRD), March 21, 2000.

10 Panaro, D., Fox Canyon Groundwater Management Agency, written communication to R.R. Davis (DWRD), March 21, 2000.

Groundwater recharge to the SPGWB occurs through stream flow percolation, rainfall percolation, and underflow from the FGWB. Most of the stream flow percolation occurs through the Santa Clara River and Santa Paula Creek, with minor contributions from other tributaries. Yield studies reported that during the period 1997 to 2003, estimated to be 21,612 afy,[11] and the safe yield appeared to be no less than 26,000 afy. These yield studies indicate the Basin was not in a state of overdraft.[12]

4.9.2 REGULATORY SETTING

A number of state and local plans and regulations, relating to parks and recreation, are applicable to the Project; they provide a regulatory framework for addressing all aspects of parks and recreational services that would be affected by implementation of the Project.

Federal Regulations, Plans, and Policies

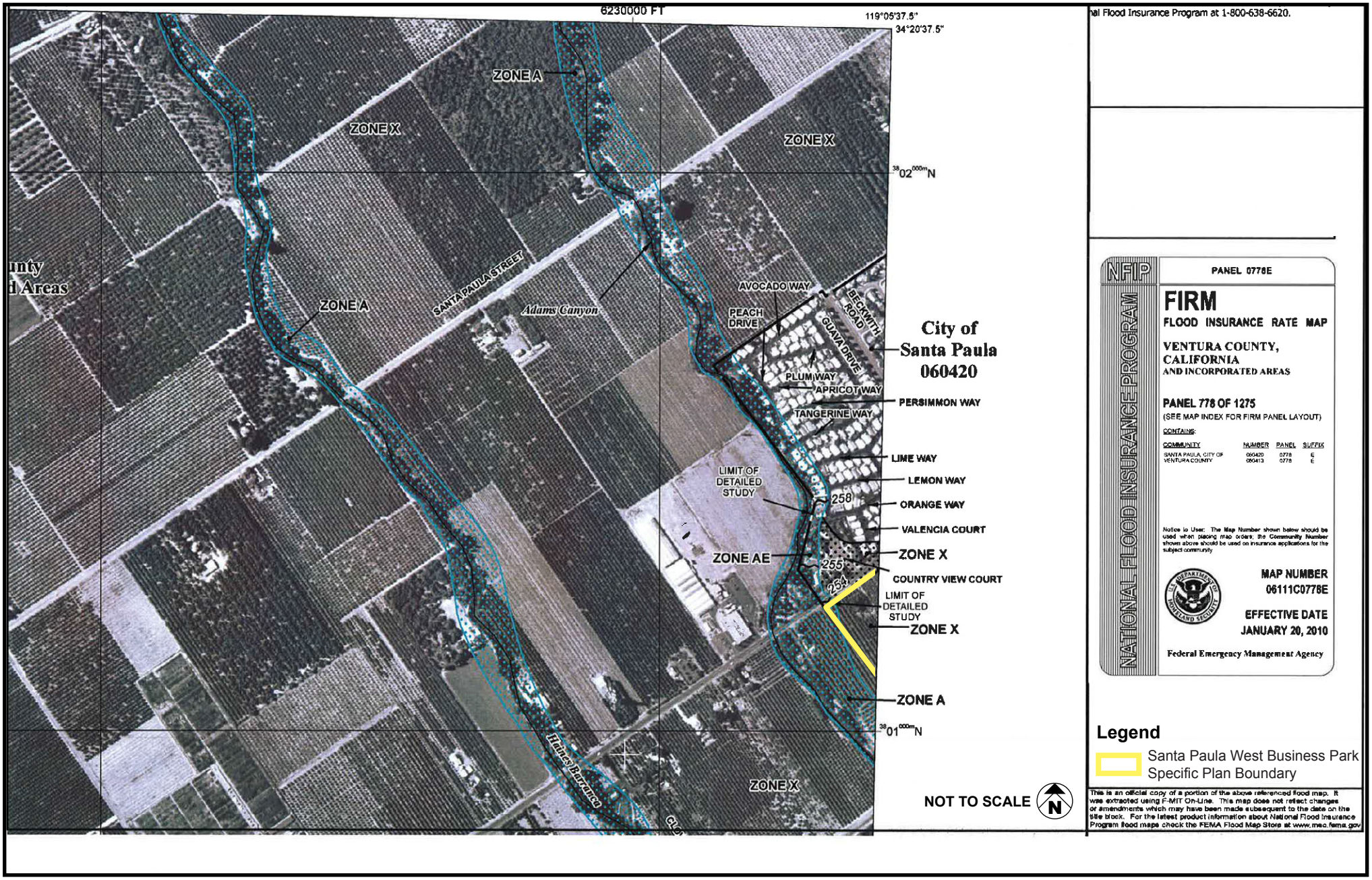
Federal Water Pollution Control Act

The federal Clean Water Act (CWA) is intended to restore and maintain the cleanliness of the nation's bodies of water to achieve a level of water quality that provides for recreation in and on the water and the propagation of fish and wildlife. Section 208 of the CWA and the requirements of the Code of Federal Regulations require local water management plans. Preparation of these water management plans is delegated to individual states by the US Environmental Protection Agency (USEPA), which is charged with implementing the CWA.

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. The water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA.

11 State of California, Resources Agency, Department of Water Resources, *California Groundwater,* Bulletin 118 Update 2003, (October 2003).

12 United Water Conservation District, *Piru and Fillmore Basins Annual Groundwater Conditions Report Water Year 2003*, (December 2004), 3.



SOURCE: Jensen Design & Survey, Inc., Preliminary Hydrology Report, Santa Paula West Business Park - 2011

FIGURE **4.9-2**

Meridian Consultants

Current FEMA Flood Insurance Map

050-002-13

National Pollutant Discharge Elimination System

In 1972, the Federal Water Pollution Control Act was amended to prohibit the discharge of pollutants to waters of the United States unless the discharge complies with the National Pollution Discharge Elimination System (NPDES) permit. The CWA was amended in 1987, adding Section 402(p) to provide a framework for regulating municipal and industrial stormwater discharges. In November 1990, the USEPA published final regulations that establish requirements for specific categories of industries, including construction projects that encompass greater than or equal to 5 acres of land. The Phase II Rule became final in December 1999, expanding regulated construction sites to those greater than or equal to 1 acre. The regulations require that stormwater and nonstormwater runoff associated with construction activity, which discharges either directly to surface waters or indirectly through municipal separate storm sewer systems (MS4), must be regulated by an NPDES permit.

The USEPA has delegated management of California's NPDES program to the State Water Resources Control Board (SWRCB) and the nine regional board offices; the Specific Plan is located within the Los Angeles Regional Water Quality Control Board (RWQCB), or Region 4.

Flood Plain Management Act

Executive Order 11988, also known as the Floodplain Management Act, requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.

Under this Order, the USACE takes action to avoid development in the base (100-year) floodplain unless it is the only practicable alternative; to reduce hazard and risk associated with floods; to minimize the impact of floods on human safety, health, and welfare; and to restore and preserve the natural and beneficial value of the base floodplain.

Flood Zone Identification

When a community participates in Federal Emergency Management Agency's (FEMA's) flood insurance program, all land is classified according to its flood risk. Risk is divided into three categories: high risk, moderate to low risk and undetermined risk. The definitions of each category are shown in **Table 4.9-4, Definitions of FEMA Flood Zone Designations.** High-risk areas have at least a 1 percent annual (100-year event) chance of flooding.

Table 4.9-4
Definitions of FEMA Flood Zone Designations

Zone	Description
Moderate- to Low-Risk Area Designations	
B and X (shaded)	Area of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods. Are also used to designate base floodplains of lesser hazards, such as areas protected by levees from 100-year flood, or shallow flooding areas with average depths of less than 1 foot or drainage areas less than 1 square mile.
C and X (unshaded)	Area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level.
High-Risk Area Designations	
A	Areas with a 1 percent annual chance of flooding and a 26 percent chance of flooding over the life of a 30-year mortgage. Because detailed analyses are not performed for such areas; no depths or base flood elevations are shown within these zones.
AE	The base floodplain where base flood elevations are provided. AE zones are now used on new format FIRMs instead of A1–A30 zones.
A1–A30	These are known as numbered A zones (e.g., A7 or A14). This is the base floodplain where the FIRM shows a BFE (old format).
AH	Areas with a 1 percent annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. Base flood elevations derived from detailed analyses are shown at selected intervals within these zones.
AH	Areas with a 1 percent annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. Base flood elevations derived from detailed analyses are shown at selected intervals within these zones.
AO	River or stream flood hazard areas, and areas with a 1 percent or greater chance of shallow flooding each year, usually in the form of sheet flow, with an average depth ranging from 1 to 3 feet. These areas have a 26 percent chance of flooding over the life of a 30-year mortgage. Average flood depths derived from detailed analyses are shown within these zones.
AR	Areas with a temporarily increased flood risk due to the building or restoration of a flood-control system (such as a levee or a dam). Mandatory flood insurance purchase requirements will apply, but rates will not exceed the rates for unnumbered A zones if the structure is built or restored in compliance with zone AR floodplain management regulations.
A99	Areas with a 1 percent annual chance of flooding that will be protected by a Federal flood-control system where construction has reached specified legal requirements. No depths or base flood elevations are shown within these zones.
Undetermined Risk Area	
D	Areas with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk.

Source: FEMA Map Center (2012). https://msc.fema.gov/webapp/wcs/stores/servlet/info?storeId=10001&catalogId=10001&langId=-1&content=floodZones&title=FEMA%2520Flood%2520Zone%2520Designations.

State Regulations, Plans, and Policies

California Water Quality Control Board

The State Water Resource Control Board (SWRCB) administers the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. To obtain coverage under this General Permit, parties discharging storm runoff are required to electronically file the permit registration documents (PRDs), which include a Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents required by this General Permit, and mail the appropriate permit fee to the SWRCB.

Los Angeles Regional Water Quality Control Board

The Specific Plan is located within the Los Angeles region, which is governed by the Los Angeles RWQCB, also known as Region 4. The Los Angeles RWQCB has jurisdiction over a majority of Ventura and Los Angeles Counties. The Los Angeles RWQCB has adopted a Water Quality Control Plan ("Basin Plan") to provide definitive guidelines and give direction to the scope of Los Angeles RWQCB activities that will optimize the beneficial uses of the state waters within the Los Angeles Basin by preserving and protecting the quality of these waters.

Local Regulations

Ventura County Watershed Protection District

The VCWPD provides for the control and conservation of flood- and stormwaters and for the protection of watercourses, watersheds, public highways, life, and property in the district from damage or destruction caused by these waters.

Various ordinances relating to the protection and regulation of flood-control facilities and watercourses provide the VCWPD authority and the requirement to obtain permits for any encroachment into VCWPD jurisdictional channels, including rights-of-way.

The Ventura County Stormwater Quality Management Plan defines the requirements of the Ventura County Municipal Storm Water NPDES Permit adopted by the Los Angeles RWQCB, pursuant to Division 7 of the California Water Code. Program elements included in the Stormwater Quality Management Plan (SQMP) include NPDES permit coverage and provisions, institutional arrangements, program structure, monitoring and reporting, fiscal resources, and legal authority. The Ventura County SQMP addresses specific stormwater pollution requirements for new developments.

Ventura County is subject to a Municipal Stormwater Permit No. CAS004002 for Stormwater (Wet-Weather) and Non-Stormwater (Dry-Weather) Discharges from the Municipal Separate Storm Sewer Systems.

In November 2012, the Los Angeles RWQCB adopted a new Municipal Stormwater Permit (Order No. R4-2012-0175) introducing new regulations including the new requirements for the non-stormwater discharge prohibition. The Ventura County Stormwater Quality Management (SWQM) Ordinance has updated its hydromodification manual to meet requirements of the new Municipal Stormwater Permit as required by the Los Angeles RWQCB.

City of Santa Paula

General Plan

Safety Element

The City of Santa Paula's Safety Element addresses safety issues with respect to Santa Paula. The Safety Element guides the City in planning for hazards, including flooding. The Safety Element defines goals, policies, and objectives to reduce risks from flood hazards and manage flood plains of the local water courses.

Conservation and Open Space Element

The Conservation and Open Space Element of the City's General Plan addresses conservation and open space issues, including hydrology and water resources. The purpose of the Conservation and Open Space Element is to maintain the overall quality of life for Santa Paula residents through the management and protection of natural resources and open space lands.

Urban Water Management Plan

The City of Santa Paula's 2010 Urban Water Management Plan Update (UWMP)[13] was prepared in compliance with California Water Code,[14] which requires urban water suppliers to prepare an UWMP to promote water conservation and efficient water use. The UWMP provides planning information on the reliability and future availability of the City's water supply. The 2010 UWMP Update is a public statement of the goals, objectives, and strategies needed to maintain a reliable water supply for the City's urban customers. This UWMP should be viewed as a long-term, general planning document, rather than as a policy for supply and demand management.

13 City of Santa Paula, *Final 2010 Urban Water Management Plan Update* (June 2011).
14 California Water Code, sec. 10610–10656.

4.9.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, the California Environmental Quality Act (CEQA) identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guidelines (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements?
- 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)?
- 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?
- 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?
- 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?
- Otherwise substantially degrade water quality?
- 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?
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- 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?
- Inundation by seiche, tsunami, or mudflow?

Methodology

The hydraulic modeling was prepared using USACE Hydrologic Engineering Center–River Analysis System (HEC-RAS) hydraulic modeling software. The existing conditions of the Santa Paula West Business Park Specific Plan were determined according to the VCWPD 2010 Hydrology Manual and the City of Santa Paula Master Plan for Drainage, and the County of Ventura Time of Concentration Calculator.

The watershed was subdivided into approximately 98 subareas ranging from 5.5 to 108 acres using Lidar topography. Ventura County standards prefer subareas to range from 40 to 80 acres, which applies to 84 percent of the subareas, but allow for an absolute maximum subarea of 120 acres. Each subarea was broken down into an overland flow path and a channel flow path to calculate the Time of Concentration.

The VCRat 2.6 program was used to calculate the 100-year peak flow rate and volume for the entire watershed area. Runoff hydrographs were computed within the model for each subarea, routed through a conveyance system and combined with other subarea hydrographs as the analysis proceeded downstream through the watershed.

An aerial reduction is a factor that account for the varying intensities over watersheds greater than 640 acres. Ventura County allows for an aerial reduction. Each confluence point has a differential aerial reduction factor due to the difference in contributing drainage areas.

The weighted average 100-year 24-hour rainfall values was calculated using GIS, which was then used to calculate the fattening factor. The fattening factor was used to provide more accurate volumes of each watershed location. The composite soil type for each basing was converted to the corresponding NRCS hydrologic soil group (Group C) and appropriate curve numbers were calculated on the basis of land use, vegetation type, and soil condition.

4.9.4 PROJECT IMPACTS

Threshold: Violate any water quality standards or waste discharge requirements?

Water quality standards are attained when designated beneficial uses are achieved and water quality objectives are being met. Beneficial uses include drinking, swimming, industrial, and agricultural water supply, and the support of fresh and saline aquatic habitats.

The Specific Plan area is currently in agriculture use. Potential impacts from development of the Specific Plan include an increase of impervious surfaces, which will increase the amount of surface runoff generated from the Project Site. Paved areas and streets will collect dust, soil, and other impurities that will then be assimilated into surface runoff during rainfall events. Pollutants such as trash and debris, oil and grease, metals, sediment, pathogens, organic compounds, nutrients, pesticides, and oxygen-demanding substances can be expected to be present in surface water runoff once Project development occurs. Best Management Practices (BMPs) have been designed to address the POCs. Water quality features designed into the Specific Plan follow the BMPs listed in the Ventura County Stormwater Quality Urban Impact Mitigation Plan (SQUIMP). Water quality treatment will either be flow based, volume based, or a combination of the two according to SQUIMP guidelines.

Construction

Development of the Specific Plan would involve construction activities over an estimated 2.5-year period. Proposed grading and construction activities would involve earth movement and the use of heavy equipment. Peak stormwater runoff could result in short-term sheet erosion with areas of exposed or stockpiled soils. Additionally, the compaction of soils by heavy equipment may reduce the infiltration capacity of soils and increase runoff and erosion potential. Given the above, pollutants such as soil, sediments, and other substances associated with construction activities (e.g. oil, gasoline, grease, and surface litter) could be present in stormwater runoff from the site.

To reduce the discharge of pollutants during construction of the proposed development, a site-specific SWPPP would be developed in accordance with the NPDES Program General permit authorized under the Clean Water Act for Construction Activities. The General Permit[15] requires the development and implementation of a site-specific SWPPP to identify an effective combination of erosion and sediment control BMPs to minimize or eliminate the discharge of pollutants into receiving waters. In addition, BMPs for managing sources of nonstormwater discharges and waste are required to be identified in the SWPPP. Examples of construction BMPs include silt, fencing, gravel bag berms, fiber rolls, and street sweeping. In addition, the SWPPP is required to identify postconstruction BMPs, which are permanent features maintained in perpetuity by the owner, developer, or building occupant.

Through compliance with the SWRCB and USEPA permits and SWPPP requirements, potential impacts to water quality during Project construction would be less than significant.

Operation

The development of the Project would increase the number of impervious surfaces on the Project Site, which has the potential to increase runoff within the Project Site. Bioswales would be designed in various parking landscape areas to provide cleansing of stormwater runoff prior to discharge into Adams Barranca and Santa Clara River. Biofilter inserts would be used in curb inlets to capture oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens. In addition, storm drain inlets and catch basins would have proper signage and stenciling to discourage illegal dumping. Filters and signage would be checked and/or replaced annually.

Two surface detention basins would be located at the center of the Project Site north of the railroad and north of the highway, respectively. An underground basin would be located east of Beckwith Drive, north of the highway. Flow rates through the basin will be reduced because of the plants inundated in the stormwater to allow for contact time with the vegetation, which will maximize infiltration and sediment

15 State Water Resources Control Board Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction Activity (General Permit).

settling and reduce flows. The final sizing of the detention basins and landscape areas would be provided with the Tentative Map design.

Overall, the BMPs and the project design features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all applicable federal, state, and local water quality rules and regulations to effectively minimize the Project's impact on water quality. Accordingly, impacts would be less than significant.

Threshold: **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)?**

The Santa Paula Basin is primarily recharged through subsurface flows of the Santa Clara River, Santa Paula Creek, and other minor tributary streams, as well as subsurface flow from the Fillmore Basin.[16] Some of the surface flow in the Santa Clara River originates as release from Lake Piru and contains natural runoff of precipitation and imported State Water Project water.[17] Percolation of precipitation and unused irrigation waters provides additional recharge. Groundwater in the Santa Paula Basin generally flows toward the southwest.[18]

The Specific Plan area is currently served by existing groundwater wells. No new groundwater wells are proposed as part of the Project. The area served by existing groundwater wells will be removed from well water and replaced by water from the City's municipal water system.

Based on the above, the Project will not result in a significant new demand for water and will not substantially deplete groundwater supplies. In addition, the Specific Plan would incorporate design features such as bioswales, bioretention cells, infiltration trenches and permeable pavement to allow surface water runoff percolation. Therefore, the Specific Plan would not substantially interfere with groundwater recharge. There will be no substantial impact to local groundwater recharge. Therefore, impacts would be less than significant.

16 State of California, Resources Agency, Department of Water Resources, *California Groundwater* (October 2003).
17 United Water Conservation District, Surface and Groundwater Conditions Report, Water Year 2000 Supplement.
18 State of California, Resources Agency, Department of Water Resources, *California Groundwater* (October 2003).

Threshold: **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?**

Construction

Site-clearing and grading operations have the greatest potential for discharging sediment downstream during storm events. As discussed above, construction and grading activities would involve earth movement and the use of heavy equipment. Peak stormwater runoff could result in short-term sheet erosion with areas of exposed or stockpiled soils. Additionally, the compaction of soils by heavy equipment may reduce the infiltration capacity of soils and increase and runoff and erosion potential.

The Project would be required to develop a site-specific SWPPP in accordance with the NPDES Program General permits authorized under the Clean Water Act for Construction Activities. Adherence to the SWPPP and implementation of standard BMPs during construction would reduce the potential for increased siltation, erosion, and hazardous material spills. Through compliance with the SWPPP and standard BMPs, potential erosion and siltation, potential impacts will be less than significant.

Post Development

The operation of the Specific Plan will contain a number of features to reduce the amount of runoff that will occur within the Specific Plan area, and limit the amount and rate of surface water flow downstream of the Specific Plan. The Specific Plan would include open space and landscaped areas, pervious concrete and asphalt paving, and the Project-related water quality design features (e.g., detention basins). The detention basins will be sized to treat 10 percent of the 50-year storm event from the storm drain, consistent with the Ventura County SQUIMP guidelines. The detention basins would significantly reduce peak runoffs downstream by storing the peak-event flows and delaying their release until after the peak storm event. One acre of land within the Specific Plan boundary has been set aside for detention basins totaling approximately 6 af in volume for detention and retention requirements. In addition, the Specific Plan will implement the use of bioswales to collect and filter water runoff and the use of infiltration/sedimentation basins to allow for infiltration and sediment settling.

As shown in **Figure 4.9-3, Conceptual Grading & Drainage Plan**, storm drain facilities would be sized to meet City of Santa Paula standards and accommodate the increased runoff generated by the increase in impervious surfaces. The storm drain system would collect onsite runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. The existing SR 126 culverts are exposed, but once the site is elevated by fill, the pipes would be underground and integrated into the new storm drain system. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. Therefore, potential impacts are considered less than significant.

Threshold: **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?**

As mentioned previously, the Specific Plan would not substantially alter drainage patterns within the Project area. The Specific Plan would provide future development in accordance with proposed land use designations for the Specific Plan area. Given that the Specific Plan area consists of undeveloped agricultural land, development would result in an increase in the rate and amount of surface runoff generated by the Specific Plan Area.

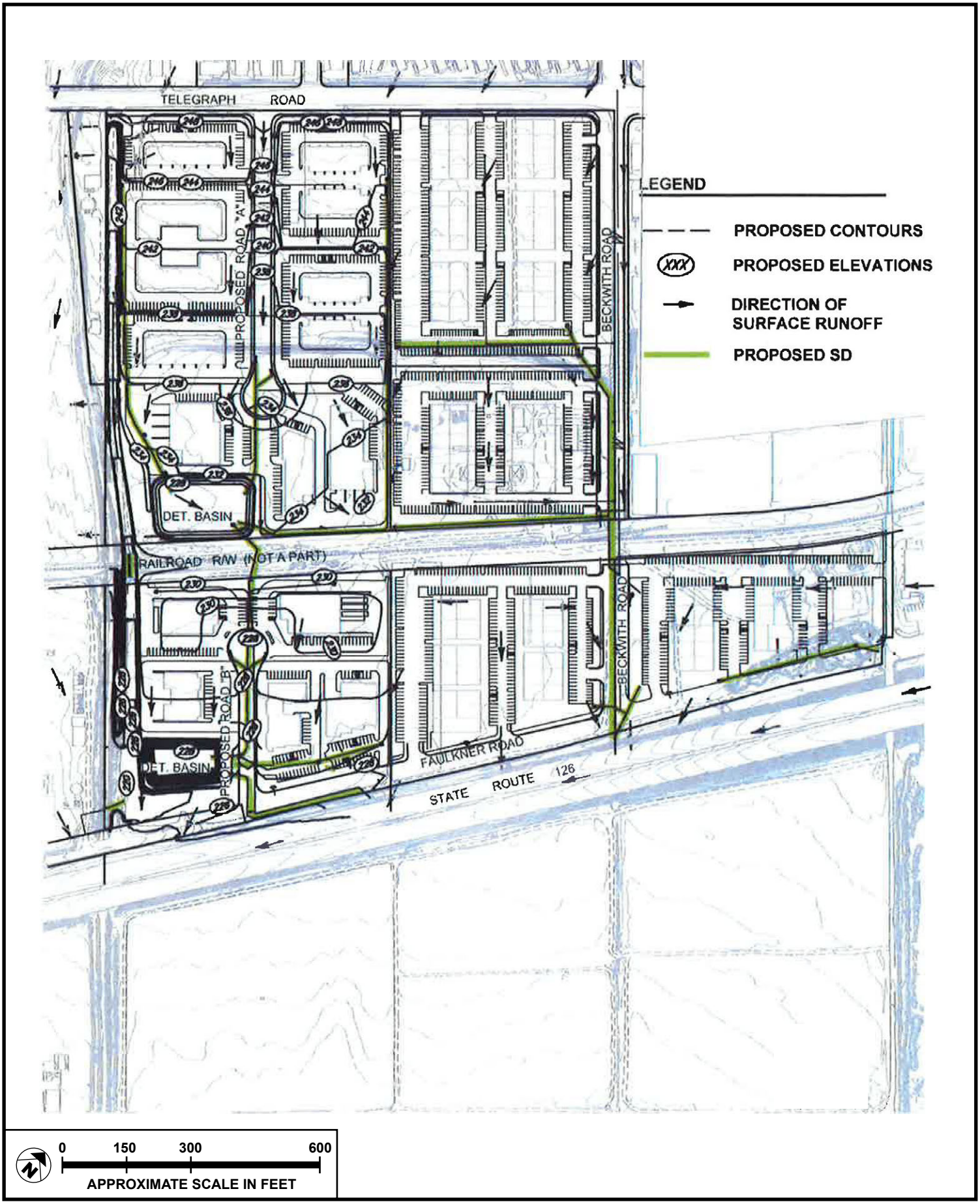
Detention basins would significantly reduce peak runoffs downstream by storing the peak storm event flows and delaying their release after the peak storm has passed. To accomplish this design, 1 acre of land within the Specific Plan boundary has been set aside for detention basins totaling approximately 6 af in volume for detention and retention requirements.

In addition, as shown in **Figure 4.9-4, Storm Drain Plan,** the storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. Therefore, impacts are considered less than significant.

Threshold: **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?**

The Project incorporates detention basins sized to treat 10 percent of the Q50 (50-year storm event) from the storm drain system consistent with the Ventura County SQUIMP guidelines. The slopes of the detention basins will be planted with various plant species, as outlined in the County of Ventura Technical Guidance Manual. As stormwater flows increase, and plants are inundated with stormwater, the flow rate would be reduced through the basin to allow contact with the vegetation. In addition, these detention basins would significantly reduce peak runoffs downstream by storing the peak event flows and delaying their release after the peak storm event. These improvements would adequately mitigate any increase in stormwater peak flows and/or volumes and would not result in on-site flooding or cause impacts related to water quality.

In addition, storm drain facilities would be sized to meet City of Santa Paula standards and accommodate the increased runoff generated by the increase in impervious surfaces, as shown in **Figure 4.9-4.** Currently, there are four storm drain culverts under SR 126, all varying in size.



SOURCE: Jensen Design and Survey – October 2016

FIGURE **4.9-3**

Meridian Consultants

Conceptual Grading and Drainage Plan

050-002-13

0 150 300 600
APPROXIMATE SCALE IN FEET

SOURCE: Jensen Design and Survey – October 2016

FIGURE **4.9-4**

Meridian Consultants

Storm Drain Plan

050-002-13

Years of sedimentation in these culverts have caused the water to pond on site. The proposed detention basins would be incorporated into the underground storm drain system, preventing any sedimentation to occur. Consequently, impacts related to water quality would be less than significant.

Threshold: Otherwise substantially degrade water quality?

As discussed above, to reduce the discharge of expected pollutants during grading and other construction activities, such as sediment into receiving waters during construction, the Project Applicant will be required to prepare a SWPPP consistent with the Ventura County NPDES permit and the Technical Guidance Manual for Storm Water Quality Control Measures to minimize or eliminate the discharge of pollutants into receiving waters. In addition, the project would utilize BMPs, including bioswales, detention basins, and storm drain systems. The bioswales would be used to mitigate concentration of nutrients through contact with vegetation and cleanse storm runoff before discharge into the five outlet points, which include Adams Canyon, the Todd Lane Drain (Pipe 9) and the three existing culvert locations under SR 126 (pipes 2,5, and 8). The design features would comply with all NPDES permit requirements and no significant impacts to water quality will result.

Threshold: 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?

The western portion of the site is designated as Flood Zone A, whereas the rest of the site is designated as Zone X. However, the Specific Plan would not introduce new housing into the area. Therefore, impacts would be considered less than significant.

Threshold: Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Development projects can have a major effect, which can be either positive or negative, on flood problems.[19] Properly designed projects can solve existing problems to the benefit of the general public. Poorly designed projects, on the other hand, can cause new problems where none previously existed. Some flood-control projects can be constructed in conjunction with land development to the benefit of the general public.

Currently there are four storm drain culverts under SR 126, all varying in size. Stormwater runoff drains towards these culverts with the intention of crossing under SR 126; however, years of sedimentation in these culverts have caused the water to pond onsite. In some cases, the water ponds high enough to flow

19 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998), p. CO-27.

east into the Todd Lane Drain. The proposed improvements, including the installation of detention basins, would prevent possible sedimentation blocking SR 126.

Adams Creek runs along the western edge of the proposed Project area. As shown in **Figure 4.9-2**, the western portion of the site is designated as Flood Zone A due to inaccurate determination of current existing conditions, due to Adams Creek overtopping its banks during a 100-year storm event. This flooding is cause by lack of capacity within the channel, lack of capacity at the SR 126 undercrossing, and debris issues at the Railroad Bridge. The Project design proposes an adjacent and parallel trapezoidal channel approximately 6 feet in depth, with a 15-foot bottom width and 2:1 side slopes, that would accommodate floodwaters in a large storm event, protect the buildings on site, and remove a portion of the property from the floodplain through a LOMR (Letter of Map Revision) with FEMA. The new channel would join with the existing Adams Barranca at the railroad crossing and the SR 126 crossing.

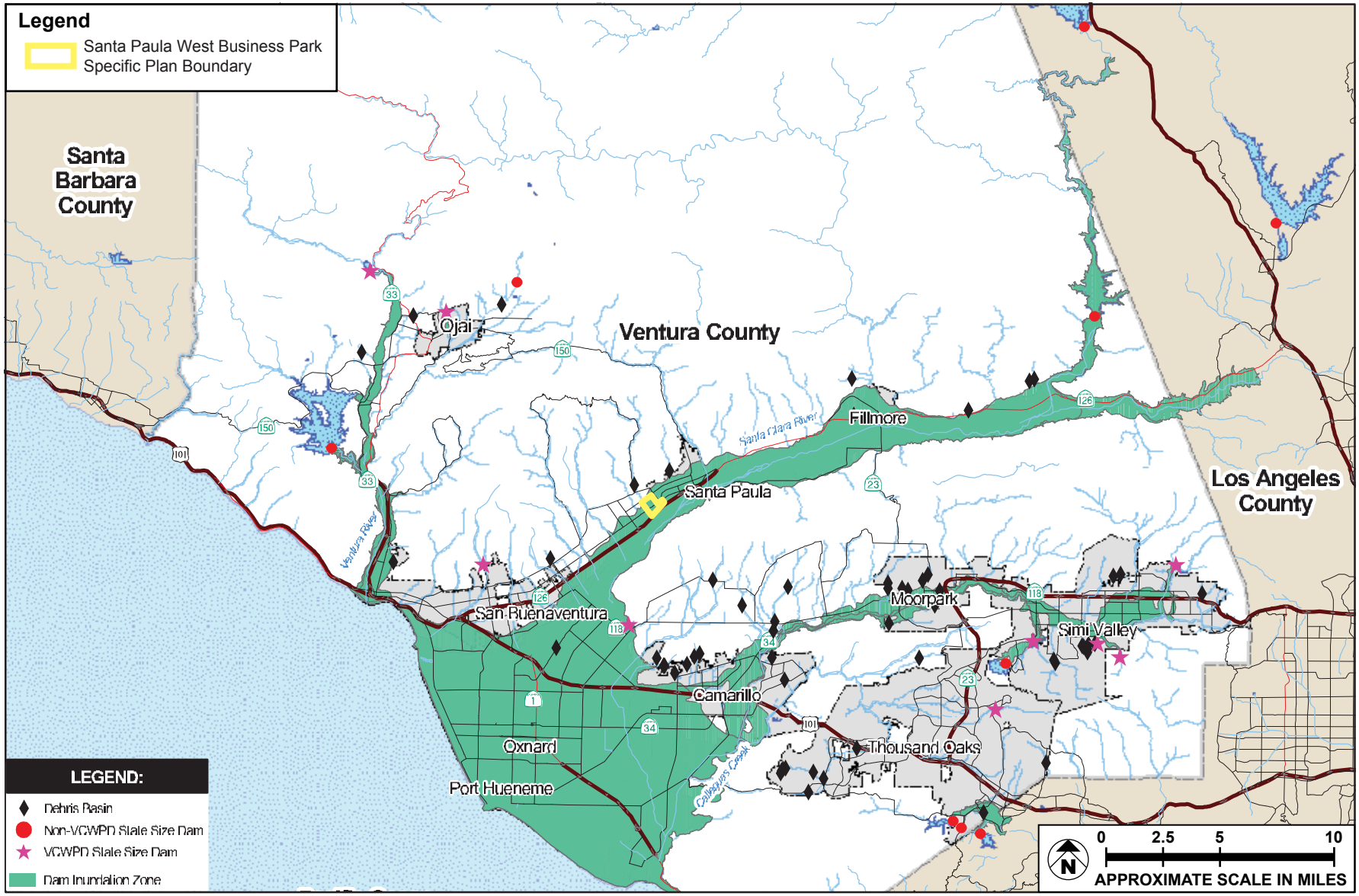
The new channel design would have the capacity to handle flows that overtop the bank on the east side and the water that ponds due to the undersized culvert at SR 126. A geotextile would be used in the channel to stabilize the soil for high velocities. Accordingly, impacts would be less than significant.

Threshold: **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?**

Failure of any of the upstream dams could have significant and/or disastrous inundation impact on the City of Santa Paula.[20] Based on the City of Santa Paula General Safety Plan, at least four dams northeast of the Santa Paula area have the potential to result in dam inundation to the City or surrounding environments: Lake Pyramid Dam, Lake Castaic Dam, Bouquet Canyon Dam, and Santa Felicia (Lake Piru).

The Specific Plan area is located within a dam failure hazard area,[21] as shown in **Figure 4.9-5, Ventura County Dam Failure Hazard Profile.** However, as noted in the Ventura County Multi-Jurisdictional Hazard Mitigation Plan,[22] to cause a significant flood, dam failure would have to occur during extreme storm events that cause inflow to the basin above the outlet capacity.

20 City of Santa Paula, *General Plan,* "Safety Element" (1998), p. S-15.
21 Ventura County, *Multi-Jurisdictional Hazard Mitigation Plan for Ventura County, California* (March 2005), Fig. 4-3.
22 Ventura County, *Multi-Jurisdictional Hazard Mitigation Plan* (March 2005), p. 4-21.



SOURCE: Ventura County Multi-Jurisdictional Hazard Mitigation Plan, 2005, Figure 4-3

FIGURE **4.9-5**

Meridian Consultants

Ventura County Dam Failure Hazard Profile

050-002-13

In addition, the Conservation and Open Space Element notes that flooding from a dam failure is also a possibility in Santa Paula.[23] Should one of the large dams fail suddenly, the City would have less than 2 hours' warning, in which time two-thirds to three-quarters of the population must be evacuated.

The Ventura County Multi-Jurisdictional Hazard Mitigation Plan identifies mitigation goals to reduce the possibility of damage due to dam failure. Mitigation goals are defined as general guidelines of goals to be achieved in terms of hazard and loss prevention.

The Specific Plan does not propose any residential land uses. Therefore, no new residential uses would be located in the hazard zone. As such, impacts would be less than significant.

Threshold: Inundation by seiche, tsunami, or mudflow?

The Project Site is approximately 12 miles inland from the Pacific Ocean and is approximately 230 to 350 feet amsl. There are no lakes, ponds, or dams adjacent to the Project Site. Therefore, the risk that the Project Site would be inundated by a seiche is considered negligible, and. impacts associated with tsunamis or seiches would be less than significant.

The Adams Barranca drainages adjacent to the Project Site are unimproved and have the potential for mud and debris flow and is designated as a High Post-Fire Debris Flow Hazard area. The proposed parallel channel and debris basin are incorporated into plans to improving the Adams Barranca. In addition, no on-site stormwater would be directed to the Adams Barranca. Therefore, impacts associated with mudflows would be less than significant.

4.9.5 CUMULATIVE IMPACTS

The cumulative impact analysis in this Section considers related development projects in the area. With regard to water quality, the related projects would be required to comply with the NPDES General Construction Permit, including implementation of a site-specific SWPPP, to prevent polluted runoff from entering local stormwater drainage systems during construction activities. Additionally, each related project would be subject to NPDES requirements and applicable SPMC requirements. Given that each related project would be required to comply with NPDES requirements and local regulations designed to prevent polluted runoff from entering local storm drain systems and receiving water bodies during construction and after development, the cumulative impact to water quality would be less than significant. Furthermore, in compliance with NPDES, the cumulative impact related to erosion and siltation would also be less than significant.

23 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998). CO-27.

The proposed development, in combination with other long-term cumulative development in the Santa Clara River watershed, would generally increase impermeable surface area throughout the watershed. Increased irrigation as the watershed builds out would further increase the overall volume of surface runoff as well as the low flow rate during the dry season. However, implementation of applicable City requirements, including the standards of the Ventura County SQUIMP, on all new development within the watershed would reduce cumulative impacts to area hydrology to a less than significant level. With the implementation of project features such as detention basins, the drainage system for the development site would function to release increased stormwater flows in a nonerosive manner ahead of upper watershed peak flows, thereby minimizing effects to downstream areas. Thus, development buildout would not contribute to increased cumulative flooding potential.

Section 4.14, Utilities and Service Systems, includes a detailed analysis of the water demand associated with the related projects and the effect on groundwater supply and recharge. As discussed, the Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume of the local groundwater table level. Development projects, including commercial, industrial, and residential, individually and cumulatively will create more impervious surfaces, thus reducing the total groundwater recharge area. However, projects located within the local watershed also have the possibility of adding to the local groundwater basin through the addition of imported and/or recycled water. The water used for irrigation could offset the difference in the reduction of groundwater recharge area to rainfall-related recharge that occurs today.

4.9.6 MITIGATION MEASURES

Potential impacts will be less than significant, and no mitigation measures are required.

4.9.7 RESIDUAL IMPACTS AFTER MITIGATION

Impacts are less than significant.

4.10 LAND USE AND PLANNING

This section describes existing and planned land use conditions within the Santa Paula West Business Park Specific Plan ("Specific Plan"), along with applicable local, county, and regional plans and policies that regulate or guide the uses of land in the Project area. Potential land use impacts are examined with respect to whether development under the Project would physically divide an existing community; would conflict with exiting land use in the surrounding area; is consistent with applicable land use plans and policies; or would conflict with any habitat conservation or natural community conservation plans. Information presented in this section is primarily derived from the City of Santa Paula General Plan and the General Plan Environmental Impact Report (EIR; February 1998), Santa Paula Municipal Code (SPMC), the proposed Santa Paula West Business Park Specific Plan (August 2014, amended October 2016), the County of Ventura General Plan (October 2013), and the Non-Coastal Zoning Ordinance (March 2014).

4.10.1 EXISTING CONDITIONS

The City of Santa Paula is a relatively compact community. Located between State Route (SR) 126 and Telegraph Road on the western portion of the City, the Santa Paula West Business Park Specific Plan area is within West Area 2, which is recognized in the Santa Paula General Plan as one of four potential expansion areas for Santa Paula.

SR 126 provides regional access to the City of Santa Paula, as well as to the Project site. On-site circulation is currently provided by a series of unpaved roads, which provide access to the existing agricultural operations. To the north of SR 126, access is provided by Telegraph Road. Additional access is provided by Beckwith Road along the east boundary. The Ventura County Transportation Commission (VCTC) railroad right-of-way, containing railway tracks, bisects the Project Site. The west boundary is approximately bounded by the lower reaches of Adams Barranca, an improved channel that runs generally north–south.

On-Site Uses

The Project Site comprises 53.81 acres and consists of relatively undeveloped land that is currently used for agricultural production. While the Project Site is directly west of the City's limit, it is within the City's Sphere of Influence (SOI) and City Urban Restriction Boundary (CURB). The Project Site is not located within the boundaries of the Santa Paula–Ventura Greenbelt, as amended in February 2006 by Ventura County Ordinance No. 4338.[1]

On-site uses primarily include agricultural operations consisting of orchards, row crops, and a limited amount of livestock. There are also two single-family residences: one located in the northwest corner of

1 Ventura County Board of Supervisors, Ordinance No. 4338 (February 2006).

the Project Site where Telegraph Road crosses Adams Barranca, and a farmworker housing unit located within these agricultural operations, near Beckwith Road. The Project Site is currently farmed by two organizations, Bender Farms and McGrath Farms. Bender Farms grows avocados on approximately 9.2 acres of land in the northeastern portion of the site and herbs on approximately 12.3 acres within the southeastern portion of the site. Approximately 4.5 acres of the Bender Farms portion of the Project Site consists of agricultural operations maintenance equipment storage facilities, offices, and other ancillary uses, such as packing facilities and related farming materials. McGrath Farms grows a variety of row crops on approximately 27.5 acres of land that make up roughly the western half of the Project Site.

Surrounding Land Uses

Figure 4.10-1, Existing Surrounding Land Uses, provides an aerial photograph of the Project Site and labels of the predominant surrounding land uses. Opposite the Project Site, along Telegraph Road to the north, are primarily single-family residences accessed from Country View Court, as well as a mobile home park accessed from Valencia Way.

The southern portion of the Project Site, which consists of agricultural uses, is bound by SR 126. These agricultural uses contain various row crops, avocados, and citrus. A limited number of single-family residential units lie within some of the agricultural properties.

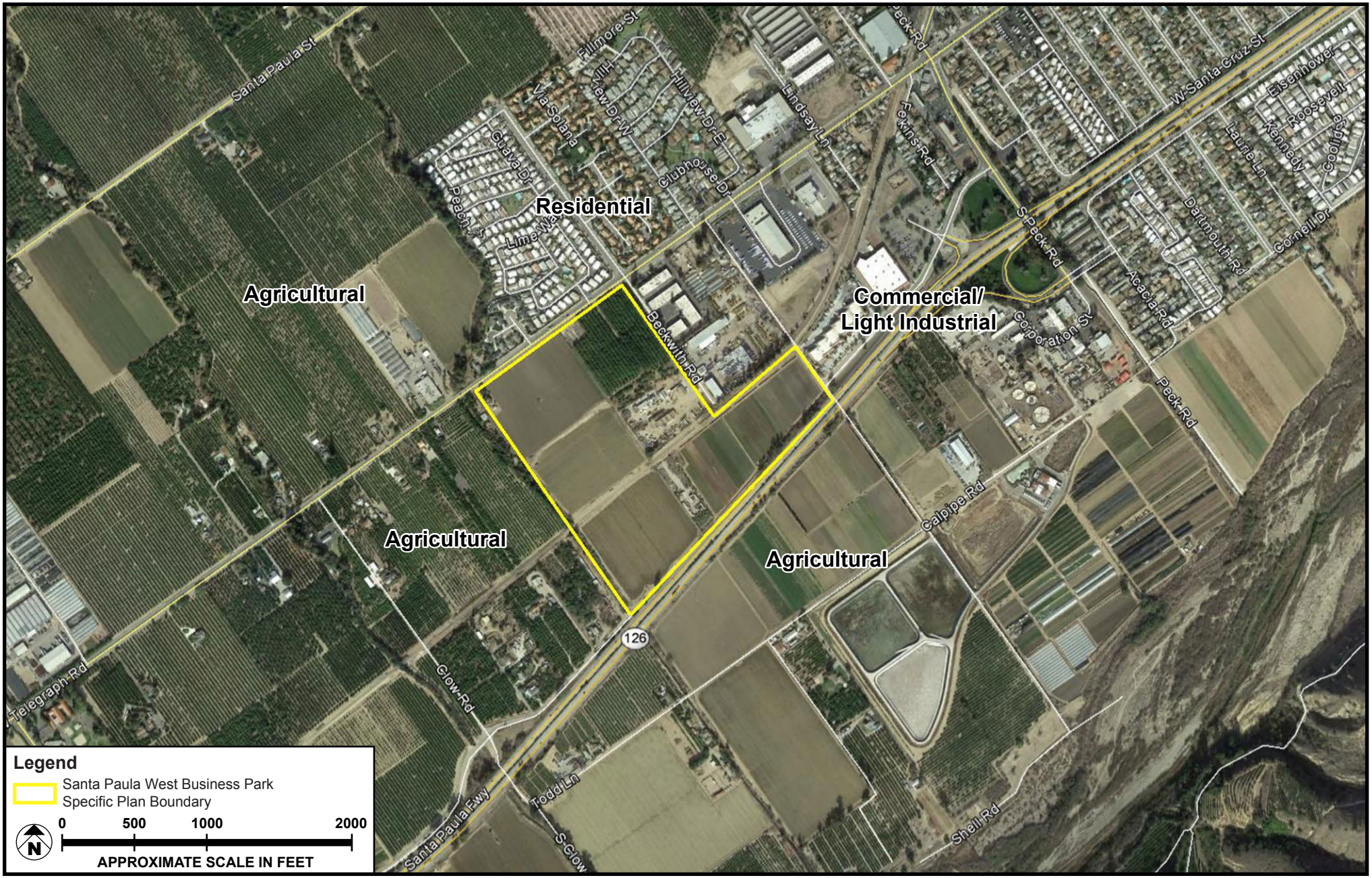
To the east, opposite the Project Site along Beckwith Road, are light industrial uses to the east, including offices, warehouse buildings, construction equipment storage, and maintenance facilities.

The Adams Barranca is located adjacent to the western boundary of the Project Site. Agricultural uses and limited single-family residences, consisting of orchards and limited amount of livestock, are located immediately west of the Adams Barranca.

General Plan and Zoning Designations

Ventura County

In the area of the Project, the Ventura County General Plan defines six land use designations: Agriculture, Open Space, Rural, Existing Community, State or Federal Facility, and Urban. As shown in **Figure 4.10-2**, **Existing Ventura County General Plan Land Use Designations,** the County designates the Project Site for Agricultural–Urban Reserve uses. **Table 4.10-1, Existing Ventura County General Plan and Non-Coastal Zoning Designations,** shows each of the five assessor's parcel numbers (APNs) that compose the Project Site is designated as Agriculture–Urban Reserve (40-acre minimum) by the County's General Plan, and Agriculture Exclusive (AE) by the Non-Coastal Zoning Ordinance.



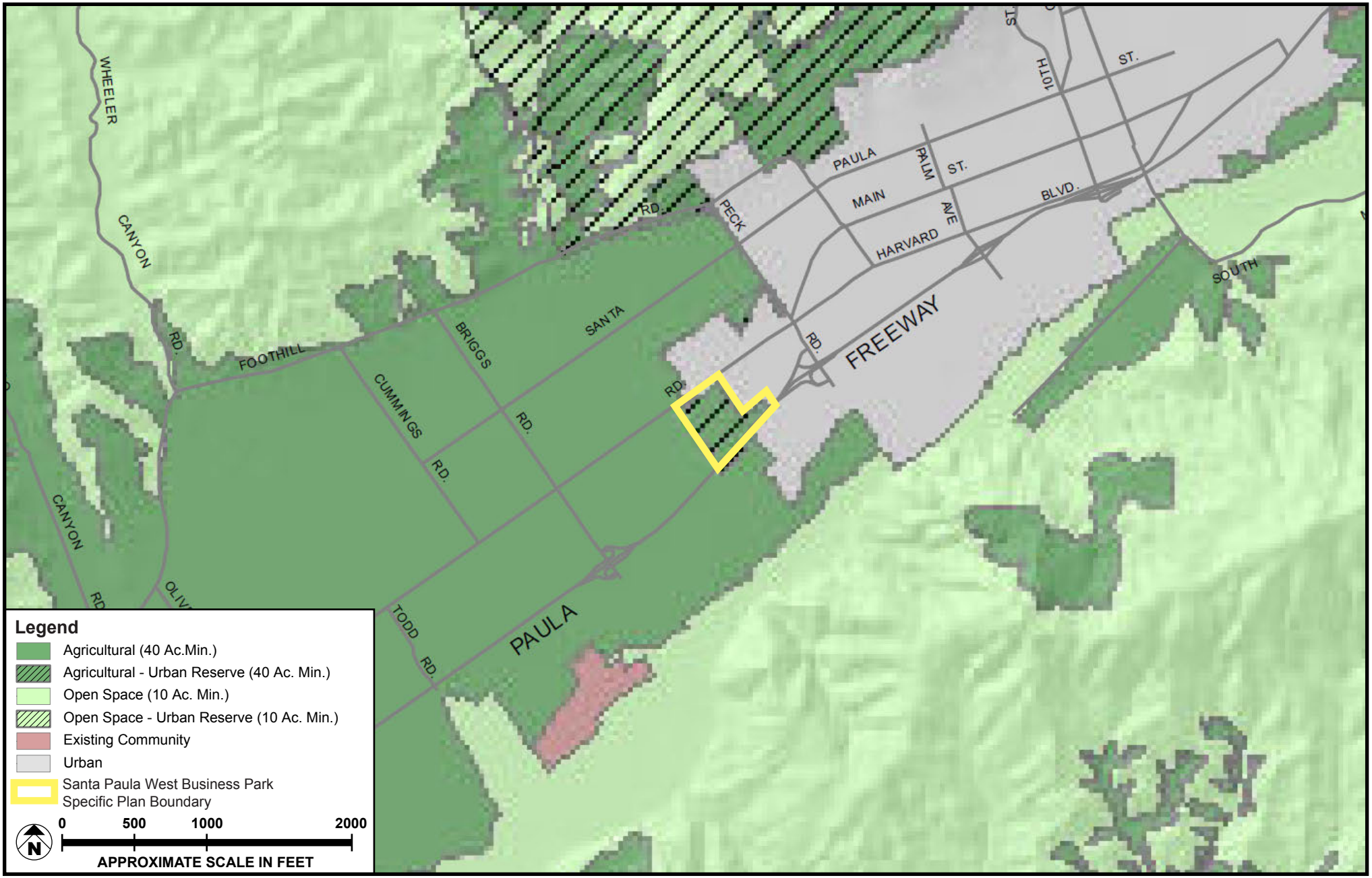
SOURCE: Google Earth - 2014; Meridian Consultants, LLC - 2014

FIGURE **4.10-1**

Meridian Consultants

Existing Surrounding Land Uses

050-002-13



SOURCE: Ventura County General Plan, Land Use Map (South Half) - 2013

FIGURE **4.10-2**

Meridian Consultants

Existing Ventura County General Plan Designations

050-002-13

Table 4-10-1
Existing Ventura County General Plan and Non-Coastal Zoning Designations

Assessor Parcel Number (APN)	General Plan Land Use Designation	Non-Coastal Zoning Ordinance Designation (Minimum Lot Area)
098-0-010-15	Agriculture–Urban Reserve	AE (40-acre minimum)
098-0-010-16	Agriculture–Urban Reserve	AE (40-acre minimum)
098-0-010-18	Agriculture–Urban Reserve	AE (40-acre minimum)
098-0-010-19	Agriculture–Urban Reserve	AE (40-acre minimum)
098-0-020-04	Agriculture–Urban Reserve	AE (40-acre minimum)

Source: County of Ventura General Plan, (2013) & County of Ventura Non-Coastal Zoning Ordinance (2014).
AE = Agriculture Exclusive

The General Plan's Agricultural land use designation is applied to all unincorporated land within a City's adopted Sphere of Influence (SOI).[2] The purpose of the AE zone, as designated by the Non-Coastal Zoning Ordinance, is to preserve and protect commercial agriculture lands as a limited and irreplaceable resource; to preserve and maintain agriculture as a major industry in Ventura County; and to protect these areas from the encroachment of nonrelated uses which, by their nature, would have detrimental effects upon the agriculture industry.[3]

Furthermore, as shown in **Figure 4.10-2,** the surrounding lands to the north (beyond the City limits), south, and west of the Project Site are designated by the County of Ventura General Plan as Agricultural with the zoning designation of AE, similar to County land use designations for the Project Site. Areas immediately east of the Project Site and along portions of the northern and southern boundaries are designated as Urban and are within the City limits of Santa Paula.

City of Santa Paula

The Santa Paula General Plan, which was adopted in 1998, serves as the long-term planning document of the community's vision for development to 2020. As identified in **Table 4.10-2, City of Santa Paula General Plan Expansion and Planning Areas**, the General Plan identifies the four expansion areas which are currently located outside of the City's limits, but which are planned for future annexation.

2 County of Ventura, *General Plan,* "Goals, Policies, and Programs" (October 2013).

3 County of Ventura, *Non-Coastal Zoning Ordinance,* "Article 4: Purposes of Zones," (March 2014).

Table 4.10-2
City of Santa Paula General Plan Expansion and Planning Areas

Expansion Area	1998 General Plan Acreage
Adams Canyon	5,413 acres
Fagan Canyon	2,173 acres
West Area 2[1]	125 acres
South Mountain	1,292 acres
Planning Area	**General Plan Acreage**
East Area 2	26 acres

Source: City of Santa Paula, General Plan, "Land Use Element" (2013).
[1] *Expansion Area includes the Santa Paula West Business Park Specific Plan*

The Project Site is identified in the General Plan as a part of the West Area 2 Expansion Area. As shown in **Figure 4.10-3, Existing City of Santa Paula General Plan Designations,** the City's General Plan Land Use Element currently designates the Project Site for Mixed-Use Commercial/Light Industrial uses. The General Plan allows for the buildout of this expansion area's 125 acres of 1,905,750 square feet with a floor-area-ratio (FAR) of 0.35.[4] The zoning surrounding the Project Site is Mobile Home Park (MHP) to the north and Commercial–Light Industrial (C-LI) and Highway Commercial (C-H) to the east, as illustrated in **Figure 4.10-3.**

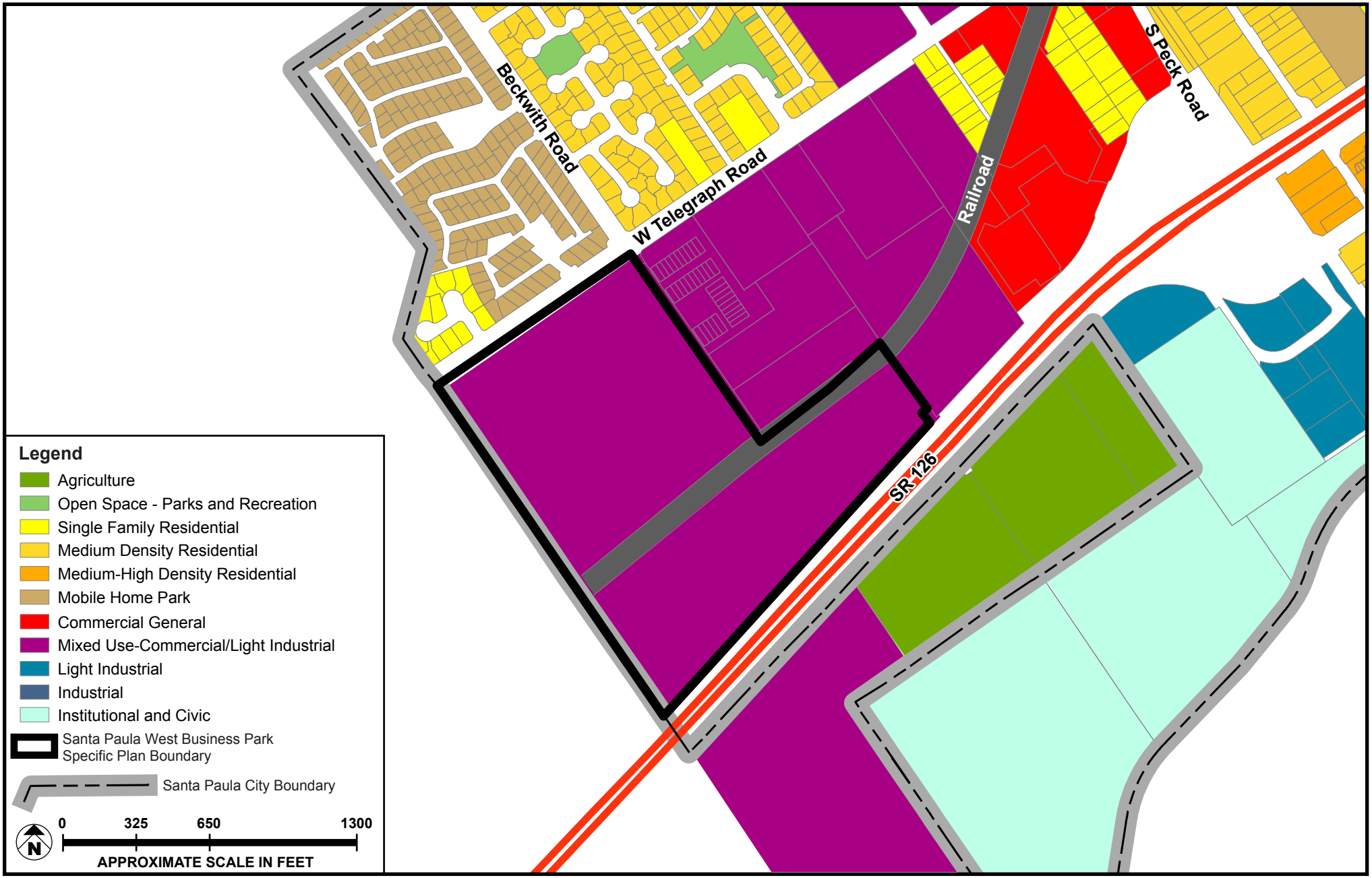
The expansion areas are shown in **Figure 4.10-4, City of Santa Paula General Plan Expansion Areas, Planning Areas, and Sphere of Influence.** The General Plan provides for urbanization and development within these five expansion and planning areas, with the exception of the South Mountain Expansion Area, which is planned for open space and recreational land uses.[5]

Chapter 16.21 of the SPMC establishes standards for the City's industrial zones to ensure compatibility between manufacturing/industrial uses and other surrounding land uses. The C-LI zoning designation allows for heavy commercial uses that may involve outdoor storage activity and low-intensity industrial businesses, including small-scale manufacturing, warehousing, and storage. The West Area 2 Expansion Area, which contains the Project Site, is designated on the City's zoning map as Specific Plan Overlay 6 (SP-6).[6] The SP-6 zone would be designated for C-LI land uses and would comply with the development standards established in Chapter 16.21 of the SPMC.

4 City of Santa Paula, *General Plan,* "Land Use Element" (2013).

5 City of Santa Paula, *General Plan,* "General Plan Map—Land Use Plan and Expansion Areas" (February 2014).

6 City of Santa Paula, Municipal Code, Chapter 16.25.020—Specific Plan Zones Established (2013).



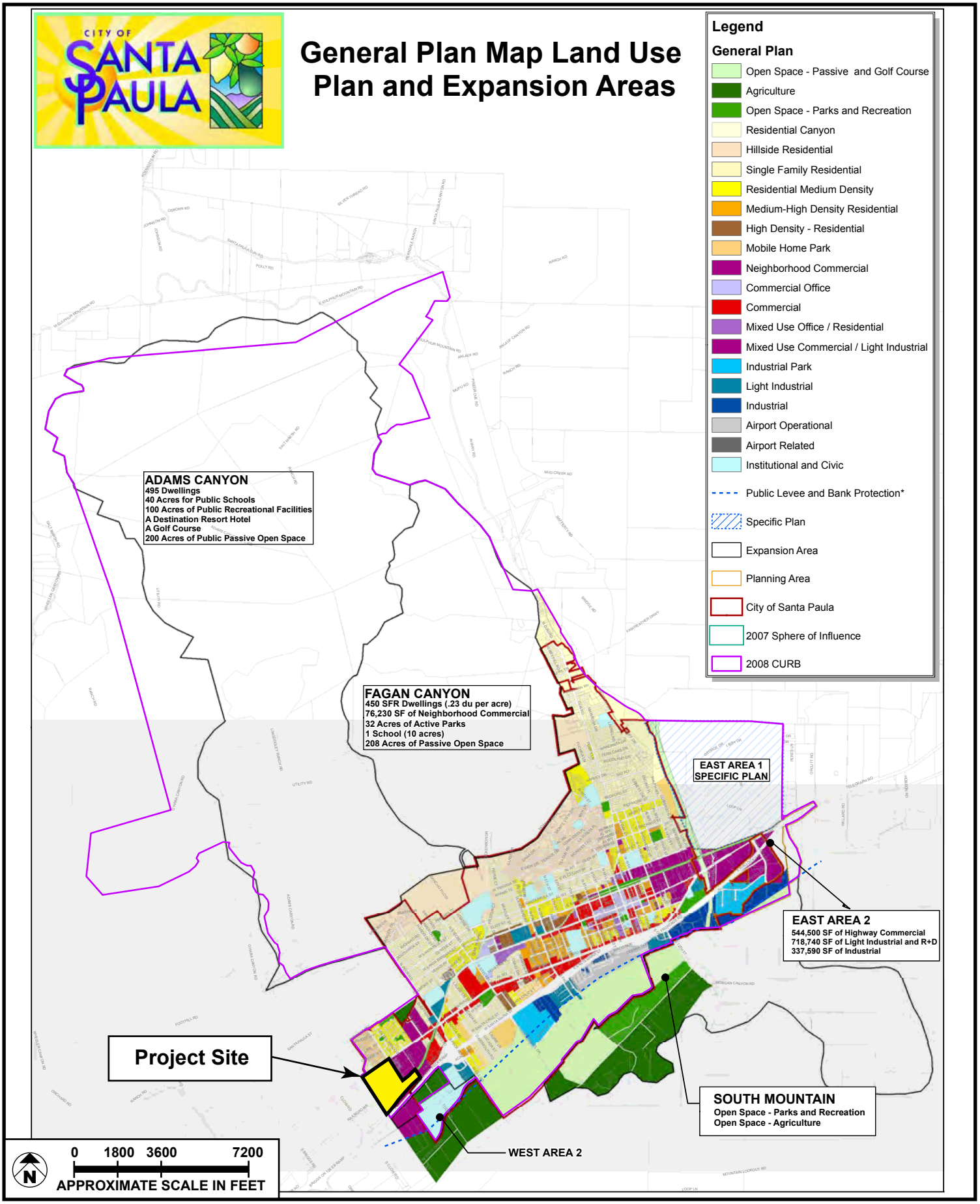
SOURCE: Santa Paula General Plan, Land Use Plan - 2010

FIGURE **4.10-3**

Meridian Consultants

Existing City of Santa Paula General Plan Designations

050-002-13



SOURCE: Santa Paula General Plan, Land Use Element - 2010

FIGURE **4.10-4**

Meridian Consultants

Santa Paula General Plan Expansion Areas, Planning Areas, and Sphere of Influence

050-002-13

The City's General Plan designates the Project Site for C-LI uses, which is consistent with the land uses proposed within the Santa Paula West Business Park Specific Plan, as identified in **Table 4.10-3, Santa Paula West Business Park Specific Plan Land Uses.**

Table 4.10-3
Santa Paula West Business Park Specific Plan Land Uses

Land Use Type	Acres	Percent of Project Site
Commercial/Light Industrial	41.96	78
Roadways (approximate)	6.95	12.9
Open Space/Passive	4.90	9.1
Gross Area of Project Site	**53.81**	**100**

Source: Santa Paula West Specific Plan (October 2016).

4.10.2 REGULATORY SETTING

State

Government Code Section 65450

Government Code Section 65450 et seq. establishes required contents of a specific plan and describes its relation to the general plan.

Southern California Association of Governments

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

SCAG has evolved as the largest council of governments in the United States, functioning as the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial, and including 191 cities. The region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles.[7] As the designated MPO, SCAG prepares plans for transportation, growth management, hazardous waste management, and air quality. Accordingly, SCAG has prepared comprehensive regional plans to address these concerns.

7 Southern California Association of Governments, "About SCAG," http://www.scag.ca.gov/about/Pages/Home.aspx.

SCAG is also responsible for the designated Regional Transportation Plan (RTP), which includes the Sustainable Communities Strategy (SCS) component as pursuant to Senate Bill (SB) 375. The SCS has been formulated to reduce GHG emissions from passenger vehicles by 8 percent per capita by 2020, by 18 percent per capita by 2035, and by 21 percent per capita by 2040 compared to 2005 targets set by the California Air Resources Control Board (CARB).

The 2016–2040 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socioeconomic, geographic, and commercial limitations. The goals included in the 2016 RTP/SCS may be pertinent to the proposed Project. These goals are meant to provide guidance for considering the Project within the context of goals and policies.

County of Ventura General Plan

The County of Ventra General Plan, which was last amended in October 2013, sets forth goals, policies, and programs to be implemented Countywide to manage future growth and land uses of unincorporated Ventura County.[8] The County's General Plan currently designates the Project site for Agriculture–Urban Reserve (40-acre minimum), with the zoning of Agricultural Exclusive (AE).

Land Use Categories

The County's land use designation and zone district classifications that apply to the Project Site are described below:

Agriculture

This land use designation is generally applied to irrigated land that is suitable for crop production and/or livestock management, and primarily to lands that are designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, on the State of California's Important Farmland Inventory. A minimum parcel size of 40 acres is considered appropriate in agricultural areas. The AE zone district classification corresponds to this land use category and prescribes permitted land uses and standards for land development, including a specification for minimum 40-acre-size parcels.

Urban Reserve Overlay

This category is applied to all unincorporated land within a city's adopted Sphere of Influence that have been determined by the Ventura County Local Agency Formation Commission (LAFCo) to be appropriate

8 County of Ventura, *General Plan,* "Goals, Policies, and Programs," (October 2013).

for eventual annexation and urbanization. Under the Agriculture designation, more intense development could not occur on affected lands until they are annexed.

City of Santa Paula General Plan

The Santa Paula General Plan was adopted in 1998 and is the "guiding document" of the City's policies to guide long-term growth within its planning area. The General Plan is the decision-making framework to guide best uses of the City's physical and economic resources. It is intended as a 'blueprint' to guide decisions concerning:

- Decisions about the use of land;
- Conservation and development of new housing;
- Provision of supporting infrastructure and public and human services;
- Protection of environmental resources;
- Protection of people and property from natural and man-made hazards;
- Allocation of fiscal resources;
- Population growth; and
- Expansion of City boundaries.

Land Use Categories

The City's General Plan currently designates the Project site as C-LI .

Commercial–Light Industrial (C-LI)

A majority of the Santa Paula West Specific Plan would provide for C-LI uses. The individual projects within the Specific Plan would consist of low intensity manufacturing, research and development, professional offices, and limited commercial uses. Development intensity is limited to a FAR of 0.35.

Santa Paula Municipal Code

The SPMC establishes zones that facilitate the logical, coordinated planning of large areas for a variety of land uses and types of development. The SPMC establishes zoning regulations setting forth detailed standards and regulations for development activities in a manner consistent with the policies of the General Plan. The West Area 2 Expansion Area is zoned SP-6 by the SPMC.

Measure I–Save Open-Space and Agricultural Resources

The Save Open-Space and Agricultural Resources Santa Paula City Urban Restriction Boundary Initiative (SOAR) amended the General Plan in 2000 (adding Section III to the Land Use Element of the General Plan) by, among other things, creating a City Urban Restriction Boundary (CURB). The CURB was established coterminous with and in the same location as the SOI established by the Ventura LAFCo on February 2, 2000.[9] Property located within the CURB may be developed in accordance with the General Plan and SPMC; any proposed extension of urban services or urbanized use to property located outside of the CURB generally requires voter approval.[10]

Ventura Local Agency Formation Commission

The Ventura LAFCo is responsible for establishing jurisdictional boundaries of public agencies in accordance with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.[11] One of LAFCo's duties is to encourage the orderly formation and expansion of local government agencies.

In addition to complying with those policies set forth in Government Code 56668, to facilitate thoughtful and efficient deliberations and decision-making, Ventura LAFCo developed a Handbook for its commissioners that identifies the following general standards considered favorable for approval of an annexation request:

- The proposal would eliminate islands, corridors, or other distortions of existing boundaries.
- The affected territory is urban in character or urban development is imminent, requiring municipal or urban-type services.
- The affected territory can be provided by all public services by the city or district as shown by the city's or district's service plans, and the proposal would enhance the efficient provision of urban services.
- The proposal is consistent with state law, adopted spheres of influence, applicable general and specific plans, and these policies.
- The proposal is for the annexation of city- or district-owned property, used or to be used for public purposes.

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10 Santa Paula General Plan, "Land Use Element" (1998).

11 California Code of Regulations, Government Code Section 56000, et seq.

Standards that are considered favorable with respect to boundary adjustments include:

- The proposal would create logical boundaries that coincide with existing and planned services and, where possible, eliminate previously existing islands.
- The proposed boundaries follow natural and man-made features such as ridgelines, drainage areas, watercourses, and edges of right-of-way, provided they coincide with lines of assessment or ownership, or are described by metes and bounds legal descriptions that can be easily used for mapping lines of assessment or ownership.
- The proposed boundaries include adjacent urbanized areas which are receiving or which may require urban services such as public water and/or sewer services.

For annexation proposals involving agricultural and open space lands, the LAFCo Commissioners Handbook indicates that such proposals may be approved if they would lead to planned, orderly, and efficient development, to be determined in accordance with these criteria:

- The territory involved is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development.
- The territory is likely to be developed within 5 years and has been prezoned for nonagricultural or open space use. In the case of very large developments, annexation should be phased wherever possible.
- Insufficient nonprime agricultural or vacant land exists within the existing boundaries of the agency that is planned and developable for the same general type of use.
- The territory involved is not subject to voter approval for the extension of services or for changing general plan land use designations. Where such voter approval is required by local ordinance, such voter approval must be obtained prior to LAFCo action on any proposal unless exceptional circumstances are shown to exist.
- The proposal will have no significant adverse effects on the physical and economic integrity of other prime agricultural or open space lands.

4.10.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, CEQA identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guidelines (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact to land use and planning if it would:

- Physically divide an established community?
- 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?
- Conflict with any applicable habitat conservation plan or natural community conservation plan?

4.10.4 PROJECT IMPACTS

The Project impact analysis considered whether the Project would divide an existing neighborhood, community, or other land use or result in secondary impacts on surrounding land uses. In addition, the analysis considers whether the Project may disrupt the physical arrangement of an established community by introducing new infrastructure or isolating existing land uses. Specific "secondary" impacts on resources such as aesthetics, air quality, or traffic are evaluated in the pertinent subsections of **Section 4.0** of this EIR.

Threshold: Physically divide an established community?

The Project Site is located adjacent to the western boundary of the Santa Paula City limits. The land that currently makes up the Project Site is unincorporated territory under the jurisdiction of the County of Ventura. The Project includes the annexation of the Project Site into the City limits, to allow for the future development of light industrial and commercial uses. The parcels within the Specific Plan boundary would be subdivided with a Tentative Tract Map and roadways within the plan area would be created. Access to the Project Site from the SR 126 and West Telegraph Road would be maintained with driveways constructed per the SPMC standards. No new streets, flood control channels, utility lines, or other major infrastructure are proposed that would involve substantial physical alterations to the existing surrounding community. Essentially the Project would result in an expansion of the City's urban area west through with use of existing infrastructure and access already in place and serving uses adjacent to the Project. Furthermore, there is no direct connectivity between the type of land uses that surround the Project Site. The surrounding land uses are in distinctive neighborhoods residential to the north) or commercial and light industrial areas (areas east), or agricultural lands (south and west) that are not directly connected physically. As such, allowed construction within the Specific Plan area would not create a physical separation or barrier between existing neighborhoods or other communities.

The Specific Plan area straddles the 100-foot-wide railroad corridor that is owned by the VCTC. However, this railroad line is currently out of commission and Project development would not encroach on the rail rights-of-way. The Specific Plan includes provisions for a landscaped screen along the railroad right of way

to soften any appearance of the allowed structures should the railroad ever become operable for passenger trains.

Furthermore, the Project entails the development of a business park that would involve an inner-circulatory system to maximize walkability and access throughout the site. The Project would integrate into the existing circulatory system that provides regional access to the City of Santa Paula. Faulkner Road would be extended through the Project Site to provide access to the Site from the development to the east. Thus, access points along SR 126 and West Telegraph Road, which bound the Project to the south and north respectively, would not be altered by the Project's circulatory system or by the Faulkner Road extension.

As the surrounding property to the east of the Project Site is also zoned by the City for Commercial/Light Industrial uses, there would be a transition between the existing uses and the Project to develop a consistent community. Annexation of the Project site in accordance with the General Plan would expand the City limits to coincide with the City's adopted SOI and CURB. The frontage would appear similar in mass and scale to the existing commercial and light industrial uses that align Telegraph Road, Beckwith Road, and Faulkner Road to the east.

Therefore, the Project would not physically divide the existing community of Santa Paula or any smaller enclaves outside the City limits. Based on these factors, the Project would not create incompatible land use relationships between the Project site and existing off-site uses, and as a result of would not disrupt, divide, or isolate existing neighborhoods or communities. Therefore, impacts related to dividing an established community would be less than significant.

Threshold: **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?**

Consistency with County of Ventura General Plan and Non-Coastal Zoning Ordinance

The 53.81-acre Specific Plan area would be annexed into the City of Santa Paula and removed from the County of Ventura Agricultural and Urban Reserve designations. With LAFCo's approval of the reorganization, the Project Site would no longer be subject to the County of Ventura's land use and zoning controls. Therefore, if approved by LAFCo and upon annexation, the Project would not conflict with the County of Ventura General Plan and Non-Coastal Zoning Ordinance.

Consistency with the City of Santa Paula General Plan and SPMC

The Specific Plan is proposed for adoption as an amendment to the City of Santa Paula's General Plan. Upon adoption by the City, the Project would retain City General Plan Land Use Element designations and City zone district classifications to the affected properties, replacing the existing Ventura County land use and zoning designations.

The City's proposed zoning designations for the Project Site were previously shown on **Figure 2.0-4, Land Use Master Plan**, and are consistent with the proposed General Plan Land Use designations for the majority of the area proposed for annexation. The Specific Plan would be zoned and designated as SP-6 SPWBPSP Plan on the City's zoning map. While the Project Site is currently not subject to the SPMC, upon adoption of the Specific Plan into the General Plan and annexation of the into the City's boundaries it would be consistent with the SPMC. Therefore, the Project would result in less than significant impacts related to zoning regulations identified in the SPMC.

The Specific Plan area includes five parcels that are adjacent to the western boundary of the City of Santa Paula. The City's General Plan identifies urbanization and development for the West Area 2 Expansion Area and indicates that the City currently has 135 acres dedicated for commercial uses, 161 acres dedicated for industrial uses, and 141 acres dedicated for open space uses. As shown previously in **Table 4.10-3,** the Project would include 41.96 acres for Commercial/Light Industrial Uses across the Site and 4.9 acres of the Project Site along the Adams Barranca on the west would be dedicated for Open Space/Passive uses. The proposed City land use designations and zone district classifications match the designations for the Project Site, as shown on the City's General Plan Land Use Map. Therefore, the Specific Plan would be consistent with the General Plan and would not result in any conflicts. Upon adoption by the City, the Specific Plan would serve as the regulating land use and zoning document utilized for all development within the Specific Plan area.

The Project proposes the construction of urbanized uses within an Expansion Area that is currently within the CURB. Thus, no voter approval is required to amend the CURB.

This Specific Plan provides appropriate development standards and uniform design standards to ensure high quality development at the western entry to the City of Santa Paula on SR 126. The Specific Plan area would be designated SPWBPSP Specific Plan on the City's General Plan Land Use Plan. Plans for future development of specific parcels within the proposed annexation area will be determined over time, as applications are submitted to the City. Future development will be subject to the proposed land use and zoning designations, which will ensure consistency with the Santa Paula General Plan land use policies for land use types and intensities.

Furthermore, the proposed Project is consistent with the long-term growth policies of the City's General Plan Land Use Element, as set forth in Section III.A. City Boundaries and Sphere of Influence, as discussed below:

1. The Project Site consists of land that is contiguous along the western portion of the current City boundary

2. There is little remaining vacant land within the existing City limits, and none of that is situated which that it could contribute to the successful development of proposed business park as set forth by the Project. This is as a result of physical constraints such as inadequate site area, inconvenient vehicular access, and likely incompatibilities with surrounding land uses.

3. The proposed annexation area, at the western edge of the existing City limits, was identified for expansion of the City's urbanized area in the City's General Plan when it was adopted in 1998. The approximately 125 acres of land was planned for major urban land development with a mixture of high quality commercial and light industrial land uses that optimize the economic value of that location in ways that benefit the entire community. Municipal services and urban infrastructure provided by the City of Santa Paula will be necessary to support the mixture and intensity of uses envisioned by the General Plan and annexation of the project is necessary to enable and facilitate the investment of the City's resources to the project site. With approval of the Santa Paula West Business Park Specific Plan to guide development of the commercial and light industrial uses within the Project Site, the Proposed Project will provide a complementary mixture of land uses that could employ future residents of that community and also provide a variety of products and services that would be conveniently accessible to that new community, as well as the existing City residents. As such, this Project represents an orderly and efficient implementation of the City's ultimate land use pattern as it is envisioned in the General Plan.

4. Future service needs of the Project area were fully considered, along with the costs of providing those services and the revenues that would be generated through implementation of the land use policies that would govern the development of the affected land.

5. As discussed in **Section 4.14, Utilities and Service Systems,** the City determined that its water supplies will be sufficient to meet the needs of the Project Site when fully developed, without jeopardizing water supplies available to landowners and water consumers within the existing City limits, including future businesses and residents within the East Area 1 and East Gateway Specific Plans. As discussed in **Section 4.12, Public Services,** the City's Police and Fire Departments will have adequate resources to respond to increased demand for services as the Project Site builds out, without adversely affecting levels of service to the rest of the City.

6. The proposed annexation area would be socially and environmentally interdependent with the existing urban area of the City of Santa Paula. This interdependence will be achieved by providing

suitable sites for commercial and light industrial businesses to meet the needs of the community not presently available in the City of Santa Paula, and by facilitating development of retail and other commercial uses that complement the residential, public facility, and small amount of commercial uses.

7. As discussed in **Section 4.2, Agricultural Resources,** farmlands on the Project Site have been designated on the State Important Farmland Map to include Prime Farmland, Farmland of Statewide Importance, and Urban and Built-up Land. The Project site is currently farmed by two organizations, Bender Farms and McGrath Farms. Bender Farms grows avocados on approximately 9.2 acres of land, and herbs on approximately 12.3 acres. McGrath Farms grows a variety of row crops on approximately 27.5 acres of land. As established in the City's General Plan, the Project Site is proposed to be converted from agricultural uses to urban uses. The General Plan identifies that development of the West Area 2 Expansion Area would result in the conversion of some agricultural land. Conversion of the Project Site to commercial and light industrial uses that would be permitted by the proposed Specific Plan and would be considered a significant an unavoidable impact on agricultural resources, as discussed in **Section 4.2.** However, it is considered to be appropriate and timely to develop the Project Site, since there is no other land of suitable size and location available within the City of Santa Paula and the City's Sphere of Influence to allow development of a large business park.

8. The Project Site was identified in the City's General Plan as part of the West Area 2 Expansion Area, since the General Plan was adopted in 1998. Therefore, the City has considered incorporation of West Area 2 into the City limits, which is currently pre-zoned in the SPMC as SP-6 for commercial and light industrial uses. The Project Site is located within West Area 2 and consists of uses consistent with those proposed for the Expansion Area.

The Proposed Project is consistent with the long-term growth policies of the City's General Plan set forth in Section III.B. Expansion and Planning Areas, as discussed below:

1. The Project Site is located within West Area 2 specifically identified in the Santa Paula General Plan as an expansion area intended for eventual expansion of the City's urbanized development limits.

2. A comprehensive Specific Plan has been prepared to guide the orderly and efficient development of the proposed annexation area adjacent to the western boundary of the City. The proposed Santa Paula West Business Park Specific Plan contains all of the elements required by the Government Code in a Specific Plan.[12]

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12 California Government Code Sections 65640, et seq.

Consistency with SCAG RTP/SCS

In 2016, SCAG adopted the 2016 Regional Transportation Plan, including the Sustainable Community Strategy. The RTP/SCS provides goals toward sustaining mobility at a regional level. The consistency of the Santa Paula West Business Park Specific Plan with the regional goals of the RTP/SCS is discussed in **Table 4.10-4**, **Consistency with SCAG RTP/SCS**.

Table 4.10-4
Consistency with SCAG RTP/SCS

RTP/SCS Goal	Specific Plan Amendment Consistency
G1: Align the plan investments and policies with improving regional economic development and competitiveness	**Consistent:** The Project would create a light industrial and commercial development that would stimulate economic development opportunities for the City and the greater community. The Project Site is located along SR 126, which provides regional access to the Santa Clara Valley. The Specific Plan, which comprises of the western edge of the existing City limits, was identified for expansion of the City's urbanized area in the City's 1998 General Plan to accommodate expected growth and economy demands in the City and region. This Project Site was identified as a suitable location for expansion of the City, given the access to the regional transportation system, existing utilities, and road infrastructure. The Specific Plan will create a desirable business park that will provide for location opportunities for various commercial and light industrial businesses. The Project will increase the competitiveness of the region and attract high-value employees as the Project would provide an employment center close to a range of desirable residential uses, as a result of the approval of the East Area 1 Specific Plan Amendment, and potentially other future residential development Thus, the Project is aligned with plan investments and policies with improving regional economic development and competitiveness.
G2: Maximize mobility and accessibility for all people and goods in the region	**Consistent:** Development of the Project would ensure that mobility and accessibility for people and goods would be maximized. The transportation planning approach for the Specific Plan provides internal streets which will encourage a balanced and safe mix of vehicular, delivery trucks or other equipment appurtenant to allowed uses. As provided in **Section 4.13, Transportation and Traffic,** the Specific Plan Area will be served by public transportation as the City expands the local operations in the future. Additionally, the Project would incorporate 4.9 acres of open and passive space uses, as well a safe and adequate system for pedestrian and bicycle circulation. These design features will maximize mobility and accessibility to all people, as well as the delivery of goods from allowed uses within the Project Site.
G3: Ensure travel safety and reliability for all people and goods in the region	**Consistent:** All modes of transportation would be required to follow safety standards set by corresponding regulatory documents. Streets, pedestrian walkways, and bicycle routes would follow safety precautions and standards established by local and regional agencies. Streets, pedestrian walkways, and bicycle routes would follow safety

	precautions and standards established by local and regional agencies. Based on an updated traffic study, the Specific Plan will include mitigation to a number of intersections and roadway segments that are within the regional transportation system, such as SR 126. Mitigation would ensure that all intersections and roadway segments affected by Project development would operate an acceptable level of service (LOS). Consequently, the travel safety and reliability for all people and delivery of goods will be maintained.
G4: Preserve and ensure a sustainable regional transportation system	**Consistent:** As discussed in **Section 4.13, Transportation and Traffic**, an updated traffic study evaluates the impact of the type and intensity of land uses that would be allowed by the Specific Plan and related projects on the local and regional transportation system. The Ventura County Transportation Commission (VCTC), as the designated Congestion Management Authority (CMA) for Ventura County, is responsible for coordinating land use, transportation planning, and air quality to mitigate traffic congestion. VCTC prepares and manages the Ventura County Congestion Management Program (VCCMP)[a] to provide local government agencies with the resources to improve traffic congestion throughout Ventura County. Mitigation requiring improvements to the regional transportation system will be coordinated with VCTC and the California Department of Transportation (Caltrans) to ensure the sustainability of the system is maintained. The Specific Plan will not result in any significant impacts to the CMP roadway network or Caltrans facilities, or to regional transportation, traffic, circulation, and mobility.
G5: Maximize the productivity of our transportation system	**Consistent:** The Specific Plan would maximize the productivity of the public transportation system for local residents, visitors, and employees that travel to the Project Site for work, for patronage, or to conduct business. As the local population increases over the life of the Project, the productivity of the transportation system will be improved; more people and goods requiring transport will contribute to the system to expand connections to the eastern portion of the City. The Project will allow for the maximum use of the local transportation system.
G6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)	**Consistent:** The reduction of energy use, improvements in air quality, and promotion of more environmentally sustainable development would be supported through planning efforts encouraging the use of alternative transportation mode and green design for buildings. Approximately 7 percent of the Specific Plan area is dedicated to open space/passive uses to provide on-site recreational opportunities for visitors and employees. Sidewalks would also be incorporated into the Specific Plan's circulation plan. The arrangement of uses combined with the on-site amenities will promote use of nonmotorized transportation modes, which will improve vehicle air emissions and promote a healthier environment.
G7: Actively encourage and create incentives for energy efficiency, where possible	**Consistent:** The Project would allow for the circulation of automobiles and service vehicles in a safe and efficient manner. The street patterns within the Project site would be organized to provide efficient circulation and access to each of the Project's neighborhood planning areas. Individual project would be designed to increase energy efficiency, water efficiency, and overall sustainability. The Project is

	also located in an urban area that would reduce vehicle trips and vehicle miles traveled due to the nature of the Project incorporating an interconnected network of streets and blocks that provides multiple routes for pedestrians, bicyclists, and motorists. This interconnected network would minimize vehicular trips throughout the Project site, thus reducing energy use.
G8: Encourage land use and growth patterns that facilitate transit and active transportation	**Consistent:** The Project would implement a thoroughfare system that encourages all forms of nonmotorized transportation. The Ventura Intercity Service Transit Authority (VISTA) provides public transit service to the City of Santa Paula. While there are currently no stops that service the Project Site, VISTA makes two stops in the City as part of the SR 126 route. As future developments within the Specific Plan occur, transit service will be extended to serve the Project Site. As provided in **Section 4.4, Transportation and Traffic,** the Project development will participate in accommodating an expansion of the VISTA transit system.
G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordinating with other security agencies	**Consistent:** The VCTC, as the designated CMA for Ventura County, provides local government agencies with the resources to improve traffic congestion throughout Ventura County. Through the VCCMP, The VCTC includes a system for monitoring the significant corridors and goods movement routes, current congestion levels. Development of the Project would maintain, preserve, and ensure a sustainable regional transportation system, such as SR-126. It would maximize productivity by implementing the Specific Plan as approved by the City, thus it would be consistent with the City's plans for development of the site. The Project would not result in significant impacts to the regional transportation system.

Source: Ventura County Transportation Commission, 2009 Update—Ventura County Congestion Management Plan*, (adopted July 2009).*

Therefore, the Project would be consistent with all nine SCAG RTP/SCS policies evaluated above. Impacts would be less than significant.

Consistency with Ventura LAFCo Analysis

Annexation of the Project Site to the City of Santa Paula would be subject to LAFCo approval, which requires consistency with state laws, as well as relevant LAFCo policies and procedures. As the Project Site is currently located within the City's LAFCo approved SOI, implementation of the Project would not conflict with state law or LAFCo's Annexation Policies and Procedures. Government Code 56668, which LAFCo is required to consider in its decision to approve a boundary reorganization request.

As previously discussed, LAFCo considers various criteria upon the decision-making process of approving an annexation request. The Project would annex land that is contiguous with the existing City boundary, thus not creating any islands, corridors, or other boundary distortions. The Project Site would connect with existing utility infrastructure and public service access provided by the City.

While the Project Site is currently utilized for agricultural production, the Site is pre-zoned by the City for urbanized uses and is adjacent to other developed lands. The City considered the conversion of agricultural lands into urban uses within the West Area 2 Expansion Area upon adoption of the 1998 General Plan. Therefore, implementation of the Project would not conflict with LAFCo's criteria regarding annexation of the agricultural lands.

As the proposed Project would annex unincorporated territory into the City of Santa Paula from the County of Ventura, the Project would apply City General Plan Land Use designations and City zone district classifications to the affected parcels, replacing the existing Ventura County land use and zoning designations. Consequently, LAFCo's approval of the annexation would entail that implementation of the Project would not conflict with the Ventura County General Plan or Non-Coastal Zoning Ordinance.

LAFCo Commissioners Handbook Standards

The Project is consistent with the Handbook policies that favor annexations to cities, as set forth in Section 3.3.1 General Standards for Annexation to Cities and Districts, because it would:

- Eliminate islands of unincorporated territory and fill in gaps within the City of Santa Paula's jurisdictional boundaries. While the VCTC railway that bisects the Project Site is not a part of the Project, the areas along the railroad right-of-way would be improved with landscaped screening to ensure compatibility with the Project. Additionally, an existing at-grade crossing will be realigned approximately 100 feet to the east to align with Beckwith Road. Implementation of the Project around the VCTC railway would not result in any conflicts with surrounding City uses.

- Facilitate urbanized development in the western portion to the City of Santa Paula, consistent with the City's existing General Plan policies that envision this area for urban expansion to accommodate City growth through 2020. Buildout of the Specific Plan area is imminent, based upon future market and economic conditions, with concurrent infrastructure improvements and extension of public services to maintain desired levels of service.

- Extensions of municipal services are needed to support the range and intensities of land uses envisioned for this area by the City's General Plan, and the City of Santa Paula has the resources to provide such services in an efficient manner. The Project Site is located within the City's SOI and is proposed for expansion within the General Plan. The Proposed Project would benefit the community as it would be used for public purposes.

The Proposed Project is consistent with Handbook policies set forth in Section 3.3.2 General Boundary Criteria, because it would:

- Create logical municipal service boundaries within the City's established SOI, eliminate existing and future islands of unincorporated territory, and 'fill in' the city limits in the strategic eastern gateway to Santa Paula.

- The proposed boundaries would follow existing rights-of-way and land ownership lines and affect only land that is contiguous to existing city boundary lines.

- The affected land can be efficiently served by the City's municipal services, most critically, water and sewer infrastructure.

The Project is consistent with Handbook policies set forth in Section 3.3.5 Agriculture and Open Space Preservation, because:

- The Proposed Project would facilitate orderly, planned and efficient development of the affected area, which has been targeted for urban expansion by the City of Santa Paula, since its General Plan was originally adopted in 1998.

- As discussed in **Section 4.2,** the Project Site is currently utilized for the agricultural production of various row crops, avocados, and citrus. While implementation of the Proposed Project would result in the conversion of agricultural land to urban uses, this conversion would be consistent with those planned land uses established within the City's General Plan.

- The agricultural land within the proposed Specific Plan is adjacent to already urbanized land to the east and north and is located in the western boundary of the City along SR 126 that is identified for urban expansion in the Santa Paula General Plan. Buildout of the Specific Plan would occur as market conditions allow. However, with the demand for additional commercial and light industrial uses within the City of Santa Paula, development of the Specific Plan within the next five years is thus considered timely.

- There is insufficient non-prime agricultural or vacant land within the City's existing boundaries that is planned and developable for the same general type of use. Not including the recently approved East Area 1 Specific Plan Amendment area, an inventory of vacant land conducted for the City's 2013-2021 Housing Element Update found approximately 60 acres of vacant, residentially zoned land and several small vacant commercial properties, throughout the current city limits. Those vacant sites are dispersed and could not provide sufficient site area to enable orderly, efficient and planned development of the commercial and light industrial uses envisioned for the Project area in the Santa Paula General Plan.

- Other undeveloped land is available within the City's Sphere of Influence does not have the locational characteristics required for light industrial uses, or are not large enough to accommodate these uses. The other major expansion areas identified in the Santa Paula General Plan, Adams and Fagan Canyons, are located well north of SR 126 and have limited access. Because of the existing

characteristics of these expansion areas, the Santa Paula General Plan limits development in Adams Canyon to single-family homes, a destination resort hotel, and a golf course, along with public facilities. Development permitted in Fagan Canyon by the General Plan includes single-family residences with supporting public facilities and a limited amount of neighborhood commercial uses.

- The affected territory is not subject to voter approval for the extension of services or for the proposed minor changes in existing City General Plan land use designations. As discussed above, the proposed Specific Plan would include the annexation of land located within the CURB. Measure L6 is not triggered by the Proposed Project for the reasons discussed above.

Threshold: **Conflict with any applicable habitat conservation plan or natural community conservation plan?**

Within the City, open space can be found in parks, along river and creek floodways, on steep hillside slopes, in public gathering spaces, and on agricultural parcels. The Santa Paula General Plan Open Space and Conservation Element designates the Adams Barranca as a natural resources area.

In addition, the Santa Paula-Ventura Greenbelt, the first greenbelt in Ventura County, was adopted in 1967, and recently amended in 2006, to maintain the land generally between the Franklin Barranca and Adams Barranca in agricultural production. As such, Adams Barranca represents the eastern reaches of the Santa Paula-Ventura Greenbelt. Although the Adams Barranca has been improved, it contains natural riparian vegetation. It likely also provides habitat for an array of local wildlife species. The natural resource and biological quality of the Barranca and other areas within the Project Site are discussed in more detail in **Section 4.4, Biological Resources**.

As provided in **Figure 2.0-4**, the Specific Plan includes a dedication of Open Space/Passive uses over 4.9 acres the includes the Adams Barranca and buffer areas on the western portion of the Project Site. This dedication would preserve the habitat and natural community as envisioned in the City's Open Space and Conservation Element of the General Plan. Therefore, impacts related to habitats conservation or natural community conservation plans would be less than significant.

4.10.5 CUMULATIVE IMPACTS

As noted in **Table 3.0-1, Related Projects**, a number of specific development projects are planned within the City of Santa Paula that may be constructed within the timeframe of the Santa Paula West Business Park Specific Plan. The majority of these related projects are comprised of smaller infill projects within the City. Many of these projects will be similar in scale, nature, and use to existing and surrounding land uses. These related projects will also be developed in accordance with the City's zoning standards. A majority

of other projects currently being planned or anticipated for future development are located throughout the existing Santa Paula area to the west of Santa Paula Creek, as previously shown on **Figure 3.0-1.**

Development within the City may also occur within the five Expansion and Planning Areas identified in the City's General Plan, including Adams Canyon, Fagan Canyon, South Mountain, West Area 2 and East Area 2 (East Gateway). No significant cumulative land use impacts from future development within these expansion areas would result as these areas will be developed in accordance with the City's General Plan. The Santa Paula General Plan considered the existing environmental characteristics of these expansion areas and, based on these characteristics, defines the type and allowed intensity of uses in these expansion areas. The Environmental Impact Report (EIR) prepared for the General Plan evaluated the impact of development of these expansion areas**.** In addition, the General Plan requires the preparation of Specific Plans for these expansion areas to further minimize environmental impacts. Additional environmental review will also be required and will be conducted prior to the adoption of these Specific Plans.

The remainder of the West Area 2 Expansion Area, which includes the Project Site, is proposed for annexation and development of light industrial and commercial uses. The East Area 1 Specific Plan Amendment area on the eastern portion of the City would include the development of various residential, commercial, light industrial, commercial, and civic uses across a 501-acre area. The East Area 1 Specific Plan Amendment will increase the on-site open space amenities and achieve greater compatibility with the nearby East Gateway light industrial and commercial development in terms of providing a balance of land uses. Therefore, the contribution of the development from the Specific Plan to cumulative land use impacts for all related projects and other General Plan anticipated land uses in the area would be less than significant.

4.10.6 MITIGATION MEASURES

Implementation of the Project would not result in significant adverse impacts related to land use and planning and mitigation measures are not required.

4.10.7 RESIDUAL IMPACTS AFTER MITIGATION

No significant impacts would result from the Project.

4.11 NOISE

This section evaluates the potential for the proposed Project to result in noise impacts within the Project Site and surrounding communities. This evaluation uses procedures and methodologies as specified by the California Department of Transportation ("Caltrans"), the Federal Transit Administration (FTA), and the Federal Highway Administration (FHWA). Noise monitoring and roadway noise modeling datasheets are included in **Appendix 4.11.**

4.11.1 EXISTING CONDITIONS

Noise and Vibration Basic

Fundamentals of Noise

Sound is mechanical energy transmitted by pressure waves in a compressible medium, such as air. Noise can be defined as unwanted sound. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). In particular, the sound pressure level is the most common descriptor used to characterize the loudness of an ambient sound level.

The unit of sound pressure expressed as a ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over 1 million times within the range of human hearing. A logarithmic loudness scale similar to the Richter scale for earthquake magnitude is used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all frequencies in the entire spectrum, so noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called A-weighting, written dB(A). The A-weighted sound level is measured on a logarithmic scale such that a doubling of sound energy results in a 3.0 dB(A) increase in noise level. In general, changes in a noise level less than 3.0 dB(A) are not typically noticed by the human ear.[1] Changes from 3 to 5 dB(A) may be noticed by some individuals who are extremely sensitive to changes in noise. An increase greater than 5 dB(A) is readily noticeable, while the human ear perceives a 10 dB(A) increase in sound level to be a doubling of sound volume. Common noise levels associated with certain activities are shown on **Figure 4.11-1, Common Noise Levels**.

1 US Department of Transportation, Federal Highway Administration, *Fundamentals and Abatement of Highway Traffic Noise* (Springfield, VA: US Department of Transportation, Federal Highway Administration, September 1980), 81.

Noise Terminology

Different types of scales are used to characterize the time-varying nature of sound. Applicable scales include the maximum noise level (Lmax), equivalent noise level (Leq), and the Community Noise Equivalent Level (CNEL). Lmax is the maximum noise level measured during a specified period. Leq is the average A-weighted sound level measured over a given time interval. Leq can be measured over any period, but is typically measured for 1-minute, 15-minute, 1-hour, or 24-hour periods. CNEL is an average A-weighted sound level measured over a 24-hour period. However, this noise scale is adjusted to account for some individuals' increased sensitivity to noise levels during the evening and nighttime hours. A CNEL noise measurement is obtained by adding 5 dB(A) to sound levels occurring during the evening, from 7:00 PM to 10:00 PM, and 10 dB(A) to sound levels occurring during the nighttime, from 10:00 PM to 7:00 AM. The 5 dB(A) and 10 dB(A) "penalties" are applied to account for increased noise sensitivity during the evening and nighttime hours. Day-night average level (Ldn) is the A-weighted equivalent sound level for a 24-hour period with an additional 10 dB imposed on the equivalent sound levels for nighttime hours of 10:00 PM to 7:00 AM.

Table 4.11-1, Noise Descriptors, identifies various noise descriptors developed to measure sound levels over different periods of time.

Table 4.11-1
Noise Descriptors

Term	Definition
Sound	A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
Noise	Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
Decibel (dB)	The unit for measuring the volume of sound equal to 10 times the logarithm (base 10) of the ratio of the pressure of a measure sound to a reference pressure.
A-Weighted Decibel (dB[A])	A sound measurement scale that adjusts the pressure of individual frequencies according to human sensitivities. The scale accounts for the fact that the region of highest sensitivity for the human ear is between 2,000 and 4,000 cycles per second (hertz).
Equivalent Continuous Sound Level (Leq)	The sound level containing the same total energy as a time varying signal over a given time period. The L_{eq} is the value that expresses the time averaged total energy of a fluctuating sound level. L_{eq} can be measured over any time period, but is typically measured for 1-minute, 15-minute, 1-hour, or 24-hour periods.

Term	Definition
Day-Night Level (Ldn)	The energy average of the A-weighted sound levels occurring during a 24-hour period with 10 dB(A) added sound levels occurring from 10 PM to 7 AM.
Community Noise Equivalent Level (CNEL)	A rating of community noise exposure to all sources of sound that differentiates between daytime, evening, and nighttime noise exposure. These adjustments add 5 dB(A) for the evening, 7:00 PM to 10:00 PM, and add 10 dB(A) for the night, 10:00 PM to 7:00 AM. The 5 and 10 decibel penalties are applied to account for increased noise sensitivity during the evening and nighttime hours. The logarithmic effect of adding these penalties to the 1-hour L_{eq} measurements typically results in a CNEL measurement that is within approximately 3 dB(A) of the peak-hour L_{eq}.[1]
sound pressure level	The sound pressure is the force of sound on a surface area perpendicular to the direction of the sound. The sound pressure level is expressed in dB.
Ambient Noise	The level of noise that is all encompassing within a given environment, being usually a composite of sounds from many and varied sources near to and far from the observer. No specific source is identified in the ambient environment.

Source: California Department of Transportation, Technical Noise Supplement; A Technical Supplement to the Traffic Noise Analysis Protocol, (Sacramento, CA: November 2009), pp. N5–N54.

Noise Barrier Attenuation

The introduction of a barrier between a noise source and a sensitive receptor redistributes the sound energy into several paths, including a diffracted path over the top of the barrier, a transmitted path through the barrier, and a reflected path directed away from the sensitive receptor. Diffraction is the bending of sound waves over the top of a barrier. The area behind the barrier in which diffraction occurs is known as a “shadow zone,” and sensitive receptors located in this area will experience some sound attenuation. The amount of attenuation is related to the magnitude of the diffraction angle. The diffraction angle will increase if the barrier height increases or if the distance from sensitive receptors is decreased to the barrier.

Sound can also travel through the barrier itself. The level of sound transmission through the barrier depends on factors relating to the composition of the barrier (such as its weight and stiffness), the angle of incidence of the sound, and the frequency spectrum of the sound. The rating of a material’s ability to transmit noise is called transmission loss. Transmission loss is related to the ratio of the incident noise energy to the transmitted noise energy, and it is normally expressed in decibels, which represents the amount noise levels will be reduced when the sound waves pass through the material of the barrier. For example, sound energy can also be reflected by a barrier wall. The reflected sound energy would not affect the sensitive receptor on the other side of the barrier but may affect sensitive receptors to the left and

right of it.[2] Man-made or natural barriers can also attenuate sound levels, as illustrated in **Figure 4.11-2, Noise Attenuation by Barriers.** A solid wall or berm may reduce noise levels by 5 to 10 dB(A).[3]

Contemporary wood frame construction techniques in California typically provide about 25 dB(A) reduction in exterior to interior noise levels. This is due to structural means used to comply with California regulations, such as the Title 24 energy conservation standards. The minimum attenuation of exterior to interior noise provided by typical structures in California is provided in **Table 4.11-2, Attenuation of Typical Structures.**

Table 4.11-2
Noise Attenuation of Typical Structures

Building Type	Open Windows (dB[A])	Closed Windows (dB[A])[a]
Residences	17.0	25.0
Churches	20.0	30.0
Hospitals/Convalescent homes	17.0	25.0
Offices	17.0	25.0
Theaters	20.0	30.0
Hotels/Motels	17.0	25.0

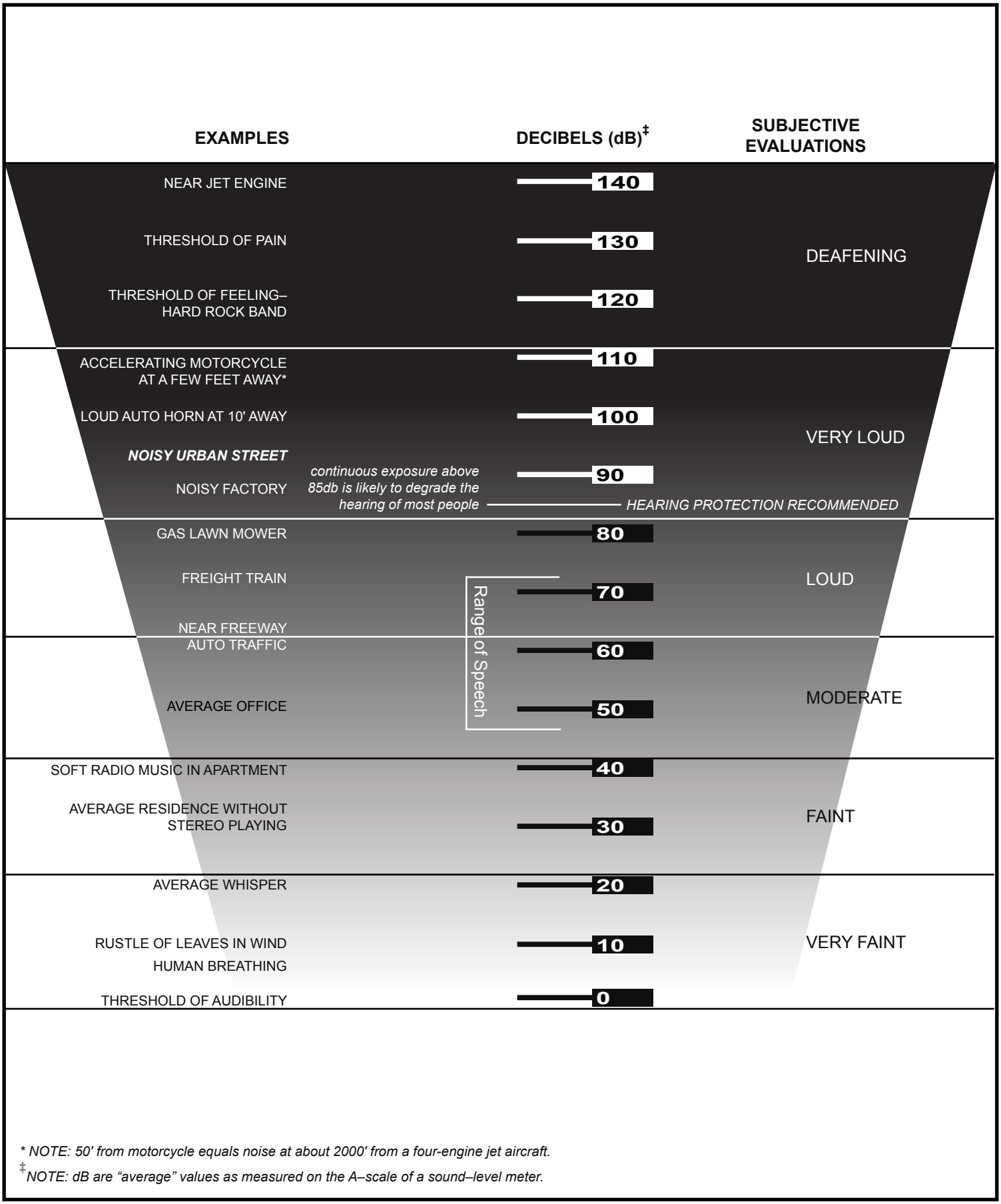
Source: Bolt Beranek and Newman, Inc., Highway Noise: A Design Guide for Highway Engineers, NCHRP Report No. 117, (1971). Prepared for Highway Research Board, National Academy of Sciences, Washington, D.C.
[a] As shown, structures with closed windows can attenuate exterior noise by a minimum of 25.0 to 30.0 dB(A).

Vibration

Vibration consists of waves transmitted through a solid medium. Groundborne vibration propagates from the source through the ground to adjacent buildings by surface waves. A vibration may be a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating, measured in hertz (Hz). Most environmental vibrations consist of a composite, or "spectrum," of many frequencies and are generally classified as broadband or random vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz. Vibration is often measured in terms of the peak

2 U.S. Department of Housing and Urban Development, Office of Community Planning and Development, *The Noise Guidebook* (n.d.), p. 21–23.

3 Carl E. Hanson, David A. Towers, and Lance D. Meister, Transit Noise and Vibration Impact Assessment, Report No. FTA-VA-90-1003-06 (Washington, DC: U.S. Department of Transportation, Federal Transit Administration, Office of Planning and Environment, 2006), 7–8. http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf.



** NOTE: 50' from motorcycle equals noise at about 2000' from a four-engine jet aircraft.*

‡NOTE: dB are "average" values as measured on the A–scale of a sound–level meter.

FIGURE **4.11-1**

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Common Noise Levels

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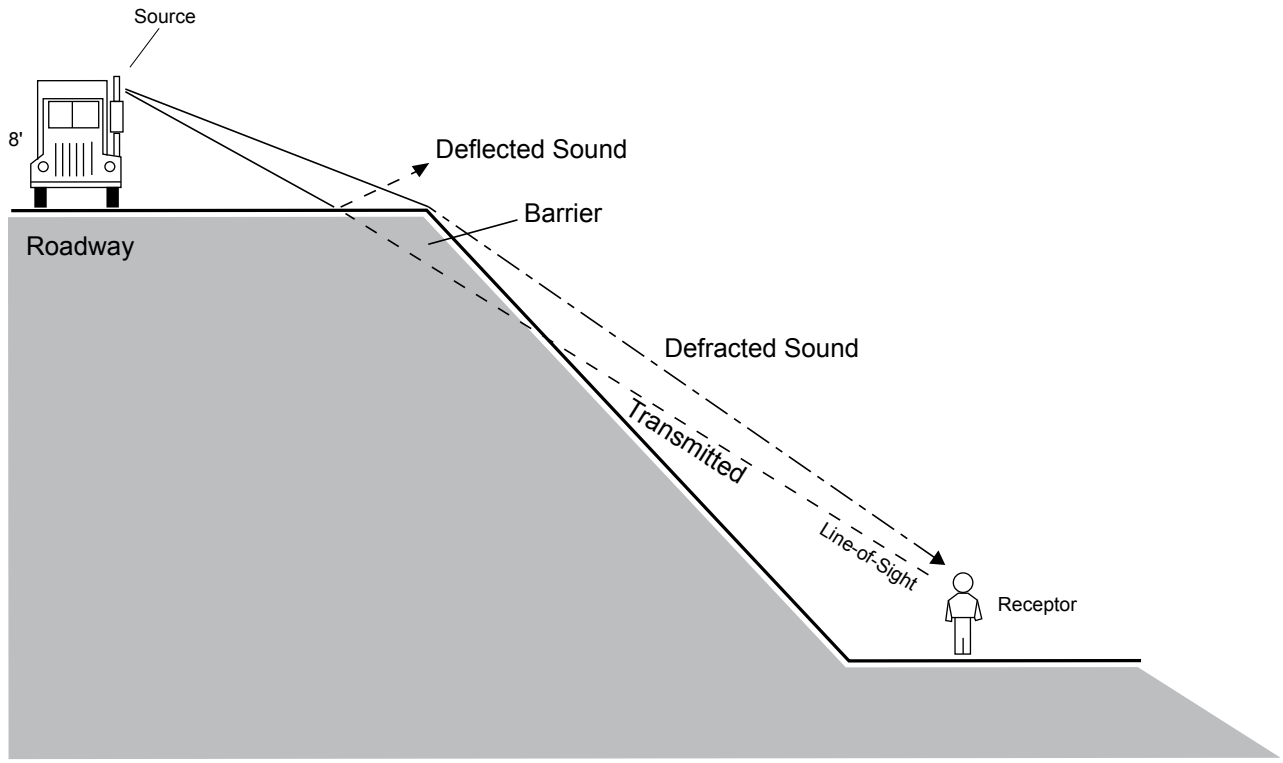
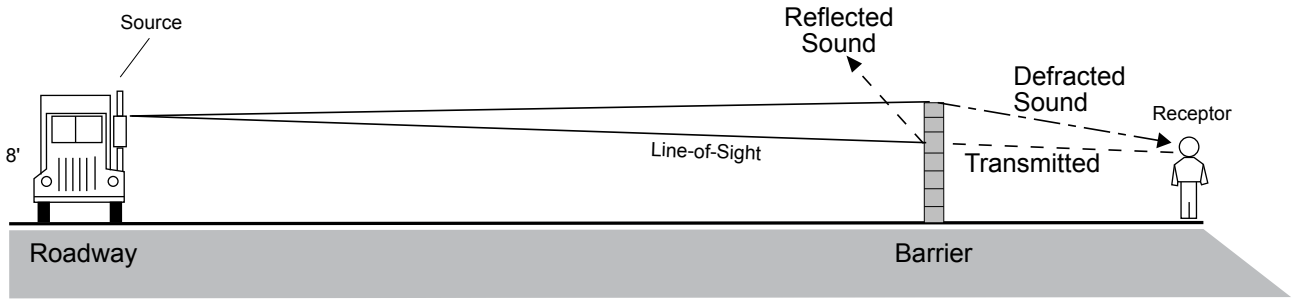


"Barrier Effect" Resulting from Differences in Elevation.



"Barrier Effect" Resulting from Typical Soundwall.

FIGURE **4.11-2**

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Noise Attenuation by Barriers

050-002-13

particle velocity (PPV) in inches per second (in/sec), because it is related to the stresses that are experienced by buildings. Vibration is also measured in vibration decibels (VdB).

The human threshold of perception is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Vibration levels are acceptable at approximately 85 VdB if there are an infrequent number of events per day.[4]

Vibration energy attenuates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source.[5] High-frequency vibrations reduce much more rapidly than low-frequency vibrations, so that in the far-field from a source, the low frequencies tend to dominate. Soil properties also affect the propagation of vibration. When groundborne vibration interacts with a building, there is usually a ground-to-foundation coupling loss, but the vibration can also be amplified by the structural resonances of the walls and floors.[6] Vibration in buildings is typically perceived as rattling of windows or of items on shelves, or as the motion of building surfaces.

Groundborne vibration is generally limited to areas within a few hundred feet of certain types of construction activities, especially pile driving. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps.[7] If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Human annoyance by vibration is related to the vibration energy and the number and duration of events, as well as the setting in which the person experiences the vibration. As discussed in the previous paragraph, vibration can be amplified by the structural resonances of the walls and floors of buildings. The more the events or the greater the duration, the more annoying it will be to humans. **Figure 4.11-3, Typical Levels of Groundborne Vibration,** identifies typical groundbourne vibration levels.

Sensitive Receptors

Some land uses are recognized as being more sensitive than others to noise levels and vibration. Residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, parks, and outdoor recreation areas are generally more sensitive to noise and vibration than are commercial and industrial land uses. Existing land uses surrounding the Project Site include single-family residences to the north and scattered single-family residences to the immediate west of the Project Site.

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4 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment* (2006).
5 California Department of Transportation, *Earthborne Vibrations* (1990), VII-27.
6 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment* (2006), 7-1, 7-2.
7 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment* (2006), 7-9.

The primary noise sources affecting sensitive receptors (homes, schools, hospitals) in the city are traffic on State Route (SR) 126 and SR 150, as well as aircraft operations at the Santa Paula Airport. Some industrial, commercial, and agricultural uses are also identified as noise contributors, although such sources have not generally been identified as significant noise problems.[8] With respect to the Project, the primary sources of noise include roadway noise, railroad operations, the Santa Paula Airport, and agricultural operations. The Santa Paula Branch Line (SPBL) is currently not operable. Sensitive receptors include single-family residences to the directly to the north across Telegraph Road, and scattered residences directly to the west.

Existing Conditions

The Santa Paula West Business Park is located within the Ventura County Local Agency Formation Commission Sphere of Influence for the City of Santa Paula and the City Urban Restriction Boundary with frontage along SR 126 and Telegraph Road and is bisected by the railroad right-of-way. While it is just west of the Santa Paula City limits, the area is within the City of Santa Paula Sphere of Influence, and is outside of the Santa Paula–Ventura Greenbelt.

The General Plan Noise Element identifies the primary noise concern associated with the airport as aerobatics, which are periodically practiced east of the City. Figure N-2 of the Noise Element shows noise contours from SR 126, SR 150 and the airport. The combined 60 dB(A) CNEL noise contour extends into the eastern portion of the Project Site. Other noise sources of noise include operations on the SPBL, and some industrial, commercial, and agricultural uses equipment when equipment is operating. Currently, there are no rail operations on the SPBL.

Existing Off-Site Roadway Noise Levels

Roadway noise is the predominant source of noise for the general vicinity of the Project Site. The estimated existing ambient roadways noise levels were modeled for the roadways that will be affected by traffic generated by the Project Site. Roadway noise modeling involved the calculation of existing and future vehicular noise levels along individual roadway segments using the FHWA Traffic Noise Model (TNM). This model calculates the average noise levels at specific locations based on traffic volumes, average speeds, roadway, geometry, and site conditions. The estimated existing roadway noise levels are provided in **Table 4.11-3, Modeled Existing Roadway Noise Levels.** As shown in **Table 4.11-3,** the existing vehicle-generated noise levels during the peak hour along roadway segments near the Project Site range from 52.8 dB(A) CNEL (Briggs Rd. s/o SR 126 WB On/Off Ramps) to a high of 65.0 dB(A) CNEL (Harvard Blvd. w/o Palm Ave.) at a distance of 75 feet from each roadway's centerline.

8 City of Santa Paula, "Noise Element," *City of Santa Paula General Plan* (April 13, 1998), p. N-3

HUMAN/ STRUCTURAL RESPONSE	PPV AMPLITUDE IN INCHES PER SECOND [1]	VELOCITY LEVEL IN VdB	RMS VELOCITY AMPLITUDE IN INCHES PER SECOND [2]	TYPICAL SOURCES: EFFECT 50 FEET FROM SOURCE
THRESHOLD, MINOR COSMETIC DAMAGE TO FRAGILE BUILDINGS	0.4	100	0.1	BLASTING FROM CONSTRUCTION PROJECTS
DIFFICULTY WITH TASKS SUCH AS READING A VDT MONITOR/TV	0.1264	90	0.0316	BULLDOZER AND OTHER HEAVY-TRACKED CONSTRUCTION EQUIPMENT
RESIDENTIAL ANNOYANCE, INFREQUENT EVENTS (E.G., COMMERCIAL RAIL)	0.04	80	0.01	COMMUTER RAIL, UPPER RANGE RAPID TRANSIT, UPPER RANGE
RESIDENTIAL ANNOYANCE, FREQUENT EVENTS (E.G., RAPID TRANSIT)	0.01264	70	0.00316	COMMUTER RAIL, TYPICAL BUS OR TRUCK OVER BUMP RAPID TRANSIT, TYPICAL
LIMIT FOR VIBRATION-SENSITIVE EQUIPMENT				BUS OR TRUCK, TYPICAL
APPROXIMATE THRESHOLD FOR HUMAN PERCEPTION OF VIBRATION	0.004	60	0.001	NEAR FREEWAY AUTO TRAFFIC
AVERAGE RESIDENCE WITHOUT STEREO PLAYING	0.00126	50	0.000316	TYPICAL GROUND VIBRATION
AVERAGE WHISPER				

[1] PPV is typically a factor 1.7 to 6 times greater than RMS vibration velocity. A factor of 4 was used to calculate noise levels.

[2] Vibration levels in terms of velocity levels are defined as: $V=20 \times \log_{10} (a/r)$
V=velocity levels in decibels
a=RMS velocity amplitude
r=reference amplitude (accepted reference quantities for vibration velocity are 1×10^{-6} inches/second in the United States)

FIGURE **4.11-3**

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Typical Levels of Groundborne Vibration

050-002-13

Table 4.11-3
Modeled Existing Roadway Noise Levels

Roadway Segment	Roadway Noise Level at 75 feet from Center (dB[A] CNEL)
Harvard Blvd. w/o 10th St.	63.1
Harvard Blvd. e/o 8th St.	63.7
8th St. s/o Main St.	55.2
8th St. n/o Harvard Blvd.	54.9
Harvard Blvd. w/o 8th St.	64.0
Harvard Blvd. e/o Palm Ave.	64.2
Palm Ave. n/o Harvard Blvd.	59.9
Palm Ave. s/o Main St.	59.8
Main St. e/o Palm Ave.	57.8
Main St. w/o 8th St.	57.1
Harvard Blvd. w/o Palm Ave.	65.0
Harvard Blvd. e/o Steckel Dr.	64.0
Steckel Dr. n/o Harvard Blvd.	54.8
Steckel Dr. s/o Main St.	53.3
Main St. e/o Steckel Dr.	60.5
Main St. w/o Palm Ave.	61.0
Harvard Blvd. w/o Steckel Dr.	63.6
Harvard Blvd. e/o Peck Rd.	63.1
Peck Rd. s/o Harvard Blvd.	59.2
Peck Rd. n/o Faulkner Rd.	59.4
Peck Rd. s/o Faulkner Rd.	58.2
Peck Rd. n/o SR 126 EB On/Off Ramp	58.3
Harvard Blvd./Telegraph Rd. w/o Peck Rd.	59.2
Telegraph Rd. e/o Beckwith Rd.	58.5
Telegraph Rd. w/o Beckwith Rd.	58.1
Telegraph Rd. e/o Briggs Rd.	62.9
Briggs Rd. s/o Telegraph Rd.	53.4
Briggs Rd. n/o Faulkner Rd.	53.4
Briggs Rd. s/o Faulkner Rd	53.6
Briggs Rd. n/o SR 126 WB On/Off ramps	53.7
Briggs Rd. s/o SR 126 WB On/Off Ramps	52.8
Briggs Rd. n/o SR 126 WB On/Off Ramps	53.1

*Source: Fehr & Peers, Draft Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan (*March 2015).
Notes: n/o = north of; s/o = south of; e/o = east of; w/o = west of.
Noise-modeled results are provided in ***Appendix 4.11.***

Santa Paula Airport

The Santa Paula Airport is located on a 38-acre site south of SR 126, approximately 1.5 miles east of the Project Site. The Santa Paula Airport currently operates as an uncontrolled public-use facility and is not used for commercial purposes. A single 2,650-foot runway generally supports propeller-driven aircraft. According to the Noise Element of the Santa Paula General Plan, aircraft noise is generally not a problem in the City because the aircraft travel pattern is mainly south of the City, over the Santa Clara River, and the required approach and departure altitude is at least 1,500 feet above mean sea level (msl) when planes are over the City limits. Once near Peck Road, near the western City limits, planes transition toward 850 feet above msl and align with the farmland south of the Santa Clara River, and then continue their decent toward land uses that are not sensitive to noise.[9]

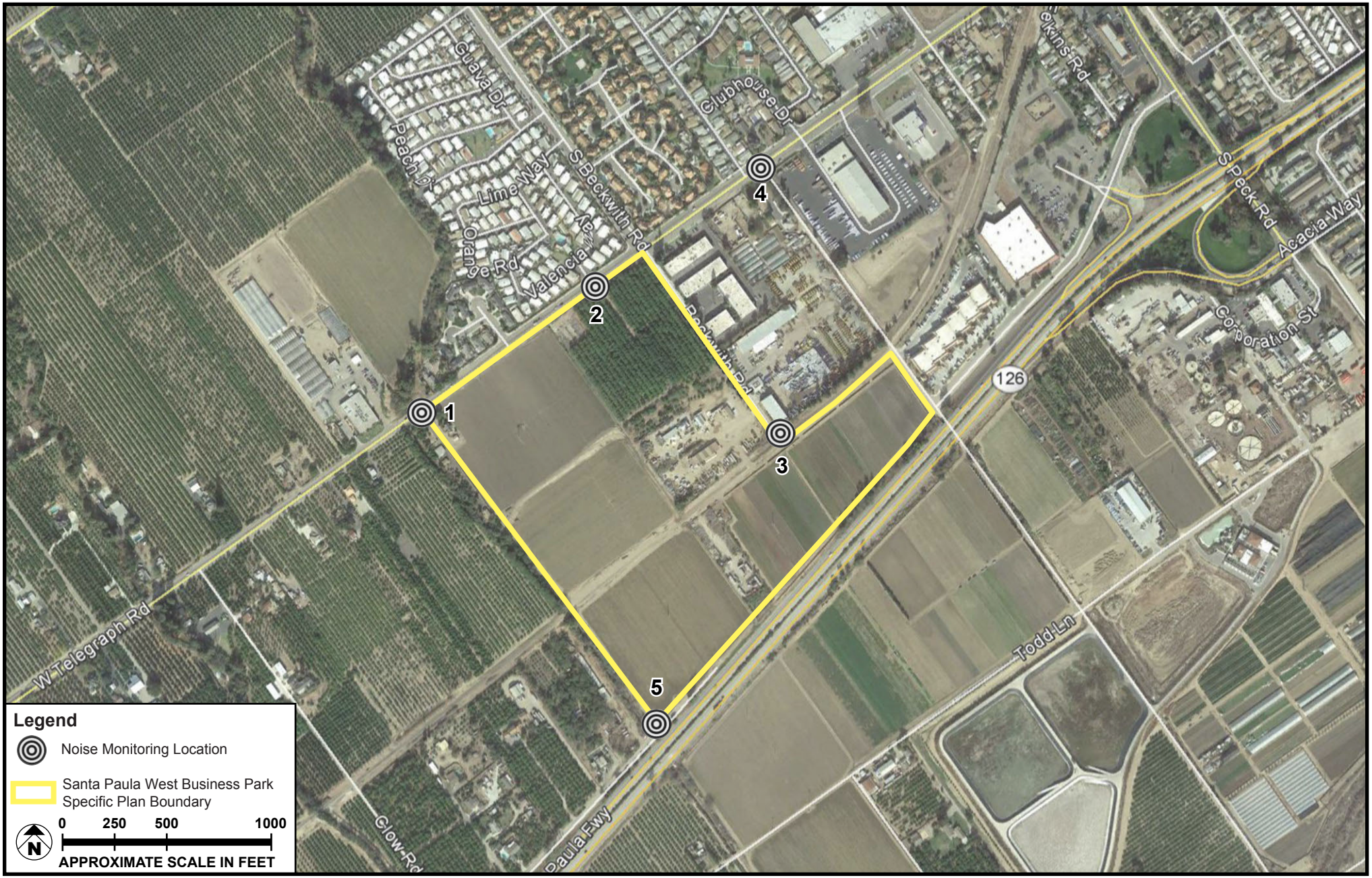
Santa Paula Branch of the Southern Pacific Railroad

The Santa Paula Branch of the Southern Pacific Railroad tracks is owned by the Ventura County Transportation Commission (VCTC). The railroad tracks, have historically been a source of noise running through the Project Site. However, no rail operations are currently generating train noise and it is uncertain what the ultimate use of the rail corridor will be.

Noise Monitoring

Existing on-site noise sources include farm equipment, motor vehicles, and activities associated with the on-site residences. Noise measurements were taken during weekdays in May 2015 with Larson Davis Type I meter. This meter satisfies the American National Standards Institute standard for general environmental noise measurement instrumentation. Random incidence microphones with windscreens were used, given the outdoor (i.e., free field) conditions of the monitoring. The microphones were positioned approximately 1.5 meters above ground level. Wind speeds during noise monitoring ranged from 5 to 15 miles per hour, and conditions were sunny. There was no construction or other abnormal noise conditions present during monitoring. The locations of the noise measurements are shown in **Figure 4.11-4, Ambient Noise Monitoring Locations.** Noise measurements were taken from 7:00 AM to 5:00 PM. **Table 4.11-4, Noise Measurements in Project Vicinity,** contain the results of the existing conditions monitoring conducted for on- and off-site areas of the Project Site.

9 Santa Paula Airport, Traffic Pattern, Runways 22 and 04, July 2014.



SOURCE: Google Earth - 2015

FIGURE **4.11-4**

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Ambient Noise Monitoring Locations

050-002-13

Table 4.11-4
Noise Measurements in Project Vicinity

Location	Leq (15-minute)
Site 1	57.9
Site 2	58.1
Site 3	57.5
Site 4	59.2
Site 5	67.6

*Note: Noise measurements are provided in **Appendix 4.11.***

4.11.2 REGULATORY SETTING

Federal

Department of Housing and Urban Development

The US Department of Housing and Urban Development (HUD) has set a goal of 65 dB(A) CNEL as the desirable maximum exterior standard for residential uses developed under HUD funding. While HUD does not specify acceptable interior noise levels, residential construction typically meet Title 24 standards, which provide in excess of 20 dB(A) of attenuation with the windows closed. Based on this premise, the interior CNEL should not exceed 45 dB(A) CNEL.[10] This is generally the federal standard used for determining impacts to off-site residences and is consistent with City regulations as well.

Federal Transit Administration

The Federal Transit Administration (FTA) has published guidelines for assessing the impacts of groundborne vibration associated with construction activities, which have been applied by other jurisdictions to other types of projects. The FTA's measure of the threshold of architectural damage for conventional sensitive structures (e.g., residential units) is 0.2 inch per second PPV.[11] The vibration threshold of perception is 0.01 inch per second PPV. With respect to human annoyance, the FTA provides criteria for various land use categories based on the frequency of vibration events. According to the FTA, a vibration criterion of 72 VdB should be used for residential land uses. With respect to potential building damage (primarily from construction activities), the FTA provides guidelines for the evaluation of potential groundborne vibration damage applicable to various building categories. According to FTA guidelines, a vibration criterion of 0.20 inches per second, or 106 VdB, should be considered as the significant impact level for nonengineered timber and masonry buildings. Structures engineered with concrete and masonry

10 Code of Federal Regulations, tit. 24, sec. 51, Housing and Urban Development, Environmental Criteria and Standards (revised April 1, 2004).

11 Hanson et al., *Transit Noise and Vibration* (2006).

(no plaster) have vibration damage criteria of 0.30 inches per second, or 110 VdB. All structures or buildings constructed of reinforced concrete, steel, or timber have vibration damage criteria of 0.50 inches per second, or 114 VdB.

State

California Building Code

California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, California Building Code. These noise standards are applied to new construction in California to ensure interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dB(A) CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dB(A) CNEL.

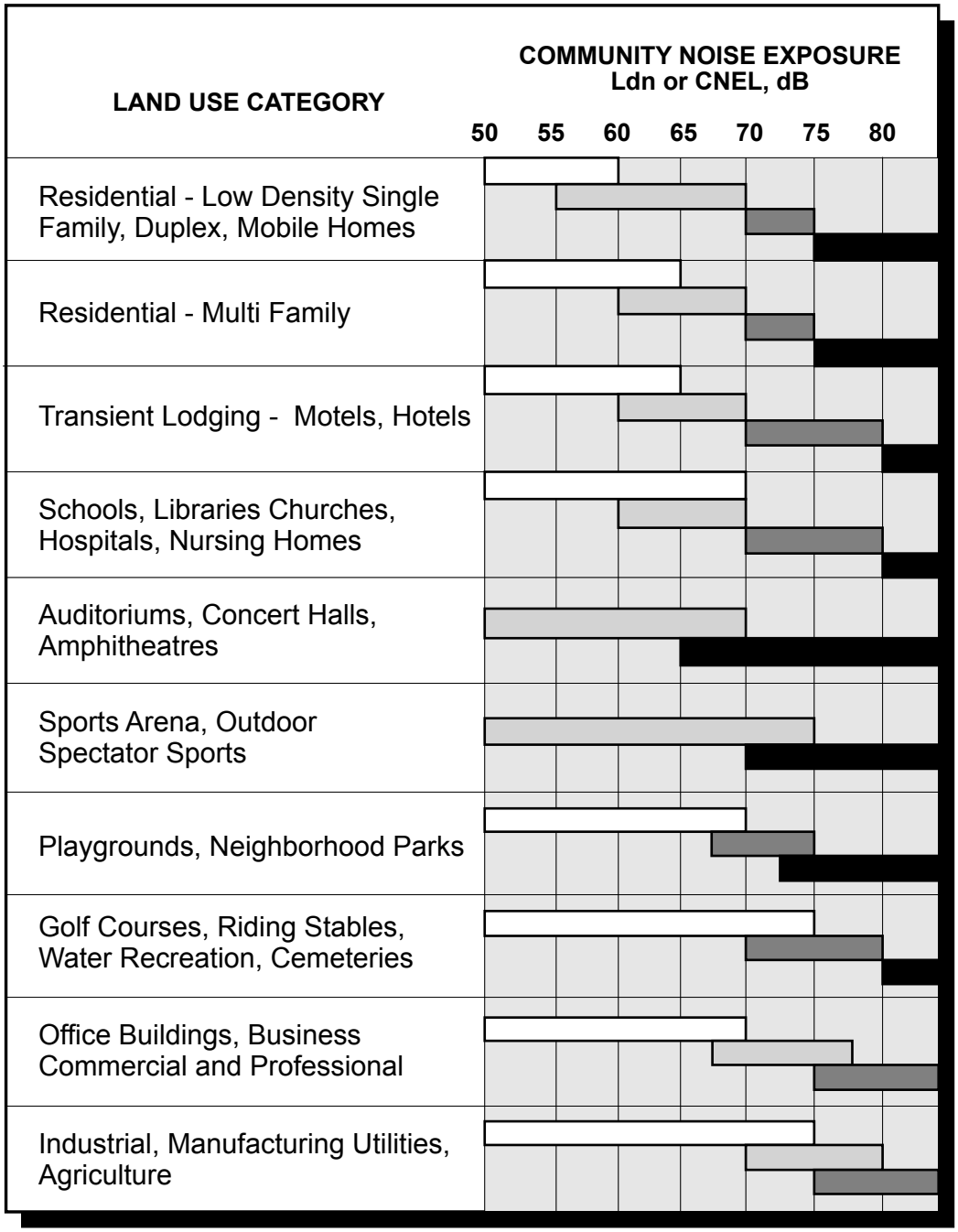
California Code of Regulations

The California Noise Insulation Standards[12] require that interior noise levels from the exterior source do not exceed 45 decibels CNEL/Ldn in any habitable room of a multi-residential use facility (e.g., hotels, motels, dormitories, long-term facilities, and apartment houses and other dwellings, except detached single-family dwellings) with doors and windows closed. Where exterior noise levels exceed 60 dB(A) CNEL/Ldn, an acoustical analysis is required to show that the proposed construction will reduce interior noise levels to 45 dB(A) CNEL/Ldn or less. If the interior 45 dB(A) CNEL limit can be achieved only with the windows closed, the residence must include mechanical ventilation that meets applicable Uniform Building Code (UBC) requirements.

California Department of Health Services

The State of California Department of Health Services, Environmental Health Division, has published recommended guidelines for noise and land use compatibility, referred to as the *State Land Use Compatibility Guidelines for Noise* ("*State Noise Guidelines*"). The *State Noise Guidelines*, illustrated in **Figure 4.11-5, Land Use Compatibility to Noise**, indicate that residential land uses and other noise-sensitive receptors generally should locate in areas where outdoor ambient noise levels do not exceed 65 to 70 dB(A) CNEL. According to the *State Noise Guidelines*, an exterior noise level of 60 dB(A) CNEL is

12 California Code of Regulations, tit. 24, sec. 3501 et seq.



NORMALLY ACCEPTABLE
Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

CONDITIONALLY ACCEPTABLE
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

NORMALLY UNACCEPTABLE
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise reduction features included in the design.

CLEARLY UNACCEPTABLE
New construction or development should generally not be undertaken.

SOURCE: California Governor's Office of Planning and Research, State of California General Plan Guidelines, Appendix C: Guidelines for the Preparation and Content of Noise Elements of the General Plan, October 2003.

FIGURE **4.11-5**

Meridian Consultants

Land Use Compatibility Guidelines for Noise

050-002-13

considered to be "normally acceptable" for single-family, duplex, and mobile homes involving normal, conventional construction, without any special noise insulation requirements. Exterior noise levels up to 65 dB(A) CNEL are typically considered "normally acceptable" for multi-family units and transient lodging without any special noise insulation requirements. Between these values and 70 dB(A) CNEL, exterior noise levels are typically considered "conditionally acceptable," and residential construction should only occur after a detailed analysis of the noise reduction requirements and needed noise attenuation features have been included in the Project design. Exterior noise attenuation features include, but are not limited to, setbacks to place structures outside the conditionally acceptable noise contour, orienting structures so no windows open to the noise source, and/or installing noise barriers such as berms and/or solid walls.

Department of Transportation

Streets and Highways Code Section 216 requires the Caltrans to abate freeway traffic noise within school classrooms under certain circumstances. These circumstances include when a new freeway or modification to existing freeway occur that effect an existing school uses; this is not applicable to the Santa Paula West Specific Plan. Classrooms, libraries, multipurpose rooms, and other spaces used for pupil personnel services at a public or private elementary or secondary school are eligible when noise levels, or projected noise levels within produced from the freeway traffic or freeway construction exceed 52 dB(A) Leq(h).[13] Allowable abatement measures include, but are not limited to, installing acoustical material, replacing or eliminating windows, installing air conditioning, or constructing sound-baffling structures.

Local

City of Santa Paula General Plan

Noise Element

As required by Government Code,[14] the Noise Element of the City of Santa Paula General Plan evaluates the existing and future noise environment associated noise sources and sets goals, objectives, and policies to limit noise exposure and address specific noise sources in the City.

Santa Paula Municipal Code

Annexation of the Santa Paula West Business Park into the City of Santa Paula is planned to occur as part of the Specific Plan approval process. Santa Paula Municipal Code (SPMC) Chapter 93 sets noise standards for the City. SPMC Section 93.21 establishes the acceptable exterior noise standard for residential uses of 65 dB(A) from 7:00 AM through 10:00 PM, and of 60 dB(A) from 10:00 PM through 7:00 AM. The exterior noise standard for other noise-sensitive uses, including schools, libraries, hospitals, community care

13 California Streets and Highway Code, title 24, sec. 216.
14 California Government Code, sec. 65302(f).

facilities, and assembly halls, is 65 dB(A) at all times. According to the SPMC, commercial and office uses cannot exceed an outdoor noise level of 70 dB(A), and neighborhood commercial uses cannot experience an external noise level of more than 65 dB(A). Industrial uses cannot to exceed an external noise level of more than 75 dB(A). The SPMC does not set acceptable interior noise level standards.

SPMC section 93.23 states that construction activities between 8:00 AM and 6:00 PM Monday through Friday are exempt from the noise standards set in SPMC section 93.21. A notice listing the times between which construction activities can take place, titled in letters at least 1 inch in height and placed at least 5 feet above ground level, must be posted at all entrances to a construction site.

4.11.3 THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of CEQA Guidelines, a significant impact related to noise would occur if the proposed project would:

- Expose people 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;
- Expose people to or generation of excessive ground-borne vibration or ground-borne noise levels;
- Create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- Create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- If located within an airport land use plan or, if such a plan has not been adopted, within 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise; or
- If located within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

The following local noise standards are used for this analysis to constitute quantitative thresholds for determining impacts from exposure to excessive noise and groundborne vibration.

On-Site Noise Thresholds

According to the City's Noise Element Noise Standard, office buildings, business commercial and professional uses are "acceptable" with exterior noise levels of up to 70 dB(A) Ldn/CNEL. Industrial uses identify 75 dB(A) as the "acceptable" exterior noise level threshold. For residential uses, the noise guidelines identify 60 dB(A) Ldn/CNEL as the "acceptable" exterior noise level threshold. In addition, as presented in the Noise Element, the maximum interior noise threshold is 45 dB(A) CNEL for noise-sensitive uses.

Off-Site Traffic Noise Thresholds

Off-site noise thresholds consider the City Noise Compatibility Matrix, *County of Ventura General Plan* community responses to changes in noise levels for potentially affected County areas, and CEQA standards. Changes in a noise level of less than 3 dB(A) are not typically noticed by the human ear.[15] Some individuals who are extremely sensitive to changes in noise may notice changes from 3 to 5 dB(A).

Based on this information, the following thresholds have been established for this analysis to assess traffic related noise increases:

- An increase of 3 dB(A) or greater in traffic noise levels that occur from project-related activities would be significant if the resulting noise levels exceeded the City Noise Compatibility Matrix for "acceptable" exterior noise levels. In addition, an increase of 5 dB(A) or less in traffic noise levels that occur from project-related activities would not be significant if the resulting noise levels remain below the "acceptable" thresholds established by the City. Increases in traffic noise greater than 5 dB(A) would be considered to be significant.
- Stationary noise sources proposed as part of the Project that result in increases in noise levels at on-site or adjacent sensitive land uses that exceed 3 dB(A) would be considered significant.

Ventura County Construction Noise Threshold Criteria and Control Plan

Specific construction noise limits for noise-sensitive locations are not currently specified in the General Plan or administrative code of the County of Ventura. The Construction Noise Threshold Criteria and Control Plan[16] is intended to establish construction noise thresholds and standard noise monitoring and control measures. The threshold criteria, monitoring, and control measures shall be applied to all discretionary development projects (public projects, Planned Development permits, Conditional Use Permits) and should be applied to ministerial development permits by amending the County building code (including excavation and grading).

The daytime,[17] evening, and nighttime[18] noise threshold criteria for construction activity are provided in **Table 4.11-5 Construction Activity Noise Threshold Criteria.** If the respective construction noise threshold criteria are exceeded, then noise abatement measures are to be implemented and adequate noise

15 Federal Highway Administration. *Fundamentals and Abatement of Highway Traffic Noise* (September 1980).

16 County of Ventura, *Construction Noise Threshold Criteria and Control Plan,* adopted 2005, amended 2010.

17 Daytime hours are considered from 7:00 AM to 7:00 PM Monday through Friday, and from 9:00 AM to 7:00 PM Saturday, Sunday and local holidays.

18 Evening hours are considered from 7:00 PM to 10:00 PM. Nighttime hours are considered from 10:00 PM to 7:00 AM Monday through Friday, and from 10:00 PM to 9:00 AM Saturday, Sunday, and local holidays.

reduction achieved to bring the construction activities into compliance with the construction noise threshold criteria.[19]

Table 4.11-5
Construction Activity Noise Threshold Criteria

Construction Duration Affecting Noise-Sensitive Receptors	*Noise Threshold Criteria shall be the greater of these noise levels at the nearest receptor area or 10 feet from the nearest noise-sensitive building.* Fixed Leq(h), dB(A)	Hourly equivalent Noise Level (Leq), dB(A)[a,b]
Daytime		
0 to 3 days	75	Ambient Leq(h) + 3 dB
4 to 7 days	70	Ambient Leq(h) + 3 dB
1 to 2 weeks	65	Ambient Leq(h) + 3 dB
2 to 8 weeks	60	Ambient Leq(h) + 3 dB
Longer than 8 weeks	55	Ambient Leq(h) + 3 dB
Evening[c]		
Residential receptor	50	Ambient Leq(h) + 3 dB
Nighttime[d]		
Resident; live-in institutional	45	Ambient Leq(h) + 3 dB

Source: County of Ventura, Construction Noise Threshold Criteria and Control Plan, Figure 4-6.
[a] The instantaneous Lmax shall not exceed the noise threshold criteria (NTC) by 20 dB(A) more than 8 times per daytime hour.
[b] Local ambient Leq measurements shall be made on any mid-week day prior to project work.
[c] The instantaneous Lmax shall not exceed the NTC by 20 dB(A) more than 6 times per evening hour.
[d] The instantaneous Lmax shall not exceed the NTC by 20 dB(A) more than 4 times per nighttime hour.

Vibration Thresholds

The CEQA Guidelines do not define the levels at which ground-borne vibration is considered "excessive." This analysis uses the Federal Railway Administration's vibration impact thresholds for sensitive buildings, residences, and institutional land uses. These thresholds are 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings.

19 County of Ventura, *Construction Noise Threshold Criteria and Control Plan, Appendix D—Construction Noise Mitigation Measures.*

4.11.4 PROJECT IMPACTS

Threshold: **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**

Construction

Construction requires site clearing, grading, asphalt paving, and construction of buildings. Construction will typically involve the use of heavy construction equipment, such as scrapers, tractors, dozers, pavers, and cranes. While construction is temporary, the use of this equipment would generate both steady-state and episodic noise that will be heard from within the Project Site and at off-site locations in the surrounding areas.

The construction noise model is based on information obtained from the FTA Roadway Noise Construction Model (RNCM). The FHWA has compiled data on noise-generating characteristics of specific types of construction equipment.[20]

The dominant source of noise from most construction equipment is engine sound, often without sufficient muffling. Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in one location for one or more days at a time, with either a fixed power operation (e.g., pumps, generators, compressors) or a variable power operation (e.g., pile drivers, pavement breakers). Mobile construction equipment (e.g., scrapers, bulldozers, loaders, trucks) would move throughout the construction site, and would travel to and from the Project Site for deliveries, hauling, and construction equipment mobilization. **Figure 4.11-6, Noise Levels of Typical Construction Equipment,** shows the typical noise levels of different types of construction equipment at a distance of 50 feet from the source.

Noise levels generated by heavy equipment can range from approximately 70 dB(A) to more than 100 dB(A) when measured at a distance of 50 feet from the noise source. The noise levels diminish with distance at a rate of approximately 6.0 to 7.5 dB(A) per doubling of distance for acoustically hard and soft sites, respectively. An example of an acoustically hard site would be a parking lot, while an acoustically soft site would be a park. Assuming an acoustically hard site, a noise level of 75 dB(A) measured at 50 feet from the noise source would be reduced to 69 dB(A) at 100 feet and to 63 dB(A) at 200 feet. Construction will occur in phases with various types of equipment used at any given time. The equipment would generate both steady state and episodic noise that would be heard off site. The usage factor is the

20 Federal Highway Administration, Roadway Noise Construction Model (RNCM), Software Version 1.1 (December 8, 2008).

percentage of time that particular equipment is anticipated to be in full power operation during a typical construction hour during the day.

Noise at Surrounding Noise Sensitive Uses

Existing sensitive receptors include single-family residences to the north across Telegraph Rd, and to the immediate west of the Project Site, west of Adams Barranca. Construction noise levels at sensitive receptors would vary based on the location of construction activity and the number of equipment in operation.

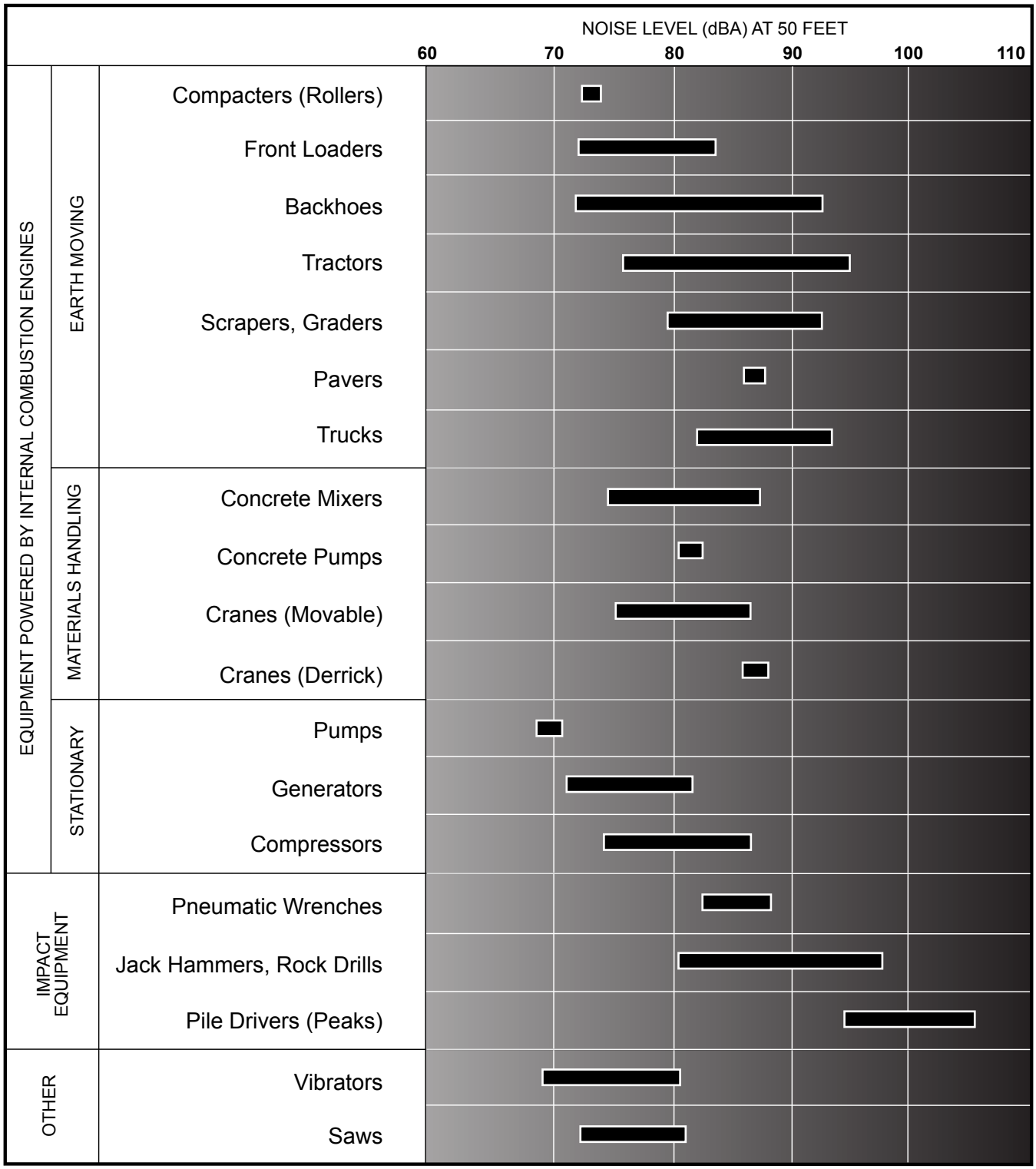
Although the City considers construction noise temporary and intermittent, future development within the Project Site would be required to comply with SPMC section 93.21, which generally requires construction noise to be restricted to the hours of 8:00 A.M. to 6:00 P.M. Monday through Friday (though a temporary noise permit can be obtained pursuant to SPMC section 93.06). This will reduce noise impacts for both surrounding uses.

West of the Project Site are scattered residential areas within large agricultural lands in the County. Construction noise could exceed construction noise thresholds for the County with an increase of greater than 3 dB(A) at residences located within the agricultural operations to the west. There is a residence located near the northwest boundary of the Project Site within 75 feet that would be subject to construction noise in excess of 65 dB(A) for exterior areas. Therefore, construction noise impacts to residences to the west are considered potentially significant.

Operational Noise

Roadway Noise

Traffic noise levels were modeled using the FHWA Noise Prediction Model (FHWA-RD-77-108). This model calculates the average noise level in dB(A) CNEL along a given roadway segment based on traffic volumes, vehicle mix, posted speed limits, roadway geometry, and site conditions. The model calculates noise associated with a specific line source, and the results characterize noise generated by motor vehicle traffic along the specific roadway segment. The model incorporates an alpha factor that characterizes the surface conditions of the area. An acoustically hard site uses an alpha factor of zero, while an acoustically soft site uses an alpha factor of 0.5. The greater the alpha factor, the greater the noise attenuates with increasing distance. Average vehicle noise rates utilized in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans.



Note: Based on limited available data samples.

SOURCE: United States Environmental Protection Agency, 1971, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," NTID 300-1.

FIGURE **4.11-6**

Meridian Consultants

Noise Levels of Typical Construction Equipment

050-002-13

According to data collected by Caltrans, California automobile noise is 0.8 to 1.0 dB(A) louder than national levels, while medium and heavy truck noise is 0.3 to 3.0 dB(A) quieter than national levels.[21]

Traffic scenarios were analyzed for potential project-related traffic impacts on the local and regional street system surrounding the Project Site based on the projected average daily trips (ADT). The following traffic scenarios were analyzed for the weekday AM peak hour (between 7:00 and 9:00 AM) and the weekday PM peak hour (between 4:00 and 6:00 PM):

- Existing Conditions
- Existing plus Project Conditions
- Cumulative Conditions (Year 2031)
- Cumulative plus Project Conditions (Year 2031)

The 24-hour traffic distribution was based on the FWHA model default parameters and differs from those contained within the City of Santa Paula General Plan. If the distribution contained within the General Plan were used, actual noise levels from those included within this study would be reduced by approximately 0.3 dB(A). Consequently, the use of the default provides a conservative worst-case scenario.

Table 4.11-6, Existing plus Project, provides the change in CNEL from existing traffic volumes and from traffic generated by the Project. The difference in traffic noise between Existing Conditions and Existing plus Project conditions represents the increase in noise attributable to Project-related traffic.

Table 4.11-6
Existing plus Project

	Roadway Noise Level 75 feet from Center (dB[A] CNEL)			
Roadway Segment	**Existing**	**Existing plus Project**	**Noise Level Increase**	**Significant Impact?**
Harvard Blvd. w/o 10th St.	63.1	63.4	0.3	No
Harvard Blvd. e/o 8th St.	63.7	63.9	0.2	No
8th St. s/o Main St.	55.2	55.2	0.0	No
8th St. n/o Harvard Blvd.	54.9	54.9	0.0	No
Harvard Blvd. w/o 8th St.	64.0	64.2	0.2	No
Harvard Blvd. e/o Palm Ave.	64.2	64.6	0.4	No

21 Rudolf W. Hendriks, *California Vehicle Noise Emission Levels,* HWA/CA/TL-87/03 (Sacramento: California Department of Transportation, Office of Transportation Laboratory, 1987).

Roadway Segment	Roadway Noise Level 75 feet from Center (dB[A] CNEL)			Significant Impact?
	Existing	Existing plus Project	Noise Level Increase	
Palm Ave. n/o Harvard Blvd.	59.9	59.9	0.0	No
Palm Ave. s/o Main St.	59.8	59.8	0.0	No
Main St. e/o Palm Ave.	57.8	58.0	0.2	No
Main St. w/o 8th St.	57.1	57.3	0.2	No
Harvard Blvd. w/o Palm Ave.	65.0	65.3	0.3	No
Harvard Blvd. e/o Steckel Dr.	64.0	64.6	0.6	No
Steckel Dr. n/o Harvard Blvd.	54.8	54.9	0.1	No
Steckel Dr. s/o Main St.	53.3	53.4	0.1	No
Main St. e/o Steckel Dr.	60.5	60.8	0.3	No
Main St. w/o Palm Ave.	61.0	61.3	0.3	No
Harvard Blvd. w/o Steckel Dr.	63.6	64.2	0.6	No
Harvard Blvd. e/o Peck Rd.	63.1	63.8	0.7	No
Peck Rd. s/o Harvard Blvd.	59.2	59.4	0.2	No
Peck Rd. n/o Faulkner Rd.	59.4	59.6	0.2	No
Peck Rd. s/o Faulkner Rd.	58.2	59.2	1.0	No
Peck Rd. n/o SR 126 EB On/Off Ramps	58.3	59.2	0.9	No
Harvard Blvd./Telegraph Rd. w/o Peck Rd.	59.2	60.6	1.4	No
Telegraph Rd. e/o Beckwith Rd.	58.5	60.2	0.7	No
Telegraph Rd. w/o Beckwith Rd.	58.1	59.3	1.2	No
Telegraph Rd. e/o Briggs Rd.	62.9	63.5	0.6	No
Briggs Rd. s/o Telegraph Rd.	53.4	53.9	0.5	No
Briggs Rd. n/o Faulkner Rd.	53.4	54.0	0.6	No
Briggs Rd. s/o Faulkner Rd.	53.6	54.2	0.6	No
Briggs Rd. n/o SR 126 WB On/Off Ramps	53.7	54.3	0.6	No
Briggs Rd. s/o SR 126 WB On/Off Ramps	52.8	52.9	0.1	No
Briggs Rd. n/o SR 126 WB On/Off Ramps	53.1	53.2	0.1	No

Source: Fehr & Peers, Draft Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan, (March 2015).
Notes: n/o = north of; s/o = south of; e/o = east of; w/o = west of.
Noise-modeled results are provided in ***Appendix 4.11.***

As previously discussed, an increase of 3 dB(A) or greater in traffic noise levels that occurs from Project-related activities would be considered significant if the resulting noise levels that occurs from Project-related activities would exceed the City Noise Compatibility Matrix for “acceptable” exterior or interior noise levels. These roadway systems do not experience an increase in noise levels of 3 dB(A) or greater. In addition, vehicle trips and traffic noise levels would remain the same with the proposed Beckwith Road

extension and would not cause an increase of 3 dB(A) or greater due to Project-related activities. Therefore, the Santa Paula West Specific Plan Area would not result in noise impacts in the local and regional street system. Impacts along these roadway systems are considered less than significant.

Railroad Noise

Exterior Noise

While there is currently no use of the Santa Paula Branch of the Southern Pacific Railroad tracks, noise from rail operations will represent an intermittent noise source if operated. While there has been no recent freight use of the portion of the SPBL adjacent to the Project Site and there is no planned freight use on the SPBL, potential impacts from use of the SPBL for freight operations were considered in this analysis.

The SPBL is classified as Federal Railroad Administration Track Class 1, the lowest track classification. Class 1 has a maximum speed of 10 mph for freight trains, and 15 mph for passenger trains.[22] Light industrial and commercial uses would be allowed near the southern boundary of the Project Site, north of the Santa Paula Branch of the Southern Pacific Railroad tracks. Predicted noise levels at 50 feet from the railway centerline to the southern boundary would be approximately 69.4 dB(A). Due to its proximity to the rail road track, uses allowed within the southern boundary of the Project Site are not sensitive to that estimate level.

Interior Noise

As mentioned previously, exterior-to-interior reduction of noise is generally 25 dB(A) or more. Assuming noise levels at 69.4 dB(A) within 50 feet from the railway centerline, interior noise could be reduced to 44.4 dB(A), below the General Plan noise threshold of 45 dB(A). Therefore, potential interior noise within the proposed development would be considered less than significant.

Threshold: **Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

Construction-related groundborne vibration impacts were evaluated using the FTA's Transit Noise and Vibration Impact Assessment guidance document. Construction equipment may create groundborne vibration during construction of the Project Site.

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The

22 Ventura County Transportation Commission, *Draft Final Report Santa Paula Branch Line Rail Study* (March 2007).

results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. The primary and most intensive vibration source associated with the development of the Project would be the use of earth-moving equipment during construction, as identified in **Table 4.11-7, Vibration Source Levels for Construction Equipment.**

Table 4.11-7
Vibration Source Levels for Construction Equipment

Equipment	VdB at 25 feet
Excavator	80
Large bulldozer	87
Backhoe	80
Loaded trucks	86
Roller	74
Small bulldozer	58

Source: Office of Planning and Environment, Federal Transit Administration, Transit Noise and Vibration Impact Assessment (May 2006) FTA-VA-90-1003-06, p. 2-9.

Loaded trucks and large bulldozers are capable of producing approximately 86 and 87 VdB, respectively, at 25 feet. The surrounding land uses within 25 feet of the Project Site include the scattered residential uses immediately to the west. The construction near this portion of this site may include some earthwork and grading activities. While offsite surrounding land uses may experience vibration events, these would not be frequent and impacts would be considered less than significant.

Operational Vibration

The primary sources of vibration from operations of the Project could include passenger vehicles and delivery trucks for industrial and commercial uses. Operations within the light-industrial and commercial uses would include typical commercial-grade stationary mechanical and electrical equipment such as air handling units, air condenser units, exhaust air fans, and electrical power generators that could produce vibration. Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the Project's operational-related vibration sources, such as mechanical and electrical equipment, would incorporate vibration attenuation mounts, as required by the particular equipment specifications. Therefore, operation of the Project Site would not increase the existing vibration levels at off-site surrounding uses; and as such, vibration impacts associated with operations would be less than significant.

Railroad Vibration

As previously noted, operating trains are a source of ground-borne vibration. The VCTC railroad tracks runs east/west of the Project Site. The tracks are not currently being operated, but should trains be operated on the tracks in the future, trains could potentially create vibration at the Project Site. To maintain compatibility with the railroad tracks, the Santa Paula West Business Park Specific Plan provides for predominantly light industrial and commercial uses.

According to the 2002 *Caltrans Transportation Related Earthborne Vibrations* study, train-generated vibration passes below the threshold of perception or 65 VdB at a distance of 90 meters, or 295 feet, from train tracks.[23] The Caltrans study identifies the threshold of annoyance or approximately 80 VdB as 20 meters, or 66 feet, from train tracks, given that vibration is constant. Given vibration from the railroad track would not be constant and would be approximately 50 feet from the track, uses allowed within Santa Paula West Specific Plan Area would not be susceptible to these conditions. Therefore, impacts would be considered less than significant.

Threshold: **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

Refer to the discussion above regarding the potential noise impacts for long-term operation of the Santa Paula West Specific Plan. The noise that could be generated from within the Specific Plan area and mobile source noise impacts would not substantially increase the ambient noise conditions in the surrounding area. Any permanent increase in ambient noise levels is considered less than significant.

Threshold: **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Construction of the land uses as well as on- and off-site infrastructure improvements (water line, storm drainage, etc.), associated with the Specific Plan, would occur over a span of several years. The construction-related noise levels associated with implementation of the Project would vary during the construction period and would depend on the construction phase. Activities during site preparation include excavation, earthmoving, and soils compaction. Other construction phases that would be included with the development of the Project would include grading, building construction, and asphalt paving.

Construction typically involves use of both mobile and stationary equipment. Mobile equipment, such as bulldozers, scrapers, and graders, are operated in a cyclical schedule during which a period of full power is followed by a period of reduced power. Stationary equipment can be subdivided into two groups. One

23 California Department of Transportation, Division of Environmental Analysis, *Transportation Related Earthborne Vibrations* (February 20, 2002), 17.

group contains such items as pumps, generators, compressors, and similar equipment that generally operates at a fixed power level and produces a constant sound level under normal operations. The other group contains impact equipment, such as jackhammers, pavement breakers, etc., which are operated in a cyclical fashion.

Noise levels generated during each of the Project phases are presented in **Table 4.11-8, Typical Maximum Noise Levels for Construction Phases.** Equipment estimates used for the analysis include site preparation/clearing, excavation, building construction, and asphalt paving noise levels representative of worst-case conditions since they assume several pieces of equipment operating simultaneously, which is very unlikely.

Table 4.11-8
Typical Maximum Noise Levels for Construction Phases

	Approximate Leq dB(A) without Noise Attenuation			
Construction Phase	**25 Feet**	**50 Feet**	**100 Feet**	**200 Feet**
Site Preparation/Clearing	94	88	82	78
Excavation	94	88	82	78
Building construction	94	88	82	78
Asphalt paving	85	79	73	67

Source: Knauer et al., FHWA Construction Noise Handbook, ch. 9.0 (August 2006).

Noise levels within the Project Site and adjacent areas would experience noise level increases during construction activities. These noise level increases would be temporary and intermittent. Future development under the Project must comply with SPMC section 93.21, which generally requires construction noise to be restricted to the hours of 8:00 AM to 6:00 PM Monday through Friday (though a temporary noise permit can be obtained pursuant to SPMC section 93.06). Therefore, no violation of the SPMC's noise regulations would occur, and temporary increases in noise during construction are not considered significant. Sensitive land uses surrounding the Project Site, such as the residential units to the north, may experience construction noise levels in excess of 3 dB(A) over existing ambient noise conditions, resulting in potentially significant construction noise impacts However, these impacts would be short-term and not constant in duration.

In addition to equipment-generated noise associated with construction activities, construction traffic would generate noise along access routes to the Project Site. The major pieces of heavy equipment would be moved onto the development only one time for each construction activity (i.e., grading). Daily transportation of construction workers and the hauling of materials both on and off the Project Site are expected to cause increases in noise levels along study-area roadways, although noise levels from such

trips would be less than peak-hour noise levels generated by Project trips during Project operation. Average daily trips associated with construction activities would not result in a doubling of trip volume along study-area roadways. Given that it takes a doubling of average daily trips on roadways to increase noise by 3 dB(A), the noise-level increases associated with construction vehicle trips along major arterials in the City of Santa Paula and nearby roadways that are within the area (unincorporated County of Ventura) would be less than 3 dB(A), and potential impacts will be less than significant.

Threshold: **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?**

Threshold: **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?**

The Project Site is not located within an airport land use plan. The Santa Paul Airport is located on a 38-acre site south of SR 126, approximately 1.5 miles east of the Project Site. The Airport is used by piston and propeller, single-, and twin-engine planes. There are no commercial aircraft in operation at the airport. The general aircraft travel pattern is south of the City, with a required approach and departure altitude of 1,500 feet.[24] Noise levels for the Airport, where most of the flight activities occur, are below 60 dB(A). Thus, people residing, attending school, or working within the future land uses of the Specific Plan area would not be exposed to excessive noise due to the aircraft travel pattern. Therefore, implementation of the Specific Plan would result in less than significant impacts related to noise generated by the Santa Paula Airport.

4.11.5 CUMULATIVE IMPACTS

Table 4.11-9, Future (Year 3031) plus Project, illustrates the change in CNEL from Year 2031 ambient conditions with the Project. The Year 2031 ambient conditions represent traffic growth or cumulative development within the Project Site. Based on the ambient growth, the greatest increase in noise would occur along Harvard Boulevard, west of Steckel Drive, with a roadway noise increase of 1.8 dB(A).

24 City of Santa Paula, "Noise Element," *City of Santa Paula General Plan* (April 13, 1998), p. N-7.

Table 4.11-9
Future (Year 2031) plus Project

Roadway Segment	Roadway Noise Level 75 feet from Center (dB[A] CNEL)					Significant Impact?
	Existing	Year 2031 Base	Year 2031 with Project	Increase in CNEL from Existing	Increase in CNEL due to Project	
Harvard Blvd. w/o 10th St.	63.1	64.7	64.9	1.8	0.2	No
Harvard Blvd. e/o 8th St.	63.7	65.5	65.7	0.8	0.2	No
8th St. s/o Main St.	55.2	56.4	56.4	1.2	0.0	No
8th St. n/o Harvard Blvd.	54.9	55.9	55.9	1.0	0.0	No
Harvard Blvd. w/o 8th St.	64.0	65.5	65.7	1.7	0.2	No
Harvard Blvd. e/o Palm Ave.	64.2	64.6	65.8	1.6	1.2	No
Palm Ave. n/o Harvard Blvd.	59.9	61.3	61.3	1.4	0.0	No
Palm Ave. s/o Main St.	59.8	61.2	61.2	1.4	0.0	No
Main St. e/o Palm Ave.	57.8	58.8	59.0	1.2	0.2	No
Main St. w/o 8th St.	57.1	58.2	58.3	1.2	0.1	No
Harvard Blvd. w/o Palm Ave.	65.0	66.0	66.3	1.3	0.3	No
Harvard Blvd. e/o Steckel Dr.	64.0	64.4	65.9	1.9	1.5	No
Steckel Dr. n/o Harvard Blvd.	54.8	56.6	56.2	1.4	-0.4	No
Steckel Dr. s/o Main St.	53.3	54.8	54.8	1.5	0.0	No
Main St. e/o Steckel Dr.	60.5	61.2	61.5	1.0	0.3	No
Main St. w/o Palm Ave.	61.0	61.8	62.1	1.1	0.3	No
Harvard Blvd. w/o Steckel Dr.	63.6	63.5	65.3	1.7	1.8	No
Harvard Blvd. e/o Peck Rd.	63.1	64.3	64.8	1.7	0.5	No
Peck Rd. s/o Harvard Blvd.	59.2	60.8	60.9	1.7	0.1	No
Peck Rd. n/o Faulkner Rd.	59.4	60.9	61.0	1.6	0.1	No
Peck Rd. s/o Faulkner Rd.	58.2	59.6	60.3	1.9	0.7	No
Peck Rd. n/o SR 126 EB On/Off Ramp	58.3	59.7	60.4	2.1	0.7	No
Harvard Blvd./Telegraph Rd. w/o Peck Rd.	59.2	60.1	61.3	2.1	1.2	No
Telegraph Rd. e/o Beckwith Rd.	58.5	60.4	59.1	0.6	-1.3	No
Telegraph Rd. w/o Beckwith Rd.	58.1	59.7	58.8	0.7	-0.9	No
Telegraph Rd. e/o Briggs Rd.	62.9	63.6	64.0	1.1	0.4	No
Briggs Rd. s/o Telegraph Rd.	53.4	57.4	57.6	4.2	0.2	No
Briggs Rd. n/o Faulkner Rd.	53.4	57.4	57.7	4.3	0.3	No
Briggs Rd. s/o Faulkner Rd.	53.6	57.5	57.7	4.1	0.2	No
Briggs Rd. n/o SR 126 WB On/Off Ramps	53.7	57.6	57.8	4.1	0.2	No

Roadway Segment	Roadway Noise Level 75 feet from Center (dB[A] CNEL)					Significant Impact?
	Existing	Year 2031 Base	Year 2031 with Project	Increase in CNEL from Existing	Increase in CNEL due to Project	
Briggs Rd. s/o SR 126 WB. On/Off Ramps	52.8	55.9	56.0	3.1	0.1	No
Briggs Rd. n/o SR 126 WB On/Off Ramps	53.1	56.1	56.1	3.0	0.0	No

Source: Fehr & Peers, Draft Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan, (March 2015).
Notes: n/o = north of; s/o = south of; e/o = east of; w/o = west of.
Noise-modeled results are provided in ***Appendix 4.11.***

As indicated in **Table 4.11-9,** cumulative development would not result in significant noise increases of more than 3.0 dB(A). In addition, vehicle trips and traffic noise levels would remain the same with the proposed Beckwith Road extension and would not cause an increase of 3 dB(A) or greater due to project-related activities. Overall, the Project's contribution would not be considered to be cumulatively considerable and significant.

With regard to stationary sources, cumulatively significant noise impacts may result from cumulative development. Stationary sources of noise that could be introduced in the area by cumulative projects could include mechanical equipment, loading docks, and parking lots. Since these projects would be required to adhere to Santa Paula's noise standards, all the stationary sources would be required to provide shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to distance, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. As such, it is not anticipated that a significant cumulative increase in permanent ambient noise levels would occur and, therefore, the impact would be less than significant.

4.11.6 MITIGATION MEASURES

Construction noise impacts will be mitigated by compliance with the Santa Paula Municipal Code.

N-1: Stationary construction equipment, such as pumps, generators, or compressors, shall be placed as far from noise sensitive uses as feasible during all phases of project construction.

N-2: All construction equipment shall be equipped with appropriate mufflers in good working condition.

N-3: Before any site activity, the contractor shall be required to submit a material haul route plan to the City of Santa Paula and Ventura County for review and approval. The contractor shall 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.

N-4: During all site preparation, grading and construction, the construction contractor shall locate all stockpiling and vehicle staging areas away from existing residences, to the extent feasible.

4.11.7 RESIDUAL IMPACTS AFTER MITIGATION

Implementation of **Mitigation Measures N-1** to **N-4** will reduce noise related impacts generated during construction to below a level of significance.

4.12 PUBLIC SERVICES

This section evaluates potential effects on public services due to the long-term development of the Project Site following the annexation of the Santa Paula West Business Park Specific Plan area ("Specific Plan") into the City of Santa Paula ("City"). Effects on fire department services, police department services, public schools, parks and recreation, libraries, and general government services are discussed with respect to the Project's demand for services, adequacy of existing and planned resources to meet service demand, and whether there is a need to construct any new facilities to provide adequate levels of service. The information provided in this section is based on correspondence and consultation with the Santa Paula Police Department, Santa Paula Fire Department, the Santa Paula Unified School District, and the local library. Each section includes an introduction, followed by discussions of existing conditions, regulatory framework, methodology, environmental impacts, cumulative impacts, project design features, and mitigation measures.

4.12.1 EXISTING CONDITIONS

Fire Protection and Emergency Medical Services

Fire Protection Services

Because it is currently located in unincorporated Ventura County, the Project Site falls within the boundaries of the County of Ventura Fire Protection District for fire prevention and suppression services. Upon implementation of the Project, the Project Site would fall within the jurisdiction of the Santa Paula Fire Department (SPFD). The SPFD provides comprehensive emergency services, including fire prevention and suppression services and emergency medical services. The SPFD's duties also include emergency medical and rescue services, as well as nonemergency services, such as business hazardous materials regulation, code enforcement, plan checking, fire safety inspections, information programs, fire investigations, and disaster preparedness. The SPFD also responds to statewide disasters as part of regional strike teams, including wildfires, earthquakes and other natural disasters. In recent years, SPFD has responded to more than 2,500 emergency calls annually. With the strategic placement of its two fire stations, the average response time to emergency calls throughout the City is less than 5 minutes.[1] The SPFD responds to incidents outside the City limits in in cooperation with surrounding agencies per the Auto-Aid Agreement. The SPFD responses outside the City limits are assigned by the closest unit to the incident.

1 City of Santa Paula Fire Department, "About Us," http://www.santapaulafire.com/about-us.html. Accessed July 2016.

The Ventura County Environmental Health Division is the designated Certified Unified Program Agency (CUPA) serving the Project Site a is responsible for regulation and inspection of all phases of hazardous materials and wastes through the implementation of various programs, such as the Hazardous Materials Business Plan (HMBP), California Accidental Release Prevention (Cal ARP), and Underground Storage Tank (UST) programs. In addition, the SPFD is responsible for code enforcement related to any construction or alteration of buildings and structures within the City.

The SPFD consists of two fire stations that cover the City's 4 square miles of jurisdiction, as summarized in **Table 4.12-1, Fire Protection and Emergency Medical Service Locations and Equipment.** Administration and Prevention offices are at the Community Development Building Annex. Fire Stations 81 and 82 house most of the department's equipment. Station 81 houses a 2015 Pierce pumper and a 1992 Pierce Pumper. Station 82 houses a 2008 E-ONE pumper, a 2002 Ferrera pumper, a light and air unit, and a mass casualty trailer. The Department also maintains a 1954 Mack Pumper and a 1923 Seagrave pumper as historical engines, along with two command vehicles and two support vehicles. Routine fire, medical, and other calls are handled by the two on-duty Engine Companies on a rotating 24-hour shift system. Engine 81 responds out of Station 81 with a full-time Captain, Engineer, and Firefighter/EMT; and Engine 82 responds out of Station 82 with a full-time Captain, Engineer, and Firefighter/EMT. When available, reserve firefighters supplement both stations and serve as the fourth firefighter. The Public Works Department's Equipment Maintenance Division provides mechanics' services.[2]

Table 4.12-1
Fire Protection and Emergency Medical Service Locations and Equipment

Station Number	Location	Distance from Project Site (miles)	Equipment/Staff
81	114 South 10th Street	2.1	Engine 81, Reserve Engine 181; 1 full-time captain, engineer, and Firefighter/EMT; staff supplemented by reserves
82	536 West Main Street	1.0	Engine 82, Reserve Engine 182, Light and Air 82; 1 full-time Captain, Engineer, and Firefighter/EMT; staff supplemented by reserves

Source: City of Santa Paula, Proposed Budget for Fiscal Year 2015–2016 (June 2015).

Total SPFD staffing resources consist of 20 full-time personnel and up to 45 reserve firefighters/ EMTs and one volunteer fire chaplain. The 20 full-time personnel are the fire chief, assistant fire chief, 6 captains, 6 engineers, and 6 full-time firefighters. Station 82's crew is also responsible for responding to

2 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).

Automatic/Mutual aid calls in Santa Paula's light and air unit when requested. This duty alternates daily between the SPFD and Fillmore Fire Department.[3]

Incoming 911 calls generated within the City are routed to Santa Paula Police dispatch. Fire and medical calls are transferred to the Ventura County Fire Protection District's (VCFPD) fire communications center, which handles dispatching for most fire departments and all ambulance agencies within Ventura County. For Santa Paula, this dispatching service is provided pursuant to a contract by which SPFD provides certain automatic aid services in exchange. The City also contracts with the VCFPD on a fee-for-service basis for hazardous materials responses requiring more than the City's own resources~~, and for continuing EMT training.~~[4] The SPFD maintains agreements with Ventura City Fire, Oxnard Fire, Federal Fire of Ventura County, and Fillmore Fire that allow these other jurisdictions to utilize the SPFD's engine companies and light and air heavy-duty pick up service unit when needed.[5] Furthermore, the SPFD participates in an automatic and mutual aid agreement in the Operational Area (Countywide) as a strategy for providing assistance during emergencies when their services require additional support.

Emergency Medical Services

The SPFD and the American Medical Response (AMR) ambulance company provide emergency medical services to the City. In 2014, SPFD was dispatched to approximately 2,500 incidents, of which approximately two-thirds were emergency medical calls.[6] All of the firefighter personnel are certified EMTs and can provide Basic life support care. The average response time of the SPFD for medical emergency services is approximately 5 minutes.[7] The SPFD follows the Personnel Training and Emergency Response Plan outlined in the California Code of Regulations Title 26, Divisions 19 and 19.1. The SPFD is ultimately responsible for coordinating any evacuation necessitated by an emergency.

The Santa Paula Hospital (SPH) currently provides medical care services to all residents within the Santa Clara Valley.[8] SPH is considered an acute-care hospital equipped to care for injured and seriously ill people. The hospital is located at 825 N. Tenth Street and is a campus of Ventura County Medical Center, which is governed by the Ventura County Board of Supervisors. SPH has state-of-the-art equipment, a comprehensive roster of services and dedicated intensive care unit (ICU), and maternity/surgical units. The hospital offers a comprehensive list of inpatient and outpatient services, with full-service

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3 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).
4 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).
5 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).
6 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).
7 City of Santa Paula Fire Department, "About Us," http://www.santapaulafire.com/about-us.html. Accessed July 2016.
8 Ventura County Health Care Agency, "Santa Paula Hospital," http://www.vchca.org/hospitals/santa-paula-hospital. Accessed July 2016.

departments for diagnostic procedures, treatment, aftercare and ongoing care, including radiology, surgery, obstetrics and gynecology, oncology, critical care, 24/7 emergency room, laboratory, and dietetics.

Fire Flow

Fire flow is an important factor in the SPFD's ability to deliver effective fire suppression activities. Fire flow is defined as the quantity of water available for fire protection in a given area and is normally measured in gallons per minute (gpm). The SPFD requires provisions of fire flows to serve individual developments in accordance with the Santa Paula General Plan Safety Element. These fire flow provisions are further determined by the specifications of the Uniform Fire Code, which considers the type of building construction, proximity to other structures, firewalls, and fire protection devices.[9] Fire flow requirements range from 1,000 gpm for buildings less than 3,600 square feet to between 1,500 gpm and 8,000 gpm for buildings greater than 3,600 square feet. These fire flow requirements are also based on maximum response distance to a SPFD fire station. In addition to the review of required fire flow for development on the Project Site, the Project Applicant must submit plans to the SPFD for the review and approval of fire hydrant locations.[10]

Police Protection

The Santa Paula Police Department (SPPD) provides police protection services to the community within the City limits and to some adjacent unincorporated territory. The Project Site currently lies outside of the City's SOI but is designated by the City as a proposed Expansion Area. Therefore, the Project is currently served by the Ventura County Sheriff's Office as well as by the SPPD because it is within an unincorporated area of Ventura County The main SPPD station is located at 214 S. Tenth Street (approximately 2 miles northeast of the Project Site) and is composed of a patrol division, investigations program, and a support division. In addition to the 7,500-square-foot facility on S. Tenth Street, the SPPD also operates out of the 1,440-square-foot Community Policing Building at Las Piedras Park. The SPPD maintains a force of approximately 34 full-time sworn police officers, 20 reserve officers, 9 full-time civilian employees, and 11 part-time civilian employees.[11] The City's current level of service is about 1 officer per 1,000 residents, and the target goal is to increase the level of service to 1.25 officers per 1,000 residents.[12]

The SPPD Patrol Division comprises patrol operations, the special response team (SRT), and the communications center. Patrol operations incorporates the reserve program, school resource officers,

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9 City of Santa Paula, *General Plan,* "Safety Element" (1998). S-15.
10 City of Santa Paula, *General Plan,* "Safety Element" (1998). S-16.
11 Electronic communication with Chris Cook, Dispatch Supervisor, Santa Paula Police Department, September 12, 2014.
12 City of Santa Paula, *General Plan,* "Land Use Element" (1998). LU-13.

and K-9 units. The Patrol Division is currently deployed with 4 sergeants, 4 senior officers, and 12 full-time police officers. Two officers are assigned as K-9 handlers.[13] The reserves program was established to provide additional resources to the SPPD for normal and emergency circumstances. Officers have the same authority, liability coverage, and protection as regularly commissioned SPPD officers. The SRT provides highly trained personnel with the tactical skills needed to resolve high-risk law enforcement incidents within the City of Santa Paula. The communications center is responsible for receiving all 911 and nonemergency calls within the City. Under the direction of the communications supervisor, 4 full-time dispatchers and 1 dispatcher-trainee staff the Santa Paula Police Communications Center. Animal control is supervised by the police commander and is staffed by one full-time animal control officer.[14]

The investigations unit (Major Crimes) is made up of one acting sergeant and three detectives. Additionally, two officers are assigned as gang officers, and one officer is assigned to narcotic investigations. They all have specialized training that allows for the investigation of all major crimes, crime-scene processing, and specialized areas (i.e., white collar crime, computer and fraud crime, sex crimes, etc.). The gang officers are assigned to identify and suppress gang-related activities, and to conduct all gang-related investigations. The narcotic officer is assigned to the Ventura County Narcotic Task Force responsible for all narcotics-related investigations. Three part-time community service officers (CSOs) are also assigned to specialized support areas (1 as court liaison and 2 as evidence management). A CSO is assigned full time to the investigations unit; duties performed include sex offender registrations and compliance checks, probation and drug offender registrations, and other duties as needed within the unit.[15]

The role of the SPPD Support Division is to manage City records, property and, evidence, and accomplish investigations of major crimes and felonies committed within the City. The records unit currently contains one records supervisor and two part-time CSOs.

The SPPD currently operates under the 2010 Strategic Plan, which was developed by the department's leadership team to identify future community and department needs.[16] As a result of the City's budget cuts, the goals and steps reflected in the Strategic Plan are designed to help the SPPD anticipate any challenges related to the delivery of police protection services. The Plan also provides performance measures to indicate the success of the department on an annual basis. Additionally, public comments

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13 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).
14 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).
15 City of Santa Paula, *Proposed Budget for Fiscal Year 2015–2016* (June 2015).
16 City of Santa Paula Police Department, "Strategic Plan," (2010). http://www.ci.santa-paula.ca.us/police/StrategicPlan.pdf.

and input, gathered from surveys and verbal discussion, were incorporated into the document to assist the SPPD on areas that need improvement or adjustments.

As shown in **Table 4.12-2, Average Response Times to Calls for Service,** response times vary based on category, priority, and the benchmark used to measure response time (received/dispatched, received/arrived, etc.). There is no recognized County or City standard for response times, nor does the SPPD track this time as a measure of service delivery.

Table 4.12-2
Average Response Times to Calls for Service

Category	Priority	Number of Calls (year to date)	Average Response Time			
			Received/ Dispatched	Received/ Arrived	Dispatched/ Arrived	Dispatched/ Clear
Dispatched	1	493	4:32	7:26	2:54	35:45
Dispatched	2	2,662	11:10	15:26	4:37	22:03
Dispatched	3	5,586	13:56	18:42	5:04	26:01
Self-Initiated	1	52	0:00	0:00	0:00	08:27
Self-Initiated	2	647	0:03	0:00	0:00	05:34
Self-Initiated	3	4,941	0:05	0:04	0:00	13:43

Source: Electronic communication with Chris Cook (September, 2014).

Mutual aid agreements exist with all other cities within the County of Ventura and the Ventura County Sheriff's Department. The agreements are intended to assist participating jurisdictions during emergencies in which their services and/or capabilities require assistance. With the current economic stagnation, the SPPD is seeking the ability to maintain existing service levels, while investigating options to increase staffing and continue to improve police service levels.

Table 4.12-3, Part I Offences 2012–2013, and **Table 4.12-4, Part II Offences and Traffic Incidents 2012,** provide information in regards to crime statistics reported throughout the SPPD's service area in 2012 and 2013. SPPD reported a total of 2,552 calls for service during the calendar month of August 2014. **Table 4.12-5, Historical Review of Crime Reporting: 2000–2013**, provides a historical summary of crimes reported between 2000 and 2013. Total Part I crimes decreased by approximately 5 percent between 2012 and 2013, despite increases in violent crimes such as homicide, rape, assault, and auto theft. Although the population in the City increased from approximately 29,980 residents in 2012 to 30,091 residents in 2013, the crime rate declined from 22.9 crimes per 1,000 residents in 2012 to 21.7 crimes per 1,000 residents in 2013.

Table 4.12-3
Part I Offences 2012–2013

Part I Offenses	2012	2013	Percent Change
Violent Crimes			
Criminal homicide	1	6	500
Rape	4	6	50
Robbery	28	33	17.9
Aggravated assault	57	64	12.3
Subtotal	*90*	*109*	*21.1*
Property Crimes			
Burglary	104	104	0
Larceny theft	425	359	-15.5
Auto theft	64	76	18.8
Arson	3	5	66.7
Subtotal	*596*	*182*	*-8.7*
Total Part I Crimes:	**686**	**653**	**-4.8**

Source: Electronic communication with Chis Cook (September 12, 2014).

Table 4.12-4
Part II Offenses and Traffic Accident Incidents 2012

Part II Offense	Number of Offenses
Animal	4
Civil matters	32
Death (not suspicious)	13
Foreign investigation	15
Fraud	90
Recovered/Possession of stolen property	3
Narcotics/Drug violations	252
Weapon violations	70
Drunk driving	69
Disorderly conduct	156
Juvenile (assistance/out of control)	162
Kidnapping	2
Miscellaneous	12
Moral sex offenses	18
Obstructing police	48
Persons cared for	79
Property damage	161
Suspicious incidents	26

Part II Offense	Number of Offenses
Traffic citation	27
Warrant/Parole arrests	17
Total Part II Offenses	**1,256**
Traffic Accident Data	**Number of Accidents**
Accidents involving DUI	7
Hit and run accidents	15
Traffic accidents (public streets)	87
Traffic accidents (private streets)	10
Accidents involving a city vehicle	5
Total Traffic Accident Incidents	**124**

Source: Electronic communication with Chris Cook (September, 2014).

Table 4.12-5
Historical Review of Crime Reporting: 2000–2013

Part I Crimes per Thousand People				
Year	**Population**	**Total Part I Crimes**	**Crime Rate**	**Percentage Change (Crime Rate)**
2013	30,091	653	46.1	33.4
2000	28,754	884	30.7	—

Total Annual Crimes Reported		
Year	**Total Part I Crimes**	**Percentage Change from Prior Year**
2013	653	-4.8
2012	686	+11.9
2011	604	-4.88
2010	635	-14.9
2009	746	-15.03
2008	878	+7.17
2007	815	+6.87
2006	759	+1.2
2005	750	+1.73
2004	737	+17.5
2003	608	-32.96
2002	907	—

Source: Electronic communication with Chris Cook (September 2014).

Public Schools

The Project Site is located within the boundaries of the Santa Paula Unified School District (SPUSD), which provides public education services to portions of the surrounding County of Ventura, well as to the City's residents. The SPUSD was established July 1, 2013, by the voters of Santa Paula to include the former Santa Paula Elementary School District (SPESD) and Santa Paula Union High School District (SPUHSD). The SPUSD also receives students from the Briggs, Mupu, and Santa Clara Elementary School Districts (also referred to as "the feeder elementary districts").[17]

According to SPUSD, the Project Site falls within the attendance boundaries of Barbara Webster Elementary (1150 Saticoy Street), Isbell Middle School (221 S. 4th Street), and Santa Paula High School (404 N. Sixth Street).

During the 2014–2015 school year, the SPUSD had a total enrollment of 5,459 students in the elementary and high schools. The enrollment of the Santa Paula Unified School District shows that between 2012 and 2013, combined enrollment declined from 5,503 to 5,459. [18]

The student enrollment per school is indicated in **Table 4.12-6**, **SPUSD Schools**. The SPUSD operates six elementary schools and one middle school with a total enrollment of 3,793. Santa Paula High School and Renaissance High School are the two high schools serving Santa Paula. Santa Paula High School is a comprehensive high school with more than 1,500 students, and Renaissance High School is a continuation high school serving more than 120 students. As of October 2013, the feeder elementary districts served a total of 783 students in grades K–8.

The California Department of Education has established capacity standards to improve school performance through the individual capacity of teachers and school leaders and through the institutional capacity of schools, districts, and state agencies to provide the most efficient and effective delivery of education to students.[19] As reflected in **Table 4.12-6,** many of the schools within the SPUSD are currently operating over capacity.

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17 Santa Paula Unified School District, "Level I Developer Fee Justification Study for Santa Paula Unified School District" (April 2014), http://www.spuhsd.k12.ca.us/cms/lib2/CA01001761/Centricity/Domain/32/Santa%20Paula%20USD%20DF1%20Study%202014.pdf.

18 California Department of Education, Educational Demographics Unit, "California Basic Educational Data System (CBED)," http://www.cde.ca.gov/ds/dc/cb/.

19 California Department of Education, "Accountability and School Improvement." http://www.cde.ca.gov/eo/in/bp/bpstrategy4.asp.

Table 4.12-6
SPUSD Schools

School Name	Maximum Capacity	Enrollment (2014-2015)	Remaining Capacity
Elementary School (K–5)[a]			
McKevett Elementary	416	407	9
Grace Thille Elementary	442	402	40
Glen City Elementary	670	623	47
Blanchard Elementary	494	459	35
Thelma B. Bedell Elementary	394	342	52
Barbara Webster Elementary	471	417	54
Middle School (6–8)			
Isbell Middle[b]	1400	1,541	-141
High School (9–12)			
Santa Paula High[c]	1,700	1,541	159
Renaissance High (Continuation School)[d]	125	121	4

Sources:
a Monique Terrazas, attendance accounting specialist, phone conversation, July 27, 2016.
b Isbell Middle School office staff, phone conversation, July 27, 2016.
c Dr. Williams, assistant principal, phone conversation, July 28, 2016.
d Renaissance High School office staff, phone conversation, July 28, 2016.

Developer fees are collected by the City to improve school facilities to meet the SPUSD's growing demands. The developer fees are capped by the State Allocation Board at a maximum of $3.36 per square foot of new residential construction and $0.54 per square foot of commercial/industrial construction. The SPUSD is entitled to collect that amount on all construction within the boundaries of its high school attendance area, with the exception of construction within the boundaries of the Briggs Elementary, Mupu Elementary, and Santa Clara Elementary School Districts. An agreement with these SPUSD elementary feeders allocates one-third of the maximum amount to the SPUSD, with two-thirds allocated to the respective elementary district.[20]

Parks and Recreation Facilities

The City of Santa Paula's park system includes two neighborhood parks, eight mini-parks and two special Interest parks, none of which are in or adjacent to the Project Site. Local public school facilities are also available for indoor and outdoor public recreation activities through a joint-use agreement between the City and the SPUSD. Santa Paula is located near several regional recreation opportunities, including the

20 Santa Paula Unified School District, *Level I Developer Fee Justification Study* (April 2014).

Pacific Ocean, Channel Islands National Park, Ventura County Parks, Six Flags Magic Mountain Theme Park, Lake Piru, and the Ronald Reagan Presidential Library and Museum. There are currently no parks or recreational facilities within or adjacent to the Project Site.

Libraries

The Blanchard/Santa Paula Public Library District (Blanchard Community Library), located at 119 N. 8th Street in Santa Paula, provides library services to the residents of Santa Paula, as well as to surrounding areas. In fiscal year 2012–2013, the library recorded 22,258 borrowers/patrons and circulated 69,559 items to borrowers.

The 22,554-square-foot facility includes computers for free public use, a local history room, a literacy center, and one meeting room. Library program services include a children's story time, a teen program, homework center assistance, adult and family literacy programs, basic Internet and computer classes, and ESL (English as a second language) classes. Library facilities and services are funded through a share of local property taxes, as assessed and collected by the County tax assessor. The library has recently completed an electrical retrofit to upgrade the electrical system that supports the building facility, as well as the surrounding parking lots. Energy efficiency and conservation features to be constructed within the building are planned to occur when sufficient funding becomes available. Furthermore, an interior expansion and facilities upgrade, which is currently still in the planning stages, would convert an undeveloped storage area into a literacy office, a multipurpose room, and a work/storage area for the Friends of the Library.

Using the 2013 City population estimate of 29,953 persons, the library has a ratio of 0.75 square feet of public library space per capita. This figure is above the commonly accepted industry standard of 0.60 square feet of public library space per capita.

Library facilities and services are funded through a share of local property taxes, as assessed and collected by the County tax assessor. The library generates revenue from current secured property taxes collected by the County of Ventura and from a flat $40 per parcel tax levied on the approximately 7,500 parcels within the district boundaries. In March 2004, Santa Paula voters approved Measure B4, which increased the parcel tax from $25 to $40 and enhanced annual revenues by more than $110,000. As a result of the increased revenues, the library was able to avoid cuts in service hours and programs. In November 2004, Santa Paula voters approved Measure L, which increased the ceiling of the spending limit by $350,000 to utilize the anticipated increased revenues for the period from July 2006 to June 2010.

Ventura County Resource Conservation District

As with other unincorporated lands in Ventura County, the Project limits are within the boundaries of the Ventura County Resource Conservation District (VCRCD), which is a special district of the state and is primarily funded by grants. It provides assistance to help both rural and urban communities conserve, protect, and restore natural resources. The VCRCD is a local unit of government and is administered under the Public Resource Code.[21] VCRCD is one of 128 Resource Conservation Districts in California and belongs to the California Association of Resource Conservation Districts (CARCD) and the National Association of Resource Conservation Districts (NACD). The NACD represents more than 3,000 Resource Conservation Districts in the country. Formation of the VCRCD was accomplished in steps involving a merger and consolidation of the Ojai and South Ventura County Resource Conservation Districts and annexation of all remaining unincorporated land in Ventura County. The three divisions of the VCRCD coincide with these three geographical areas (Ojai, Santa Clara Valley, and South Ventura County).

Ventura County landowners experiencing difficulty with soil, drainage, or related problems may obtain technical assistance from VCRCD with:

- Controlling erosion and reducing sedimentation;
- Water conservation;
- Preventing flood damage in upstream areas;
- Minimizing the risk of fire by promoting fire zone planning;
- Rangeland conservation;
- Wetlands and habitat restoration;
- Selecting plant varieties, seeding methods and rates, and solving problems related to the management of cropland, pasture, woodland, wildlife habitat and other land;
- Soil use potentials and limitations;
- Other conservation projects.

General Government Services and Facilities

General government services for the project area are currently administered by the County of Ventura at their Government Center in the City of San Buenaventura. This includes planning, public works, building and safety, tax assessment and collection, and a variety of other human and animal services. Since most

21 California Public Resources Code, div. 9.

of the Project area is undeveloped and there is no development activity at present, there is little need for, or cost associated with, provision of these services within the Project area.

4.12.2 REGULATORY SETTING

State and local plans and regulations relating to municipal police protection, which are applicable to the Project, provide a regulatory framework for addressing all aspects of police protection services that would be affected by construction and implementation of the Project.

State

California Building Standards Code

The California Building Standards Code (CBSC) is included within the Title 24 of the California Code of Regulations (CCR), which is maintained by the California Building Standards Commission. The CBSC contains regulations that govern the construction of buildings to protect the public health, safety, and general welfare within the State of California. These regulations are based on set standards that have been previously adopted by state agencies that implement or enforce building standards. The California Fire Code (Part 9 of the Title 24, CBSC) contains fire-safety-related building standards consistent with national practices and policies that protect the public and property from fire hazards and hazardous conditions.

Cal-OSHA

The mandated Cal-OSHA requirement for firefighter safety is known as the "two-in/two-out rule." This rule requires a minimum of two personnel to be available outside a structure prior to entry by firefighters to provide an immediate rescue for trapped or fallen firefighters, as well as immediate assistance in rescue operations.

California Penal Code

The California Penal Code, Sections 830-832.17 sets forth the requirement of the organization and operation of law enforcement agencies within the State of California.[22] This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are State Peace Officers.

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22 State of California, State Penal Code. http://www.leginfo.ca.gov/cgi-bin/displaycode?section=pen&group=00001-01000&file=830-832.17.

Local

City of Santa Paula General Plan

The City of Santa Paula's General Plan Land Use and Safety Elements set forth a number of goals and policies that relate to police protection services. These goals and policies are intended to implement city-wide programs that will guide efficient and effective police protection for the general public.

Land Use Element

The Land Use Element of the General Plan provides discussion of the public service systems in the City. In addition to police and fire protection and schools, the Land Use Element recognizes parks and recreational facilities, along with civic buildings such as city hall, community centers, and fire stations within the land use category of Institutional and Civic Uses.[23]

Safety Element

The Safety Element addresses anticipated increased personnel needs, facility upgrades, and need for advocacy programs to promote a high level of community safety.

Development Impact Fees

The City and the area school districts have implemented development impact fees consistent with State government and education code sections. The City's fees include recreation, transportation, fire, library, public administration, and police fees. The school districts collect school facilities fees based on an adopted fee program that is independent of the City's program. Potential impacts and applicable fees discussed in this section include fire, police, library, and school fees.

4.12.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, the City determines a project may be deemed to have a significant impact on public services, including police protection services, if it would:

- Result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    - Fire Protection?

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23 City of Santa Paula, *General Plan,* "Land Use Element" (adopted 1998 and updated through Resolution No. 6700, September 20, 2010, corrected April 12, 2011), p. LU-13.

- Police Protection?
- Schools?
- Parks?
- Other Public Facilities?

4.12.4 PROJECT IMPACTS

Potential Project impacts were evaluated based on the ability of the Santa Paula Fire and Police Departments to maintain adequate service ratios, response times, or other performance objectives in the City resulting from development of the Project. Factors taken into consideration affecting fire and police safety protection include the Project size, required fire flow, response time, response distance vehicles, emergency access, and school and library capacity.

Threshold: **Result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:**

Fire Services

Impact

The Specific Plan will allow for the development of light industrial and commercial uses over a 53.81-acre Project Site. The build-out of the Specific Plan area will require specific tract maps that provide more detailed design of the building footprints and internal circulation. Before buildings are constructed building plans will be submitted for review and approval, which will ensure compliance with all UFC standards. The SPFD will review all tract maps and all building permit and improvement applications to ensure designs meet fire code requirements. Review of future development plans under the Specific Plan will be required to provide defensible space, serviceable access, adequate fire hydrants, adequate building addressing, adequate interior fire sprinkler systems, adequate fire or emergency alarm system, and approved locking systems for any gated access ways, among other standard conditions. All access and internal driveway widths are designed to allow for emergency vehicle access throughout the Project Site.

The Specific Plan will result in an increase in the need for services from existing SPFD facilities, equipment, and staff personnel. The anticipated level of service calls is not expected to exceed 2–4 times per week, however, multiple calls through the City at any given time could exacerbate response times and require greater dependence on mutual aid (i.e., adjacent jurisdictions). Because mutual aid responders would be

coming from as far as the cities of Fillmore or San Buenaventura (approximately 10 miles east and west of the City, respectively), this circumstance could result in substantial response delays.

Common guidelines for serious medical emergencies (e.g., heart attack) recommend response times within 5 minutes of notification. Similarly, national standards for fire response also have a 5-minute response benchmark for intervention of incipient fires to prevent rapid fire escalation and extensive or life-threatening fire development. However, national guidance on emergency vehicle response speeds recommends no response speed greater than 20 miles per hour beyond the posted speed limit. Stations 81 and 82 are located approximately 2.1 and 1.2 miles from the Project Site, respectively. It is estimated that response times to the Project Site from Stations 81 and 82 would be approximately 5.0 minutes or less. Based on national standards and the SPFD's average incident response times, implementation of the Specific Plan would not likely exceed response time standards for both Station 81 and Station 82.

Furthermore, as part of the review of the Specific Plan, the City of Santa Paula and Project Applicant will enter into a Development Agreement with the property owner that addresses the funding of public services, including fire protection services. Under the terms of the Development Agreement, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection facilities and personnel costs. No new facilities would be required to serve the Project Site as a result of the implementation of the Specific Plan. As such, mitigation is not required.

While emergency vehicle response times could increase because of increased traffic on the local roadways as a result of development under the Specific Plan, these impacts would be reduced to less than significant with implementation of the traffic mitigation measures provide in **Section 4.13, Transportation and Traffic,** which will ensure all roadways and intersections operate at acceptable levels of service.

The SPFD utilizes the California Fire Code Appendix B to determine the required fire flow for new structures. Appendix B utilizes type of construction and total building area to identify the required flow from public water systems used for firefighting. SPFD's standards for water flow rates range from 1,500 to 4,500 gallons per minute (gpm) for a duration capability of 2 and 4 hours, respectively. As previously discussed, the SPFD will review all future building plans and require adequate fire-flow pressure and flow rates through automatic fire sprinkler systems, fire hydrants, and other design features where appropriate (as required by appropriate federal, state, and local fire code and building code requirements. As such, potential impacts with regard to fire-flow requirements will be less than significant.

Police Services

Impacts

Development of the Specific Plan would increase the demand for services and resources provided by the SPPD. This would include initial review of development plans to identify requirements to ensure adequate access and surveillance opportunities, building and field inspections to ensure compliance with approved plans and local standards, and to respond to a variety of potential property-related and personal crimes, traffic accidents, and any number of possible public safety and "disturbance of the peace" circumstances. Similar to service demands for fire protection services, the exact service demands for police protection services cannot be predicted, particularly with respect to calls for service, over the operating life of the fully developed Project area. This increased need for police officers would occur incrementally over a period of years as the Project area develops based on market conditions, rather than all at once.

As previously discussed, there is no adopted response time standard, and the SPPD does not track this as a measure of service delivery.

Because the Project would not require construction of new or expanded police protection facilities, project-related police protection impacts would be less than significant.

Schools

Impacts

Because no new residential zoning or new residential development is proposed, the Project would not generate new housing with residents who would have a need for public school facilities. There is a possibility that some future employees who work in the Project area could occupy homes in the existing City limits and could have school-age children who attend local schools in the SPUSD. The School capacity and student generation estimate is based on the residential units, and it is expected that employees of occupants within the Specific Plan uses would either travel from of outside the City or would reside within the existing and future housing stock in the City, and as such, would not add students to the local school system. Future households would occupy homes within the SPUSD current service boundaries, and there would be no need to construct additional school facilities that already serve those areas or the Project. Therefore, the Project would not significantly impact the local school districts.

Parks

Impacts

Because the Project does not include any new residential zoning or any new residential development projects, it would not result in an increase in the residential population that could visit the City's parks

and recreation facilities. Businesses do not typically generate any regular or significant demand on parks and recreation facilities, as the occupants are normally at the business site throughout the work day, or perhaps travel briefly off site from time-to-time for meals or errands. Also, the Specific Plan includes approximately 4.9 acres of open space that could be used by occupants of the facilities allowed under the Specific Plan during lunch breaks for passive recreation. Therefore, implementation of the Specific Plan would not result in a substantial increase in level of use of existing parks and would not increase demand to a level that would generate a need for new or expanded parks facilities. Project impacts would be less than significant.

Other Public Facilities

Impacts

Annexation of the Project area would shift all local government services to the City of Santa Paula. There would be increased demand for a variety of City resources, especially during the development planning, permitting, and inspection phases, and much less so thereafter. All services can be provided from the City's existing administrative facilities. All of these added costs would be more than offset by one-time and annually recurring tax revenues generated as the Project area is developed.

The proposed detachment of the Project area from the VCRCD would likely decrease the need for the services provided by that agency because the urbanization of this area would not require the technical assistance for the land resource conservation that VCRCD provides.

Because no new governmental facilities would need to be constructed to administer governmental services for the Project area, there would be no environmental impacts related to public facilities construction projects.

4.12.5 CUMULATIVE IMPACTS

Implementation of the Project, including long-term development of the Project area in accordance with the Specific Plan and the proposed zone district standards for the other affected properties, would contribute to a cumulative increase in the demand for local government services, local libraries, and police and fire protection due to the effects of existing, planned, and future development throughout the City limits. Given that no new police, fire, library or general governmental facilities would need to be constructed to provide adequate levels of service to the Project Site, and also given that the tax revenues generated by the fully developed Project area would contribute to offset the increased cost of public services to this area, the Project's effects would be less than cumulatively considerable. As discussed earlier in this section, this Project would result in negligible effects on public schools and on parks and

recreation facilities because it does not include any new residential zoning or residential development; it will not be cumulatively considerable.

The City has regulations and ordinances in place to address impacts on public services (e.g., police, fire), including the provision and acquisition of new facilities and equipment. All planned development would be reviewed by the respective agencies and corresponding mitigation design features and payment of fees would be required. Therefore, cumulative impacts associated with public services would be less than significant.

4.12.6 MITIGATION MEASURES

No mitigation is required.

4.12.7 RESIDUAL IMPACTS

Impacts would be less than significant.

4.13 TRANSPORTATION AND TRAFFIC

This section describes the existing transportation and circulation characteristics of the Santa Paula West Project area ("Project Site"), potential environmental impacts, recommended mitigation measures to help reduce or avoid identified impacts, and the level of significance of impacts after mitigation. The traffic impact analysis study prepared to evaluate potential traffic impacts and mitigation measures associated with the proposed project is contained in **Appendix 4.13.**

4.13.1 EXISTING CONDITIONS

Traffic data was collected to develop a detailed description of existing traffic conditions in the study area. The following discussion provides a description of the local street system that will serve land uses within the Santa Paula West Project area, a review of traffic volumes on the study-area street system, an assessment of the resulting operating conditions, and a description of the current public transit system that services the study area.

Existing Street System

Primary regional access is provided by State Route (SR) 126, which runs east–west. Secondary regional access is provided by Ojai Road (SR 150)/10th Street and 12th Street/South Mountain Road in the north and south directions, respectively. Immediately to the north of the Project Site is Telegraph Road, and immediately south of the Project Site is SR 126. Faulkner Road also fronts the Project Site just north of SR 126. The closest adjacent north–south streets providing access to the Project Site are Briggs Road to the west and Peck Road to the east. Beckwith Road provides direct access onto the Project Site onto Telegraph Road and Faulkner Road. The following provides a brief description of the streets adjacent to the Project Site and those providing regional access to the site:

State Highways

SR 126 (Santa Paula Freeway)

SR 126 is an east–west freeway providing access to Fillmore and Santa Clarita to the east and to Ventura and Oxnard to the west. SR 126 is a four-lane divided freeway west of Hallock Drive with a speed limit of 65 mph. East of Hallock Drive, it is a four-lane highway divided by a two-way left-turn lane with a speed limit of 60 mph.

10th Street/Ojai Road (SR 150)

10th Street (SR 150), classified as a Collector, is a north–south street extending from Santa Maria Street in the south to its terminus north of Vista Point Place. 10th Street lies east of the Project Site and is a two-

lane road divided by a double yellow line or a two-way left-turn lane. On-street parking is generally allowed on both sides of 10th Street, and the speed limit is 30 mph. At the intersection of 10th Street/Ojai Road and Santa Paula Street, SR 150 deviates from 10th Street along Ojai Road. Ojai Road (SR 150) is a north–south highway extending from Santa Paula Street to Meiners Oaks in the north. 10th Street lies east of the Project Site and is a two-lane street divided by a double yellow line. On-street parking is generally allowed, and the posted speed limit ranges from 30 to 40 mph.

Major Roadways

Harvard Boulevard

Harvard Boulevard, classified as an Arterial, is an east–west street extending from Peck Road to the east where it joins with Telegraph. Harvard Boulevard lies east of the Project Site and is a four-lane road divided by a two-way left-turn lane. On-street parking is generally allowed on both sides of the street and the speed limit is 35 miles per hour (mph).

Telegraph Road/Main Street

Telegraph Road, classified as an Arterial, is an east–west oriented street extending westward from Peck Road. Telegraph Road lies north of the Project Site and is a two-lane road divided by a single dashed yellow line. On-street parking is available on both sides of the street and the speed limit ranges from 35 to 50 mph. East of Harvard Boulevard, the roadway is named Main Street. Main Street continues as a two-lane road divided with either a single dashed yellow line or a double yellow line. On-street parking is generally allowed on both sides of the street, and the speed limit ranges from 25 mph to 35 mph.

Faulkner Road

Faulkner Road, classified as an Arterial, is an east–west street extending from Peck Road to its current terminus west of the SR 126 Westbound Ramps. Faulkner Road lies south of the Project Site and is a four-lane road divided by a double yellow line or a two-lane road divided by a double yellow line. On-street parking is not allowed on Faulkner Road, and the speed limit is 25 mph.

Briggs Road

Briggs Road, classified as a Local Street, is a north–south street extending from SR 126 in the south to Foothill Road in the north. Briggs Road lies west of the Project Site and is a two-lane road divided by a double yellow line. On-street parking is not allowed along Briggs Road, and the speed limit is 25 mph.

Peck Road

Peck Road, classified as an Arterial, is a north–south street extending from SR 126 in the south to Foothill Road in the north. Peck Road lies east of the project Site and is a two-lane road divided by a double yellow line. On-street parking is generally not allowed along Peck Road, and the speed limit is 30 mph.

Steckel Drive

Steckel Drive, classified as a Collector, is a north–south street extending from SR 126 in the south to Foothill Road in the north. Steckel Drive lies east of the Project Site and is a two-lane road divided by a double yellow line. On-street parking is generally not allowed along Steckel Drive, and the speed limit is 30 mph.

Palm Avenue

Palm Avenue, classified as an Arterial, is a north–south street extending from SR 126 in the south to its terminus north of Santa Paula Street. Palm Avenue lies east of the Project Site and is a two-lane road divided by a double yellow line. On-street parking is generally allowed on both sides of Palm Avenue, and the speed limit is 30 mph.

8th Street

8th Street, classified as a Collector, is a north–south street extending from Santa Maria Street in the south to its terminus north of Santa Paula Street. 8th Street lies east of the Project Site and is a two-lane road divided by a double yellow line. On-street parking is generally allowed on both sides of 8th Street, and the speed limit is 30 mph.

12th Street/South Mountain Road

12th Street, classified as a Collector, is a north–south street extending from Richmond Road in the north to its terminus at Santa Maria Street, where it becomes South Mountain Drive. 12th Street lies east of the Project Site and is a two-lane road divided by a double yellow line. On-street parking is generally allowed on both sides of 12th Street, and the speed limit is 25 mph. South Mountain Drive, classified as an Arterial, is generally an east–west rural road extending from Santa Maria Street in the west toward Fillmore in the east. South Mountain Drive is east of the Project Site and is a two-lane road divided by a double yellow line. On-street parking is not allowed on South Mountain Drive, and the speed limit is 25 mph.

Study Intersections

The area of study encompasses most of Santa Paula, spanning from Briggs Avenue in the west to 10th Street in the east. The study includes 16 study intersections that were analyzed for each of the traffic

scenarios described above. The selection of these intersections was based on input received from the City, as well as a review of previous studies. The study area is consistent with previous studies conducted for projects in the City. These study intersections are shown in **Figure 4.13-1**, **Study Intersections**, and are listed below with by numbers that correspond to the locations shown in the figure:

1. 10th Street & Harvard Boulevard
2. 8th Street & Main Street
3. 8th Street & Harvard Boulevard
4. Palm Avenue & Main Street
5. Palm Avenue & Harvard Boulevard
6. Steckel Drive & Main Street
7. Steckel Drive & Harvard Boulevard
8. Peck Road & Harvard Boulevard/Telegraph Road
9. Peck Road & Faulkner Road
10. Peck Road & SR 126 Eastbound On/Off Ramps
11. Faulkner Road & SR 126 Westbound On/Off Ramps
12. Beckwith Road & Telegraph Road
13. Briggs Road & Telegraph Road
14. Briggs Road & Faulkner Road
15. Briggs Road & SR 126 Westbound On/Off Ramps
16. Briggs Road & SR 126 Eastbound On/Off Ramps

Of the 16 intersections, 9 operate under signal control; the remaining 7 operate under stop control.

Existing Traffic Volumes and Level of Service

Weekday peak-period traffic counts (from 7:00 to 9:00 AM and from 4:00 to 6:00 PM) were collected in late August 2014 for 5 of the 16 analyzed intersections in this study. For the remaining 11 intersections, traffic counts used in *Transportation Analysis Report for the Santa Paula West Business Park Specific Plan* (Fehr & Peers, March 2015), which were collected in March 2014, were used. All traffic counts were collected outside of weeks with major holidays to represent typical conditions. Existing AM and PM peak-hour traffic volumes for the study intersections are shown in **Figure 4.13-2, Existing Peak-Hour Traffic Volumes.**

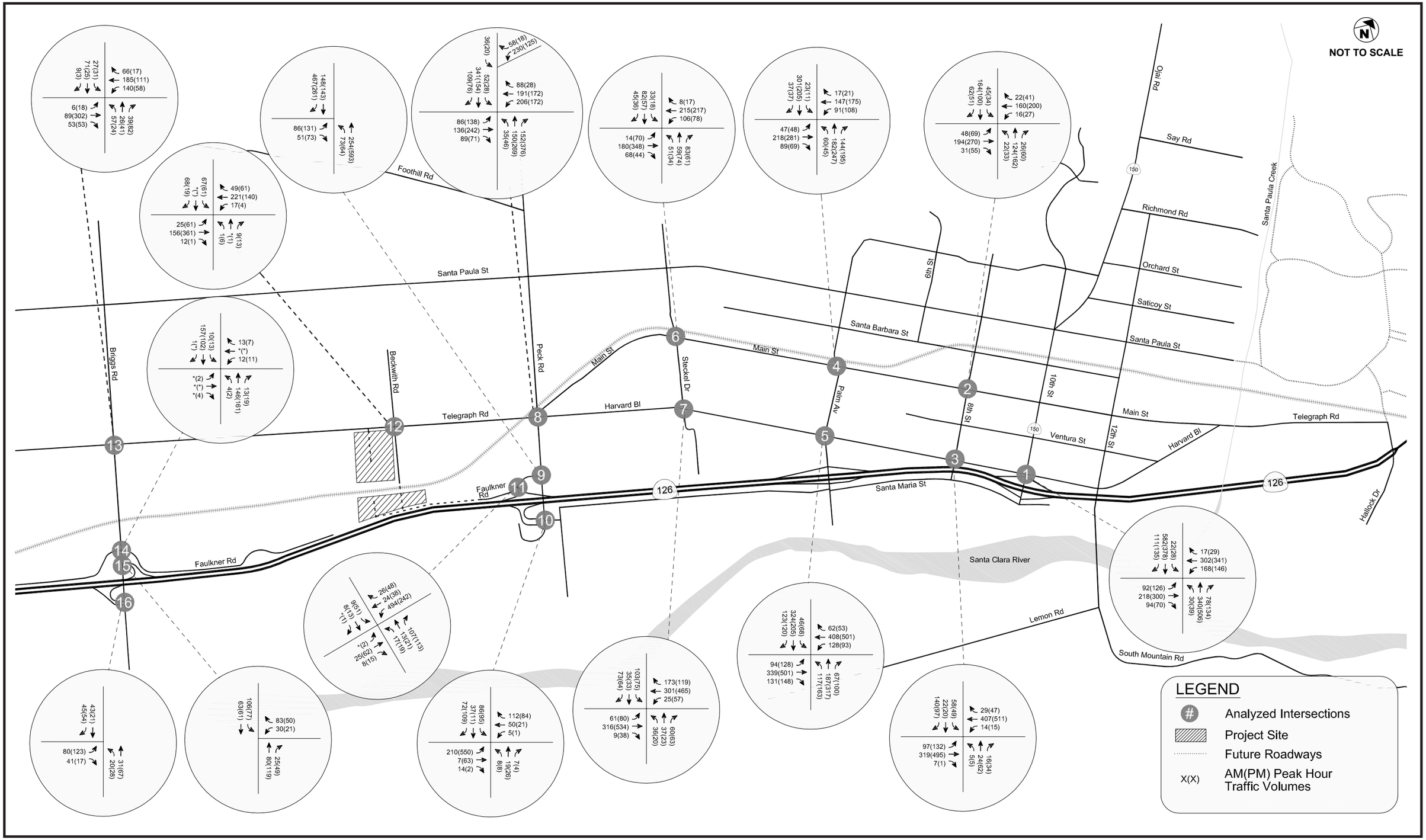
SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-1**

Meridian Consultants

Project Site and Proposed Study Intersections

050-002-13



SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-2**

Meridian Consultants

Existing Peak-Hour Traffic Volumes

050-002-13

Intersections

Table 4.13-1, Intersection Level of Service Analysis—Existing Conditions, summarizes the results of the analysis of the existing weekday morning and afternoon peak-hour LOS at each of the analyzed intersections. Of the nine signalized intersections, all currently operate at LOS C or better during both the AM and PM peak hours. Of the seven stop-controlled intersections, all but one currently operate at LOS C or better during both the AM and PM peak hours. The exception is Peck Road and SR 126 Eastbound On/Off Ramps/Acacia Way (Intersection 10), which operates at LOS D in the PM peak hour.

Table 4.13-1
Intersection Level of Service Analysis—Existing Conditions

Intersection		Peak Hour	V/C or delay	LOS
1	10th Street & Harvard Boulevard	AM	0.752	C
		PM	0.764	C
2	8th Street & Main Street	AM	0.316	A
		PM	0.389	A
3	8th Street & Harvard Boulevard	AM	0.261	A
		PM	0.351	A
4	Palm Avenue & Main Street	AM	0.457	A
		PM	0.430	A
5	Palm Avenue & Harvard Boulevard	AM	0.539	A
		PM	0.542	A
6	Steckel Drive & Main Street	AM	10.6	B
		PM	11.2	B
7	Steckel Drive & Harvard Boulevard	AM	0.341	A
		PM	0.354	A
8	Peck Road & Harvard Boulevard/Telegraph Road/Main Street	AM	0.666	B
		PM	0.483	A
9	Peck Road & Faulkner Road	AM	0.338	A
		PM	0.453	A
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way	AM	9.6	A
		PM	26.1	D
11	Faulkner Road & SR 126 WB On/Off Ramps	AM	19.0	C
		PM	10.0	B

Intersection		Peak Hour	V/C or delay	LOS
12	Beckwith Road & Telegraph Road	AM	11.6	B
		PM	14.8	B
13	Briggs Road & Telegraph Road	AM	0.280	A
		PM	0.369	A
14	Briggs Road & Faulkner Road	AM	9.9	A
		PM	10.1	B
15	Briggs Road & SR 126 WB On/Off Ramps	AM	10.0	A
		PM	10.0	A
16	Briggs Road & SR 126 EB On/Off Ramps	AM	9.6	A
		PM	10.2	B

Source: Fehr & Peer, Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan (March 2015).
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Freeways and Multilane Highway Segments and Ramps

Table 4.13-2, Existing Level of Service Freeway and Multilane Highway Segments, provides a summary of the current operating conditions of freeway and multilane highways. As shown in **Table 4.13-2,** all freeway segments currently operate at LOS C or better in both directions during both peak hours.

Table 4.13-2
Existing Level of Service Freeway and Multilane Highway Segments

			Eastbound			Westbound		
	Roadway Segment	Peak Hour	Volume	Density (pc/mi/ln)	LOS	Volume	Density (pc/mi/ln)	LOS
1	SR 126: Hallock Drive to 10th Street (SR 150)	AM	932	7.5	A	1,509	12.2	B
		PM	1,729	14.0	B	1,729	14.0	B
2	SR 126: 10th Street (SR 150) to Palm Avenue	AM	1,136	9.2	A	2,102	17.0	B
		PM	1,729	14.0	B	1,729	14.0	B
3	SR 126: Palm Avenue to Peck Road	AM	1,253	10.1	A	2,429	19.6	C
		PM	1,729	14.0	B	1,729	14.0	B
4	SR 126: Peck Road to Briggs Road	AM	1,354	10.9	A	2,802	22.8	C
		PM	1,729	14.0	B	1,729	14.0	B
5	SR 126: Briggs Road to Wells Road	AM	1,410	11.4	B	2,820	22.9	C
		PM	1,729	14.0	B	1,729	14.0	B

		Eastbound			Westbound		
			Density			Density	
Roadway Segment	Peak Hour	Volume	(pc/mi/ln)	LOS	Volume	(pc/mi/ln)	LOS

Source: Fehr & Peers, Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan (March 2015).

Alternative Transportation Systems

Transit Service

Existing transit service in the City includes Dial-A-Ride service; the Santa Paula Commuter Bus, which provides service for local students only on school days; and the Vista Highway 126 commuter bus that provides service between Ventura and Fillmore during the week, with reduced service on Saturday. Transit service is not currently provided near East Area 1 due to the lack of demand.

Bicycle Facilities

Designated bicycle facilities in the City of Santa Paula are located on Santa Paula Street and along the railroad tracks between Peck Road and 9th Street. There are no existing bicycle facilities on the Project Site.

Pedestrian Facilities

The Project area lacks a complete network of pedestrian facilities around the Project Site, such as sidewalks, crosswalks, and pedestrian safety features. The north side of Telegraph Road and the east side of Beckwith Road provide sidewalks.

Santa Paula Airport

The Santa Paula Airport is located within the south-central portion of the City of Santa Paula, and is bounded by SR 126 on the north, Palm Avenue on the west, Ojai Street on the east, and the Santa Clara River on the south. The airport is a public-use airport that is privately owned and operated by the Santa Paula Airport Association. Santa Paula Airport is classified by the Federal Aviation Administration (FAA) in the National Plan of Integrated Airport Systems (NPIAS) as a general aviation airport.[1]

1 Federal Aviation Administration, N*ational Plan of Integrated Airport Systems (NPIAS)* (1995).

The State of California has defined air safety zones in the *Airport Land Use Planning Handbook*.[2] Santa Paula Airport has adopted the State of California Air Safety Zones to define areas near the airport where land use restrictions are established for public safety. The Ventura County Airport Land Use Commission (ALUC) has established land use guidelines for the various safety zones in the Comprehensive Land Use Pan (CLUP).[3] The CLUP for Santa Paula Airport establishes the various safety zones for approaching and departing aircraft and provides restrictions on development within the zones, including Air Safety and Height Restriction Zone. The Project Site is not located within any of the safety or height restriction zones identified in the CLUP.

4.13.2 REGULATORY SETTING

State

Caltrans, Guide for the Preparation of Traffic Impact Studies

The California Department of Transportation ("Caltrans") reviews federal, state, and local agency development projects, and land use change proposals for their potential impact to State highway facilities. Caltrans developed the Guide for the Preparation of Traffic Impact Studies for the purpose of improving the Caltrans local development review process.[4] This Guide states that Caltrans endeavors to maintain a target level of service standard for state highway facilities "at the transition between LOS 'C' and LOS 'D.'" but does not identify any specific LOS standard. However, Caltrans recognizes it may not always be feasible to maintain this level of service and determines the appropriate target level of service for highway facilities with cities and counties. If an existing State highway facility is operating at less than the desired target level of service, then the goal is to maintain the existing level of service.[5]

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2 State of California, Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook* (October 2011).

3 Ventura County Airport Land Use Commission, *Airport Comprehensive Land Use Plan for Ventura County—Final Report*, prepared by Coffman Associates, Inc., adopted July 7, 2000.

4 Caltrans, Guide for the Preparation of Traffic Impact Studies (2002), 1.

5 Caltrans, Guide for the Preparation of Traffic Impact Studies (2002).

Local

Ventura County Transportation Commission

Congestion Management Plan

The Ventura County Transportation Commission (VCTC), as the designated Congestion Management Authority (CMA) for Ventura County, is responsible for coordinating land use, transportation planning, and air quality to mitigate traffic congestion. The Ventura County Congestion Management Program (VCCMP) provides local government agencies and private developers with the resources to track and analyze traffic congestion throughout Ventura County.

The VCTC designated the VCCMP road network in 1991 as part of the development of the first CMP.[6] The network is comprised of the state highway system and principal arterials in Ventura County, including State Route 126 (SR 126), State Route 150 (SR 150), and Harvard Boulevard/Telegraph Road west of SR 150.[7]

City of Santa Paula General Plan

Circulation Element

The City of Santa Paula General Plan Circulation Element[8] defines the basic circulation system of the City and provides for the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, other local public utilities and facilities in the City.

4.13.3 THRESHOLDS OF SIGNIFICANCE

CEQA Guidelines

To assist in determining whether a project would have a significant effect on the environment, the California Environmental Quality Act (CEQA) identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantially adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guidelines (Environmental Checklist Form) lists the following thresholds, under which a project may be a deemed to have a significant on transportation and traffic if it would:

- 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

6 Ventura County Transportation Commission (VCTC), 2009 Update—Ventura County Congestion Management Plan (VCCMP), adopted July 2009.
7 VCTC, 2009 Update—VCCMP, adopted July 2009, Exhibit 9.
8 City of Santa Paula, *General Plan,* "Circulation Element."

not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?

- 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?
- 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?
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

As adopted in the Santa Paula General Plan Circulation Element,[9] the minimum acceptable level of service at intersections in the City is LOS C. If traffic from the project results in an intersection operating at LOS D or worse, this is identified as a significant impact.

The minimum desirable level of service on the analyzed freeway segments is LOS E, as described in the VCCMP. If the addition of project traffic were to cause or significantly worsen LOS F, it would be considered a significant impact. Although the VCTC has adopted LOS E as a minimum system-wide level of service on all VCCMP roadways it does not provide specific criteria regarding when an individual project's impact may be deemed significant. Therefore, for the purpose of this analysis, the significance threshold from 2010 Los Angeles Congestion Management Program (CMP) for Los Angeles County (Los Angeles County Metropolitan Transportation Authority, 2010) was used. The Los Angeles County CMP states that a project impact would be considered significant if the facility were projected to operate at LOS F after the addition of project traffic, and if the project causes a net increase in traffic demand of 2 percent of capacity or more (i.e., V/C ratio increase greater than or equal to 0.02).

4.13.4 PROJECT IMPACTS

The traffic study analyzed potential Project-related traffic impacts on the local and regional street system surrounding the Project Site. The following traffic scenarios were analyzed for the weekday AM (between 7:00 AM and 9:00 AM) and weekday PM r (between 4:00 PM and 6:00 PM) peak hours.

- Existing plus Project Conditions
- Cumulative Base Conditions (Year 2031)

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9 City of Santa Paula, *General Plan,* "Circulation Element."

- Cumulative plus Project Trip Generation (Year 2031)

Trip Generation

Trip generation rates and equations from the ITE *Trip Generation Manual*[10] were used to develop trip generation estimates for the land uses that would be permitted in the Project area.

Internal capture credits were applied to several of the Project land uses. Internal credits reflect the tendency of users of one land use to visit other land uses within the Project. Service areas also factored into the application of the trip credits.

As provided in **Table 4.13-3, Daily Trip Generation,** the projected number of daily trips is approximately 5,546, including 646 AM peak-hour trips and 732 PM peak-hour trips.

Traffic Distribution

The geographic distribution of traffic generated by a proposed project depends on several factors, including the nature of the proposed land uses, the location of site access points in relation to the surrounding street system, the geographic distribution of existing and future population centers, existing travel patterns, and topographic constraints.

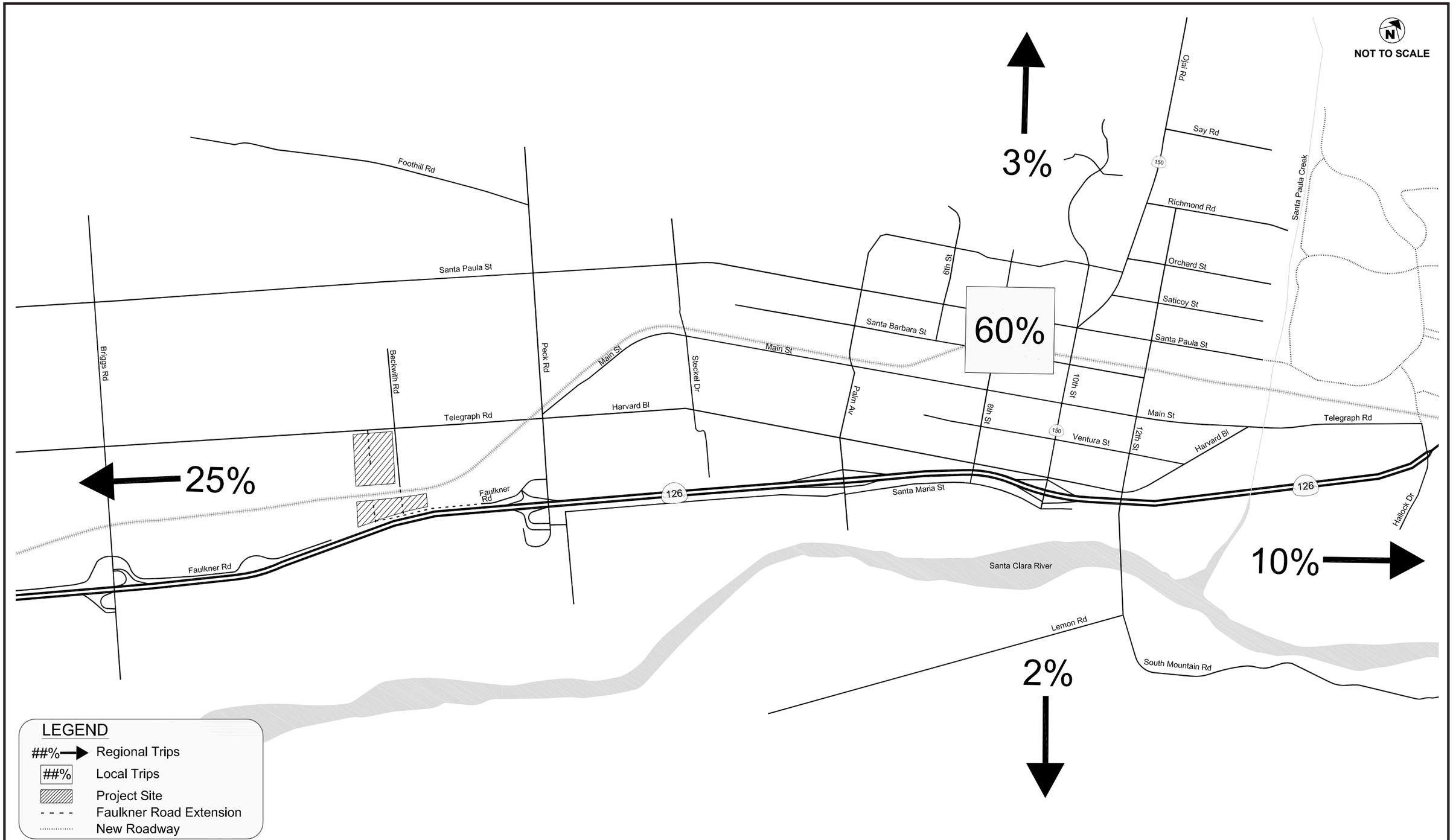
The estimated trip distribution pattern is shown in **Figure 4.13-3, Project Trip Distribution**, and includes:

- 60 percent local trips within town
- 3 percent to/from the north
- 2 percent to/from the south
- 10 percent to/from the east
- 25 percent to/from the west

10 Institute of Transportation Engineers, *Trip Generation Manual,* 9th ed. (Washington, DC: Institute of Transportation Engineers, 2012).

Table 4.13-3
Daily Trip Generation Estimates

			AM Peak Hour			PM Peak Hour		
Land Use	**Size**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Northeast of Railroad Tracks								
General Light Industrial (ITE 110)	187,373 sq. ft.	1,306	151	21	172	22	160	182
Shopping Center (ITE 820)	2,836 sq. ft.	121	2	1	3	1	10	11
Total Project Trips Northeast of Railroad Tracks		***1,427***	153	22	175	23	170	193
Northwest of Railroad Tracks								
General Light Industrial (ITE 110)	219,695 sq. ft.	1,531	178	24	202	26	187	213
Shopping Center (ITE 820)	5,347 sq. ft.	228	3	2	5	3	17	20
Total Project Trips Northwest of Railroad Tracks		***1,759***	181	26	207	29	204	233
South of Railroad Tracks								
General Light Industrial (ITE 110)	276,105 sq. ft.	1,924	224	30	254	32	236	268
Shopping Center (ITE 820)	10,222 sq. ft.	436	6	4	10	18	20	38
Total Project Trips South of Railroad Tracks		***2,360***	230	34	264	50	256	306
TotaProject Trips		**5,546**	**564**	**82**	**646**	**102**	**630**	**732**



SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-3**

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Project Trip Distribution

050-002-13

Project Traffic Assignment

The traffic generation and distribution pattern were used to assign the Project-generated traffic to the local and regional street system. The estimated Project-generated peak-hour traffic volumes at each of the analyzed intersections during typical weekday AM and PM peak hours are shown in **Figure 4.13-4**, **Project-Only Peak-Hour Traffic Volumes.**

Another future scenario considers impacts on the roadway network that would occur if Beckwith Road were not extended to Faulkner Road. This scenario would not require a new at-grade crossing of the VCTC railroad, and project traffic would be divided between future development on parcels north of the railroad and parcels south of the railroad, as the circulation patterns would change for access to the respective Project areas. The number and location of analyzed intersections and roadway segments is identical to what was analyzed for the cumulative base plus project conditions with Beckwith Road extension.

Figure 4.13-5, **Project-Only Peak-Hour Traffic Volumes (without Beckwith Extension)**, shows the estimated project-only volumes without the Beckwith Road extension traffic volumes at each of the analyzed intersections during typical weekday AM and PM peak hours. The Project-only volumes without the Beckwith Road extension differ from the volumes shown in **Figure 4.13-4**, which assumes the extension would be in place.

Threshold: **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?**

Existing plus Project Conditions

Intersections

To determine the impact of traffic from the Project, traffic generated by Project uses was added to the existing traffic volumes to determine the resulting LOS. These Existing plus Project traffic volumes are provided in **Figure 4.13-6, Existing plus Project Peak-Hour Traffic Volumes.** These traffic volumes were analyzed to determine the V/C (volume to capacity) ratios and LOS for each study intersection. The results are shown in **Table 4.13-4, Existing plus Project Impacts.**

Table 4.13-4
Existing plus Project Impacts

	Intersection	Existing			Existing plus Project				
		Peak Hour	V/C or delay	LOS	V/C or delay	LOS	Change	Significant Impact Existing	Significant Impact Project
1	10th Street & Harvard Boulevard	AM	0.752	C	0.797	C	0.045	No	No
		PM	0.764	C	0.815	D	0.051	No	Yes
2	8th Street & Main Street	AM	0.316	A	0.323	A	0.007	No	No
		PM	0.389	A	0.405	A	0.016	No	No
3	8th Street & Harvard Boulevard	AM	0.216	A	0.280	A	0.019	No	No
		PM	0.351	A	0.355	A	0.004	No	No
4	Palm Avenue & Main Street	AM	0.457	A	0.478	A	0.021	No	No
		PM	0.430	A	0.488	A	0.018	No	No
5	Palm Avenue & Harvard Boulevard	AM	0.539	A	0.568	A	0.029	No	No
		PM	0.542	A	0.553	A	0.011	No	No
6	Steckel Drive & Main Street	AM	10.6	B	11.1	B	0.5	No	No
		PM	11.2	B	11.9	B	0.7	No	No
7	Steckel Drive & Harvard Boulevard	AM	0.341	A	0.386	A	0.045	No	No
		PM	0.354	A	0.381	A	0.027	No	No
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	0.669	B	0.834	D	0.165	No	Yes
		PM	0.483	A	0.552	A	0.069	No	No
9	Peck Road & Faulkner Road	AM	0.338	A	0.419	A	0.081	No	No
		PM	0.453	A	0.464	A	0.011	No	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way	AM	9.6	A	11.7	B	2.1	No	No
		PM	26.1	D	40.7	E	14.6	Yes	Yes
11	Faulkner Road & SR 126 WB On/Off Ramps	AM	19.0	C	22.0	C	3.0	No	No
		PM	10.0	B	11.6	B	1.6	No	No
12	Beckwith Road & Telegraph Road	AM	11.6	B	18.7	C	7.1	No	No
		PM	14.8	B	30.2	D	15.4	No	Yes
13	Briggs Road & Telegraph Road	AM	0.280	A	0.310	A	0.030	No	No
		PM	0.369	A	0.398	A	0.029	No	No
14	Briggs Road & Faulkner Road	AM	9.9	A	10.1	B	0.2	No	No
		PM	10.1	B	10.4	B	0.3	No	No

	Intersection	Existing			Existing plus Project				
		Peak Hour	V/C or delay	LOS	V/C or delay	LOS	Change	Significant Impact Existing	Significant Impact Project
15	Briggs Road & & SR 126 WB On/Off Ramps	AM	10.0	A	10.3	B	0.3	No	No
		PM	10.0	A	10.3	B	0.3	No	No
16	Briggs Road & & SR 126 EB On/Off Ramps	AM	9.6	A	9.9	A	0.3	No	No
		PM	10.2	B	10.2	B	0.3	No	No

Source: Fehr & Peers, Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan, (March 2015).

As shown on **Table 4.13-4,** a total of 12 intersections are projected to operate at LOS C or better during both the AM and PM peak hours. The four intersections listed below are projected to operate at LOS D or worse during one or both peak hours:

- Intersection 1: 10th Street and Harvard Boulevard (LOS D AM)
- Intersection 8: Peck Road & Harvard Boulevard/Telegraph Road/Main Street (LOS D AM)
- Intersection 10: Peck Road & SR 126 Eastbound On/Off Ramps/Acacia Way (LOS E PM)
- Intersection 12: Beckwith Road & Telegraph Road (LOS D PM)

Because the City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at each of these four intersections. All of the impacted intersections have Project-specific impacts (impacts directly related to the addition of Project traffic).

Intersections without Beckwith Road Extension

Under this scenario, the future traffic conditions are considered if Beckwith Road is ultimately not extended south to Faulkner Road. This scenario would not require a new at-grade crossing of the VCTC railroad tracks that bisect the Project Site. To determine the impact of traffic from the Project, traffic generated by Project uses was added to the existing traffic volumes to determine the resulting LOS. These Existing plus Project traffic volumes are shown in **Figure 4.13-7, Existing plus Project Peak-Hour Traffic Volumes (without Beckwith Extension).** These traffic volumes were analyzed to determine the V/C (volume to capacity) ratios and LOS for each study intersection. The results are shown in **Table 4.13-5, Existing plus Project Impacts (without Beckwith Extension).**

Table 4.13-5
Existing plus Project Impacts (without Beckwith Extension)

			Existing		Existing plus Project				
								Significant Impact	
Intersection		Peak Hour	V/C or delay	LOS	V/C or delay	LOS	Change	Existing	Project
1	10th Street & Harvard Boulevard	AM	0.752	C	0.788	C	0.036	No	No
		PM	0.764	C	0.800	C	0.036	No	No
2	8th Street & Main Street	AM	0.316	A	0.328	A	0.012	No	No
		PM	0.389	A	0.411	A	0.022	No	No
3	8th Street & Harvard Boulevard	AM	0.261	A	0.281	A	0.020	No	No
		PM	0.351	A	0.355	A	0.004	No	No
4	Palm Avenue & Main Street	AM	0.457	A	0.480	A	0.023	No	No
		PM	0.430	A	0.455	A	0.025	No	No
5	Palm Avenue & Harvard Boulevard	AM	0.539	A	0.570	A	0.031	No	No
		PM	0.542	A	0.553	A	0.011	No	No
6	Steckel Drive & Main Street [1]	AM	10.6	B	11.1	B	0.5	No	No
		PM	11.2	B	12.0	B	0.8	No	No
7	Steckel Drive & Harvard Boulevard	AM	0.341	A	0.386	A	0.045	No	No
		PM	0.354	A	0.381	A	0.027	No	No
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	0.669	B	0.885	D	0.216	No	Yes
		PM	0.483	A	0.599	A	0.116	No	No
9	Peck Road & Faulkner Road	AM	0.338	A	0.441	A	0.103	No	No
		PM	0.453	A	0.522	A	0.069	No	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way [1]	AM	9.6	A	11.8	B	2.2	No	No
		PM	26.1	D	40.3	E	14.2	Yes	Yes
11	Faulkner Road & SR 126 WB On/Off Ramps [1]	AM	19.0	C	21.7.0	C	2.7	No	No
		PM	10.0	B	12.4	B	2.4	No	No
12	Beckwith Road & Telegraph Road [1]	AM	11.6	B	18.8	C	7.2	No	No
		PM	14.8	B	30.0	D	15.2	No	Yes
13	Briggs Road & Telegraph Road	AM	0.280	A	0.306	B	0.026	No	No
		PM	0.369	A	0.401	B	0.032	No	No
14	Briggs Road & Faulkner Road [1]	AM	9.9	A	10.1	B	0.2	No	No
		PM	10.1	B	10.4	B	0.3	No	No

			Existing		Existing plus Project				
								Significant Impact	
Intersection		Peak Hour	V/C or delay	LOS	V/C or delay	LOS	Change	Existing	Project
15	Briggs Road & & SR 126 WB On/Off Ramps[a]	AM	10.0	A	10.3	B	0.3	No	No
		PM	10.0	A	10.3	B	0.3	No	No
16	Briggs Road & & SR 126 EB On/Off Ramps[a]	AM	9.6	A	9.9	A	0.3	No	No
		PM	10.2	B	10.2	B	0.0	No	No

Source: Fehr & Peers, Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan (March 2015).
[a] Intersection is controlled by stop signs. Average vehicular delay in seconds is reported rather than V/C ratio.

A total of 13 intersections are projected to operate at LOS C or better during both AM and PM peak hours. The three intersections listed below are projected to operate at LOS D or worse during one or both peak hours.

Intersection 8: Peck Road and Harvard Boulevard/Telegraph Road/Main Street (LOS D AM)

Intersection 10: Peck Road and SR 126 Eastbound On/Off Ramps/Acacia Way (LOS E PM)

Intersection 12: Beckwith Road and Telegraph Road (LOS D PM)

Because the City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at each of these three intersections. With the exception of Peck Road and SR 126 Eastbound On/Off Ramps intersection because the existing has an LOS D in the PM peak hour, all of the impacted intersections have Project-specific impacts (impacts directly related to the addition of Project traffic).

SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-4**

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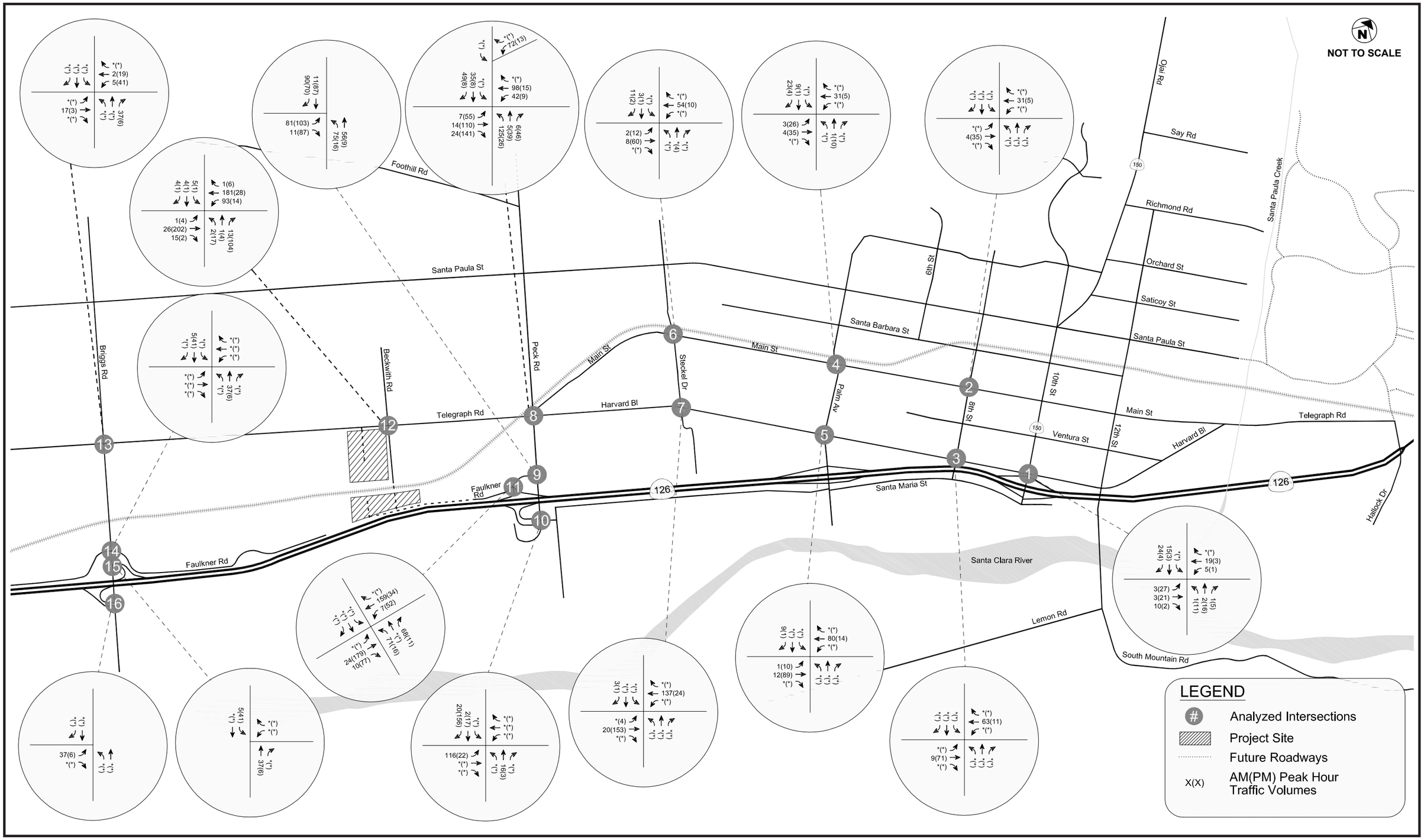
Project-Only Peak-Hour Traffic Volume

050-002-13



SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-5**

Meridian Consultants

Project-Only Peak-Hour Traffic Volumes (without Beckwith Extension)

050-002-13

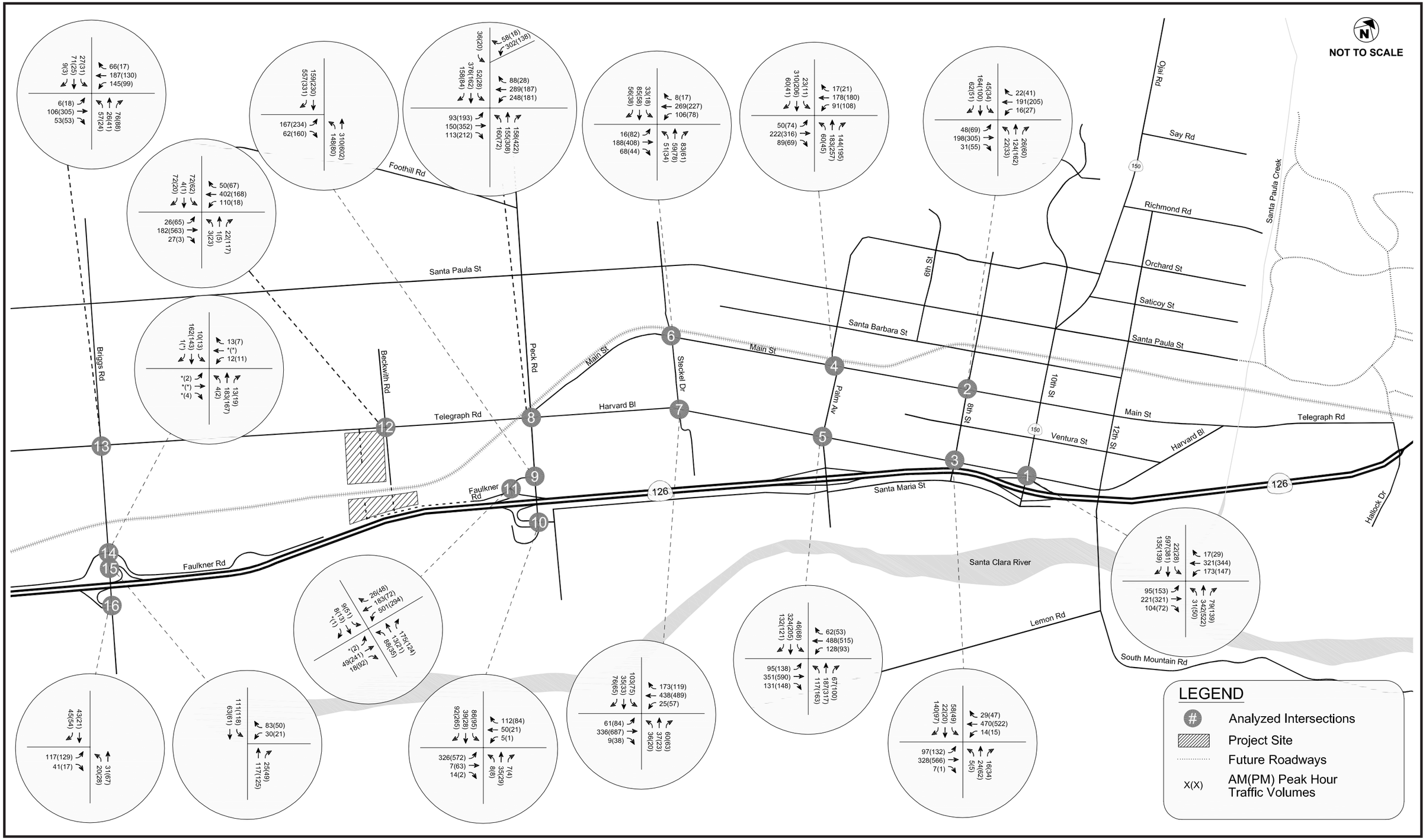
SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-6**

Meridian Consultants

Existing plus Project Peak-Hour Traffic Volumes

050-002-13



SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-7**

Meridian Consultants

Existing plus Project Peak-Hour Traffic Volumes (without Beckwith Extension)

050-002-13

Table 4.13-6
Existing plus Project Level of Service Analysis—Freeway and Multilane Highway Segments

			Existing				Existing plus Project				
			Eastbound		Westbound		Eastbound		Westbound		
	Roadway Segment	Peak Hour	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Project Impact?
1	SR 126 - Hallock Drive to 10th Street (SR 150)	AM	7.5	A	12.2	B	7.6	A	13.0	B	NO
		PM	14.0	B	14.0	B	15.2	B	15.2	B	NO
2	SR 126 - 10th Street (SR 150) to Palm Avenue	AM	9.2	A	17.0	B	9.3	A	18.2	C	NO
		PM	14.0	B	14.0	B	15.2	B	15.2	B	NO
3	SR 126 - Palm Avenue to Peck Road	AM	10.1	A	19.6	C	10.3	A	20.9	C	NO
		PM	14.0	B	14.0	B	15.2	B	15.2	B	NO
4	SR 126 - Peck Road to Briggs Road	AM	10.9	A	22.8	C	11.8	B	22.9	C	NO
		PM	14.0	B	14.0	B	15.2	B	15.2	B	NO
5	SR 126 - Briggs Road to Wells Road	AM	11.4	B	22.9	C	12.5	B	23.1	C	NO
		PM	14.0	B	14.0	B	15.2	B	15.2	B	NO

Source: Fehr & Peers, Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan (March 2015).

Freeway and Multilane Segments and Ramps

The summary of the freeway and multilane highway impacts analyses is provided in **Table 4.13-6, Existing plus Project Impacts—Freeway and Multilane Segments.** The five freeway segments currently operate at LOS C or better in both directions. Based on the significance threshold for the Los Angeles County CMP, the Project does not operate at LOS F after the addition of project traffic and the Project does not cause a net increase in traffic demand of 2 percent of capacity or more. Therefore, the Project would result in less than significant impacts to freeway and multilane segments.

The freeway LOS results for the scenario that does not include the Beckwith Road extension are the same as those shown in **Table 4.13-6** where the extension would be constructed.

Threshold: **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?**

Congestion Management Plan

An analysis was completed to comply with the monitoring requirements found in the Ventura County Transportation Commission's (VCTC) 2009 VCCMP. The VCTC has adopted LOS E as a minimum system-wide level of service on all VCCMP roadways. In the study area, SR 126 and SR 150, as well as Harvard Boulevard/Telegraph Road west of SR 150, are part of the CMP roadway network

The results of the intersection analysis are provided in **Table 4.13-6** and the freeway analysis presented in **Table 4.13-9** (included later in this Section)**,** indicate that these facilities would operate at LOS C or better during both peak hours under the Existing plus Project scenario and cumulative base plus project conditions in the year 2031. Therefore, impacts to the VCCMP would be less than significant.

Threshold: **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?**

The nearest airport is the Santa Paula Airport, located to the southeast of the Project Site**.** The Project Site is not located within any of the various safety zones established by the Comprehensive Land Use Pan (CLUP), nor is it within the Safety Zone, which includes the Inner Safety Zone (ISZ), the Outer Safety Zone (OSZ), and the Traffic Pattern Zone (TPZ), as provided in the City's General Plan Safety Element. Furthermore, the Project would not significantly change development patterns nor would it increase the heights of any structures beyond three stories. Therefore, the Project would result in a less than significant impact to air traffic patterns or safety risks.

Threshold: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The internal circulation network would be constructed in compliance with the Santa Paula Municipal Code and would not contain dangerous design features (e.g., sharp curves, dangerous intersections) and would be designed to accommodate traffic of the Project, including any delivery trucks related other commercial vehicles related to the uses allowed under the Specific Plan. There is no farmland proposed on the Project Site, and therefore; there would be no incompatible uses such as farm equipment. Implementation of the Project would result in less than significant impacts related to roadway design features and incompatible uses.

Threshold: Result in inadequate emergency access?

No changes are proposed that would impact emergency access. Primary access would be provided by Faulkner Road, Telegraph Road, Beckwith Road. The City of Santa Paula Fire Department (SPFD) provides minimum standards for emergency access. All structures will be required to maintain setbacks between buildings to accommodate fire protection access from all sides of each separate structure and roads will be required to meet standards for emergency access regarding roadway widths, length of roadway, secondary access, and turnarounds, among others.

In addition, as required by the City's Fire Code all individual building permit applications will include a review by the SPFD to ensure adequate setbacks between structures are maintained and that all sides of a building can be accessed by emergency personnel and emergency equipment. No structures would be located beyond 150 feet from a location in which a fire engine could be parked. Impacts with regard to emergency accessibility would be less than significant.

Threshold: Conflict with adopted policies, plan, or program regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The City's General Plan includes goals to ensure that City residents have alternative transportation opportunities, such as transit, bikeways, and pedestrian routes.

The annexation of the area as proposed will not conflict with any policies regarding public transit, bicycle or pedestrian facilities. The Specific Plan will establish standards for vehicular access and pedestrian facilities located within the plan area. The Specific Plan area can accommodate a range of uses that are accessible by auto, bike, or foot, and which generally share a common supply of parking integrated into the divisions within the Specific Plan boundary. The Specific Plan would not conflict with any existing

designated bike lanes or pedestrian facilities. Therefore, impacts to public transit, bicycle, or pedestrian facilities would be less than significant.

4.13.5 CUMULATIVE IMPACTS

The cumulative base traffic projections normally reflect changes to existing traffic conditions that can be expected from two sources. The first source is the ambient growth in traffic, which reflects increases in traffic due to regional growth and development. The second source is traffic generated by specific development located within or near the study area. These projected traffic volumes represent cumulative base conditions.

Information on related projects to determine cumulative traffic growth was obtained from the City of Santa Paula Planning Department. These related projects are included in **Section 3.0**, **Related Projects**. These developments are assumed to be in place by year 2031 and are included in the forecasts. Trip generation estimates were prepared for the related projects in the City using standard trip generation rates from Trip Generation, 9th Edition (Institute of Transportation Engineers [ITE], 2012). The cumulative projects are estimated to add approximately 4,509 AM peak-hour trips and 5,235 PM peak-hour trips. Detailed trip estimates for related projects are included in **Appendix 4.13.**

To develop the ambient growth rate for Santa Paula for 2031, the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) Travel Demand Model was used. The SCAG model is maintained SCAG and is reviewed by local agencies throughout the SCAG region. Land use projections for the City in that model were compared with projections in the countywide model maintained by the Ventura County Transportation Commission and found to be more conservative. A review of forecast traffic volume growth on roadways within the City indicated an ambient growth rate of approximately 0.5% percent per year, or 8.5 percent over the 17-year planning horizon for this study. This growth was applied to the existing baseline traffic volumes to reflect the effects of regional growth through 2031. The projected traffic volumes representing the cumulative base conditions (Year 2031) without the Project are shown in **Figure 4.13-8**, **Cumulative Base Peak-Hour Traffic Volumes**.

Future (Year 2031) Traffic Conditions

Roadway Infrastructure Improvements

Physical street system improvements expected to be implemented by 2031 in the study area, based on approved programs and/or Project revisions, were included in the analysis of cumulative base conditions.

Future (Year 2031) plus Project Conditions

To evaluate the potential impact of the Project on the local street system, future traffic conditions were projected with and without the traffic from the Project.

The year 2031 future peak-hour traffic volumes were analyzed to determine the projected V/C ratio and LOS for each of the analyzed intersections. The Project traffic volumes were added to the year 2025 future base traffic projections, resulting in future plus project AM and PM peak-hour traffic volumes. These traffic volumes are shown in **Figure 4.13-9, Cumulative plus Project Peak-Hour Traffic Volumes.**

SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-8**

Meridian Consultants

Cumulative Base Peak-Hour Traffic Volumes

050-002-13

SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-9**

Meridian Consultants

Cumulative plus Project Peak-Hour Traffic Volumes

050-002-13

A summary of the future 2031 intersection impact analysis is provided in **Table 4.13-7, Future (Year 2031) plus Project Impacts.** This analysis provides the Project V/C ratio and LOS for each of the analyzed intersections based on peak-hour traffic volumes.

Table 4.13-7
Future (Year 2031) plus Project Impacts

	Intersection	Cumulative Base (Year 2031)			Cumulative plus Project (Year 2031)				
								Significant Impact	
		Peak Hour	V/C or delay	LOS	V/C or delay	LOS	Change	Cumulative	Project
1	10th Street & Harvard Boulevard	AM	0.992	E	1.037	F	0.045	Yes	Yes
		PM	1.033	F	1.082	F	0.049	Yes	Yes
2	8th Street & Main Street	AM	0.423	A	0.425	A	0.002	No	No
		PM	0.496	A	0.512	A	0.016	No	No
3	8th Street & Harvard Boulevard	AM	0.387	A	0.406	A	0.019	No	No
		PM	0.492	A	0.495	A	0.003	No	No
4	Palm Avenue & Main Street	AM	0.607	B	0.629	B	0.022	No	No
		PM	0.569	A	0.588	A	0.019	No	No
5	Palm Avenue & Harvard Boulevard	AM	0.757	C	0.766	C	0.009	No	No
		PM	0.757	C	0.767	C	0.010	No	No
6	Steckel Drive & Main Street	AM	14.1	B	15.2	C	1.1	No	No
		PM	16.7	C	18.6	C	1.9	No	No
7	Steckel Drive & Harvard Boulevard	AM	0.444	A	0.489	A	0.045	No	No
		PM	0.488	A	0.500	A	0.012	No	No
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	0.908	E	1.079	F	0.171	Yes	Yes
		PM	0.741	C	0.810	D	0.069	No	No
9	Peck Road & Faulkner Road	AM	0.439	A	0.519	A	0.080	No	No
		PM	0.627	B	0.637	B	0.010	No	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way	AM	12.2	B	16.6	C	4.4	No	No
		PM	97.6	F	127.3	F	29.7	Yes	Yes
11	Faulkner Road & SR 126 WB On/Off Ramps	AM	56.3	F	66.9	F	10.6	Yes	Yes
		PM	14.1	B	17.4	C	3.3	No	No
12	Beckwith Road & Telegraph Road	AM	12.3	B	21.0	C	8.7	No	No
		PM	16.9	C	40.1	E	23.2	No	Yes

	Intersection	Cumulative Base (Year 2031)			Cumulative plus Project (Year 2031)				
		Peak Hour	V/C or delay	LOS	V/C or delay	LOS	Change	Significant Impact Cumulative	Significant Impact Project
13	Briggs Road & Telegraph Road	AM	0.487	A	0.507	A	0.020	No	No
		PM	0.565	A	0.594	A	0.029	No	No
14	Briggs Road & Faulkner Road	AM	13.3	B	13.7	B	0.4	No	No
		PM	14.3	B	14.8	B	0.5	No	No
15	Briggs Road & & SR 126 WB On/Off Ramps	AM	19.5	C	21.0	C	1.5	No	No
		PM	15.5	C	16.7	C	1.2	No	No
16	Briggs Road & & SR 126 EB On/Off Ramps	AM	11.7	B	12.2	B	0.5	No	No
		PM	13.7	B	13.8	B	0.1	No	No

Source: Fehr & Peers, Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan (March 2015).

As shown in **Table 4.13-7,** 12 of the 16 intersections are projected to operate at LOS C or better during the morning and afternoon peak hours under the future baseline conditions. The following four intersections are projected to operate at LOS D or worse during one or both of the analyzed peak hours in 2031 without traffic from the Project:

1. 10th Street & Harvard Boulevard (LOS E AM LOS F PM)

8. Peck Road & Harvard Boulevard/Telegraph Road/Main Street (LOS E AM)

10. Peck Road & SR 126 EB On/Off Ramps/Acacia Way (LOS F PM)

11. Faulkner Road & SR 126 WB On/Off Ramps (LOS F AM)

As shown in **Table 4.13-7,** with the addition of Project traffic, 11 of the 16 intersections are projected to operate at LOS C or better during both the morning and afternoon peak hours. Of the 16 intersections, the addition of traffic from the Project would result in significant impacts at the following five intersections:

<u>Intersection 1:</u> 10th Street & Harvard Boulevard (LOS F AM and PM)

<u>Intersection 8:</u> Peck Road & Harvard Boulevard/Telegraph Road/Main Street (LOS F AM)

<u>Intersection 10:</u> Peck Road & SR 126 EB On/Off Ramps/Acacia Way (LOS F PM)

<u>Intersection 11:</u> Faulkner Road & SR 126 WB On/Off Ramps (LOS F AM)

Intersection 12: Beckwith Road & Telegraph Road (LOS F PM)

As defined by the City of Santa Paula's definition of minimum desirable intersection level of service (LOS C), traffic generated by the Project would cause or contribute to significant traffic impacts at each of these intersections. Of the five impacted intersections, Project-specific impacts (impacts directly related to the addition of project traffic) are identified at the following intersection:

12. Beckwith Road & Telegraph Road (LOS F PM)

The Project-related traffic added to this intersection during the PM peak hour would contribute to a projected decline below LOS C operation under cumulative plus project conditions. The addition of Project-related traffic to the other impacted intersections would contribute to the projected undesirable levels of service.

Future (Year 2031) plus Project (without Beckwith Extension)

Figure 4.13-10, **Cumulative plus Project Peak-Hour Traffic Volumes (without Beckwith Extension)**, provides the estimated future project-generated peak-hour traffic volumes at each of the analyzed intersections during typical weekday AM and PM peak hours without the Beckwith Road extension. The Project-only volumes differ from those that would occur with the Beckwith Road extension.

These volumes were analyzed to determine the projected future operating conditions under this scenario. The results of the intersection analysis are summarized in **Table 4.13-8**, **Future (Year 2031) plus Project Intersection Impacts (without Beckwith Extension)**.

Table 4.13-8
Future (Year 2031) plus Project Impacts (without Beckwith Extension)

Intersection		Peak Hour	Cumulative Base (Year 2031) V/C or delay	Cumulative Base (Year 2031) LOS	Cumulative plus Project (Year 2031) V/C or delay	Cumulative plus Project (Year 2031) LOS	Cumulative plus Project (Year 2031) Change	Significant Impact Cumulative	Significant Impact Project
1	10th Street & Harvard Boulevard	AM	0.992	E	1.028	F	0.036	Yes	Yes
		PM	1.033	F	1.068	F	0.035	Yes	Yes
2	8th Street & Main Street	AM	0.423	A	0.425	A	0.002	No	No
		PM	0.496	A	0.518	A	0.022	No	No
3	8th Street & Harvard Boulevard	AM	0.387	A	0.407	A	0.020	No	No
		PM	0.492	A	0.495	A	0.003	No	No
4	Palm Avenue & Main Street	AM	0.607	B	0.630	B	0.023	No	No
		PM	0.569	A	0.594	A	0.025	No	No

	Intersection	Peak Hour	Cumulative Base (Year 2031) V/C or delay	LOS	Cumulative plus Project (Year 2031) V/C or delay	LOS	Change	Significant Impact Cumulative	Significant Impact Project
5	Palm Avenue & Harvard Boulevard	AM	0.757	C	0.767	C	0.010	No	No
		PM	0.757	C	0.768	C	0.011	No	No
6	Steckel Drive & Main Street	AM	14.1	B	15.2	C	1.1	No	No
		PM	16.7	C	18.9	C	2.2	No	No
7	Steckel Drive & Harvard Boulevard	AM	0.444	A	0.489	A	0.045	No	No
		PM	0.488	A	0.500	A	0.012	No	No
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	0.908	E	1.131	F	0.223	Yes	Yes
		PM	0.741	C	0.857	D	0.116	No	Yes
9	Peck Road & Faulkner Road	AM	0.439	A	0.541	A	0.102	No	No
		PM	0.627	B	0.696	B	0.069	No	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way	AM	12.2	B	17.0	C	4.8	No	No
		PM	97.6	F	126.6	F	29.0	Yes	Yes
11	Faulkner Road & SR 126 WB On/Off Ramps	AM	56.3	F	66.8	F	10.5	Yes	Yes
		PM	14.1	B	21.1	C	7.0	No	No
12	Beckwith Road & Telegraph Road	AM	12.3	B	21.1	C	8.8	No	No
		PM	16.9	C	39.3	E	22.4	No	Yes
13	Briggs Road & Telegraph Road	AM	0.487	A	0.500	A	0.013	No	No
		PM	0.565	A	0.597	A	0.032	No	No
14	Briggs Road & Faulkner Road	AM	13.3	B	13.8	B	0.5	No	No
		PM	14.3	B	14.9	B	0.6	No	No
15	Briggs Road & & SR 126 WB On/Off Ramps	AM	19.5	C	21.2	C	1.7	No	No
		PM	15.5	C	16.9	C	1.4	No	No
16	Briggs Road & & SR 126 EB On/Off Ramps	AM	11.7	B	12.2	B	0.5	No	No
		PM	13.7	B	13.8	B	0.1	No	No

Source: Fehr & Peers, Traffic Impact Analysis for the Santa Paula Business Park Specific Plan (March 2015).

SOURCE: Fehr & Peers - March 2015

FIGURE **4.13-10**

Meridian Consultants

Cumulative plus Project Peak-Hour Traffic Volumes (without Beckwith Extension)

050-002-13

A total of 11 intersections are projected to operate at LOS C or better during both AM and PM peak hours. The five intersections listed below are projected to operate at LOS D or worse during one or both peak hours.

Intersection 1: 10th Street and Harvard Boulevard (LOS F AM and PM)

Intersection 8: Peck Road and Harvard Boulevard/Telegraph Road/Main Street (LOS F AM and LOS D PM)

Intersection 10: Peck Road and SR 126 Eastbound On/Off Ramps/Acacia Way (LOS F PM)

Intersection 11: Faulkner Road and SR 126 Westbound On/Off Ramps (LOS F AM)

Intersection 12: Beckwith Road and Telegraph Road (LOS E PM)

As defined by the City of Santa Paula's definition of minimum desirable intersection level of service (LOS C), traffic generated by the Project would cause or contribute to significant traffic impacts at each of these intersections. Of the five impacted intersections, Project-specific impacts (impacts directly related to the addition of project traffic) are identified at one intersection:

Intersection 12: Beckwith Road and Telegraph Road (LOS E PM)

The Project-related traffic added to this intersection during the PM peak hour would contribute to a projected decline below LOS C operation under cumulative plus project conditions. The addition of Project-related traffic to the other impacted intersections would contribute to the projected undesirable levels of service.

Future 2031 Freeway and Multilane Highway Segments and Ramps

A summary of impacts to five freeway and multilane highway segments is provided in **Table 4.13-9**, **Future (Year 2031) Freeway and Multilane Highway Segments**.

Of the 10 directional freeway segments selected for analysis, all are projected to operate at LOS E or better during both the AM and PM peak hours under cumulative base conditions. As defined in the VCCMP, the minimum desirable level of service on freeway segments is LOS E. Therefore, no freeway segments would be significantly impacted due to cumulative development.

Table 4.13-9
Future (Year 2031) Freeway and Multilane Highway Segments (without Beckwith Extension)

			Cumulative Base Year 2031				Cumulative Base plus Project					
			Eastbound		Westbound		Eastbound		Westbound		Significant Impacts	
	Roadway Segment	Peak Hour	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Cumulative Impact?	Project Impact ?
1	SR 126 - Hallock Drive to 10th Street (SR 150)	AM	17.7	B	17.7	B	18.5	C	18.5	C	NO	NO
		PM	23.2	C	23.2	C	24.7	C	24.7	C	NO	NO
2	SR 126 - 10th Street (SR 150) to Palm Avenue	AM	24.3	C	24.3	C	25.9	C	25.9	C	NO	NO
		PM	23.2	C	23.2	C	24.7	C	24.7	C	NO	NO
3	SR 126 - Palm Avenue to Peck Road	AM	27.2	D	27.2	D	29.0	D	29.0	D	NO	NO
		PM	23.2	C	23.2	C	24.7	C	24.7	C	NO	NO
4	SR 126 - Peck Road to Briggs Road	AM	33.3	D	33.3	D	33.5	D	33.5	D	NO	NO
		PM	23.2	C	23.2	C	24.7	C	24.7	C	NO	NO
5	SR 126 - Briggs Road to Wells Road	AM	38.7	E	38.7	E	39.1	E	39.1	E	NO	NO
		PM	23.2	C	23.2	C	24.7	C	24.7	C	NO	NO

Note: pc/mi/ln = passenger cars per mile per lane.

4.13.6 MITIGATION MEASURES

The following recommended mitigation measures would fully mitigate all but one of the identified existing undesirable LOS and project and cumulative impacts.

MM TRA-1 **Peck Road & Harvard Boulevard/Telegraph Road/Main Street (Intersection 8)**. This intersection could be mitigated to LOS C or better with the addition of one travel lane to both the northbound and southbound approaches on Peck Road and the addition of a northbound right overlap phase. The northbound lane configuration would be one right-turn lane, two through lanes, and one left-turn lane. The northbound right-turn movement would also have an overlap signal head installed to accommodate the overlap phase. The southbound lane configuration would be one shared through/right-turn lane, one through lane, and one left-turn lane.

Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.

MM TRA-2 **Peck Road & SR 126 EB On/Off Ramps/Acacia Way (Intersection 10)**. This intersection could be mitigated to LOS C or better by installing a traffic signal. A peak-hour signal-warrant analysis is provided in Appendix D of the Traffic Impact Analysis and indicates that the installation of a traffic signal would be warranted under existing plus project conditions during the PM peak hour.

Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.

MM TRA-3 **Beckwith Road & Telegraph Road (Intersection 12)**. This intersection could be mitigated to LOS C or better by installing a traffic signal and reconfiguring the westbound approach. A peak-hour signal-warrant analysis is provided in Appendix E and indicates that the installation of a traffic signal would be warranted under existing plus project conditions. The westbound approach can be restriped to provide one right-turn lane, one through lane, and one left-turn lane (a reconfiguration of the existing two-way left-turn lane). With the development of the Santa Paula West Business Park, Beckwith Road will be widened to full City standards, which provide for a 64-foot roadway within an 84-foot right-of-way. With the additional roadway width, the northbound approach could be widened from its current single-lane configuration to provide one left-turn lane and one shared through/right-turn lane. With this configuration as mitigation, the intersection would operate at LOS C or better under existing plus project conditions.

Since the impacts at this intersection are project-related impacts (rather than cumulative impacts to which the project would contribute), the Project applicant shall be responsible for providing 100 percent of these mitigation improvements.

MM TRA-4 **Faulkner Road & SR-126 Westbound On/Off Ramps (Intersection 11**) – This intersection could be mitigated to LOS C or better by reconfiguring the westbound approach The westbound approach can be restriped to provide one shared through/right-turn lane and two left-turn lanes. While the freeway on-ramp at this location currently provides two lanes, this improvement would require coordination with and approval by Caltrans.

Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.

10th Street & Harvard Boulevard (Intersection 1) – Mitigation measures from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project including bicycle lanes is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, this intersection cannot be fully mitigated. Alternatively, a peak-hour parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include on shared through/right turn lane, one through lane (during peak hours), and on left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B under the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these mitigations were not considered as a feasible mitigation.

Mitigation without Beckwith Road Extension

For the Existing plus Project scenario without the Beckwith Road extension, the mitigation measures MM TRA -1 through MM TRA-3 listed for the three significantly impacted intersections would similarly mitigate all intersection impacts.

For the Cumulative plus Project Scenario without the Beckwith Road extension, mitigation measures MM TRA -1 through MM TRA-3 would similarly mitigate all but two intersection impacts:

<u>Intersection 1:</u> 10th Street and Harvard Boulevard and

<u>Intersection 8:</u> Peck Road and Harvard Boulevard/Telegraph Road/Main Street.

These impacts would remain significant and unavoidable for the Cumulative plus Project Scenario without the Beckwith Road extension due to the City's beautification project including bicycle lanes is planned along 10th Street at this location.

4.13.7 RESIDUAL IMPACTS AFTER MITIGATION

Residual impacts after mitigation are provided in **Table 4.13-10** through **Table 4.13-13**.

Residual Impacts for Intersection 10 (Peck Road & SR 126 EB On/Off Ramps/Acacia Way) Intersection 11 (Faulkner Road & SR 126 WB On/Off Ramps), and Intersection 12 (Beckwith Road & Telegraph Road) would be reduced to less than significant. However, impacts at Intersection 1 (10th Street and Harvard Boulevard) and Intersection 8 (Peck Road and Harvard Boulevard/Telegraph Road/Main Street) would remain significant and unavoidable as described below.

Intersection 1—10th Street & Harvard Boulevard

Mitigation measures from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak-hour parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these mitigations were not considered as a feasible mitigation. The constraints of the intersection and the proposed bicycle lanes discussed under the Existing plus Project scenario would also apply to the Cumulative plus Project scenario. Therefore, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable.

Intersection 8—Peck Road & Harvard Boulevard/Telegraph Road/Main Street

This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation. Given the constraints of the intersection, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable.

Residual Impacts—Existing plus Project Impacts with Mitigation

Table 4.13-10
Existing plus Project Impacts with Mitigation

	Intersection	Peak Hour	V/C or Delay	Existing plus Project LOS	Existing plus Project Change	Significant Impact Cumulative?	Significant Impact Project?	With Mitigation V/C or Delay	With Mitigation LOS	With Mitigation Change	With Mitigation Signif. Impact?
1	10th Street and Harvard Boulevard	AM	0.797	C	0.045	No	No	0.797	C	0.045	No
		PM	0.815	D	0.051	No	Yes	0.815	D	0.051	Yes
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	0.834	C	0.165	No	Yes	0.669	B	0.000	No
		PM	0.552	A	0.069	No	No	0.510	A	0.027	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way[a]	AM	11.7	B	2.1	No	No	0.411	A	—	No
		PM	40.7	E	14.6	No	Yes	0.665	B	—	No
12	Beckwith Road & Telegraph Road[a]	AM	18.7	C	7.1	No	No	0.300	A	—	No
		PM	30.2	D	15.4	No	Yes	0.496	A	—	No

[a] Intersection is controlled by stop signs. Average vehicular delay in seconds is reported rather than V/C ratio.

Residual Impacts without Beckwith Road Extension

Table 4.13-11
Existing plus Project Impacts with Mitigation (without Beckwith Extension)

	Intersection	Peak Hour	V/C or Delay	Existing plus Project LOS	Existing plus Project Change	Significant Impact Cumulative?	Significant Impact Project?	With Mitigation V/C or Delay	With Mitigation LOS	With Mitigation Change	With Mitigation Signif. Impact?
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	0.885	D	0.216	No	Yes	0.647	B	-0.022	No
		PM	0.599	A	0.116	No	No	0.590	A	0.107	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way[a]	AM	11.8	B	2.2	No	No	0.415	A	—	No
		PM	40.3	E	14.2	Yes	Yes	0.659	B	—	No
12	Beckwith Road & Telegraph Road[a]	AM	18.8	C	7.2	No	No	0.328	A	—	No
		PM	30.0	D	15.2	No	Yes	0.495	A	—	No

[a] *Intersection is controlled by stop signs. Average vehicular delay in seconds is reported rather than V/C ratio.*

Residual Impacts—Future (2031) Cumulative plus Project Impacts with Mitigation

Table 4.13-12
Future (Year 2031) Cumulative plus Project Impacts with Mitigation

	Intersection	Peak Hour	V/C or Delay	Cumulative plus Project LOS	Cumulative plus Project Change	Significant Impact Cumulative?	Significant Impact Project?	With Mitigation V/C or Delay	With Mitigation LOS	With Mitigation Change	With Mitigation Signif. Impact?
1	10th Street & Harvard Boulevard	AM	1.037	F	0.045	Yes	Yes	1.037	F	0.045	Yes
		PM	1.082	F	0.049	Yes	Yes	1.082	F	0.049	Yes
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	1.079	F	0.171	Yes	Yes	0.842	D	-0.066	Yes
		PM	0.810	D	0.069	No	Yes	0.650	B	-0.091	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way[a]	AM	16.6	C	4.4	No	No	0.460	A	—	No
		PM	127.3	F	29.7	Yes	Yes	0.646	B	—	No
11	Faulkner Road & SR 126 WB On/Off Ramps[a]	AM	66.9	F	10.6	Yes	Yes	15.1	C	-41.2	No
		PM	17.4	C	3.3	No	No	12.8	B	-1.3	No
12	Beckwith Road & Telegraph Road[a]	AM	21.0	C	8.7	No	No	0.325	A	—	No
		PM	40.1	E	23.2	No	Yes	0.533	A	—	No

[a] *Intersection is controlled by stop signs. Average vehicular delay in seconds is reported rather than V/C ratio.*

Residual Impacts—Future (2031) Cumulative plus Project Impacts with Mitigation (without Beckwith Extension)

Table 4.13-13
Future (Year 2031) Cumulative plus Project Impacts with Mitigation (without Beckwith Extension)

	Intersection	Peak Hour	V/C or Delay	Cumulative plus Project LOS	Cumulative plus Project Change	Significant Impact Cumulative?	Significant Impact Project?	With Mitigation V/C or Delay	With Mitigation LOS	With Mitigation Change	With Mitigation Signif. Impact?
1	10th Street & Harvard Boulevard	AM	1.028	F	1.036	Yes	Yes	1.028	F	0.036	Yes
		PM	1.068	F	1.035	Yes	Yes	1.068	F	0.035	Yes
8	Peck Road & Harvard Boulevard/ Telegraph Road/Main Street	AM	1.131	F	0.223	Yes	Yes	0.891	D	-0.017	Yes
		PM	0.857	D	0.116	No	Yes	0.687	B	-0.054	No
10	Peck Road & SR 126 EB On/Off Ramps/Acacia Way[a]	AM	17.0	C	4.8	No	No	0.464	A	—	No
		PM	126.6	F	29.0	Yes	Yes	0.647	B	—	No
11	Faulkner Road & SR 126 WB On/Off Ramps[a]	AM	66.8	F	10.5	Yes	Yes	15.1	C	-41.2	No
		PM	21.1	C	7.0	No	No	13.1	B	-1.0	No
12	Beckwith Road & Telegraph Road[a]	AM	21.1	C	8.8	No	No	0.349	A	—	No
		PM	39.3	E	22.4	No	Yes	0.531	A	—	No

[a] *Intersection is controlled by stop signs. Average vehicular delay in seconds is reported rather than V/C ratio.*

4.14 UTILITIES AND SERVICE SYSTEMS

This section describes the existing utilities and service systems located on and immediately surrounding the Santa Paula West Business Park Specific Plan ("Specific Plan") area. The section addresses the potential impacts of the Project on water service, sewer service, and solid waste. Each subsection includes an introduction, followed by discussions of existing conditions, regulatory framework, methodology, potential environmental impacts, cumulative impacts, and recommended mitigation measures to help reduce or avoid identified impacts, and the level of significance of adverse impacts after mitigation.

Information presented in this section derives from the City of Santa Paula's General Plan (1998), the City of Santa Paula's *Draft Water Supply Assessment for the Proposed Santa Paula West Business Park Specific Plan Project* ("Draft WSA"; November 2016), the Final 2010 Urban Water Management Plan (UWMP) Update (June 2011), the 2005 Potable Water System Master Plan Amendment (June 2012), the Wastewater System Master Plan (2012), the *Sanitary Sewer Technical Report* prepared by Jensen Design & Survey, Inc. (May 2015), CalRecycle, well-pumping data through year 2014, and the proposed Santa Paula West Business Park Specific Plan (October 2016). The Draft WSA is included in **Appendix 4.14**.

4.14.1 EXISTING CONDITIONS

Water

On-Site Water Availability

The Project Site currently contains two small farmworker dwelling units that use potable water and approximately 49 acres under agricultural production that also use water for irrigation. The remainder of the Project Site consists of nonirrigated open space and improvements such as roads and equipment storage areas associated with farming operations.

Within the Santa Paula Groundwater Basin, water for the Project Site is currently provided by an on-site water well that supplies water for existing agricultural irrigation uses and for domestic consumption (residents). This existing water well also provides water for off-site users other than those on the Project Site. This existing well has been in service for a long period of time and, for the purposes of future conditions, has run its design life.

Water Demand

The City's water distribution system provides domestic water service to approximately 7,278 end users.[1] As provided in **Table 4.14-1**, **2010 City Water Demand**, the total 2010 water demand within the City was

1 City of Santa Paula, *Final 2010 Urban Water Management Plan Update (UWMP),* June 2011.

4,416 acre-feet (af).[2] The largest land use in the City for water demand is single-family residential, which accounted for approximately 57 percent of the total 2010 water demands. Multifamily residential accounts represented approximately 20 percent of the 2010 demands. Commercial/Institutional accounts represented approximately 14 percent of the 2010 demands. Industrial, landscape and agricultural irrigation, unmetered, and "other" accounts represented the balance of the demands.

Table 4.14-1
2010 City Water Demand

Customer Classification	Demand (acre-feet)	Percent of Total Water Demand
Single-family residential	2,504	56.7
Multifamily residential	887	20.1
Commercial/Institutional	601	13.6
Industrial	44	1
Landscape irrigation	22	0.5
Other	41	0.9
Agricultural irrigation	0	0
Unmetered	317	7.2
Total	**4,416**	100.00

Source: City of Santa Paula, Final 2010 Urban Wastewater Management Plan (UWMP) Update, June 2011, Table 3-1.

The City does not generally provide wholesale water to any other agencies, nor does it purchase water from any wholesale agency. However, in 2010, the City provided 39 af to the Middleroad Mutual Water Company.[3] The City does not use potable supplies for saline barriers, groundwater recharge, conjunctive use, raw water, or recycled water uses.

The 2010 UWMP Update includes estimated future water demand based on the City's General Plan (see **Table 4.14-2, Estimated Future Potable Water Demand**).[4] Future water requirements are estimated through 2035 according to future land use, population projections, and water demand characteristics. Potable water demands for potential developments were estimated to be a net increase of 1,697 af.

2 City of Santa Paula, Final *2010 UWMP Update* (June 2011).
3 City of Santa Paula, Final *2010 UWMP Update* (June 2011).
4 City of Santa Paula, *Final 2010 UWMP Update* (June 2011).

Table 4.14-2
Estimated Future Potable Water Demand

Land Use	Potential Development[a,b,c,d]	Estimated Potable Water Demand (afy)[e]
Existing Demand		4,416
Potential Future Demand		
Residential		
Adams Canyon	495 du	
East Area 1	1,500 du	
Fagan Canyon	450 du	
Other	200 du	
Subtotal	2,645 du	1,349
Commercial/Industrial/Institutional[e]		
Adams Canyon[f]	100,000 sq. ft.	
East Area 1[g]	811,000 sq. ft.	
East Area 2	1,602,000 sq. ft.	
Fagan Canyon[h]	100,000 sq. ft.	
West Area 2	1,906,000 sq. ft.	
Other	1,200,000 sq. ft.	
Subtotal	5,706,300 sq. ft.	267
Parks and Recreation[e]		
Adams Canyon[i]	200 acres	
East Area 1	89 acres	
Fagan Canyon	7 acres	
South Mountain	115 acres	
Other	0 acres	
Subtotal	411 acres[1]	0
Unaccounted Water[j]		81
Subtotal Potential Future Demand		1,696
Total Future Potable Demands		**6,112**

Source: City of Santa Paula, Final 2010 UWMP Update (June 2011), Table 2-4.
Notes: afy = acre-feet per year; du = dwelling units; sq. ft. = square feet.
[a] Source: City of Santa Paula General Plan, "Land Use Element" (2011).
[b] Source: City of Santa Paula General Plan (1998).
[c] East Area 1 Specific Plan (2007).
[d] Source: personal communication (City, 2011b)
[e] All new community landscape areas, including golf courses, will be irrigated with recycled water. However, this water demand will be approximately 900 afy.
[f] Includes school and destination resort hotel.
[g] Includes two schools, a community college, and an assisted living facility. It should be noted that the community college is not a part of the East Area 1 Specific Plan Amendment.
[h] Includes school.
[i] Includes golf course (Adams Canyon).
[j] Source: Assume 5 percent.

As shown in **Table 4.14-3, Potable Water Demands 2015–2035**, the estimated total potable water demand (existing plus potential) is approximately 4,840 af in 2015 and will increase to approximately 6,116 af by 2035. Future water demand values represent the total potable water demand, including anticipated future development.

Table 4.14-3
Potable Water Demands 2015–2035 (afy)

	2015	2020	2025	2030	2035
Total Demand	4,840	5,265	5,689	6,116	6,116

Source: City of Santa Paula, Final 2010 UWMP Update (June 2011), Table 3-2.
Note: afy = acre-feet per year.

Water Supply

The City of Santa Paula (City) Public Works, Water Division, supplies water to the City. The City of Santa Paula currently has secured water rights from two sources: groundwater allocation from the Santa Paula Basin, and surface water through an agreement with the Canyon Irrigation Company. Currently the Santa Paula Basin is the City's sole source of water supply.[5]

The total amount of water produced by the City was 4,455 af in 2010. In comparison, the City produced 5,046 af in 2005, an amount that is 591 af more than was produced in 2010. The highest annual water demand for the period 2000 to 2010 was recorded in 2002, when 5,359 af was produced.

The City's current groundwater supply includes production from five active wells. Domestic water is pumped from Wells 1-B, 11, 12, 13, and 14, which can produce up to 10.6 million gallons per day.[6] **Table 4.14-4, City Groundwater Well Production**, summarizes the City's groundwater resources by well, including current status, well capacity, and 2010 production. Wells 12 and 14 produced 81 percent of the water for the City in 2010. The City no longer operates Wells 2, 8, and 9 because of a history of elevated nitrate levels in water extracted from these sources; these wells were sold to an agricultural enterprise.

5 City of Santa Paula, 2010 *UWMP Update* (June 2011).
6 City of Santa Paula, 2010 *UWMP Update* (June 2011).

Table 4.14-4
City Groundwater Well Production

Well No.	Status	Capacity (gpm)	2010 Production (acre-feet)
1-B	Active	1,288	114.9
11	Active	1,232	393.2
12	Active	1,448	1,768.8
13	Active	1,932	353.3
14	Active	3,219	1,825.3
		Total	**4,455.5**

Source: City of Santa Paula, Final 2010 UWMP Update (June 2011), Table 4-3.

The Project Site is located outside of the incorporated City boundary but is within West Area 2, which is a future expansion area under the City's General Plan, and is within the City's Sphere of Influence. The entire Project Site would be located within the City's service area after annexation of the site to the City.

Construction of the City's centralized water conditioning facility and the Well 14 pumping plant was completed in 2000. The centralized water conditioning facility was designed to remove manganese and iron from up to 10 million gallons of water per day from Wells 11, 13, and 14, and future Well 15. Well 14 is anticipated to contribute an added 4.5 million gallons of water per day to the system. This added production capacity will help the City's water system to meet peak water use demands in hot summer weather. Both facilities are housed in a new building located along Main Street. Well 1-B was recently rehabilitated. Annual production from existing and planned wells will be limited by the City's current groundwater allocation (5,412 acre-feet per year [afy]) in the Santa Paula Basin.

There are several options that the City may consider for meeting future water demands including: long-term transfer of water rights; short-term transfer of water rights; State Water Project (SWP) water; use of recycled water; and supporting water demand management programs.[7] Implemented over time, these programs are expected to provide the City with sufficient supplies to meet future water demands.

Water Supply Assessment

A Draft WSA was prepared for the Specific Plan in accordance with the requirements of Section 10910 of the California Water Code (Senate Bills [SB] 610 and 221) to verify the sufficiency of the local water supply

7 City of Santa Paula, *2010 UWMP Update* (June 2011).

to meet the demand associated with the land uses allowed under the Specific Plan.[8] The Draft WSA considered water supplies for the entire 53.81-acre Specific Plan area and specifically for the areas of light industrial, commercial, and landscaped areas that would be allowed for development under the Specific Plan. The Draft WSA also considered the Project water demand in light of the existing water demand for the agriculture and related uses currently on the Project Site.

The Draft WSA reported the 20-year water supply and demand estimates from the City's 2010 UWMP, prepared in 2011 in accordance with California Water Code Sections 10610 and 10656. The Draft WSA concluded that there would be no decrease in availability of groundwater supplies through the year 2037. Furthermore, the Draft WSA determined that the City of Santa Paula's projected water supply for 20 years is adequate to meet the demand for the Project, as well as existing and planned future uses in the City in normal, single dry, and multiple dry years.

Section 15155 (d) of the California Environmental Quality Act (CEQA) Guidelines states that when a WSA has been prepared for a project, no additional WSA is required if the water demands of the project have not substantially increased and there have been no changes in circumstances or conditions that would substantially affect the ability of City to supply the water needed for the project.

The Specific Plan Draft WSA provided water demand estimates for the City of Santa Paula through 2037, which corresponded with the 20-year forecast required in a WSA if the Project were to be initiated in 2017. The 2010 UWMP addresses new requirements developed by the State of California Department of Water Resources (DWR) as published in their *Guidebook to Assist Urban Water Suppliers to Prepare a 2010 Urban Water Management Plan* (March 2011).

On January 17, 2014, the Governor of the State of California proclaimed a state of emergency due to current drought conditions and called on Californians to reduce their water usage by 20 percent. On March 1, 2014, the Governor signed into law emergency drought legislation that finds and declares that California is experiencing an unprecedented dry period and shortage of water for its citizens, local governments, agriculture, environment, and other uses.

Additionally, the Fox Canyon Groundwater Management Agency (GMA), the local agency responsible for groundwater management for aquifers on the Santa Paula Basin, adopted an emergency pumping ordinance (Emergency Ordinance E) on April 11, 2014, that implements a phased 20 percent reduction over 18 months, consistent with Governor Brown's January 2014 drought declaration, other agencies' efforts, and the GMA's need to achieve groundwater basin sustainability.

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8 City of Santa Paula, Draft *Water Supply Assessment for the Proposed Santa Paula West Business Park Specific Plan Project* (November 2016).

On December 22, 2014, Governor Brown issued Executive Order B-28-14, which extended the suspension of certain activities subject to the CEQA contained in the January 2014 and April 2014 proclamations, including the State Water Resources Control Board's (SWRCB's) adoption of emergency regulations pursuant to Water Code section 1058.5, through May 31, 2016. On March 17, 2015, the SWRCB adopted an expanded emergency conservation regulation prohibiting certain irrigation practices, restricting certain commercial activities, and ordering all urban water suppliers to implement mandatory restrictions on outdoor irrigation. The emergency regulation orders larger urban water suppliers (i.e., those providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 af of water annually, excluding wholesalers) to provide monthly data on water production, enforcement, and outdoor water conservation measures being implemented.

On April 1, 2015, Governor Brown signed Executive Order B-29-15, directing the SWRCB to impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage through February 2016, as compared to the amount used in 2013. The Governor instructed the SWRCB to consider the relative per capita water usage of each supplier's service area and to require those areas with high per capita use to achieve proportionally greater reductions than those with low use. The order mandates that the Governor's January 2014 proclamation, April 2014 proclamation, Executive Order B-26-14, and Executive Order B-28-14 remain in full force and effect except as modified.

On May 5, 2015, the SWRCB adopted an emergency conservation regulation in accordance with the Governor's directive. The provisions of the emergency regulation went into effect on May 18, 2015. The emergency regulation identifies how much water communities must conserve based on their average residential water use, per person per day, last summer. Every person should be able keep indoor water use to no more than 55 gallons per day. For the most part, the amount of water that each person uses in excess of this amount is water that is applied to lawns and other ornamental landscapes.

To reduce water use by 25 percent statewide, a regulation adopted by the SWRCB places each urban water supplier into one of eight tiers, each of which is assigned a conservation standard ranging between 4 and 36 percent.[9]

As of March 2016, the City of Santa Paula had a Conservation Standard of 26 percent as directed by the SWRCB; from March to June 2016, the City achieved 24.2 percent water savings. The Governor issued a

9 State of California, Office of Administrative Law, OAL File No. 2015-0506-02 EE, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board (May 18, 2015). http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/oal_approved_regs2015.pdf.

new Executive Order, as of June 1, 2016, reducing the Conservation Standards as a result of improved conditions, and the City now has a zero percent conservation standard.[10]

In September 2016, Governor Brown signed SB 1262 (Pavley). Details of this bill are discussed below under Regulatory Setting. It should be noted here, however, that SB 1262 is not effective until January 2017.

Project Site Water Supply and Demand

The existing land uses within the Specific Plan area includes approximately 54 acres of agricultural land, fallow agricultural land, and a small amount of industrial uses.

Water supply for irrigation on the Specific Plan area has been historically supplied from an on-site well that overlies the Santa Paula Basin. The existing well in the area (E11S) is owned and operated by McGaelic Group and Bender combined.

Approximately 49 acres of the Santa Paula West Specific Plan site is under cultivation for avocados, herbs, and a variety of row crops. Production records for the irrigation well for the period 2010 to 2014 are shown on **Table 4.14.-5, Existing Well Pumping Records 2010–2014.** Water usage has been from one well but delivered to several parcels, including McGaelic West (McGrath owners), Bender Farms, and Jaime Santana; only the McGaelic West and Bender parcels are within the Project Site. As shown on Table 4.14-5, over the last five years (2010 to 2014), the total water used on site has averaged 281.1 afy.

Table 4.14-5
Existing Well Pumping Records 2010–2014

Year	McGaelic West (acre-feet)	Bender (acre-feet)	Total Usage (acre-feet)
2010	N/A	112.9	112.9
2011	122.9	89.4	212.3
2012	176.5	162.9	339.4
2013	187.8	232.7	420.5
2014	120.8	199.6	320.4
Total	608.0	797.5	1,405.5
2010–2014 Average per Year	**121.6**	**159.5**	**281.1**

Source: Email from Beverly Gutierrez, Hoffman, Vance & Worthington, Inc., Existing Water Use Spreadsheet (2015)

10 State Water Resources Control Board, Self-Certification Conservation Standards—"Stress-test" (by supplier), Pulled on October 18, 2016, http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/emergency_reg/uw_self-cert_summary.pdf.

Groundwater Allocation Transfers from Developed Properties

In accordance with Santa Paula Municipal Code Section 52.021, landowners or developers are required to transfer their groundwater rights to the City as a condition of project approval. This regulation is intended to ensure that new urban land users provide sufficient water resources for their needs. If the associated water rights are not sufficient to serve the proposed development's anticipated water use (as determined by the City), or if the water rights are held by another entity who cannot or will not dedicate those rights to the City, the developer must either purchase additional water rights and dedicate them to the City or pay a water resource in-lieu fee to the City. This regulation applies to developments inside and outside City limits that seek to receive potable water service from the City.

Purchased Groundwater Allocations

Water availability is complicated by the fact that the actual safe yield of the Santa Paula Groundwater Basin is unknown.[11] Disagreement over the issue between the UWCD and the water users, including the City and the City of San Buenaventura (Ventura), led to the adjudication of the Santa Paula Groundwater Basin. The Stipulated Judgment[12] represents the beginning of a program of basin management, including the regulation of pumping, that is aimed at meeting the reasonable water supply needs of the parties, including protection for historic users, without harm to the Santa Paula Groundwater Basin.

The 2010 UWMP recognizes that in 2005, it was determined that 497 afy of potentially available groundwater allocations held by others within the Santa Paula Basin boundary were not being utilized.[13] The City has the option to independently pursue the acquisition of groundwater allocations at any time in the future.

The available water resources and demand for water resources in the City is estimated in the Draft WSA. **Table 4.14-6, Existing and Projected City Water Resources and Demand**, provides a summary of existing and projected water demand through the year 2037.

11 City of Santa Paula, *2010 UWMP Update* (June 2011), 32.
12 *United Water Conservation District v. City of San Buenaventura* (California, 1996; 2010).
13 City of Santa Paula, Draft Water Supply Assessment for the Proposed Santa Paula West Business Park Specific Plan Project (November 2016).

Table 4.14-6
Existing and Projected City Water Resources and Demand (afy)

Percent	2015	*2017	2020	2025	*2027	2030	2035	*2037
Existing Supplies								
City Wells	5,483	5,483	5,483	5,483	5,483	5,483	5,483	5,483
Santa Paula Creek	500	500	500	500	500	500	500	500
Subtotal	5,983	5,983	5,983	5,983	5,983	5,983	5,983	5,983
Projected Supplies								
Groundwater Allocation Transfers	454	544.8	908	1,362	1,816	1,816	1,816	1,816
Purchased Groundwater Allocations	200	225	300	400	497	497	497	497
SWP	0	0	0	0	0	0	0	0
Recycled Water	400	480	800	1,200	1,622	1,622	1,622	1,622
Subtotal	1,054	1,244.8	2,008	2,962	3,935	3,935	3,935	3,935
Total Projected Supplies	**7,037**	**7,228**	**7,991**	**8,945**	**9,918**	**9,918**	**9,918**	**9,918**
Estimated Demand								
City of Santa Paula	4,840	4,925	5,265	5,689	6,113	6,113	6,113	6,113
West Area 2 Allocation	88.8	88.8	88.8	88.8	88.8	88.8	88.8	88.8
Projected Santa Paula West Project Area	0	39.8	39.8	39.8	39.8	39.8	39.8	39.8
Total Estimated Demand (Projected + City Demand)	**4,840.00**	**4,964.80**	**5,304.80**	**5,728.80**	**6,152.80**	**6,152.80**	**6,152.80**	**6,152.80**
Project Demand as % of West Area 2	0%	44.82%	44.82%	44.82%	44.82%	44.82%	44.82%	44.82%
Project Demand as % of Total City Supply	0%	0.81%	0.76%	0.70%	0.65%	0.65%	0.65%	0.65%
Difference (Supply – Demand)	**2,197**	**2,263**	**2,686**	**3,216**	**3,765**	**3,765**	**3,765**	**3,765**

Source: City of Santa Paula, Final 2010 Urban Water Management Plan Update (June 2011).
**Projected data*

Notes:

All values rounded to the nearest 1 AF.

Santa Paula West Area Business Park Specific Plan would start construction in 2017 and be completed by 2027. Conservatively assumed full build out Project Demand numbers in 2017.

The City's current (2011) allocation is 5,483 AFY.

The City currently wheels the 500 AFY of surface water from Santa Paula Creek to farmers Irrigation Company, which uses the surface water in lieu of pumped groundwater, and the City gains 500 AFY groundwater pumping credits in the Santa Paula Basin.

Total of 1,815 AFY allocation transfers achieved over 4 equal 5-year periods (approximately 454 AFY per 5-year period.

The City anticipates purchasing groundwater allocations. It is anticipated that approximately 200 AFY could be developed by 2015, 300 AFY by 2020, 400 AFY by 2025, and 497 by 2030.

The City has rights to 2,198 AFY. However, actual delivery may be only 60 percent of water rights (DWR, 2010) in an average year, 7 percent in a single dry year, and 34 percent in multiple dry years. For the purposes of this UWMP, the City does not anticipate receiving SWP water in the near future.

The City purchased the WRF in 2015, however, currently there is no infrastructure to supply recycled water to the City The 2010 UWMP anticipated that approximately 400 afy could be developed by 2015, 800 afy by 2020, 1,200 afy by 2025, and 1,622 afy by 2030.

The 2010 UWMP Update anticipates that the City will acquire through allocation transfers 454 AFY by 2015, 908 AFY by 2020, 1,362 AFY by 2025, and 1,815 AFY by 2030 and 2035 through allocation transfers within the Santa Paula Basin as provided for in the Judgment.

Implementation of these water supply programs is anticipated to provide the City with sufficient water supplies to meet future water demand. As shown in **Table 4.14-7, Existing and Potential City Water Resources and Demands**, the potential water supplies available to the City exceed the estimated water demand at City build-out conditions.

Table 4.14-7
Existing and Potential City Water Resources and Demands

Supplies	2010	2015	2020	2025	2030	2035
Existing Supplies						
City wells[a]	5,483	5,483	5,483	5,483	5,483	5,483
Santa Paula Creek[b]	500	500	500	500	500	500
Subtotal	*5,983*	*5,983*	*5,983*	*5,983*	*5,983*	*5,983*
Potential Future Supplies						
Groundwater allocation transfers	0	454	908	1,362	1,816	1,816
Purchased groundwater allocations	0	200	300	400	497	497
SWP[c]	0	0	0	0	0	0
Recycled water[d]	0	400	800	1,200	1,622	1,622
Subtotal	*0*	*1,054*	*2,008*	*2,962*	*3,935*	*3,935*
Total Potential Supplies	**5,983**	**7,037**	**7,991**	**8,945**	**9,918**	**9,918**
Total Estimated Demands	**4,416**	**4,480**	**5,265**	**5,689**	**6,113**	**6,113**
Net Surplus	**1,567**	**2,197**	**2,726**	**3,256**	**3,805**	**3,805**

Source: City of Santa Paula, Final 2010 UWMP Update, 2011, Table 4-4.
[a] The City's current allocation is 5,483 afy (State of California, Superior Court. 2010. Amended and Restated Judgment, United Water Conservation District vs. City of San Buenaventura)
[b] The City currently wheels the 500 afy of surface water from Santa Paula Creek to Farmers Irrigation Company, which uses the surface water in lieu of pumped groundwater, and the City gains 500 afy groundwater pumping credits in the Santa Paula Basin.
[c] The City has rights to 2,198 afy. However, actual delivery may be only 60 percent of water rights in an average year, 7 percent in a single dry year, and 34 percent in multiple dry years. For the purposes of this UWMP, the City does not anticipate receiving SWP water in the near future.
[d] The City anticipates initiating a recycled water program by 2015.

State Water Project Water

The County of Ventura contracted for 20,000 afy of State Water Project (SWP) water, with 5,000 afy of that amount subcontracted to the UWCD, which has designated 2,198 afy of SWP water for use by the City.[14] The City has discussed a contract with UWCD to ensure that 2,198 afy is reserved for the City. The

14 City of Santa Paula, Final *2010 UWMP Update* (June 2011), 42.

City does not anticipate directly receiving SWP water in the near future.[15] However, the City may trade, transfer, and/or sell a portion of the SWP water rights to augment existing supplies.

Since the 2010 UWMP was prepared, the California Department of Water Resources has updated its State Water Project Delivery Reliability Report three times (2011, 2013, and 2015). The biennial Report assists SWP contractors in assessing the reliability of the SWP component of their overall supplies. The 2015 SWP Reliability Report updates the DWR estimate of future water delivery reliability through 2035. The City's 2010 UWMP update incorporates this updated information from DWR. The updated analysis in the 2015 SWP Reliability Report showed that the primary component of the annual SWP deliveries (referred to as Table A deliveries) would be less under current and future conditions.[16]

The 2015 SWP Reliability Report recognized continuing challenges to the ability of the SWP to deliver full contractual allotments of SWP water. For current conditions, the dominant factor for these reductions is the restrictive operational requirements contained in the federal biological opinions. Deliveries estimated for the 2015 Report expressly account for the operational restrictions of the biological opinions issued by the U.S. Fish and Wildlife Service in December 2008 and the National Marine Fisheries Service in June 2009 governing the SWP and Central Valley Project (CVP) operations. SWP exports have decreased since 2005, although the bulk of the change occurred by 2009 as the federal BOs went into effect, restricting operations. These effects are also reflected in the SWP delivery estimates. The most salient findings in this report are as follows:

- Under existing conditions, the average annual delivery of Table A water estimated for this 2015 Report is 2,550 thousand acre-feet per year (tafy), 3 tafy less than the 2,553 tafy estimated for the 2013 Report.
- The likelihood of existing-condition SWP Article 21 deliveries (supplemental deliveries to Table A water) being greater than 20 tafy has decreased by 3 percent relative to the likelihood presented in the 2013 Report.

For future conditions, the 2015 SWP Reliability Report conservatively assumed that the restrictions imposed by the biological opinions will still be in place, and includes the potential effects of climate change to estimate future deliveries. The changes in run-off patterns and amounts were included along with a potential rise in sea level. Sea level rise has the potential to require more water to be released to repel salinity from entering the San Francisco Bay/Sacramento-San Joaquin Delta Estuary ("Bay-Delta") to meet the water quality objectives established for the Delta. For the 2015 SWP Reliability Report, the changes in

15 City of Santa Paula, Final *2010 UWMP Update* (June 2011), 44.

16 Department of Water Resources (DWR), *The State Water Project Final Delivery Capability Report 2015* (July 1, 2015), https://msb.water.ca.gov/documents/86800/144575dd-0be1-4d2d-aeff-8d7a2a7b21e4.

run- off patterns and amounts were incorporated into the analyses, but the potential rise in sea level was not.

The analyses in the 2015 SWP Reliability Report indicated that the SWP, using existing facilities operated under then current regulatory and operational constraints and future anticipated conditions, and with all contractors requesting delivery of their full Table A amounts in most years, could deliver 60 percent of Table A amounts on a long-term average basis.

Many of the same specific challenges to SWP operations described in the State Water Project Delivery Reliability Report 2013 remained in 2015—most notably, the effects on SWP pumping caused by issuance of the 2008 and 2009 federal biological opinions (BOs), which were reflected in the SWP delivery reliability report. The analyses in this report consider climate change and the effects of sea level rise on water quality, but do not incorporate the probability of catastrophic levee failure.

Recycled Water

Construction of the new City Water Recycling Facility (WRF) that meets California Title 22 regulations for recycled water was completed in early 2010.[17] The WRF has a capacity of 3.15 million gallons per day (mgd), with a final build-out capacity of 4.2 mgd and a peak operating capacity of 7.0 mgd.

The 2010 UWMP estimates recycled water urban demand within the City (and adjacent areas) will be approximately 1,622 afy. The 2010 UWMP anticipates that the City will develop a recycled water program for landscape irrigation and that the estimate amounts that could be delivered in the future are 800 afy by 2020, 1,200 afy by 2025, and 1,622 afy by 2030.[18] The recycled water demand could be fully met with recycled water from the new WRF.

Currently, there are no recycled water systems in the proposed Project vicinity. However, the 2012 Wastewater Master Plan has included West Area 2 to have a future wastewater flow of 0.082 mgd or 919 afy during average dry weather season.[19]

Water Conveyance System

The City's domestic water supply is conveyed via gravity throughout its distribution network system. The City currently delivers a portion of the overall domestic water supplies to the Project Site. The closest existing domestic water system to the Project Site includes a main line within Telegraph Road.

17 City of Santa Paula, *Wastewater System Master Plan* (June 2012), 1
18 City of Santa Paula, Final *2010 UWMP Update* (June 2011), 47.
19 City of Santa Paula, *Wastewater System Master Plan* (June 2012)

Wastewater

The City of Santa Paula Public Works Water Division provides wastewater services to the City.

On-site Sewer

The Project Site is not connected to the City's wastewater treatment system. There are two small farmworker dwelling units and ancillary agricultural facilities located on-site. These residences and the ancillary facilities utilize septic systems to store wastewater, which is periodically pumped and disposed of via private sewage collection services. The nearest sewer system pipeline is an 8-inch line located beneath Telegraph Road to the north of the Project Site.

Citywide Sewer System

The City's Wastewater System Master Plan, prepared by Boyle Engineering and updated by the City of Santa Paula in June 2012, addresses the provisions of wastewater collection facilities to serve the West Area 2 Expansion Area. In May 2015, Jensen Design & Survey, Inc. prepared the Sanitary Sewer Technical Report to provide a blueprint for the design of the sanitary system within the Specific Plan area and to develop conceptual design parameters. The wastewater system consists of approximately 60 miles of collection lines, with pipeline diameters ranging from 6 to 24 inches, 0.5 miles of force mains, 1,190 manholes, and two lift stations. Wastewater flows are conveyed by gravity through the existing pipe network. Two City-owned and -operated sewer lift stations (Harding Park and Lemonwood pump stations) are also used to convey these flows in areas where gravity flow is inadequate. These flows are eventually treated at the existing wastewater treatment plant (WTP) located in the southwest corner of the City.

In January 2012, the City adopted the 2011 Sanitary Sewer Management Program, which provides long-term maintenance for the system to preserve and provide adequate collection and transportation of local wastewater.

Treatment Plant Capacity

The City residents generate and treat approximately 2 mgd of sewage. The City has defined geographic boundaries in which residential, commercial, public, and industrial areas are defined. Each group generates wastewater, which enters the sewer system and is ultimately treated at the WTP. The City constructed a water recycling facility (WRF) for the treatment of sewage generated by the City to replace the original WTP. The new WRF began operations in May of 2010. This new facility has a normal operating capacity of 3.15 mgd with a final build-out capacity of 4.2 mgd, and a peak operating capacity of 7.0 mgd. The process design is a membrane bioreactor (MBR) and reduces energy costs by more than 35 percent. The facility, which has a footprint of 1.5 acres, is completely enclosed for maximum odor and noise control.

The WRF will be capable of producing California Code of Regulations (CCR) Title 22 unrestricted water reuse for agricultural and municipal needs. The treated effluent produced meets the Los Angeles Regional Water Quality Control Board's (RWQCB's) current wastewater discharge requirements, as well as California Department of Health Service (DHS) requirements for recycled water use. Prior discharges to the Santa Clara River received advanced secondary treatment.

Solid Waste

Solid waste collection services are provided in the City of Santa Paula by a private solid waste collection company and disposed of at the Toland Road Landfill, operated by the Ventura Regional Sanitation District (VRSD).

The City participates in a curbside recycling program, which includes the recycling of glass (food and beverage containers), metal (aluminum cans, etc.), and plastic. Curbside pickup of paper, cardboard, and yard trimmings is provided, as well as community drop-off events for residents to dispose of large items, household hazardous waste, and motor oil and filters.

In 2015, the City disposed of 25,684 tons of solid waste at all landfills identified below except for the Bakersfield Metropolitan (Bena) Sanitary Landfill.[20] The City provides refuse collection, recycling, and disposal through contracts with Crown Disposal Co., Inc., a private hauling company. Crown Disposal collects 100 percent of the City's solid waste. The solid waste is disposed of at Toland Road Sanitary Landfill; Chiquita Canyon Sanitary Landfill; Simi Landfill and Recycling Center; Azusa Land Reclamation Co. Landfill; Antelope Valley Public Landfills I and II; and the Bakersfield Metropolitan (Bena) Sanitary Landfill. **Table 4.14-8, Solid Waste Facilities**, provides the characteristics of the disposal waste facilities that currently accept waste from the City.

20 California Department of Resources Recycling and Recovery (CalRecycle), Disposal Reporting System (DRS), Jurisdiction Disposal by Facility during 2015 for Santa Paula.

Table 4.14-8
Solid Waste Facilities

Facility	Daily Capacity (tons/day)	Remaining Capacity (cy)	Ceased Operation Date
Toland Road Sanitary Landfill	1,500	21,983,000[a]	2027
Chiquita Canyon Sanitary Landfill	6,000	8,617,126[b]	2019
Simi Valley Landfill & Recycling Center	9,250	119,600,000[c]	2052
Azusa Land Reclamation Co. Landfill	8,000	51,512,201[d]	N/A
Antelope Valley Public Landfills I and II	3,564	20,400,000[e]	2042
Bakersfield Metropolitan (Bena) Sanitary Landfill	4,500	32,808,260[f]	2046

Source: CalRecycle, Solid Waste Information System (SWIS) database, http://www.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx, accessed October 2016.
Note: cy = cubic yards.
[a] *As of June 2006.*
[b] *As of April 2016.*
[c] *As of September 2012.*
[d] *As of March 1996.*
[e] *As of April 2011.*
[f] *As of July 2013.*

The existing uses within the Project Site include two small farmworker dwelling units and agricultural operations for the production of orchards, row crops, and a limited number of livestock. Therefore, the Project Site currently generates approximately 4.08 tons of solid waste per year.[21] The existing amount of agricultural crop residual is considered negligible because it is a subcomponent of the "other organic" standard material type developed by CalRecycle (formerly the California Integrated Waste Management Board).[22]

4.14.2 REGULATORY SETTING

Water

Federal

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996 and requires a variety of actions to protect drinking water and its sources. SDWA authorizes the U.S.

21 Solid Waste generation is 2.04 tons per year per residential unit. Source: Ventura County Solid Waste Management Department, Estimated Solid Waste Generation Rates for Industrial/Commercial/Residential Establishments, Guidelines for Preparation of Environmental Assessments for Solid Waste Impacts.

22 CalRecycle (formerly the California Integrated Waste Management Board), *California 2008 Waste Characterization Study* (August 2009), 107.

Environmental Protection Agency (USEPA) to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water. The USEPA, state agencies, and water purveyors work together to ensure that SDWA standards are met.

State

California Department of Water Resources

The State of California Department of Water Resources (DWR) released its *State Water Project Final Delivery Capability Report* ("Report") in July 2015. The Report updates the estimated water delivery capacity of the SWP for current conditions and two decades from 2015.[23] The estimates include the best-known future effects of climate change and the anticipated changes in Sacramento River basin land uses. The assessment of current and future SWP reliability allows DWR to plan for reliable future water supplies in California.

Comprehensive Water Legislation

In November 2009, four legislative bills (SBX7-1, SBX7-6, SBX7-7, and SBX7-8) and the supporting bond bill (SBX7-2), creating a comprehensive water package designed to meet California's water challenges, were approved by then-governor Arnold Schwarzenegger.[24] The legislation establishes the governmental framework to achieve the coequal goals of providing a more reliable water supply to California and restoring and enhancing the Delta ecosystem. The package includes requirements to improve the management of California's water resources by monitoring groundwater basins; developing agricultural water management plans; reducing statewide per capita water consumption 20 percent by 2020; and reporting water diversions and uses in the Delta. It also appropriates $250 million for grants and expenditures for projects to reduce dependence on the Delta if the bond issue is approved by the voters in the future.

The Safe, Clean, and Reliable Drinking Water Supply Act of 2010 (SBX 7-2) was placed and passed on the November 2014 ballot as California Proposition 1, the Water Bond (AB 1471). AB 1471 provides funding for California's aging water infrastructure, as well as for projects and programs to improve the ecosystem and water supply reliability for California. The bond bill includes $2.7 billion for actions improving Bay-Delta sustainability. These investments will help to reduce seismic risk to

23 Department of Water Resources (DWR), *The State Water Project Final Delivery Capability Report 2015* (July 1, 2015), https://msb.water.ca.gov/documents/86800/144575dd-0be1-4d2d-aeff-8d7a2a7b21e4.

24 Department of Water Resources (DWR), *California Water Plan Update 2009,* vol. 4 (December 2009). Reference Guide, Legislation, 2009 Comprehensive Water Package, Special Session Policy Bills and Bond Summary, (November 2009).

Bay-Delta water supplies, protect drinking water quality, and reduce conflict between water management and environmental protection.

Part of the comprehensive water package included SBX7-7 (Steinberg, Chapter 4, Statutes of 2009—Statewide Water Conservation). This bill creates a framework for future planning and actions by urban and agricultural water suppliers to reduce California's water use. SBX7-7 requires the development of agricultural water management plans and requires urban water agencies to reduce statewide per capita water consumption 20 percent by 2020. CVWD has included the provisions of SBX7-7 in its 2010 UWMP and has reduced water demand by 20 percent since 2006.

On January 17, 2014, California Governor Brown declared a drought state of emergency, and directed state officials to take all necessary actions to prepare for these drought conditions.25 State agencies, led by the Department of Water Resources, are in the process of executing a statewide water conservation campaign, calling on Californians to reduce their water usage by 20 percent.

Recent Regulations, Executive Orders and SWRCB Actions

Executive Orders

On January 17, 2014, Governor Edmund G. Brown Jr. declared a drought state of emergency.[26] On April 25, 2014, the governor signed Executive OrderB-26-14[27] (April 2014 Proclamation) stating, among other things, that

> *severe drought conditions continue to present urgent challenges: water shortages in communities across the state, greatly increased wildfire activity, diminished water for agricultural production, degraded habitat for many fish and wildlife species, threat of saltwater contamination of large fresh water supplies conveyed through the Sacramento-San Joaquin Bay Delta, and additional water scarcity if drought conditions continue into 2015.*

On December 22, 2014, Governor Brown issued Executive Order B-28-14,[28] which extended the suspension of certain activities subject to CEQA contained in the January 2014 and April 2014 Proclamations, including the SWRCB adoption of emergency regulations pursuant to Water Code section

25 Office of the Governor, "Governor Brown Declares Drought State of Emergency," January 17, 2014, http://gov.ca.gov/news.php?id=18368.

26 Office of the Governor, "Governor Brown Declares Drought State of Emergency," January 17, 2014, http://gov.ca.gov/news.php?id=18368.

27 State of California, Executive Department, Executive Order for State Drought Actions, B-26-14, April 25, 2014, http://gov.ca.gov/news.php?id=18496.

28 State of California, Office of Governor Edmund G. Brown Jr., "Executive Order B-28-14" (December 22, 2014), https://www.gov.ca.gov/news.php?id=18815.

1058.5, through May 31, 2016. On March 17, 2015, the SWRCB adopted an expanded emergency conservation regulation prohibiting certain irrigation practices, restricting certain commercial activities, and ordering all urban water suppliers to implement mandatory restrictions on outdoor irrigation. The emergency regulation orders larger urban water suppliers—those providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, excluding wholesalers—to provide monthly data on water production, enforcement, and outdoor water conservation measures being implemented.

On April 1, 2015, Governor Brown signed Executive Order B-29-15,[29] directing the SWRCB to impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage, compared to the amount used in 2013, through February 2016. The governor instructed the SWRCB to consider the relative per capita water usage of each supplier's service area and to require those areas with high per capita use to achieve proportionally greater reductions than those with low use. The order mandates that the governor's January 17, 2014, Proclamation, April 25, 2014, Proclamation, Executive Order B-26-14, and Executive Order B-28-14 remain in full force and effect except as modified.

State Water Resources Control Board

In 2014, the State Water Resources Control Board (SWRCB) determined that an emergency existed due to severe drought conditions and that adoption of the proposed emergency regulation was necessary to address the emergency. California is currently in the fourth year of a significant drought resulting in severe impacts to California's water supplies and its ability to meet all the demands for water in the State.

On May 5, 2015, the SWRCB adopted an emergency conservation regulation in accordance with the governor's directive. The provisions of the emergency regulation went into effect on May 18, 2015.[30] The emergency regulation identifies how much water communities must conserve based on their average residential water use, per person per day, last summer. Every person should be able keep indoor water use to no more than 55 gallons per day. For the most part, the amount of water that each person uses in excess of this amount is water that is applied to lawns and other ornamental landscapes.

29 State of California, Executive Department, Executive Order B-29-15 (April 1, 2015), http://gov.ca.gov/docs/4.1.15_Executive_Order.pdf

30 State Water Resources Control Board, Resolution No. 2015-2032, Emergency Regulation for Statewide Urban Water Conservation (adopted May 5, 2015).

To reduce water use by 25 percent statewide, a regulation adopted by the SWRCB places each urban water supplier into one of eight tiers which are assigned a conservation standard, ranging between four percent and 36 percent.[31]

As of March 2016, the City of Santa Paula had a Conservation Standard of 26 percent as directed by the SWRCB and from March 2016 to June 2016, they had achieved 24.2 percent water savings. The Governor issued new Executive Order, as of June 1, 2016, reducing the Conservation Standards as a result of improved conditions and the City now has a zero percent conservation standard.[32]

Legislative Actions

Sustainable Groundwater Management Act

In September 2014, Governor Edmund G. Brown Jr. signed a three-bill package known as the Sustainable Groundwater Management Act (SGMA). The legislation allows local agencies to customize groundwater sustainability plans to their regional economic and environmental needs. SGMA creates a framework for sustainable, local groundwater management for the first time in California history. SGMA empowers local agencies to adopt groundwater management plans that are tailored to the resources and needs of their communities.

The three bills that make up SGMA are AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley).

AB 1739—Groundwater Management

AB 1739 (Dickinson) authorizes the DWR or a groundwater sustainability agency (GSA) to provide technical assistance to entities that extract or use groundwater to promote water conservation and protect groundwater resources. This bill requires the DWR, by January 1, 2017, to publish on its Internet website best management practices for the sustainable management of groundwater, and requires the DWR to prepare and release a report by December 31, 2016, on the agency's best estimate of water available for replenishment of groundwater in the state.

AB 1739 requires a GSA to submit a groundwater sustainability plan (GSP) to DWR for review upon adoption. The bill authorizes a local agency to submit to DWR for evaluation and assessment an alternative

31 State of California, Office of Administrative Law, OAL File No. 2015-0506-02 EE, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board (May 18, 2015). http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/oal_approved_regs2015.pdf.

32 State Water Resources Control Board, Self-Certification Conservation Standards—"Stress-test" (by supplier), http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/emergency_reg/uw_self-cert_summary.pdf. Accessed October 18, 2016.

that the local agency believes satisfies the objectives of these provisions. AB 1739 also requires DWR to review any of the above-described submissions at least every 5 years after initial submission to DWR.

In addition, AB 1739 requires that prior to the adoption or any substantial amendment of a general plan, the planning agency review and consider a GSP; groundwater management plan; groundwater management court order, judgment, or decree; adjudication of water rights; or a certain order or interim plan by the SWRCB. AB 1739 requires the planning agency to refer a proposed action to adopt or substantially amend a general plan to any GSA that has adopted a GSP or local agency that otherwise manages groundwater, and to the SWRCB if it has adopted an interim plan that includes territory within the planning area.

SB 1168—Groundwater Management

SB 1168 (Pavley) notes that the policy of the state is that groundwater resources be managed sustainably for long-term reliability and multiple economic, social, and environmental benefits for current and future beneficial uses. This bill states that sustainable groundwater management is best achieved locally through the development, implementation, and updating of plans and programs based on the best available science.

SB 1168 requires DWR to categorize each basin as high, medium, low, or very low priority. The initial priority for each basin was to be established no later than January 31, 2015. The bill authorizes a local agency to request that DWR revise the boundaries of a basin and required DWR to adopt by January 1, 2016, regulations on the methodology and criteria to be used to evaluate the proposed revision.

In addition, all groundwater basins designated as high- or medium-priority basins by the DWR that are designated as basins subject to critical conditions of overdraft are to be managed under a GSP or coordinated GSPs by January 31, 2020; all other groundwater basins designated as high- or medium-priority basins are to be managed under a GSP or coordinated GSPs by January 31, 2022.

This bill would authorize any local agency, as defined, or combination of local agencies to elect to be a GSA and would require, within 30 days of electing to be or forming a GSA, said agency to inform the DWR of its election or formation and its intent to undertake sustainable groundwater management.

SB 1319—Groundwater

SB 1319 (Pavley) prohibits the SWRCB from establishing an interim plan to remedy a condition where the groundwater extractions result in significant depletions of interconnected surface waters until January 1,

2025. This provision delays the similar provision in AB 1739 from 2022 to 2025. The bill further requires the SWRCB to exclude any portion of a basin in compliance with groundwater management requirements from probationary status. This provision narrows the similar provision in AB 1739 to only apply to the portion of the basin that is out of compliance.

The bill requires the SWRCB to include any element of a GSP or the entire plan in its interim plan if SWRCB finds it would help meet the sustainability goal. This provision revises the similar provision in AB 1739 to allow for the inclusion of local plans when developing interim plans for basins with probationary status.

A GSP has not yet been adopted for the Santa Paula Basin pursuant to SGMA and is not required until 2022.

SB 1262 (Pavley)—Water Supply Planning

In September 2016, Governor Brown signed SB 1262 (Pavley), which states that if a water supply for a proposed project includes groundwater from a basin that is not adjudicated and is designated as medium or high priority, the following additional information must be included in the WSA: whether DWR has identified the basin as being subject to critical conditions of overdraft; and if a GSA has adopted a (GSP) or approved an alternative plan under the SGMA, a copy of the GSP, or an alternative plan. For a basin that is not adjudicated and is designated by DWR as low or very low priority, the WSA must include information as to whether DWR has identified the basin as being overdrafted or projected that the basin will become overdrafted if present management conditions continue.

SB 1262 is not effective until January 1, 2017. However, as noted earlier, pursuant to SB 1262 and the amended Water Code Section 10910, the Santa Paula Basin is an adjudicated Basin of which the DWR has not indicated is in overdraft.[33]

Water Supply Availability and Reliability

The City is required under California Water Code (Sections 10610 to 10656) to assess citywide water supply and demand over the next 20 years in 5-year increments in its UWMP. The City completed its most recent update in 2010. The 2010 update examines water planning, including recycled water, over a 20-year period in 5-year increments; identifies and quantifies adequate water supplies for existing and future water demands in normal, dry, and multiple dry years; identifies actions to prepare for and implement during a catastrophic interruption of water supplies; and implements conservation and efficient use of

33 California's Groundwater Bulletin 118, Santa Clara River Valley Basin Santa Paula Subbasin, http://www.water.ca.gov/pubs/groundwater/bulletin_118/basindescriptions/4-4.04.pdf.

urban water supplies. The UWMP determined that the City's current water supplies are sufficient to meet proposed General Plan development levels to 2020.

Water Supply Assessment Study

The California Water Code, Section 10912 requires that a detailed report regarding water availability and planning for additional water supplies be included for the following types of projects:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space
- A proposed hotel or motel, or both, having more than 500 rooms
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- A mixed-use project that includes one or more of the projects specified in this subdivision
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project

In addition, Government Code Section 66473.7 requires that adequate water supplies be demonstrated as available for the following:

- A proposed residential development of more than 500 dwelling units, if the public water system (PWS) has more than 5,000 service connections
- Any proposed development that increases connections by 10 percent or more, if the PWS has fewer than 5,000 connections

California Green Building Standards Code

The purpose of the California Green Building Standards Code ("CALGreen") is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:

1. Planning and design
2. Energy efficiency
3. Water efficiency and conservation
4. Material conservation and resource efficiency
5. Environmental quality

The residential mandatory measures are provided in chapter 4 and the nonresidential ones in chapter 5 of the CALGreen Code.

In response to State of Emergency proclamations issued by Governor Brown in January and April of 2014, and most recently Executive Order B-29-15 (issued April 1, 2015), California Department of Housing and Community Development (HCD) proposed emergency building standard regulations pertaining to the reduction of potable water use for exterior landscape irrigation for newly constructed residential buildings. HCD, in coordination with the California Building Standards Commission (CBSC), Department of Water Resources (DWR), the Division of the State Architect, and other stakeholders, developed emergency regulations that amend the 2016 CALGreen Code.[34]

CALGreen provides mandatory residential measures, such as stormwater drainage and retention systems, which are thought to prevent flooding of adjacent properties and prevent pollution from stormwater runoff by retaining soil on site or by providing filtering to restrict sedimentation from reaching stormwater drainage systems and receiving streams or rivers. To comply, the retention basin must be sized and shown on the site plan, and water has to be filtered and routed to a public drainage system. The new residential structure also must comply with local stormwater ordinances. The drainage system must also be shown on the site plan (swales, drain piping, retention areas, and groundwater recharge).

The code also requires a 20 percent reduction of indoor water use, and it utilizes both a prescriptive and performance method. The prescriptive method provides some technical features that must be followed:

- Showerheads ≤ 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi)
- Lavatory faucets ≤ 0.5 gpm at 60 psi
- Kitchen faucets ≤ 1.8 gpm at 60 psi
- Urinals ≤ 0.5 gal/flush
- Water closets ≤ 1.28 gallon/flush

34 California Department of Housing and Community Development, Finding of Emergency Regarding the 2013 California Green Building Standards Code (CALGreen), California Code of Regulations, tit. 24, pt. 11.

CALGreen also specifies acceptable performance standards for plumbing fixtures with reduced water usage. Fixtures can be installed if they meet standards listed in the code.

Outdoor water usage is regulated. CALGreen requires irrigation controls to be weather or soil moisture based and to automatically adjust irrigation in response to changes in plants' needs as weather conditions change, or have rain sensors or communication systems that account for local rainfall.

Local

2010 Urban Water Management Plan Update

Section 10610 et seq. of the California Water Code, known as the Urban Water Management Planning Act, calls for creation and periodic update of UWMPs by all urban water suppliers and sets forth the requirements for such plans, including definition of relevant terms.

Under the definition given in Section 10617, an urban water supplier is an entity "providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually." Water for this development will be supplied from the City of Santa Paula's existing water system, which is supplied via groundwater wells throughout the City.

In 2011, the City of Santa Paula completed an UWMP update that included the portions of the East Area 2 Annexation Area located east of the City, south of the Ventura County Transportation Commission railroad, surrounds Hallock Drive area, but excluded the triangle area north of Hallock Drive.[35] This UWMP did not discuss the specific development and activities contemplated by the Santa Paula West Business Park, although it did discuss, in general terms, the nature and extent of the long-term water supply for the City for the West Area 2 and included an estimated 1,906,000 square feet of commercial/industrial/institutional uses on approximately 125 acres. Much of this general discussion is cited and paraphrased in this WSA. The UWMP contains an analysis of the factors required by Government Code section 66437.7 (a)(2), and such factors apply to this WSA.

Accordingly, this WSA, in concert with the UWMP prepared by the City, includes all necessary data and analyses required by California Water Code section 10910 et seq. and by Government Code section 66437.7 et seq.

The 2010 UWMP is currently being updated to meet the DWR's requirements for the 5-year update for 2015; a revised update is anticipated in early 2017.

35 City of Santa Paula, *General Plan*, "Land Use Element" (2011), LU-24.

Water In-Lieu Fee Ordinance

In accordance with City of Santa Paula Municipal Code (SPMC) Section 52.021 (Water Resource In-Lieu Fee Ordinance No. 1058*)*, landowners or developers are required to transfer their groundwater rights to the City as a condition of project approval. The intent of the Ordinance is to ensure that new urban land users provide sufficient water resources for their needs without taxing existing users. If the associated water rights are not sufficient to serve the proposed development's anticipated water use (as determined by the City), or if the water rights are held by another entity who cannot or will not dedicate those rights to the City, the developer must purchase additional water rights and dedicate them to the City or pay a water resource in-lieu fee to the City. This ordinance applies to water rights within City limits as well as parcels outside City limits who must receive service from the City Water Enterprise.

City Municipal Code—Ordinance Section 52.038, Water Waste

"No person shall [un]lawfully or neglectfully waste water in any manner whatsoever. Continued wasting of water after mailing of [City] notice by registered mail to the customer of record at the mailing address of record by the [City] Director may result in discontinued water service." This Code is a beneficial tool to curb misuse and waste of potable water within the City. The provisions of the Code can be used during periods of normal water supply and supply deficiency. Violation of this Code is subject to City penalties.

City Municipal Code—Ordinance 1223, Chapter 59, Landscape Water Conservation Standards

In accordance with Government Code 65565(c) for the purpose of complying with California law and promoting water conservation, the City maintains Ordinance 1223, Landscape Water Conservation Standards, to be utilized in conjunction with the City of Santa Paula land Development Provisions for Landscaping and the Guidelines for Implementation of Water Efficient Landscape. Compliance with the guidelines and Landscape Water Conservation Standards is mandatory for all new development projects that are subject to discretionary review by the City of Santa Paula.

Wastewater

Federal

Clean Water Act

As noted elsewhere, the federal Clean Water Act (CWA) Section 401 regulates the discharges of pollutants into Waters of the United States from any point or nonpoint source. Individual permits are issued for certain defined sources of discharge, while nonpoint source runoff from construction sites and urban development is regulated under a series of general permits. Construction that disturbs 1 acre or more is regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater program. In the State of California, the program is administered by the local RWQCB.

Federal Pretreatment Regulations

Part 403 in the Code of Federal Regulations establishes the responsibilities of federal, state, and local government, industry and the public with respect to implementing National Pretreatment Standards to control pollutants that pass through or interfere with treatment processes in publicly owned treatment works (POTW) or that may contaminate sewage sludge.

Title 22 Recycled Water

Title 22 sets bacteriological water quality standards based on the expected degree of public contact with recycled water.[36] Title 22 establishes the quality and/or treatment processes required for an effluent to be used for a specific nonpotable application. The following categories of recycled water are identified:

- Disinfected tertiary recycled water
- Disinfected secondary-2.2 recycled water
- Disinfected secondary-23 recycled water
- Un-disinfected secondary recycled water

In addition to recycled water uses and treatment requirements, Title 22 addresses sampling and analysis requirements at the treatment plant, preparation of an engineering report prior to production or use of recycled water, general treatment design requirements, reliability requirements, and alternative methods of treatment.

State

The California Ocean Plan was originally adopted by the SWRCB and approved by the USEPA in June 1972, and is revised every three years. Among the California Ocean Plan requirements are the following water quality objectives (Chapter II):

General Provisions

a. This chapter sets forth limits or levels of water quality characteristics for ocean waters to ensure the reasonable protection of beneficial uses and the prevention of nuisance. The discharge of waste shall not cause violation of these objectives.

b. The Water Quality Objectives and Effluent Limitations are defined by a statistical distribution when appropriate. This method recognizes the normally occurring variations

36 20 CCR, sec. 1605.1 Federal and State Standards for Federally Regulated Appliances, and 1605.3, State Standards for Non-Federally Regulated Appliances.

in treatment efficiency and sampling and analytical techniques and does not condone poor operating practices.

c. Physical Characteristics

1. Floating particulates and grease and oil shall not be visible.

2. The discharge of waste shall not cause aesthetically undesirable discoloration of the ocean surface.

3. Natural light shall not be significantly reduced at any point outside the initial dilution zone as the result of the discharge of waste.

4. The rate of deposition of inert solids and the characteristics of inert solids in ocean sediments shall not be changed such that benthic communities are degraded.

d. Chemical Characteristics

1. The dissolved oxygen concentration shall not at any time be depressed more than 10 percent from that which occurs naturally, as the result of the discharge of oxygen demanding waste materials.

2. The pH shall not be changed at any time more than 0.2 units from that which occurs naturally.

3. The dissolved sulfide concentration of waters in and near sediments shall not be significantly increased above that present under natural conditions.

4. The concentration of substances set forth in Chapter II, Table B, in marine sediments shall not be increased to levels which would degrade indigenous biota.

5. The concentration of organic materials in marine sediments shall not be increased to levels that would degrade marine life.

6. Nutrient materials shall not cause objectionable aquatic growths or degrade indigenous biota.

e. Biological Characteristics

1. Marine communities, including vertebrate, invertebrate, and plant species, shall not be degraded.

2. *The natural taste, odor, and color of fish, shellfish, or other marine resources used for human consumption shall not be altered.*

3. *The concentration of organic materials in fish, shellfish or other marine resources used for human consumption shall not bioaccumulate to levels that are harmful to human health.*

Local

The Los Angeles RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The City is responsible for adhering to Los Angeles RWQCB regulations as they apply to wastewater generated and discharged by the WRF. The resulting effluent from the treatment process must meet the Waste Discharge Requirements (WDR) Order No. R4-2007-0028 as amended by WDR Order No. R4-2010-0074.

Solid Waste

Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) is the nation's primary law governing the disposal of solid and hazardous waste. The RCRA set national goals for reducing the amount of waste generated and ensuring that wastes are managed in an environmentally sound manner. The Solid Waste Program encourages states to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste, sets criteria for municipal solid waste landfills, and prohibits the open dumping of solid waste. RCRA regulations encourage source reduction and recycling, and promote the safe disposal of municipal waste.

State

Assembly Bill 939

Assembly Bill (AB) 939 (Chapter 1095, Statutes of 1989), the Integrated Waste Management Act, required, among other things, all cities and counties to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. In addition, AB 939 requires each county and incorporated cities to prepare a Source Reduction and Recycling Element for its jurisdiction, identifying waste characterization; source reduction; recycling; composting, solid waste facility capacity; education and public information; funding; special waste (asbestos, sewage sludge, etc.); and household hazardous waste, in addition to a countywide Siting Element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the jurisdiction that cannot be reduced or recycled for a 15-year period. Each city plan must demonstrate integration with the relevant county plan. The plans must

promote (in order of priority) source reduction, recycling and composting, and environmentally safe transformation and land disposal. Elements of the plans must be updated every 5 years.

California's 75-Percent "Recycling" Goal

On October 6, 2011, Governor Brown signed AB 341, establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. The bill also mandates that local jurisdictions implement commercial recycling by July 1, 2012.

Local

Santa Paula Municipal Code Chapter 50.015

Per Santa Paula Municipal Code, responsible persons must arrange for solid waste collection service with the city or a franchisee.[37] Regulations regarding the use of containers stipulate the following:

- Responsible persons must keep in a suitable place one or more containers capable of holding, without spilling, leaking, or emitting odors, all solid waste that accumulates on the premises between the times of two successive collections.
- Responsible persons must deposit in containers or commercial bins provided by the city or franchisee all solid waste generated or accumulated on premises.
- It is unlawful for any person to place ashes that are not cold and free from fire in any container.

Santa Paula Municipal Code Chapter 50.140

In response to AB 393, the City adopted Santa Paula Municipal Code Section 50.140, which requires permit applicants working on construction, remodeling, and/or demolition projects within City limits to practice waste prevention; to reuse, recycle or salvage; and, least preferred, to deposit waste in landfills.

- Waste generators must complete a Certificate of Implementation and a Waste Reduction & Recycling Summary Report (WRRS). The thresholds for planning and reporting job site waste diversion are:
  - Commercial and residential additions or alterations that require a building permit and are greater than 500 square feet
  - Demolition of any structure requiring a permit, regardless of cost or value
  - All new construction (pursuant to the Green Building Code)

37 Santa Paula Municipal Code, tit. V, Public Works, ch. 50.015.

4.14.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether a project would have a significant effect on the environment, the CEQA identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the State CEQA Guidelines (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on utilities and service systems if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- 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?
- 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?
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- 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?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Comply with federal, state, and local statutes and regulations related to solid waste?

4.14.4 PROJECT IMPACTS

Threshold: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The City's Public Works Department oversees management of all water and wastewater issues for the City. The City recently constructed a new WRF in 2010 that treats the wastewater generated within City limits. The City is located within the jurisdiction of the Los Angeles RWQCB.

The Los Angeles RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The City is responsible for adhering to Los Angeles RWQCB regulations as they apply to wastewater generated and discharged by the WRF. The resulting effluent from the treatment process must meet WDR Order No. R4-2007–0028 as amended by WDR Order No. R4-2010-0074. Development of the Project will result in the removal of the existing septic tanks that currently serve the site. Once developed and occupied, uses within the Specific Plan area will generate wastewater that will be connected to the City's sewer system and conveyed through a series of pipelines to the WRF

for treatment. Effluent from the treatment plant must comply with the SPMC to meet the requirements of the WDR permit issued to the City by the Los Angeles RWQCB.

As a result, the treated effluent will not exceed applicable requirements, and the Project's potential impacts related to wastewater treatment are less than significant.

Threshold: **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?**

Water and Recycled Water System

The Specific Plan's domestic water system would receive water via proposed 10- and 12-inch water mains as identified in **Figure 2.0-11, Domestic and Recycled Water Master Plan.** The point of connections (POCs) for the Project would be along Faulkner Road and Telegraph Road. The existing 8-inch water line located beneath Beckwith Road would remain in place.

From the point of connections, a new 12-inch line would proceed north through the Project Site. The proposed distribution system will be comprised of 8-inch through 12-inch mains. The water mains located beneath Beckwith Road and Faulkner Road would be publicly owned and maintained, while the remaining on-site domestic and fire would be master metered.

Construction of the City's WRF was completed early 2010. The treatment capacity of the City WRF is 4.2 mgd, or 4,704 afy. The City WRF produces water that meets California Title 22 regulations for recycled water. At present, recycled water is not available within the City of Santa Paula area. Estimated recycled water urban demand within the City (and adjacent areas) will be approximately 1,622 AFY. The recycled water demand could be fully met with recycled water from the new WRF.

The City purchased the WRF in 2015; however, the City presently does not have the funds to distribute the water. According to the City's Potable Water System Master Plan, the City would, in the future, develop a recycled water system conveyance plan that would include a line in Telegraph Road. The Project includes an on-site recycled water distribution system to irrigate the greenbelt and other irrigation areas. This will allow the Specific Plan area to make use of recycled water when the City completes its planned recycled water plan and extends a line to the point of connection in the railroad right of way at Beckwith Road.

The Specific Plan's recycled water system would operate via a proposed 12-inch distribution main constructed beneath Telegraph Road, which is currently within City limits. The proposed recycled water distribution system will be comprised of 6-inch mains from the POC of the City's recycled water system.

This terminus would become the main POC for the proposed Project, in addition to a POC located beneath the Ventura County Transportation Commission (VCTC) railroad right-of-way.

Water and recycled water pipeline construction impacts would be less than significant because they would be required to comply with the City's noise ordinance, construction traffic management plan, requirements to cease construction should cultural resources be uncovered, and restrictions to avoid underground pipelines during excavation. In addition, no new or increased severity of impacts would occur as a result of the Project.

Wastewater Collection System and Treatment

As previously described, there is no existing sewer system in the Specific Plan area. The City's Wastewater System Master Plan identifies and describes the improvements required to service the Project Site, such as a new off-site mainline that will need to be completed prior to implementation of the Specific Plan. The connection of the Project Site to the City's system would utilize a new lift station at the intersection of Beckwith Road and Faulkner Road at the southeast corner of the Specific Plan area. These improvements would bring the site's POC for sewer service to this proposed lift station and would require completion prior to implementation of Specific Plan. The Sewer System Master Plan for the Specific Plan is shown in **Figure 2.0-12**, **Sewer System Master Plan**.

Construction of these improvements would require temporary construction and lane closures where the sewer line is constructed within the road rights-of way. Pipeline construction impacts would be less than significant because they would be required to comply with the City's noise ordinance, construction traffic management plan, requirements to cease construction should cultural resources be uncovered, and restrictions to avoid underground pipelines during excavation.

The new WRF has a normal operating capacity of 3.15 mgd, with a final build-out capacity of 4.2 mgd and a peak operating capacity of 7.0 mgd. The City is currently generating approximately 2.0 mgd, so there is unused capacity at the facility to accept the incremental addition of 0.029 mgd that is anticipated from occupancy of the Specific Plan area. Therefore, the Project would have less than significant impacts to wastewater treatment capacity within the City.

Threshold: **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?**

As provided in **Table 4.14-9**, **Estimated Wastewater Generation**, the estimated total wastewater generation for the full build-out of uses within the Specific Plan area is approximately 0.01 mgd.

Table 4.14-9
Estimated Wastewater Generation

Land Use	Building Square Footage	Wastewater Generation Rates	Total Daily Generation (mgd)
Commercial/Light Industrial	442,743.8	41.1 gpd/ksf	0.018
Light Industrial	196,978.3	41.1 gpd/ksf	0.008
		Total	**0.026**

Notes: gpd = gallons per day; ksf = thousand square feet; mgd = million gallons per day.
Building square footage found by multiplying total area square footage by 0.35 FAR per the October 2016 Specific Plan.

As noted previously, the WRF has a normal operating capacity of 3.15 mgd, with a final build-out capacity of 4.2 mgd and a peak operating capacity of 7.0 mgd. The City is currently generating approximately 2 mgd, so there is unused capacity at the facility to accept the incremental addition of 0.026 mgd from occupancy of the Specific Plan. The West Area 2 Expansion Area was included in the City's Wastewater System Master Plan as projected development within the City, with an estimated wastewater generation of 0.0818 mgd. Thus, the Project's estimated daily wastewater generation would be approximately 32 percent of the projected development potential for the West Area 2 Expansion. As the Project would not exceed the City's Wastewater System Master Plan projected capacity of the WRF, impacts would be less than significant.

The proposed Project's physical constraints and point of connection at the sewer main in Todd Lane will not accommodate a gravity line using standard allowable design slopes and good design practices. Therefore, a lift station is proposed for the system at the southeast corner of the Project Site. The lift station will be designed to the City of Santa Paula standards being automated with redundant pumps and adequate alarm systems. Complete design will be done during the Project improvement plan preparation.

The Specific Plan is proposing the best-fit alignment to connect to the existing 42-inch sewer main in Todd Lane, leading to the City of Santa Paula WRF. On site, the sewer will drain through one new 8-inch main running east–west along the southerly property line in Faulkner Road. The gravity system will continue toward Faulkner Road, through a new 12-inch casing pipe under State Route (SR) 126, and then south along the Todd drainage channel to a new lift station located at the northwest of Todd Lane at the channel. The proposed lift station will pump flows through the existing 6-inch force main located in Todd Lane. The existing 6-inch force main travels east underneath the existing 9-by-6-foot concrete box culvert and discharges to the existing 8-inch sewer in Todd Lane. This existing 8-inch sewer connects to the existing 42-inch sewer located in Todd Lane, which discharges to the City of Santa Paula WRF.

As concluded in the Sanitary Sewer Technical Report, the Project Site sewer system will be in accordance with the City of Santa Paula design guidelines. The Santa Paula West sewer system is in agreement with the design flows anticipated within the City's Wastewater Master Plan for this development. Also, the main backbone, will have additional capacity before reaching 50% pipe utilization of 253 gpm (0.564 cfs) for future connections and therefore there would be no impacts.

Threshold: **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?**

The Project Site is currently developed with agricultural uses as well as two residences and ancillary facilities for on-site agricultural operations. Implementation of the Specific Plan would result in the conversion of agricultural uses with urban development on the site, thus altering existing stormwater drainage on the Project Site.

Treatment systems incorporated into the Project design will be based on the treatment volume calculation guidelines provided in the Ventura County Water Quality Manual. The treatment types will include bioswales, bioretention cells, infiltration trenches, permeable pavement and/or detention basins as needed based on the proposed site plan layout. As a basis for design, the proposed Project must meet or not exceed the storm drainage requirements of the US Army Corps of Engineers (USACE), Ventura County Watershed Protection District (VCWWD), and the City of Santa Paula (on-site drainage systems) where applicable.

Drainage for the Specific Plan is presented in **Figure 2.0-14, Grading and Drainage Master Plan;** and the Storm Drain Plan is shown in **Figure 2.0-15, Storm Drain Plan.** Storm drain facilities would be sized to meet City of Santa Paula standards and accommodate the increased runoff generated by the increase in impervious surfaces on the Project Site. It should also be noted the development of the Project Site would occur in phases, as market conditions allow. Thus, the Project Site's storm drain plan may change throughout build-out of the site and would subsequently be subject to City approval.

The storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. The existing SR 126 culverts are exposed, but once the site is elevated by fill, the pipes would be underground and integrated into the new storm drain system. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream.

The storm drain system includes a series of storm drain pipelines, detention basins, and a trapezoidal channel that will run along the Adams Barranca. One acre of land within the Project Site would be set

aside for detention basins totaling approximately 6 af of volume for detention and retention requirements. The basin along Adams Barranca would include debris catchment facilities to reduce debris from storm flows that have caused problems at the railroad culvert and the Caltrans culvert in this channel. These detention basins would serve dual roles of flood protection and water quality enhancement. The trapezoidal channel will be approximately 6 feet in depth, with a 15-foot bottom width and 2:1 side slopes that will accommodate flood waters in a large storm event and protect the buildings on site; in addition, the channel will remove a portion of the property form the floodplain through a LOMR (Letter of Map Revision) with the Federal Emergency Management Agency. The new channel would join with the existing Adams Barranca at the railroad crossing and the SR 126 crossing.

The detention basins will significantly reduce peak runoffs downstream by storing the peak event flows and lagging their release after the storm peak. The Project's proposed design features and drainage plan would not result in an increase in stormwater runoff from the site or exceed stormwater drainage requirements established by the USACE, VCWWD, or City. Impacts would be less than significant.

Threshold: **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Water Supply and Demand

At full build-out, the development under the Specific Plan would allow for the development of up to a total of approximately 1,264,982.4 square feet of commercial/light industrial uses and approximately 562,795.2 square feet of light industrial uses on the Project Site. Both of these land uses have a floor to area ratio (FAR) of 0.35 that would allow approximately 442,743.8 square feet of commercial/light industrial buildings and approximately 196,978.3 square feet of light industrial buildings. In addition, the boundary of the site adjacent to the Adams Barranca would be designated for approximately 4.9 acres of passive open space.

Demand for the proposed Project is approximately 39.8 afy (20.5 afy for Commercial/Light Industrial use, 1.5 afy for Light Industrial use, and 17.8 afy for landscape irrigation). The potable demand of 22 afy for the Commercial/Light Industrial and Light Industrial uses is 25 percent of the West Area 2 total supply allocation. The landscaped areas will be irrigated using reclaimed water to be delivered from the City's wastewater treatment plant.

The Project will replace existing agricultural uses on the site. As such, water currently used for agricultural irrigation will be used instead for Project consumption. Currently agricultural uses on the Project Site use approximately 281.1 afy (average over the past 5 years). As such, the Project's consumption will be a net reduction in total water use of 241.3 afy.

It should be noted that the West Area 2 Planning Area has been allocated a supply of 88.8 afy based on future development. The Project would use a portion of this allocation. However, with the removal of the agricultural uses currently on the Project Site, the Project can a portion of the existing water currently used for irrigation. It should be noted that that this portion of the pumped water will be pumped instead by the City from other wells, and not from the current well on site.

The Project will use reclaimed water (17.8 afy) that will be available from the City's wastewater treatment facility for irrigation; this will further reduce the demand on potable water supplies. The City forecasts having between 400 afy (2015) and 1,622 afy (2035) of reclaimed water available for use. The Project will require only a portion of the recycled water (2.9 percent in 2017 and 1.1 percent in 2035).As shown on **Table 4.14-10, Project Supply and Demand Comparison—Average Year (afy),** shows the Project water demand as a percent of total supply throughout various milestones in the build-out schedule. By 2027 (build-out), the Project is estimated to demand 39.8 afy of water. Water demand from the Project represents 0.81 percent of City's total projected urban water demand in 2017, and decreasing to 0.65 percent in 2037.

The 2010 UWMP Update projects total water demands for the Santa Paula Business Park through 2035 and demonstrates that supplies are sufficient to meet demands. The projected demand for the Project will account for only a small fraction of the projected demands. Therefore, there would be no impacts to available water supplies and no new or expanded entitlements are needed.

Table 4.14-10
Project Supply and Demand Comparison—Average Year (afy)

	2015	2017	2020	2025	2027	2030	2035	2037
Total City supply[a]	7,037.0	7,419[b]	7,991.0	8,945.0	9,334.2[c]	9,918.0	9,918.0	9,918.0[d]
West Area 2 allocation[e]	88.8	88.8	88.8	88.8	88.8	88.8	88.8	88.8
Existing agricultural use[f]	281.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Project demand[g]	0	39.8	39.8	39.8	39.8	39.8	39.8	39.8
Percent of City's total supply	0%	0.81%	0.76%	0.70%	0.65%	0.65%	0.65%	0.65%
Net change from agricultural use	0	(241.3)	(241.3)	(241.3)	(241.3)	(241.3)	(241.3)	(241.3)
Available reclaimed water	400	600[b]	800	1,200	1,368.8[c]	1,622	1,622	1,622[d]
Project demand for reclaimed water	0	17.8	17.8	17.8	17.8	17.8	17.8	17.8
Percent of available reclaimed water	0.00%	2.97%	2.23%	1.48%	1.30%	1.10%	1.10%	1.10%

Notes:
[a] *City of Santa Paula, 2010 Urban Water Management Plan (June 2011) Table 4-4, p. 41.*
[b] *value extrapolated from 2015 and 2020 data.*
[d] *Value extrapolated from 2025 and 2030 data.*
[d] *Value carried over from 2035 data.*
[e] *City of Santa Paula, 2010 Urban Water Management Plan (June 2011) Table 2-4, p. 16.*
[f] *See Table 3 of the Water Supply Assessment.*
[g] *See Table 2 of the Water Supply Assessment.*
[h] *City of Santa Paula, 2010 Urban Water Management Plan (June 2011), Table 4-6, p. 47.*

Threshold: **Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Threshold: **Comply with federal, state, and local statutes and regulations related to solid waste?**

The Project would generate solid waste during construction. This waste would be generated as a result of the demolition of existing on-site structures, pavement, and agricultural waste as well as the construction of new commercial and light industrial development. Much of the solid waste generated from construction of the Project would be recyclable, such as wood and metal scrap and formed construction board (cement and drywall board). As provided by the SPMC, Section 50.140, Construction and Demolition Diversion, demolition and construction must divert 50 percent of waste tonnage from landfills. Separate calculations and reports are required for the demolition and construction portion of projects involving

both activities. Impacts related to construction solid waste generation are considered potentially significant.

All new development allowed within the Specific Plan will support recycling to reduce the amount of solid waste sent to the landfill. Waste carts for trash, recycling, and green waste would be provided. Estimates of the amount of solid waste that would be generated during operation have been calculated using the waste generation factors contained in the Ventura County Solid Waste Management Department Guidelines of Preparation of Environmental Assessments for Solid Waste Impacts, and are listed in **Table 4.14-11, Estimated Solid Waste Generation**.

Table 4.14-11
Estimated Solid Waste Generation

Land Use	Building Square Footage	Generation Rate	Solid Waste Generation (tons/year)	Solid Waste Generation (tons/day)
Commercial/Light Industrial	442,743.8	0.0024 tons/sq. ft./yr.	1,062.58	2.91
Light Industrial	196,978.3	0.0108 tons/sq. ft./yr.[a]	2,127.37	5.83
		Total Solid Waste Generation	**3,189.95**	**8.74**

Source: Ventura County Solid Waste Management Department. Guidelines of Preparation of Environmental Assessments for Solid Waste Impacts. May 1998.
[a] 0.0108 was used for Light Industrial since there is no generation rate for this type of use.
Notes: sq. ft. = square feet; yr. = year.
Building square footage found by multiplying total area square footage by 0.35 FAR per the October 2016 Specific Plan.

The Project Site currently generates approximately 4.08 tons of solid waste per year. Under the Specific Plan, future operations would generate approximately 3,189.95 tons of solid waste per year, which equates to approximately 8.74 tons of solid wastes per day that will be delivered to landfills.[38] As mentioned previously, the Toland Road Landfill, due to its location and capacity, is the primary provider of solid waste disposal to the City of Santa Paula; other landfills in the region are also used but to a lesser extent. The Toland Road Landfill is permitted to accept a maximum of 1,500 tons of solid waste per day, with a remaining capacity of 21,983,000 cubic yards. The proposed Project would account for less than 1 percent of the Toland Road Landfill permitted daily capacity.

Additionally, the next closest landfills to the Project Site are the Chiquita Canyon Sanitary Landfill and Simi Valley Landfill & Recycling Center. The proposed Project would account for less than 1 percent of the maximum permitted daily capacity for these two landfills. However, the Chiquita Canyon Sanitary Landfill is only permitted through 2019. While there would be a substantial increase in generated solid waste on the Project Site, adequate landfill capacity appears to be available within the City and nearby landfills.

38 Toland Road Landfill is open 5 days per week, which is approximately 260 days per year. 3,189.95 tons/260 days = 12.27 tons/day.

Solid waste generated during construction and operation of the Project would be required to comply with all federal, state, and local statutes and regulations to reduce and recycle solid waste. Therefore, impacts would be less than significant.

As previously mentioned, the proposed Project would comply with AB 939 and AB 231 and the City's Construction and Demolition Diversion section of the Municipal Code, which states that demolition, construction, and remodeling shall divert 50 percent of waste tonnage. However, given that future landfill capacity may not be ensured through the life of the development of the Specific Plan, for many years after occupancy, impacts to solid waste would be potentially significant.

4.14.5 CUMULATIVE IMPACTS

Water

The 2010 UWMP prepared for the City projects water demand within the City's service area through the year 2035. The 2010 UWMP analyzes future water demand at build-out conditions for normal, dry year, and multiple dry water years. As indicated in the analysis above, there is expected to be a surplus of water during normal, dry year, and multiple dry year scenarios. The Specific Plan's demand for water use would meet the projected development demands within the City. Therefore, the cumulative increase in water demand of related projects and build-out of the City pursuant to the General Plan is considered less than significant.

Wastewater

In association with the related projects identified in **Section 3.0, Related Projects**, the Specific Plan and related projects would result in a cumulative increase in projected wastewater flow within the City of Santa Paula. As shown in **Table 4.14-12, Cumulative Wastewater Generation,** the development of related projects would result in a generation flow of 2.372 mgd at build-out. Combined with the net increase of approximately 0.01 mgd from the Project, the cumulative wastewater generation by the Specific Plan and related projects would be approximately 2.382 mgd.

Table 4.14-12
Cumulative Wastewater Generation

Land Use	Unit	Wastewater Generation Rates	Total Daily Generation (mgd)
Residential	1,786 units [a]	163 gpd/person [b]	1.057
Commercial	217,298 sq. ft.	41.1 gpd/ksf [b]	0.009
Industrial	805,474 sq. ft.	41.1 gpd/ksf [b]	0.033
Adams Canyon[c]	—	—	0.499 [b]
Fagan Canyon[d]	—	—	0.178 [b]
East Area 2 (East Gateway)[e]	—	—	0.533 [b]
West Area 2[f]	—	—	0.063 [b]
Related Projects Total			2.372
Project Net			**0.01**
Total Cumulative			**2.382**

Source: City of Santa Paula Planning Department (2014) and East Area 1 Amendment Supplemental EIR (September 2014).
Notes: sq. ft. = square feet; ksf = thousand square feet; gpd = gallons per day; and afy = acre feet per year.
[a] *3.63 persons/unit*
[b] *From East Area 1 Amendment Supplemental EIR. Generation rate derived from the a*ssumption that 80 percent of water demand is returned as wastewater per the 2010 City pf Santa Paula Wastewater Master Plan
[c] *Blended per the 2010 UWMP. Includes 495 residential units, 100,000 sq. ft. commercial/industrial/industrial, and 200 acres of parks and recreation land.*
[d] *Blended per the 2010 UWMP. Includes 450 dwelling units and 100,000 sq. ft. of commercial/industrial/institutional space, and 7 acres of parks and recreation land.*
[e] *Blended per the 2010 UWMP. Includes 1,602,000 sq. ft. of commercial/industrial/institutional space.*
[f] *West Area 2 accounts for the entire 125 acre expansion area.*
East Area 1 is added into residential, commercial and industrial as appropriate.

Zone 2 of the wastewater treatment service area would undergo various infrastructure improvements to handle the future wastewater flows with the development the West Area 2 and other existing and proposed uses within the zone. Development of the Specific Plan includes construction of a new lift station at the intersection of Beckwith Road and Faulkner Road at the southeast corner of the Specific Plan area, north of SR 126. Completion of proposed Project improvements would convey most of the wastewater flow to the POC along the existing sewer lines north of the site along Telegraph Road. In addition, the WRF has been designed to accept wastewater from the cumulative growth of the City under the General Plan, including all related projects. As such, the Project's contribution to cumulative wastewater system and treatment impacts would be less than significant.

Solid Waste

Development under the Specific Plan and the related projects would add incremental increases in solid waste disposal at landfills located within Ventura County. Approximately 12 years of capacity remain at the Toland Road Sanitary Landfill, 4 years at the Chiquita Canyon Sanitary Landfill, 37 years at the Simi

Valley Landfill & Recycling Center, 10 years at the Azusa Land Reclamation Co. Landfill, 27 years at Antelope Valley Public Landfills I and II, and 23 years at the Bakersfield Metropolitan (Bena) Solid Waste Landfill. .

Assuming that all of the expansion areas and other probable future developments are completely built out according to the City's General Plan, the cumulative solid waste generation would total 58,788 tons per year, as shown in **Table 4.14-13, Estimated Cumulative Solid Waste Generation**. The Specific Plan would account for approximately 5 percent of the City's estimated cumulative solid waste generation.

Table 4.14-13
Estimated Cumulative Solid Waste Generation

Land Use	Unit	Solid Waste Generation Rates	Solid Waste Generation (tons/day)	Solid Waste Generation (tons/year)
Residential [a]	1,786 units [b]	0.00612 tons/household/day	10.93	2,842
Commercial [a]	217,298 sq. ft.	0.0025 tons /1000 sq. ft./day	0.54	141
Industrial [a]	805,474 sq. ft.	0.0025 tons/1000 sq. ft./day	2.01	524
East Gateway Project[c]	-		39.5	10,275
Fagan Canyon[d]	-		6.9	1,798
Adams Canyon[d]	-		5.0	1,291
West Area 2[de]	-		24.9	6,480
Existing City uses[d]	-		113.6	29,531
Other City build-out[f]	-		22.7	5,906
Total			226.08	58,788

Source: Ventura County Solid Waste Management Department, Estimated Solid Waste Generation Rates for Industrial/Commercial/Residential Establishments, Guidelines for Preparation of Environmental Assessments for Solid Waste Impacts. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates
Note:
Tons per year were determined using the Toland Road Landfill number of operational days within a year (260 operational days).
[a] Land uses include development from East Area 1.
[b] 3.63 persons/unit
[c] East Gateway Project solid waste generation was determined by the East Gateway Draft EIR.
[b] Data from East Area 1 Specific Plan Amendment Supplemental EIR.
[e] West Area 2 includes entire 125 acre expansion area.
[f] Other build-out assumes 20 percent of solid waste generated by existing uses to account for all other probable future projects identified in the City's Development Activity List.

The City would continue to implement programs for source reduction and recycling and require that subsequent projects complete environmental review to minimize solid waste disposal at the six disposal

facilities. Furthermore, the State has set a goal to recycle, source-reduce, or compost 75 percent of solid waste generated.

The City would utilize the Toland Road Sanitary Landfill until the landfill reaches capacity. At the time Toland Road Sanitary Landfill closes, the City would utilize the capacity of the five remaining landfills previously used for solid waste disposal. The combined remaining capacity of the five landfills is estimated to last for 95 years, or an average of 19 years.

As such, cumulative impacts would be less than significant because the six landfills discussed above have sufficient capacity for decades to service the development of the Specific Plan and other development requiring solid waste disposal.

4.14.6 MITIGATION MEASURES

The following measures have been identified to mitigate the identified solid waste impacts.

SW-1 Before issuance of a demolition permit or construction permit, 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.

4.14.7 RESIDUAL IMPACTS AFTER MITIGATION

Implementation of **Mitigation Measure SW-1** would reduce impacts to utilities and services to less than significant levels.

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant environmental impacts of the project. An EIR is required to include sufficient information about each alternative to meaningful evaluation, analysis, and comparison with a proposed project. This section identifies and describes alternatives to the proposed Project, evaluates the environmental impacts that would result from each of these alternatives and compares these to the proposed Project, as required by CEQA.

Key provisions of the CEQA Guidelines[1] pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be costlier.
- The No Project Alternative shall be evaluated along with its impact. The No Project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- If the project is a development project on an identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. Discussion of this alternative shall compare the environmental effects of the property remaining in its existing state to the environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this no project consequence should be discussed. In certain instances, the No Project Alternative means "no build," wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical results of not approving the project rather than create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.[2]

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1 California Code of Regulations, tit. 14, sec. 15126.6.
2 California Code of Regulations, tit. 14, sec. 15126.6.

- The range of alternatives required in an EIR is governed by a "rule of reason"; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.[3]

The range of feasible alternatives to a proposed project is to be selected and discussed in a manner that fosters meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternative site.[4]

5.2 PROJECT OBJECTIVES

The Santa Paula West Business Park Specific Plan has the following objectives, based on the City's General Plan and the existing physical, environmental, demographic, and market conditions:

1. Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in West Area 2 that reflects and complements the existing pattern and scale of development in Santa Paula;
2. Provide for light industrial and commercial uses that complement existing uses adjacent to the Project area; and
3. Provide suitable sites for Light Industrial and commercial buildings that meet the needs of the community but which are not presently available in the City of Santa Paula.

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3 California Code of Regulations, tit. 14, sec. 15126.6(f)(3).
4 California Code of Regulations, tit. 14, sec. 15126.6(f)(1).

5.3 ALTERNATIVES CONSIDERED AND ELIMINATED FROM DETAILED CONSIDERATION

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 Santa Paula West Business Park Specific Plan.

Alternative Site for the Santa Paula West Business Park

The proposed Santa Paula West Business Park Specific Plan Project also includes the proposed annexation of Project area into the City of Santa Paula. As discussed in **Section 4.10, Land Use**, the Santa Paula General Plan identifies expansion areas and planning areas to allow for the growth of the City due to the small amount of vacant land within the City. The Specific Plan Area is located within the West Area 2 Planning Area as identified in the Santa Paula General Plan. The General Plan Land Use Element notes that the City currently has 135 acres dedicated for commercial uses, 161 acres dedicated for industrial uses, and 141 acres dedicated for open space uses.

The entire site of the proposed Specific Plan Area is active agricultural land designated as Prime Farmland on the State Important Farmland Map. As discussed in **Section 4.2, Agricultural Resources**, the annexation and conversion of this agricultural land to urban development would be a significant and unavoidable impact of the proposed Project. This impact could potentially be avoided by identifying an alternative location for the uses planned for the Santa Paula West Business Park Specific Plan Area.

The City prepared an inventory of vacant and underutilized sites in the City for the City's Housing Element. There are no available vacant or underutilized sites that would accommodate a large industrial/retail commercial or a single large tenant. The City currently has less than 10 acres of vacant or underutilized industrial/commercial sites available within the City limits. While large vacant and underutilized parcels are available in the City, the largest parcels are designated for residential use and would require a General Plan Amendment to change the land use designation to permit industrial/commercial use. Further, these sites located in existing developed residential neighborhoods do not have the location or access characteristics required for large light industrial/commercial tenants. Because there are no suitable sites available that could accommodate a large industrial/retail commercial center of the type that would permitted under the Specific Plan in the City's current boundaries, the Santa Paula West Business Park project therefore incudes a request from the City to annex additional land within the City's Sphere of Influence to create the business park area.

Other expansion areas identified in the Santa Paula General Plan**,** which consist of Fagan Canyon, and Adams Canyon are not suitable in terms of location and other site characteristics, to accommodate a large light industrial/commercial center.

Because no suitable alternative sites for a large industrial/retail community retail center within the City of Santa Paula or the City's Sphere of Influence, detailed evaluation of this alternative is not provided.

5.4 ALTERNATIVES CONSIDERED

As discussed above in the introduction to this section, 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: 25% Less Development

Alternative 3: 50% Less Development

Evaluation of the No Project Alternative is required by the CEQA Guidelines.[5] Specifically, the CEQA Guidelines state the when the project consists of a development project, the No Project Alternative should consider the circumstance where the project does not proceed, including whether it is predictable that some other development project will be proposed on the site. When the project consists of a revision to a land use plan, the No Project Alternative should consider the continuation of existing land use plan. Because the Santa Paula West Business Park Specific Plan Project includes revisions to a land use plan and a proposed development project on the Specific Plan site, Alternative 1 evaluates the No Project–No Development Alternative.

Alternative 2 evaluates a 25 percent reduction in development which would evaluate the Project at 75 percent build-out. Alternative 3 evaluates a 50 percent reduction in development which would analyze the Project at 50 percent build-out.

As discussed above in Section 5.3, an alternative site for the Project would not feasibly meet the basic objectives of the Project and an alternative site is currently not available is not being evaluated in detail for these reasons.

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5 California Code of Regulations, tit. 14, sec. 15126.6(e).

5.5 ALTERNATIVES ANALYSIS

This subsection provides a comparison of the impacts of the alternatives and the proposed Santa Paula Business Park Specific Plan Project for the environmental topics addressed in this EIR. In all cases, the comparison of impacts assumes that all feasible mitigation measures identified in this EIR would be implemented for the impacts resulting from the alternatives. Similarly, in all cases where it can be safely assumed that there are feasible mitigation measures for impacts caused by the alternative, it is assumed that those mitigation measures would be implemented. In accordance with the CEQA Guidelines, the discussion of the environmental effects of the alternatives may be less detailed than that provided for the proposed project but should be sufficiently detailed to allow meaningful evaluation, analysis, and comparison with the proposed project.[6]

Alternative 1: No Project Alternative–No Development

Description of Alternative

Under the No Project Alternative, the proposed Specific Plan Project, including the Santa Paula Business Park Specific Plan and applications for LAFCo jurisdictional reorganization, would not be approved by the City of Santa Paula. There would be no change to any of the existing land uses or jurisdictional boundaries under this alternative.

Analysis of Alternative

Aesthetics

The existing visual characteristics within the Project area would not be altered and there would be no aesthetic impacts in or near the Project area. In comparison, if approved, the proposed Project would result in the near term development of the Specific Plan area with some mixture of commercial and industrial uses that would substantially change the visual character and quality of that part of the Project Site. Over the long term, without the Specific Plan Project, there would likely be an incremental change in the visual character of the rest of the Project area, as currently undeveloped and underutilize parcels are developed with commercial and light industrial uses in accordance with applicable zoning standards at the time they are developed. As discussed in **Section 4.1** of this Draft EIR, the Specific Plan Project as proposed would result in significant impacts that would be avoided by this alternative.

Agricultural Resources

Under the No Project Alternative, the unincorporated areas of the County would remain zoned as Agricultural Exclusive. All existing uses would remain under the current conditions. The agricultural land

6 California Code of Regulations, tit. 14, sec. 15126.6(d).

designated as Prime Farmland and farmland of statewide importance within the Project area would remain unchanged and would not convert to non-agricultural uses. This alternative would avoid the significant impact of converting agricultural land to urban uses that would result from the proposed Project.

Air Quality

Under the No Project Alternative, impacts from the emissions of ROG and NOx for both construction and operation would that would exceed the regional construction emissions thresholds under the proposed Project would be eliminated. This alternative would avoid the significant impact of converting agricultural land to urban uses that would result from the proposed Project.

Biological Resources

With the No Project–No Development Alternative, the existing conditions of the Specific Plan Project Area would remain unchanged, and no impacts to biological resources would occur.

Cultural Resources

Under the No Project Alternative, there would be no construction or ground disturbing activities that could impact historical resources, or unearth any archeological or paleontological resources or human remains that may be present within the Project area. All potential impacts to cultural resources would be avoided with this alternative.

Geology and Soils

With the No Project Alternative, no new development would occur within the Project area and all potential impacts associated with new development in the Project area would be avoided.

Greenhouse Gas

Under the No Project Alternative, no new development would occur within the Project area and all potential impacts associated with new development in the Project area would be avoided. No greenhouse gas (GHG) emissions would be generated within the proposed annexation area.

Hazards and Hazardous Materials

Under Alternative 1, no development would occur on the Project Site. Accordingly, there would be no increase in the use, transportation, and disposal of hazardous materials and the potential risk of exposure to these hazards would not increase. Implementation of this alternative would not allow for the potential elimination of existing hazardous material sites that may be present in the Project area. With the implementation of the Specific Plan Project or any or the other alternatives, any new development

occurring on any documented hazardous materials sites would have to be preceded by remediation and cleanup of any existing hazardous materials conditions subject to required oversight by public agencies with jurisdiction over hazardous materials remediation. Similar to the proposed Project, this alternative would have no significant impacts; however, there would be fewer impacts with this alternative.

Hydrology and Water Quality

The project area would remain unchanged under the No Project Alternative. Runoff from existing developed areas is conveyed to existing drainage facilities within the Project area. The on-site drainage is a tributary to the Santa Clara River. Storm runoff patterns would not change under the No Project Alternative; however, they would slightly increase from the additional impervious surfaces that would be on site. Culverts currently on site do not operate at full capacity because they are 50 percent blocked with sediment. The proposed Project would ensure proper drainage for stormwater and water quality purposes. Hydrology and water quality impacts under the No Project Alternative would not result in significant impacts, similar to the proposed Project; however, impacts would be fewer.

Land Use and Planning

With the No Project Alternative, there would be no changes in existing land use conditions or in the local or regional land use planning and regulatory frameworks that currently govern the affected land area. Accordingly, there would be no land use impacts. None of the objectives and community benefits of the proposed Project would occur. There would be no development in the Specific Plan area that might improve the City's economic base and complement the existing pattern and scale of development in Santa Paula. Municipal services and infrastructure would not be provided to the unincorporated areas proposed for annexation to the City. New commercial and industrial uses that could complement the mixture of uses in the new Specific Plan area would not be developed. The No Project–No Development Alternative would not implement a key General Plan land use policy to expand the City's urban limits into the West Area 2 Planning Area to provide a suitable site for a commercial and industrial within the City. Consequently, this alternative would have negative impacts with respect to land use and planning, while the proposed Project would have both positive and less than significant impacts.

This alternative, like the proposed Project, would not divide an established community and would have no effect on any habitat conservation plans.

Noise

Because the No Project Alternative would not result in new development, there would be no construction. Consequently, the significant noise impacts due to construction, identified for the proposed Project would

be avoided. Measures have been identified to mitigate all potential noise impacts identified for the proposed Project; however, impacts would be fewer with the No Project Alternative.

Public Services

With no changes in existing conditions, there would be no impact on any public services and no need to extend any of the City's municipal services to serve new development or existing uses. As discussed in **Section 4.10**, extension of the full range of municipal services to the Specific Plan Project area would not result in any significant impacts. There would not be any effect on local public schools, parks and recreation and library facilities and a less than significant effect on police and fire protection services. This alternative would not, therefore, avoid any significant impacts that would result from the proposed Project; however, impacts would be fewer.

Transportation and Traffic

With the No Project Alternative, there would be no new development as a result of the Specific Plan Project. Of the 16 intersections analyzed in the Project area, the intersection level of service (LOS) for 12 of these intersections operate at LOS C or better during both the AM and PM peak hours and 4 intersections would have potentially significant impacts. The current conditions plus project could be mitigated to less than significant apart from one intersection that would be significant and unavoidable. Cumulative future conditions would result in 2 significant and unavoidable impacts either with or without the Project. With the incorporation of the mitigation, conditions with the Project would be similar to that of the current conditions.

However, one stop-controlled intersection of the 7 analyzed, currently operates at LOS D during the PM peak hour. Under the No Project Alternative there would be no improvements, or mitigation, applied to this intersection to improve the level of service. Although implementation of the proposed Project would increase the LOS at one intersection, the significant and unavoidable impacts would greater and the No Project Alternative would result in less impacts than the proposed Project.

Utilities and Service Systems

Existing water use would continue under the no Project alternative averaging 281 acre-feet per year (afy) from an irrigation well. As discussed in **Section 4.9, Hydrology and Water Quality**, the Santa Paula Groundwater Basin is the primary source of water for the City and the adjoining County parcels. The Basin is an adjudicated basin and the existing extractions from the Basin would remain within each water user's allocated amount. Water demands for the Project would be around 39.8 afy at full build-out. As such, water demand impacts would be more within both the City's and the County's jurisdiction when compared to the proposed Project and impacts would be greater.

Currently, septic systems are being used to store wastewater from the residences. The amount of wastewater generated by existing uses would increase and a new off-site mainline would need to be completed prior to implementation of the Specific Plan. The increase in wastewater projected from development in the Specific Plan Project Area, is identified and addressed in the City's Wastewater Master Plan. The City's water recycling facility (WRF) would be able to accommodate wastewater generated by the proposed Project. This alternative would not require new pipelines to be built; however, any impacts from the proposed Project would be mitigated. Neither this alternative nor the proposed Project would result in significant impacts; however, this alternative would have fewer impacts.

Solid waste would be increased by the proposed Project. Any impacts would be mitigated to less than significant. Neither this alternative nor the proposed Project would result in significant impacts; however, impacts would be fewer with the No Project Alternative.

Stormwater runoff would increase with development of the Specific Plan area. Detention basins would be used to reduce peak runoffs downstream. While there would be no significant impacts with the proposed Project or alternative, the alternative would have less of an impact.

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the Project alternatives is provided in **Table 5.0-3, Comparison of Alternatives to the Proposed Project** at the end of this section. The potential impacts of the proposed Project would be avoided or lessened if no new development occurs within the Specific Plan Project Area.

Land use and water usage impacts for the proposed Project would be significantly fewer than those under the No Project–No Development Alternative. While this alternative would not generate any impacts to water or land use, the impacts of this alternative could be considered greater than the proposed Project.

The No Project–No Development Alternative would not meet any of the basic objectives defined by the City of Santa Paula for the propose Santa Paula West Business Park Specific Plan Project.

Alternative 2: 25 Percent Reduction

Description of Alternative

This alternative assumes that there would be a 25 percent reduction in the 53.81 acres that makes up the proposed Project. This assumes that 75 percent, or approximately 40.36 acres of the Project would be built with the Specific Plan, and 25 percent, or approximately 13.45 acres would remain under the jurisdiction of the County of Ventura with land use subject to the County's General Plan and zoning, and agricultural operations would still continue.

As shown in **Figure 5.0-1, Alternative 2 Conceptual Project Area**, it is assumed that the portion of the site on the corner of Beckwith Road and Telegraph Road, which is approximately 13 acres, would remain under agricultural operations and the remainder of the Specific Plan area would continue with development as proposed. Currently there are agricultural operations to the south, west and northwest of the proposed Project site, residential to the north and northeast, and commercial/light industrial uses to the east.

Analysis of Alternative

Aesthetics

Under Alternative 2, the site would exclude approximately 13 acres from development, which would result in a smaller footprint than the full build-out of the proposed Project. However, construction would still be visible from SR 126, and impacts would remain significant and unavoidable. This alternative would change the visual nature of the site, as would the proposed Project. Impacts would remain the same as the proposed Project.

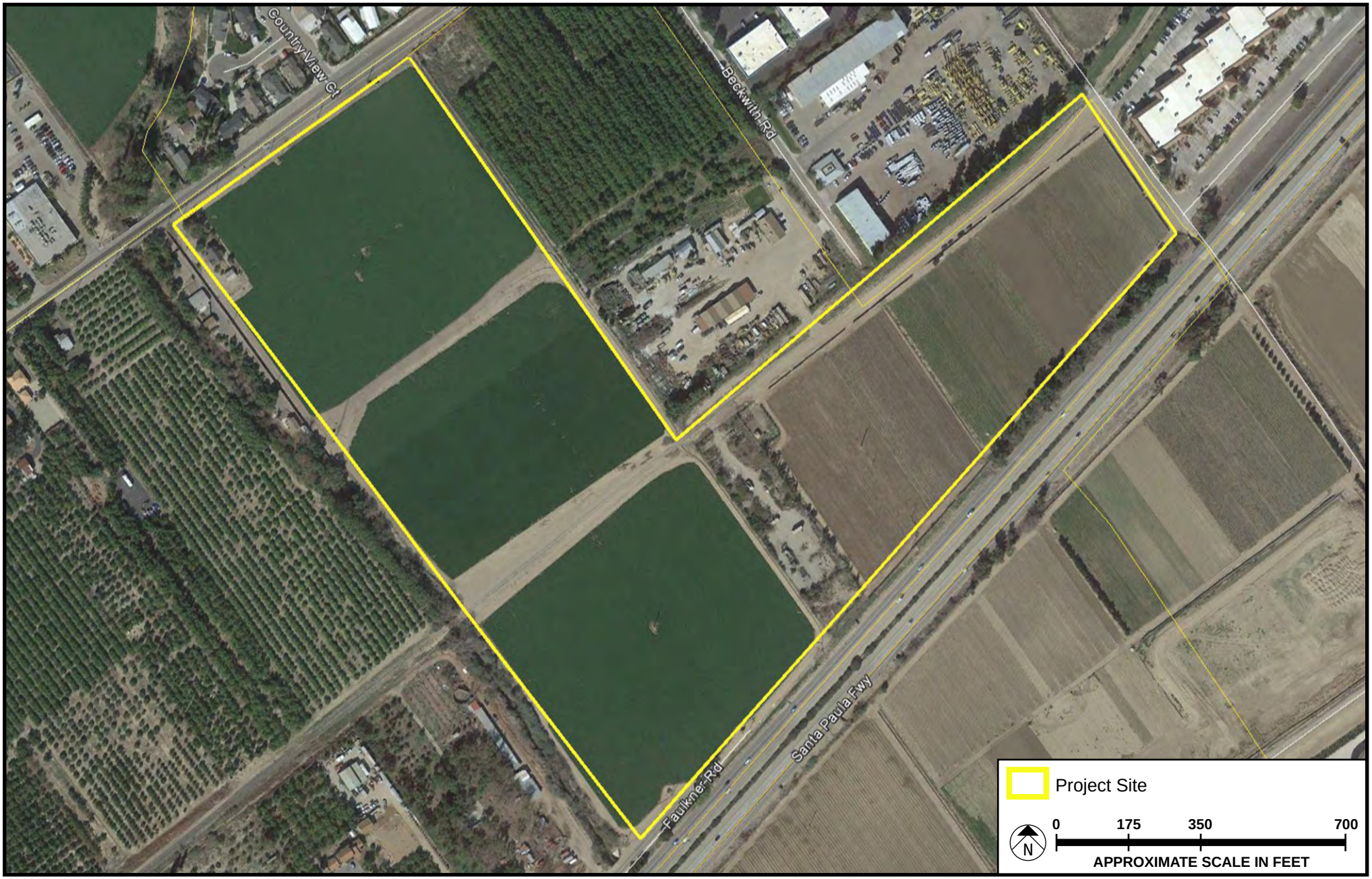
Agricultural Resources

Under this alternative, approximately 8 acres of Prime Farmland and 0.7 acres of Farmland of State wide importance, would remain as is. Additionally, the approximately 13 acres that make up the area that would not be developed would remain as Agricultural Exclusive. Under Alternative 2, there would be less of an impact to agricultural resources, but there would still be significant and unavoidable impacts.

Air Quality

As discussed in **Section 4.13, Transportation and Traffic**, the proposed Project would generate a net increase of approximately 5,546 average daily vehicle trips (ADTs). Under Alternative 2, approximately 4,160 daily trips would be generated. As with the proposed Project, emissions would be generated by area sources, energy sources, and mobile sources, with mobile sources generating the majority of the overall emissions. The overall development under Alternative 2 would generate operational emissions below the Ventura County Air Pollution Control District's (VCAPCD's) thresholds of significance, but construction emissions would remain above VCAPCD standards. Mitigation measures similar to those recommended for the proposed Project would be necessary to reduce construction impact which would remain significant.

Impacts associated with Air Quality Management Plan (AQMP) consistency, exposure of sensitive receptors to substantial pollutant concentrations, and objectionable odors under Alternative 2 would be fewer, and impacts would remain less than significant.



SOURCE: Google Earth 2016

FIGURE **5.0-1**

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Alternative 2 Conceptual Project Area

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Biological Resources

As portions of the Project area would remain in agricultural use with Alternative 2, potential impacts to biological resources would be reduced in comparison to the proposed Project, even though the Project area consists of disturbed and agricultural areas with limited amounts of seminatural habitat area. This alternative would still disturb Adams Barranca Mixed Willow Riparian, Agricultural Land, developed land, and black walnut trees in addition to potentially impacting the species as described in the proposed Project in **Section 4.4, Biological Resource**. Appropriate Mitigation Measures would reduce any impacts to biological resources similar to the proposed Project would result in similar, less than significant impacts.

Cultural Resources

This alternative would develop a smaller portion of the site with commercial and light industrial uses. This alternative would have a similar potential to uncover previously unknown archaeological resources and human remains. Compliance with the Mitigation Measures during the construction phase would ensure development would not result in significant impacts to potential cultural resources. Impacts would be similar to those of the proposed Project.

Geology and Soils

Construction under this alternative would include similar grading and excavation activities; however, they would be limited to a smaller portion of the site of just approximately 40 acres. Grading and excavation activities would be identical and would result in similar erosion and sedimentation impacts to those of the proposed Project. Any future development within the site would have to comply with the California Building Code (CBC) requirements for seismicity, liquefaction, subsidence, and expansive soils, similar to the proposed Project, which would mitigate potential significant impacts associated with the existing soils and geology conditions of the site. This alternative would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) including best management plans (BMPs) for erosion control on and off site, as well as mitigation measures of the proposed Project pertaining to erosion control plans. For this reason, the geology and soils impacts of this alternative would be similar to the proposed Project and less than significant.

Greenhouse Gas

The proposed Project would generate a net increase of approximately 5,546 ADT while 4,160 ADT could be generated under Alternative 2. As with the proposed Project, GHG emissions would be generated by area, energy, and mobile sources, waste disposal, and water and wastewater treatment and conveyance, with mobile sources generating the majority of the overall GHG emissions. All industrial land use projects that exceed 10,000 MTCO2e per year are considered potentially significant under the South Coast Air Quality Management District (SCAQMD) screening threshold, which is recognized by the VCAPCD. The

estimated Project operational GHG emissions with project design features was estimated to be 6,674.83 MTCO2e per year, which would not exceed the screening threshold. Given that Alternative 2 includes a 25 percent reduction in uses, this alternative would result 5,006 MTCO2e per year, which would not exceed the screening threshold. In addition, as with the proposed Project, development under Alternative 2 is expected to be consistent with all feasible and applicable strategies and the recommended measures of ARB Scoping Plan to reduce greenhouse gas emissions in California. Neither this alternative nor the proposed Specific Plan would result in significant greenhouse gas impacts; however, impacts under this alternative would be slightly fewer.

Hazards and Hazardous Materials

While this alternative would result in a density reduction to approximately 40 acres, development would still occur; and impacts similar to those of the proposed Project, but at a reduced intensity, would occur. Construction of the Project would still require materials that could contain hazardous materials, such as fuels, solvents, oils, coatings, etc. that could spill or release. Additionally, agricultural land containing residual pesticides, would still be disturbed. Mitigation measures pertaining to these issues would still be implemented and impacts would be similar to that of the proposed Project.

Hydrology and Water Quality

Alternative 2 would involve slightly less grading of the site with only approximately 40 acres instead of 53.81 acres. However, the grading would still temporarily increase the bare soil area during construction, which may increase soil erosion and sedimentation in stormwater runoff. In addition, construction could contribute other pollutants to stormwater drainage. Similar to the proposed Project, this alternative would be required to comply with the National Pollutant Discharge Elimination System (NPDES) and implement a SWPPP with BMPs in addition to supplying the Project with infiltration basins, thereby making impacts to runoff less than significant. Additionally, this alternative would need to comply with the Los Angeles Regional Water Quality Control Board approved requirements. Therefore, this alternative would have impacts similar to those of the proposed Project, and all impacts would be less than significant.

Land Use and Planning

Alternative 2 would develop and annex approximately 40 acres of the proposed Project site into the City of Santa Paula, and leave approximately 13 acres of agricultural land within the County of Ventura. As shown on **Figure 5.0-1,** this alternative would create an island belonging to the County of Ventura surrounded by the City of Santa Paula.

Some of the objectives and community benefits of the proposed Project would not occur and there would not be full development in the Specific Plan area. Municipal services and infrastructure would be

inconvenienced by supplying services to areas surrounding the approximately 13 acres that would not belong to the City. Approximately 8 acres of commercial/light industrial and 5 acres of light industrial, would not be developed. This alternative would not fully implement the General Plan land use policy to expand the City's urban limits into the West Area 2 Planning Area to provide a suitable site for a commercial and industrial within the City. Consequently, this alternative would have negative impacts with respect to land use and planning, while the proposed Project would have both positive and less than significant impacts.

This alternative, like the proposed Project, would not divide an established community and would have no effect on any habitat conservation plans.

Noise

Alternative 2 would include earthmoving activities during construction that would cause short-term impacts as would the proposed Project. However, those levels would be reduced in intensity and duration as only 40 acres would be built on the proposed Project Site. Implementation of various Mitigation Measures for construction under this alternative would reduce noise impacts to a level of less than significant. Operational activities of Alternative 2 would result in fewer weekday and weekend trips to the proposed Project site when compared to the proposed Project. Impacts would be similar and less than significant.

Public Services

Without annexing approximately 13 acres to the City of Santa Paula, the City's municipal services needs would slightly decrease. However, there would still be a demand for the City's police, fire, and other City resources. Because there is no residential development involved, public schools and parks would not be impacted under this alternative. Similar to the proposed Project, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection and police services. There would be similar, less than significant impacts under Alternative 2 as the proposed Project.

Transportation and Traffic

The proposed Project, with improvements, would result in less than significant impacts at all study intersections apart from two; 10th Street and Harvard Boulevard and Peck Road and Harvard Boulevard/Telegraph Road/Main Street, which would be significant and unavoidable during future conditions even without the Project. However, 10th Street and Harvard Boulevard would cause a significant and unavoidable impact with existing conditions plus Project. The traffic engineers at Fehr and Peers, ran the traffic model for the 10th Street and Harvard Boulevard with a 25 percent reduction. As

shown in **Table 5.0-1, Existing plus Project with Mitigation 25 Percent Reduction Comparison,** under this alternative, there is a somewhat less but still significant impact during the PM peak hour.

Table 5.0-1
Existing plus Project with Mitigation 25 Percent Reduction Comparison

		Existing		Existing plus Project				With Mitigation			
Intersection	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	Change	Signif. Impact?	V/C or Delay	LOS	Change	Signif. Impact?
March 2015 Analysis											
10th Street & Harvard Boulevard	AM	0.752	C	0.797	C	0.045	No	0.797	C	0.045	No
	PM	0.764	C	0.815	D	0.051	Yes	0.815	D	0.051	Yes
25% Reduction											
10th Street & Harvard Boulevard	AM	0.752	C	0.786	C	0.034	No	0.786	C	0.034	No
	PM	0.764	C	0.803	D	0.039	Yes	0.803	D	0.039	Yes

Notes: Intersection is controlled by stop signs. Average vehicular delay in seconds is reported rather than V/C ratio.

Utilities and Service Systems

Existing water use would continue under Alternative 2, averaging an approximately 25 percent of 281 afy or 70.25 afy from an irrigation well. As discussed in **Section 4.9, Hydrology and Water Quality**, the Santa Paula Groundwater Basin is the primary source of water for the City and the adjoining County parcels. The Basin is an adjudicated basin and the existing extractions from the Basin would remain within each water user's allocated amount. Water demands for the Project would be 75 percent of the proposed Project estimate of 39.8 afy or 29.8 afy at full build-out. Total water demands for the area would be 100.05 afy which is greater than the proposed Project of 39.8 afy. As such, water demand impacts would be more within both the City's and the County's jurisdiction when compared to the proposed Project and impacts would be greater.

Currently, septic systems are being used to store wastewater from the residences. The amount of wastewater generated by existing uses would increase and a new off-site mainline would need to be completed prior to implementation of the Specific Plan. The increase in wastewater projected from development in the Specific Plan Project Area, is identified and addressed in the City's Wastewater Master Plan. The City's WRF would be able to accommodate wastewater generated by the proposed Project. This alternative would still require new pipelines to be built but on a smaller scale; however, any impacts from the proposed Project would be mitigated. Neither this alternative nor the proposed Project would result in significant impacts; however, this alternative would have fewer impacts.

Solid waste would be increased by the proposed Project; however, under this alternative, there would be slightly less solid waste. For both the Project and this alternative, any impacts would be mitigated to less than significant. Neither would result in significant impacts; however, impacts would be fewer with Alternative 2.

Stormwater runoff would increase with development of the Specific Plan area; however, it would be slightly less with this alternative. Detention basins would be used to reduce peak runoffs downstream. While there would be no significant impacts with the proposed Project or alternative, Alternative 2 would have less of an impact.

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the Project alternatives is provided in **Table 5.0-3** at the end of this section.

The 25 Percent Reduction Alternative would result in reduced impacts where compared to the proposed Project. Land use is considered to be greater as it would create an unincorporated island and the general plan would not be fully implemented.

This alternative would meet the basic objectives defined by the City of Santa Paula for the proposed Project.

Alternative 3: 50 Percent Reduction

Description of Alternative

Alternative 3 assumes that there would be a 50 percent reduction in the 53.81 acres that makes up the proposed Project. This assumes that 50 percent, or approximately 26.90 acres of the Project would be built with the Specific Plan, and 50 percent, or approximately 26.90 acres would remain under the jurisdiction of the County of Ventura with land use subject to the County's General Plan and zoning, and agricultural operations would still continue.

As shown in **Figure 5.0-2, Alternative 3 Conceptual Project Area**, it is assumed that the southern portion of the site along SR 126, would remain under agricultural operations and the remainder of the Specific Plan area would continue with development as proposed. Currently there are agricultural operations to the south, of SR 126 to the west and northwest of the proposed Project site, residential is to the north and northeast, and commercial/light industrial uses to the east.

Analysis of Alternative

Aesthetics

Under this alternative, the site would exclude approximately 27 acres from development, which would result in a smaller footprint than the full build-out of the proposed Project. Additionally, the area would be further from SR 126 and less likely to be visible from the road. Alternative 3 would change the visual nature of the site, as would the proposed Project, but the aesthetic changes would be of less intensity. Additionally, the significant and unavoidable impacts from the proposed Project during construction would also be less because the alternative would be set further back from SR 126.

Agricultural Resources

Under this alternative, approximately 20 acres of Prime Farmland would remain as is. Additionally, the approximately 27 acres that make up the area that would not be developed would remain as Agricultural Exclusive. Under Alternative 3, there would be less of an impact to agricultural resources, but there would still be significant and unavoidable impacts.

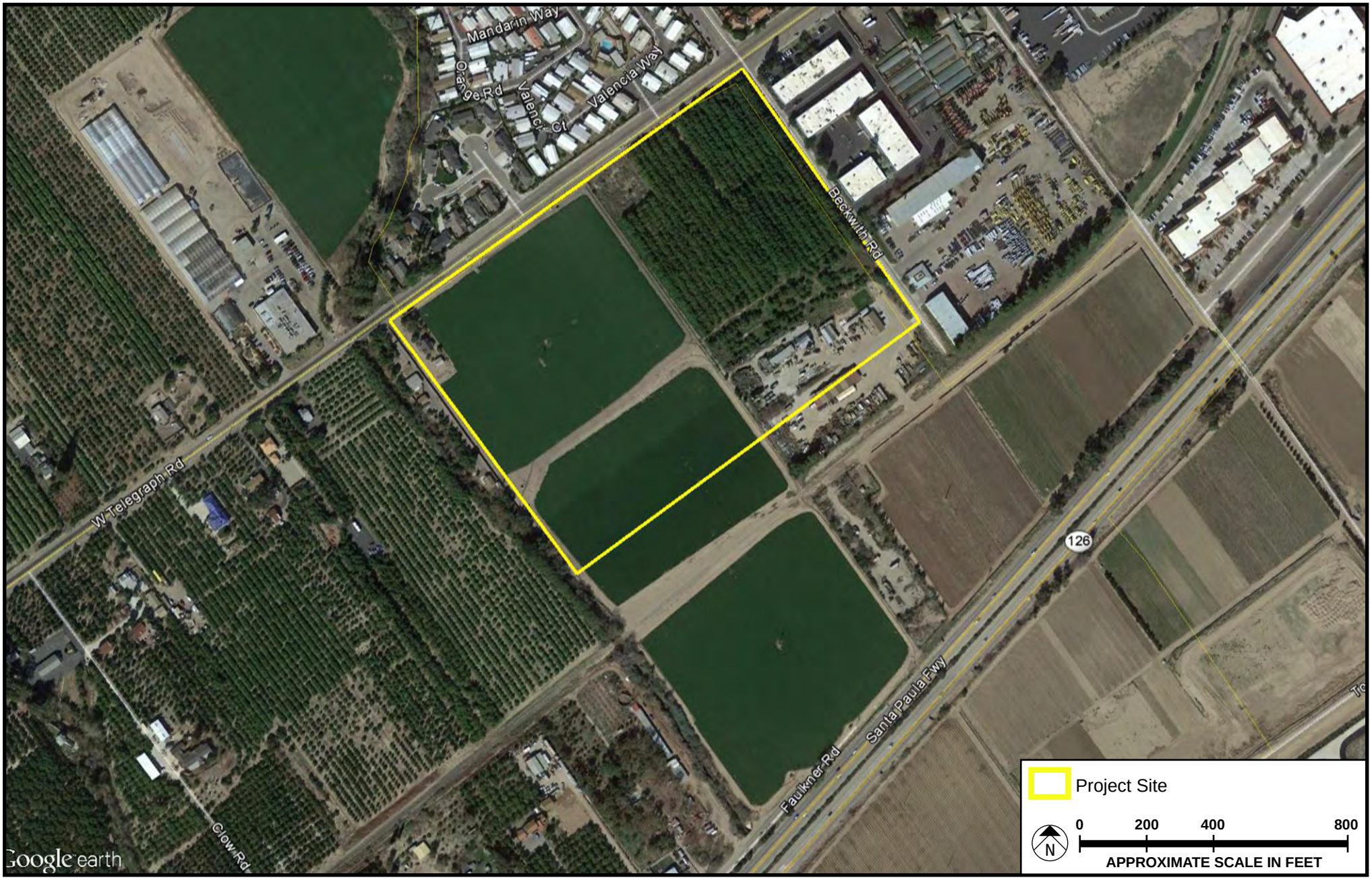
Air Quality

As discussed in **Section 4.13, Transportation and Traffic**, the proposed Project would generate a net increase of approximately 5,546 daily trips. Under Alternative 3, approximately 2,773 daily trips would be generated. As with the proposed Project, emissions would be generated by area sources, energy sources, and mobile sources, with mobile sources generating the majority of the overall emissions. The overall development under Alternative 3 would generate operational emissions below the VCAPCD's thresholds of significance, but daily construction emissions would remain above VCAPCD standards. Mitigation measures similar to those recommended for the proposed Project would be necessary to reduce construction impact which would remain significant.

Impacts associated with AQMP consistency, exposure of sensitive receptors to substantial pollutant concentrations, and objectionable odors under Alternative 3 would be fewer; and impacts would remain less than significant.

Biological Resources

Because portions of the Project area would remain in agricultural use with Alternative 3, potential impacts to biological resources would be reduced in comparison to the proposed Project, even though the Project area consists of disturbed and agricultural areas with limited amounts of seminatural habitat area. This alternative would still disturb Adams Barranca Mixed Willow Riparian, Agricultural Land, Agricultural Avocado Orchards, and developed land, in addition to potentially impacting the species as described in **Section 4.4, Biological Resource**. However, under this alternative, none of the black walnut trees would



SOURCE: Google Earth 2016

FIGURE **5.0-1**

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Alternative 3 Conceptual Project Area

050-002-13

be removed or disturbed. Appropriate Mitigation Measures would reduce any impacts to biological resources similar to the proposed Project, and impacts would be less than significant; however, there would be fewer impacts under this alternative.

Cultural Resources

This alternative would develop a smaller portion of the site with commercial and light industrial uses. Alternative 3 would have a similar potential to uncover previously unknown archaeological resources and human remains. Compliance with the Mitigation Measures during the construction phase would ensure development would not result in significant impacts to potential cultural resources. Impacts would be similar to those of the proposed Project.

Geology and Soils

Construction under this alternative would include similar grading and excavation activities; however, they would be limited to a smaller portion of the site of just approximately 27 acres. Grading and excavation activities would be identical and would result in similar erosion and sedimentation impacts to those of the proposed Project. Any future development within the site would have to comply with the CBC requirements for seismicity, liquefaction, subsidence, and expansive soils, similar to the proposed Project, which would mitigate potential significant impacts associated with the existing soils and geology conditions of the site. This alternative would be required to develop and implement a SWPPP, including BMPs for erosion control on and off site, as well as the mitigation measures of the proposed Project pertaining to erosion control plans. For this reason, the geology and soils impacts of Alternative 3 would be similar those for to the proposed Project and less than significant.

Greenhouse Gas

The proposed Project would generate a net increase of approximately 5,546 ADT while 2,773 ADT could be generated under Alternative 3. As with the proposed Project, GHG emissions would be generated by area, energy, and mobile sources, waste disposal, and water and wastewater treatment and conveyance, with mobile sources generating the majority of the overall GHG emissions. All industrial land use projects that exceed 10,000 MTCO2e per year are considered potentially significant under the SCAQMD screening threshold, which is recognized by the VCAPCD. The estimated Project operational GHG emissions with project design features was estimated to be 6,674.83 MTCO2e per year, which would not exceed the screening threshold. Because Alternative 3 includes a 50 percent reduction in uses, this alternative would result 3,337.4 MTCO2e per year, which would not exceed the screening threshold. In addition, as with the proposed Project, development under Alternative 3 is expected to be consistent with all feasible and applicable strategies and the recommended measures of ARB Scoping Plan to reduce greenhouse gas

emissions in California. Neither this alternative nor the proposed Specific Plan would result in significant greenhouse gas impacts; however, impacts under this alternative would be slightly fewer.

Hazards and Hazardous Materials

While this alternative would result in a density reduction to approximately 27 acres, development would still occur; and impacts similar to those of the proposed Project, but at a reduced intensity, would occur. Construction of the Project would still require materials that could contain hazardous materials, such as fuels, solvents, oils, coatings, etc. that could spill or release. Additionally, agricultural land containing residual pesticides, would still be disturbed. Mitigation measures pertaining to these issues would still be implemented and impacts would be similar to that of the proposed Project.

Hydrology and Water Quality

Alternative 3 would involve 50 percent less grading of the site with only approximately 27 acres instead of 53.81 acres. However, the grading would still temporarily increase the bare soil area during construction, which may increase soil erosion and sedimentation in stormwater runoff. In addition, construction could contribute other pollutants to stormwater drainage. Similar to the proposed Project, this alternative would be required to comply with NPDES and implement a SWPPP with BMPs in addition to supplying the Project with infiltration basins, thereby making impacts to runoff less than significant. Additionally, this alternative would need to comply with the Los Angeles Regional Water Quality Control Board approved requirements. Therefore, Alternative 3 would have impacts similar to those of the proposed Project, and all impacts would be less than significant.

Land Use and Planning

Alternative 3 would develop and annex approximately 27 acres of the proposed Project site into the City of Santa Paula, and leave approximately 27 acres of agricultural land within the County of Ventura. As shown on **Figure 5.0-2,** this alternative would extend the City of Santa Paula boundary, and leave a strip of agricultural land south or the developed area in the County of Ventura.

Some of the objectives and community benefits of the proposed Project would not occur and there would not be full development in the Specific Plan area. Municipal services and infrastructure would still need to supply services to the area but on a smaller scale. Approximately 2 acres of open space, 5 acres of light industrial, 17 acres of commercial/light industrial, would no longer be developed. Additionally, the approximate 3 acres of railroad would no longer be included within the boundary of the Project area. Alternative 3 would not fully implement the General Plan land use policy to expand the City's urban limits into the West Area 2 Planning Area to provide a suitable site for a commercial and industrial within the

City. Consequently, this alternative would have negative impacts with respect to land use and planning, while the proposed Project would have both positive and less than significant impacts.

This alternative, like the proposed Project, would not divide an established community and would have no effect on any habitat conservation plans.

Noise

Alternative 3 would include earthmoving activities during construction that would cause short-term impacts as would the proposed Project. However, those levels would be reduced in intensity and duration as only 27 acres would be developed. Implementation of various Mitigation Measures for construction under this alternative would reduce noise impacts to a level of less than significant. Operational activities of this alternative would result in one less impact from traffic when compared to the proposed Project. Impacts to noise would be slightly fewer under this alternative, and impacts would be less than significant.

Public Services

Without annexing approximately 27 acres to the City of Santa Paula, the City's municipal services needs would slightly decrease. However, there would still be a demand for the City's police, fire, and other City resources. Because there is no residential development involved, public schools and parks would not be impacted under this alternative. Similar to the proposed Project, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection and police services. There would be similar, less than significant impacts under Alternative 3 as the proposed Project.

Transportation and Traffic

The proposed Project, with improvements, would result in less than significant impacts at all study intersections apart from two: 10th Street and Harvard Boulevard, and Peck Road and Harvard Boulevard/Telegraph Road/Main Street. These impacts would be significant and unavoidable during future conditions even without the Project. However, 10th Street and Harvard Boulevard would cause a significant and unavoidable impact with existing conditions plus Project. The traffic engineers at Fehr and Peers ran the traffic model for the 10th Street and Harvard Boulevard with a 50 percent reduction. As shown in **Table 5.0-2, Existing plus Project with Mitigation 50 Percent Reduction Comparison,** this intersection would no longer be considered a significant impact under Alternative 3, and impacts would be fewer.

Table 5.0-2
Existing plus Project with Mitigation 50 Percent Reduction Comparison

		Existing		Existing Plus Project				With Mitigation			
Intersection	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	Change	Signif. Impact?	V/C or Delay	LOS	Change	Signif. Impact?
March 2015 Analysis											
10th Street & Harvard Boulevard	AM	0.752	C	0.797	C	0.045	No	0.797	C	0.045	No
	PM	0.764	C	0.815	D	0.051	Yes	0.815	D	0.051	Yes
50% Reduction											
10th Street & Harvard Boulevard	AM	0.752	C	0.775	C	0.023	No	N/A	N/A	N/A	N/A
	PM	0.764	C	0.791	C	0.027	No				

Notes: Intersection is controlled by stop signs. Average vehicular delay in seconds is reported rather than V/C ratio.

Utilities and Service Systems

Existing water use would continue under Alternative 3, averaging approximately 50 percent of 281 afy, or 140.5 afy, from an irrigation well. As discussed in **Section 4.9, Hydrology and Water Quality**, the Santa Paula Groundwater Basin is the primary source of water for the City and the adjoining County parcels. The Basin is an adjudicated basin, and the existing extractions from the Basin would remain within each water user's allocated amount. Water demands would be 50 percent of the proposed Project estimate of 39.8 afy, or 19.9 afy, at full build-out. Total water demands for the area would be 160.4 afy, which is greater than the proposed Project demand of 39.8 afy. As such, water-demand impacts would be more within both the City's and the County's jurisdictions when compared to the proposed Project, and impacts would be greater.

Currently, septic systems are being used to store wastewater from the residences. The amount of wastewater generated by existing uses would increase and a new off-site mainline would need to be completed prior to implementation of the Specific Plan. The increase in wastewater projected from development in the Specific Plan Project Area, is identified and addressed in the City's Wastewater Master Plan. The City's WRF would be able to accommodate wastewater generated by the proposed Project. This alternative would still require new pipelines to be built but on a smaller scale; however, any impacts from the proposed Project would be mitigated. Neither this alternative nor the proposed Project would result in significant impacts; however, this alternative would have fewer impacts.

Solid waste would be increased by the proposed Project; however, under this alternative, there would be slightly less solid waste. For both the Project and this alternative, any impacts would be mitigated to less

than significant. Neither would result in significant impacts; however, impacts would be fewer with Alternative 3.

Stormwater runoff would increase with development of the Specific Plan area; however, it would be slightly less with this alternative. Detention basins would be used to reduce peak runoffs downstream. While there would be no significant impacts with the proposed Project or alternative, the alternative would have less of an impact.

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the Project alternatives is provided in **Table 5.0-3** at the end of this section.

The 50 Percent Reduction Alternative would result in reduced impacts where compared to the proposed Project, and avoid would the significant and unavoidable impact of the proposed Project on transportation and traffic at one intersection. Land use is considered to be greater because the general plan would not be fully implemented.

This alternative would meet the basic objectives defined by the City of Santa Paula for the proposed Project.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The findings of the alternatives analysis discussed above are summarized in **Table 5.0-3**.

The *CEQA Guidelines* require that an environmentally superior alternative be identified among the selected alternatives.[7] 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.

Alternative 1, the No Project Alternative, would have the fewest impacts and 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.

7 California Code of Regulations, tit. 14, sec. 15126.6(e)(2).

The environmentally superior alternative among the remaining alternatives would be the Alternative 3, the 50 Percent Reduction Alternative. This alternative would avoid the significant and unavoidable environmental impact identified under traffic for the proposed Project.

However, this alternative would not eliminate the significant and unavoidable impacts for aesthetics, agricultural resources, and air quality during construction, and 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. Additionally, water usage would be greater by approximately 120.6 afy when compared to the build-out of the proposed Project.

Table 5.0-3
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 & High Density Residential
Aesthetics	Construction and Operation: Significant and unavoidable	Less	Similar	Less
Agricultural Resources	Significant and unavoidable	Less	Less	Less
Air Quality	Construction: Significant and unavoidable Operation: Less than significant	Less	Less	Less
Biological Resources	Less than significant	Less	Similar	Less
Cultural Resources	Less than significant	Less	Similar	Similar
Geology/Soils	Less than significant	Less	Similar	Similar
Greenhouse Gas	Less than significant	Less	Less	Less
Hazards/Hazardous Waste	Less than significant	Less	Similar	Similar
Hydrology/Water Quality	Less than significant	Less	Similar	Similar
Land Use/Planning	Less than significant	Greater	Greater	Greater
Noise	Less than significant	Less	Similar	Less
Public Services	Less than significant	Less	Similar	Similar
Transportation/Traffic	Project Impacts: Significant and unavoidable at one intersection Cumulative Impact: Significant and unavoidable at two intersections	Less	Less	Less

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 & High Density Residential
Utilities/Services Systems				
Water	Less than significant	Greater	Greater	Greater
Wastewater	Less than significant	Less	Less	Less
Solid Waste	Less than significant	Less	Less	Less
Stormwater	Less than Significant	Less	Less	Less

6.0 EFFECTS NOT FOUND TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires a brief description of any possible significant effects that were determined not to be significant and were not analyzed in detail within the environmental analysis. Therefore, this Section has been included in the EIR as required by CEQA. The discussion below presents the analysis of the effects related to mineral resources, population and housing, and recreation not found to be significant. Any items not addressed in this Section were addressed in **Section 4.0, Environmental Impact Analysis**, of the Draft EIR.

6.1 MINERAL RESOURCES

Threshold: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The City of Santa Paula is considered to contain significant mineral aggregate resources (sand and gravel), especially along the Santa Paula Creek and Santa Clara River.[1] Most these sand and gravel aggregate resources are used in highways, bridges, parking lots, and concrete buildings. one non-habitNo significant impacts would occur.

Threshold: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

While the Project Site and adjacent uses to the west and south are currently under agricultural uses, the Project Site is located within an area characterized by features typical of the urban landscape. Land uses to north are single-family residential uses, and land uses to the east are commercial and light industrial uses.[2] According to the County of Ventura General Plan, the Project Site is designated within a Mineral Resource Zone (MRZ)-1 and an MRZ-4. MRZ-1 is defined as an area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. An MRZ-4 is defined as an area where available information is inadequate for assignment to any other MRZ. Therefore, implementation of the Project would not result in the loss of locally important mineral resource recovery sites. No significant impacts would occur.

1 City of Santa Paula, *General Plan,* "Conservation and Open Space Element" (1998).
2 City of Santa Paula, *General Plan,* "Land Use Element" (1998).

6.2 POPULATION AND HOUSING

Threshold: Induce substantial population growth in an area, either directly or indirectly?

The proposed Project would implement the Santa Paula West Business Park Specific Plan ("Specific Plan"), which consists of the development of a mix of light manufacturing, research and development, professional office, and commercial uses within the City. Because the Project would not be developing any additional residential uses to the City, it would not contribute to a direct population increase. The Project would have the potential to increase the population of the City and surrounding areas as a result of the increased employment from the Project. However, given that the Project would remove existing agricultural uses from the Project Site, any increase in employment from the Project would be offset by a corresponding decrease in employment from these existing uses.

It is also anticipated that local residents would comprise a majority of the additional employment opportunities provided from the Project. According to the 2016 Adopted Growth Forecast of the Southern California Association of Governments (SCAG), there were approximately 7,800 jobs in 2012. SCAG anticipates that the City will have an estimated employment of 11,700 in 2040, a total increase of 3,900 jobs from 2012.[3] Project employment increase would be approximately 1,510 employees[4] and would not result in SCAG employment projections for the City being exceeded. Furthermore, the build-out of the Project would develop as market conditions allow; thus, the increase of employment as a result of the Project would occur throughout several years. Because the proposed Project would not substantially induce additional population into the area, no significant impacts would occur.

Threshold: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The Project Site is designated by the City's General Plan for commercial and light industrial uses. There is currently one nonhabitable (due to a recent fire) farmworker dwelling unit on the Project Site. While implementation of the Project would displace the existing housing on the Project Site, this displacement would not be substantial. According to the Department of Finance, as of January 2015, there was an estimated 4.2 percent vacancy rate of housing in Santa Paula.[5] Therefore, sufficient housing is available

3 Southern California Association of Governments, 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy* (adopted April 2016), Appendix: Demographics and Growth Forecast, 29, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

4 US Green Building Council, Building Area per Employee by Business Type (May 13, 2008), http://www.usgbc.org/Docs/Archive/General/Docs4111.pdf, accessed August 24, 2016.

5 California Department of Finance, Demographic Research Unit, "Table 2: E-5 City/County Population and Housing Estimates, 1/1/2016," http://vcrma.org/pdf/demograghics/2016_DOF.pdf.

in the City, and the Project would not displace existing housing or require the construction of replacement housing. There would be no significant impacts.

Threshold: **Displace substantial numbers of people, necessitation the construction of replacement housing elsewhere?**

As previously mentioned, the Project Site is designated by the City for commercial and light industrial uses, and the Project would implement a business park. There are currently two farmworker dwelling units on the Project Site. While the Project would involve the removal of these two units, and subsequently the displacement of people, this displacement would not be substantial.

Because there would be no displacement of people as a result of the Project, the construction of replacement housing would not be required. No significant impacts would occur.

6.3 RECREATION

Threshold: **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

The proposed Project would develop a mix of light manufacturing, research and development, professional office, and commercial uses. Given that the Project does not involve the implementation of residential uses, there would not be an increased demand for local or regional parks or other recreational facilities in the area. The Project would conform with the City's designated commercial and light industrial uses, which do not include any operational connection to local or regional parks. Therefore, impacts are not considered significant.

Threshold: **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

While the Project would incorporate open space and passive uses on site, it would not involve the development of recreational facilities. In addition, the Project would not require the construction or expansion of recreational facilities because a population increase is not anticipated to result from the Project. No significant impacts would occur.

7.0 GROWTH-INDUCING IMPACTS

7.1 DEFINITION OF GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe the potential growth-inducing impacts of a proposed project. Specifically, Section 15126.2(d) states that a project may foster economic or population growth, or additional housing, either directly or indirectly, in a geographical area if it meets any one of the following criteria below:[1]

- Removal of an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).
- Urbanization of land in a remote location (e.g., leapfrog development).
- Economic expansion or growth occurring in an area in response to a project (e.g., changes in revenue base, employment expansion, etc.).
- Establishment of a precedent-setting action (e.g., a change in zoning or general plan designation).

CEQA does not consider growth inducement to be necessarily detrimental, beneficial, or of significance to the environment. Typically, the growth-inducing potential of a project is considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies. Significant growth impacts could also be manifested through the provision of infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies.

7.2 GROWTH-INDUCING IMPACTS RELATED TO THE PROJECT

Removal of Impediments to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., sewer or water service), while planning impediments may include restrictive zoning and general plan designations.

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1 California Public Resources Code, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126(d).

The on- or off-site service systems are not sized to support urban land use intensities envisioned by the City's General Plan for the Santa Paula West Business Park Specific Plan. Implementation of the Project would introduce substantial amounts of urban development, such as 774,227 square feet of various commercial and light industrial uses. There are no proposed residential uses, thus there would be no direct population introduction to the Project Site. Furthermore, the Project would also generate employment opportunities for existing and future City residents. This increase of development and population on the Project Site would result in a change in uses on an area that is almost exclusively agricultural in nature and use.

Urban development and intensity allowed by the Specific Plan ("Specific Plan") would require constructing on-site urban infrastructure such as access driveways, domestic and recycled water pipelines, sewer pipelines, and related utilities. Future development under the Specific Plan would also include off-site improvements for access, such as the Beckwith Road widening, the Faulkner Road extension, a sewer main connection and lift station, and storm drains (conveyance and detention/debris basins). In addition, as a result of the increase of development and employees and visitors on site, there would be an increase of demand on the City's public services (fire and police protection).

The Project will occur on land designated for development, and the City has planned for utilities and public services to meet the long-term demand of the Project once implemented. Exiting City water and sewer main pipelines located within Telegraph Road would provide readily available points of connection to the Project. In addition, City water and sewer main pipelines also exist within Faulkner Road immediately east of the Specific Plan boundary and would provide direct points for connection to serve future development in the Specific Plan area. No increased capacity would be needed for the existing main lines; the improvements needed to make the connections would involve minimal construction within existing road rights-of-way. The Project would include a general plan amendment and is consistent with projected local and regional growth in the area. The Project will not encourage and facilitate growth within areas immediately adjacent to the Project Site. Lands to the north consist of single-family residential uses, and lands to the east are of similar commercial/light industrial uses as the proposed Project. The agricultural lands south of the Project Site are currently designated by the City's General Plan for commercial/light industrial uses, similar to the Project. Lastly, the land west of the Project Site will remain undeveloped and is governed by Save Open Space and Agricultural Resources (SOAR), Santa Paula City Urban Restriction (CURB) Initiative, and the Santa Paula-San Buenaventura Greenbelt Agreement.

Economic Growth

City of Santa Paula

As discussed in **Section 6.0, Effects Not Found to Be Significant,** according to the 2016 Adopted Growth Forecast of the Southern California Association of Governments (SCAG), there were approximately 7,800 jobs in 2012. SCAG anticipates that the City will have an estimated employment of 11,700 in 2040, a total increase of 3,900 jobs from 2012. Project employment increase would be approximately 1,510 employees.[2] It is anticipated that local residents would comprise a majority of the additional employment opportunities provided from the Project.

County of Ventura

According to SCAG, in 2015 there were approximately 363,000 total jobs within the County of Ventura. The amount of jobs is anticipated to be 419,808 in 2040, which represents a projected increase of 15.6 percent between 2015 and 2040.

Temporary short-term construction jobs would be created during the implementation of the Project, which will be developed as market conditions allow. While the exact amount of construction jobs cannot be estimated, the number and type of jobs will fluctuate over time depending on the type and size of future development projects under construction on the Project Site.

Urbanization of Land in a Remote Area

Development can be considered growth inducing when it is not contiguous to existing urban development and intervening open space areas occur between developments. The Project is located within the City of Santa Paula. The General Plan designation for the Project Site is West Area 2 Expansion Area, designating it as SP-6 (Specific Plan Area 6) in Chapter 16.25 of the Santa Paula Municipal Code (SPMC). The SP-6 zone would fall under the C-LI land use designation and would comply with the development standards established in Chapter 16.21 of the SPMC.

The Project Site is located within the CURB. Property located within the CURB may be developed in accordance with the General Plan and the SPMC. Furthermore, the Project Site is located directly adjacent to existing urban development within the City, including residential, commercial, and light industrial uses. There is an existing network of roadways immediately adjacent to the Project Site that will allow for direct connections to the existing City circulation network and regional roadways (e.g. SR 126). Furthermore,

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2 US Green Building Council, Building Area Per Employee by Business Type (May 13, 2008), http://www.usgbc.org/Docs/Archive/General/Docs4111.pdf.Aaccessed August 24, 2016.

utility infrastructure is also adjacent to the Project Site, which will allow direct connections to water supply, sewer systems, electricity, etc. Stormwater control facilities are also provided in the area. Therefore, the Project is consistent with applicable planning policies and does not involve the urbanization of land in a remote area that would induce growth in surrounding areas.

Economic Expansion

The Land Use Element identifies the City's economic health and well-being as a central goal of the General Plan.[3] A major reason the City updated the Santa Paula General Plan in 1998 was to address issues affecting the City's economic health and to provide land for development. The General Plan provides for diverse businesses to provide goods and services to residents and other businesses so that commercial needs do not have to be met outside the City. The General Plan notes that the land use supply, combined with other strategies, can assist in addressing the lack of vacant/developable land, provision of land use designations of a size, and location that can assist in attracting job-generating development and commercial uses.[4] New uses would also lead to reassessed property valuations, in providing increased property tax revenue.

Temporary short-term construction jobs would be created during the implementation of development allowed under the Specific Plan. Given that construction requires specialized trade skills, the number and type of jobs would fluctuate over time depending on the type and size of future development projects under construction throughout the Project Site.

The Specific Plan is expected to result in the generation of industrial, warehouse, and manufacturing jobs.[5] Currently, there is a lack of nonagricultural and private commercial jobs in the City. Nearly one-third of the employment workforce work for the City of Santa Paula, and more than 7,000 residents commute to jobs located outside the City.[6] Providing these jobs will create more employment opportunities for City residents and would be anticipated to result in economic expansion.

In addition to the direct on-site jobs generated by the Project, new employees in the Specific Plan area would also be expected to generate additional employment due to household and employee expenditures for goods and services in the City and larger region. However, at this time, it would be speculative to estimate the number and type of employees that might be supported by this additional spending.

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3 City of Santa Paula, *General Plan,* "Land Use Element" (1998).

4 City of Santa Paula, *General Plan,* "Land Use Element" (1998).

5 Stanley R. Hoffman Associates, Inc., *East Area Fiscal Analysis, City of Santa Paula* (November 2013).

6 City of Santa Paula, *General Plan,* "Land Use Element" (1998).

Finally, new spending and employment generated by the Project would produce secondary or multiplier effects as businesses benefitting from direct expenditures purchase goods and services in the City and large region to support their business activity. Again, at this time, it would be speculative to estimate the number and type of employees that might be supported by this additional spending.

Overall, the Project would result in economic expansion within the City of Santa Paula that has been planned for in the Santa Paula General Plan and that would be supportive of the City's economic development goals. These effects would result in additional jobs and contribute to both local and regional economic activity. The economic expansion that would result from this proposed Project would not induce unanticipated growth outside the City of Santa Paula. Impacts associated with economic growth would be beneficial.

8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

According to the California Environmental Quality Act (CEQA) Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse hereafter unlikely."[1] Primary impacts and, particularly, secondary impacts generally commit future generations to similar uses. In addition, irreversible commitments of resources should be evaluated to ensure that such current consumption is justified. Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of Project implementation that cannot be avoided.

Primary impacts will result from the consumption of nonrenewable resources during construction and operation of the Santa Paula West Business Park Specific Plan ("Specific Plan"). Nonrenewable resources such as sand, gravel, and steel and renewable resources such as lumber will be consumed during project construction. Energy, fossil fuels, oils, and natural gas will be irreversibly committed during construction. These same resources are used for vehicles and for heating and cooling equipment during operations. The continued use of these resources associated with Project operations represents a long-term obligation. The energy consumed in developing and maintaining the Project Site for urban use may be considered a permanent investment.

Construction of the Project would consume limited amounts of certain types of lumber; raw materials in steel; metals such as copper and lead; aggregate materials used in concrete and asphalt, such as sand and stone; water; petrochemical construction materials such as plastic; and other similar slowly renewable or nonrenewable resources. Additionally, fossil fuels for construction vehicles and equipment would be consumed. In terms of Project operations, the following slowly renewable and nonrenewable resources would be required: natural gas and electricity, petroleum-based fuels, fossil fuels, and water. The consumption of such resources would represent a long-term commitment of those resources.

The commitment of resources required for the construction and operation of the Project would limit the availability of such resources for future generations or for other uses during the life of the Project. However, continued use of such resources is consistent with anticipated growth in the City of Santa Paula.

A total of approximately 50 acres of the 54-acre Project Site would be developed to accommodate light industrial and commercial uses under the proposed Specific Plan. The remaining 4 acres would be allotted for open space and passive uses on the Project Site. Therefore, the Project will result in the conversion of approximately 49 acres (combined) of prime and farmland of statewide importance, as identified on the

1 California Public Resources Code, tit. 14, div. 6, ch. 3, California Environmental Quality Act Guidelines, sec. 15126(c).

California Department of Conservation Farmland Mapping and Monitoring Program, Important Farmland Map for Ventura County, to nonagricultural uses.[2] While the Project would result in the removal of agricultural lands for urbanized uses, it would dedicate 3.65 acres of various greenways and open space along the Adams Barranca, which is adjacent to the western boundary of the Project Site.

The Project Site is not located within an area identified for mineral extraction, currently undergoing mineral extraction, or within a petroleum resource area that would be adversely affected by future development under the proposed Santa Paula West Business Park (refer to **Section 6.0, Effects Not Found to Be Significant**).

Water, wastewater, and solid waste resources would also be irreversibly committed during construction of various future development projects of the Project Site. Once constructed, ongoing maintenance and operation of future structures built on the Project Site would result in further commitment of water, wastewater, and solid waste resources. These commitments represent long-term obligations that would accompany future development activities (refer to **Section 4.14, Utilities and Service Systems**).

The proposed Santa Paula West Business Park will allow for the development of a variety of land uses that are desired by the City to implement urban development in an area designated for commercial and light industrial uses. The Project will maintain an open space edge buffer along Adams Barranca to minimize any potential impacts from the proposed urbanized development on the Project Site.

2 California Department of Conservation, Farmland Mapping and Monitoring Program, Ventura County Important Farmland, (2010).

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