

**APPENDIX 1.0**

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**Notice of Preparation and Comments**

# Notice of Preparation

**To:** Responsible and Trustee Agencies and others on the attached distribution list

**From:** City of Santa Paula  
P.O. Box 569  
Santa Paula, California 94061-0569

**POSTED**  
AUG 29 2014  
MARK A. LUNN  
Ventura County Clerk and Recorder

**Subject:** Notice of Preparation of a Draft Environmental Impact Report By: \_\_\_\_\_, Deputy

## Santa Paula West Business Park Specific Plan

The City of Santa Paula, as the Lead Agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) to evaluate the Santa Paula West Business Park Specific Plan (Specific Plan or Project). The proposed Specific Plan contains a comprehensive set of plans, exhibits, regulations, conditions and programs for orderly development of the Business Park, which is designed to contain a combination of office, manufacturing, research and development, professional office, and limited commercial uses on approximately 54 acres located in the western edge of the City of Santa Paula. In addition to regulating land use, the Specific Plan addresses vehicular circulation, landscaping, pedestrian walkways and infrastructure.

The purpose of this Notice of Preparation (NOP) is to bring your attention to the Specific Plan and request that your organization assist the City in identifying the scope and content of the environmental information relevant to your agency's statutory responsibilities that should be contained in the EIR. Your agency may need to use the EIR prepared by the City when considering other approvals for the Project. The City also welcomes comments from other interested parties.

The Project Description, including the location, is provided in Attachment A. The preliminary scope of the EIR is provided in Attachment B.

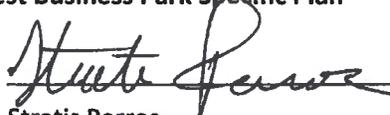
Due to the time limits mandated by State law, your response must be sent no later than 30 days after receipt of this NOP. A Scoping Meeting will be held September 9, 2014 at 6:30 PM at the Santa Paula City Hall in the City Council Chambers. All parties are invited to this meeting to provide comments on the content of the EIR.

Please submit comments to: Mr. Stratis Perros, Deputy Planning Director, City of Santa Paula, P.O. Box 569, Santa Paula, California 94061-0569. Please provide the name of a contact person at your agency. You may also email your response to: [sperros@spcity.org](mailto:sperros@spcity.org).

**Project Title:** Santa Paula West Business Park Specific Plan

**Date:** 8.27.14

**Signature:**

  
Stratis Perros

**Title:** Deputy Planning Director

**Telephone:** (805) 933-4214

# SANTA PAULA WEST BUSINESS PARK SPECIFIC PLAN NOP

## ATTACHMENT A: PROJECT DESCRIPTION

### LOCATION

**Figure 1** shows the regional location of the Santa Paula West Business Park. **Figure 2** shows the Specific Plan location in the local context. The proposed Specific Plan area is bounded on the north by Telegraph Road, on the east by existing industrial and commercial development in the existing Santa Paula city limits, on the south by agriculture and on the west by the Adams Barranca. The Project site contains frontage along State Route 126 and Telegraph Road and is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way.

The Specific Plan area is located within the Sphere of Influence and the City Urban Restriction Boundary (CURB) of the City of Santa Paula. As part of the Specific Plan approval process, annexation of the Santa Paula West Business Park site to the City of Santa Paula is proposed.

### PROJECT DESCRIPTION

The Santa Paula West Business Park is a planned development consisting of a mix of light manufacturing, research and development, professional office and commercial uses consistent with the Commercial/Light Industrial and Light Industrial zones as defined the City of Santa Paula Zoning Ordinance.

**Figure 3** illustrates the proposed lot configuration for the Business Park, 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.

The Adams Barranca, located along the western boundary of the business park would be zoned Open Space/Passive in the Specific Plan. A 64-foot wide roadway dedication 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. Also, 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.

**Figure 4** provides a Land Use Master Plan and **Figure 5** provides the Zoning Implementation Plan for the proposed Project.

The Master Plan land use designations and corresponding areas include:

<b>Land Use Designation</b>	<b>Acres</b>	<b>Percent of Project Site</b>
Commercial / Light Industrial	37.48	68.8
Roadways (Approximate)	13.30	24.5
Open Space/Passive	3.65	6.7
<b>Total Gross Area:</b>	<b>54.43</b>	<b>100</b>

The zoning for the Business Park would be SP-6 (Specific Plan Area 6). Land uses that are permitted within the Master Plan Land Use designations and zoning for the Business Park are outlined in the Specific Plan. The Specific Plan incorporates the development standards for the C/LI zone and LI zone (commercial/light industrial and light industrial) as outlined in the Santa Paula Municipal Code.

The Specific Plan also includes a Master Circulation Plan that provides a framework and standards for safe vehicular, pedestrian, and bicycle circulation, as also addresses parking. The Specific Plan would also establish design standards for landscaping, general signage, and site design guidelines.

**PROPOSED DISCRETIONARY APPROVAL ACTIONS**

This EIR would serve as the primary source of environmental information to support review and consideration of the following actions:

The Ventura Local Agency Formation Commission (LAFCo) will consider Annexation of the site to the City of Santa Paula.

The City of Santa Paula will consider the following actions:

- General Plan Amendment to change the land use designation to the Santa Paula West Business Park Specific Plan
- Zoning designation of SP-6 (Specific Plan Area 6)
- Development Agreement
- Annexation of the site to the City of Santa Paula

## ATTACHMENT B: PRELIMINARY SCOPE OF THE EIR

### EIR Scope of Study

Based on a preliminary review of the Project that is consistent with Section 15060 of the California Environmental Quality Act (CEQA) Guidelines, the City of Santa Paula has determined that an EIR should be prepared for this Project. In addition, consistent with Section 15082 of the State CEQA Guidelines, the City has identified the potential for significant environmental effects related to the following CEQA topics:

- Land Use and Planning
- Agricultural Resources
- Transportation and Circulation
- Air Quality
- Noise
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Aesthetics
- Cultural and Historic Resources
- Public Services
- Utilities and Services
- Greenhouse Gas

A brief description of the scope of analysis the City has identified for the Draft EIR related to each of these topics is provided below.

Land Use and Planning - The Santa Paula West Business Park would implement the City's General Plan. The EIR will assess the consistency of the proposed Specific Plan with the City of Santa Paula General Plan and other applicable local land use plans and policies, and regional land use plans, such as the Southern California Association of Governments Regional Transportation Plan.

Agricultural Resources - The EIR will assess the potential impacts to agricultural resources as a result of the development allowed under the proposed Specific Plan. The analysis will consider conversion of farmland resources, as mapped in the Farmland Mapping and Monitoring Program and local land use plans.

Transportation and Circulation – The EIR will include preparation of a traffic study to evaluate the potential impacts of traffic that could be generated upon development of the proposed Specific Plan. The analysis will assess current traffic conditions and the capacity of the street system. Potential impacts will address future development and the estimated number of vehicle trips that could be introduced

onto the street network, including volume to capacity ratios and level of service (LOS) at affected intersections. Potential impacts on public transit service will also be addressed.

Air Quality - The potential impacts for the development under the Specific Plan will be evaluated in accordance with the Guidelines for the Preparation of Air Quality Impact Analysis and other requirements of the Ventura County Air Pollution Control District (VCAPCD). Modeling will be conducted using the California Emissions Estimator Model (CalEEMod). The analysis will include both construction and long-term operational impacts for regulated air emission pollutants. This section of the EIR will also evaluate consistency with the VCAPCD Air Quality Management Plan.

Noise - The potential for development under the Specific Plan to increase noise above ambient noise levels. Both construction and operational noise (from the land uses and traffic) will be analyzed for impacts to residential uses, nearby schools, or other nearby sensitive land uses.

Biological Resources - Potentially occurring sensitive biological resources will be addressed to determine if impacts would occur as a result of development under the Specific Plan. Consistency with the federal Endangered Species Act (Act) of 1973, as amended, in addition to any local or regional habitat conservation plan guidelines that may be applicable to the Project site will be discussed. Field surveys and records research will generally evaluate the potential for the Project site and immediate vicinity to support sensitive biological resources.

Geology and Soils - The EIR will include a description of the existing geology and soil conditions, and evaluate any potential impacts that could occur as a result of development of the Specific Plan. The EIR will assess potential geological and geotechnical impacts or constraints associated with the site based on review of available published information and a site reconnaissance.

Hydrology and Water Quality - The EIR analysis will describe the hydrology (water resource, drainage, and flooding) and water quality conditions of the Project site within and adjacent to the project development areas. The EIR will identify the regulatory framework affecting hydrology and water quality issues and describe the consistency of the proposed Specific with applicable water quality regulations for storm water runoff.

Hazards and Hazardous Materials - The EIR will provide information on hazards and hazardous materials conditions in the area and any potential impacts from development of the Specific Plan. The analysis will include historical database records reviews and site reconnaissance.

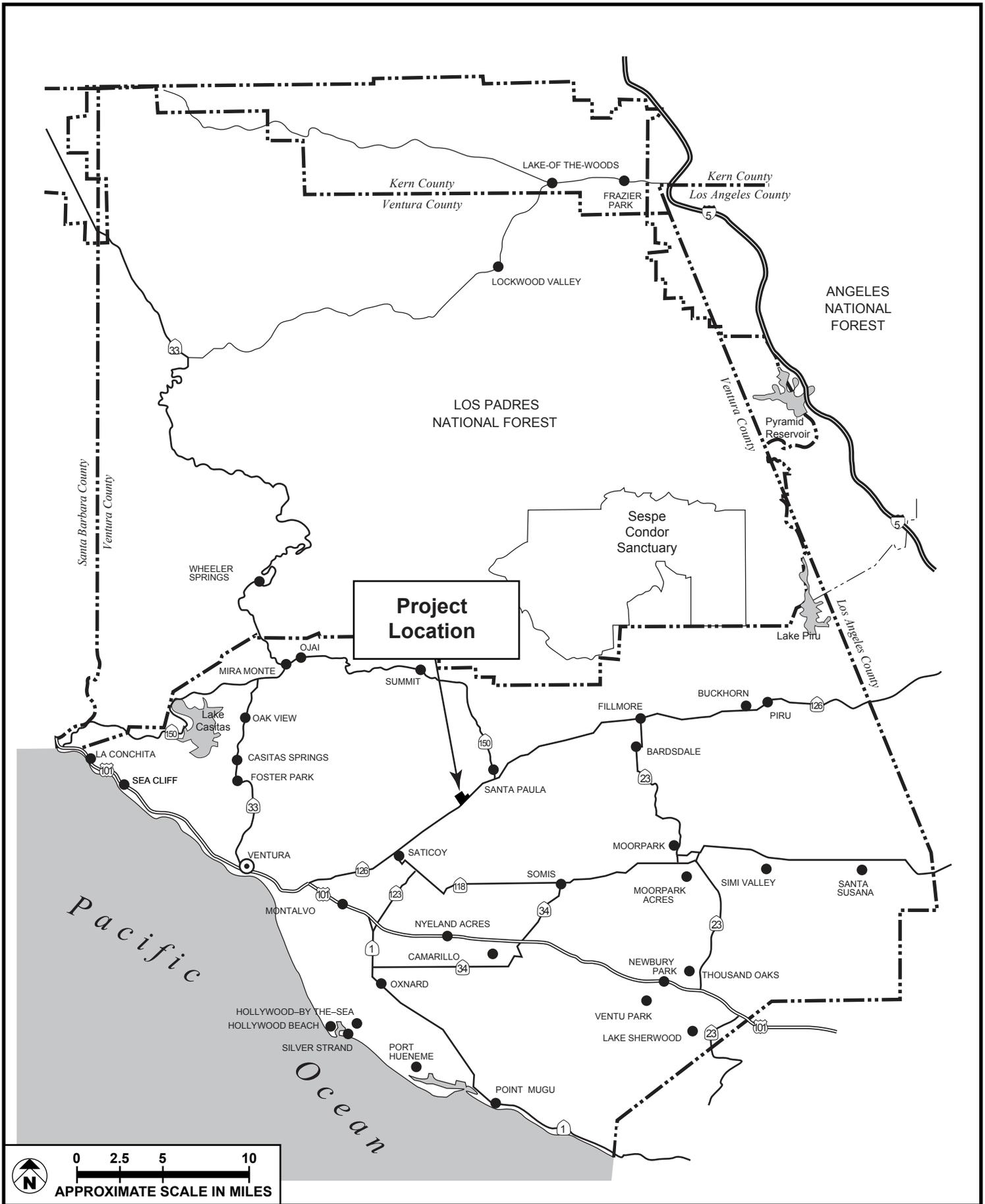
Aesthetics - The EIR will evaluate the changes to the existing visual appearance and character of the Specific Plan site and the due to the introduction of the new industrial and commercial buildings that would result from development under the Business Park Specific Plan.

Cultural Resources - The EIR will assess the potential for any archaeological or paleontological resources within the Specific Plan area or vicinity based on a Phase 1 investigation and subsequent recommendations. The potential for development under the Specific Plan to affect these resources will be identified.

Public Services - The EIR will discuss the potential for environmental impacts that could occur from increased demand for police, fire recreation, and schools, to meet the needs of the additional development that would be allowed by the Specific Plan.

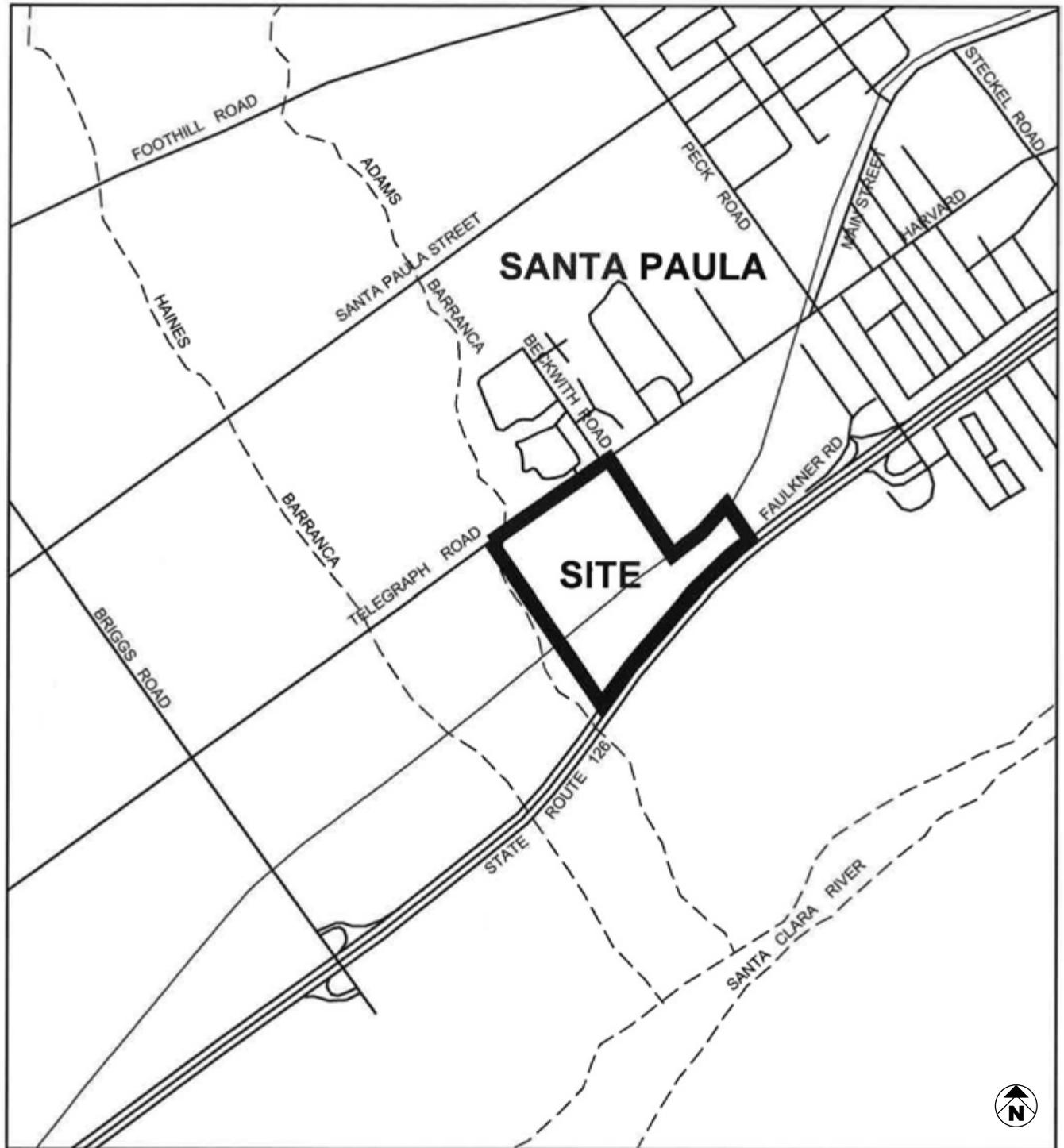
Utilities and Service Systems - The EIR will assess the impacts of the proposed Specific Plan on water supply, wastewater, and solid waste. The analysis will include a water supply assessment, and all service provides for the Specific Plan site will be consulted.

Greenhouse Gas Emissions – Modeling will be conducted using the California Emissions Estimator Model (CalEEMod). Modeling results will provide estimates of direct short-term construction and long-term operational CO<sub>2</sub> emissions for the Project. The EIR will analyze potential construction emissions generated from such sources as construction equipment. Long-term operational GHG emissions from additional traffic, as well as area source emissions from consumption of fossil fuels for operations, water, and space heating systems for operations will be analyzed.



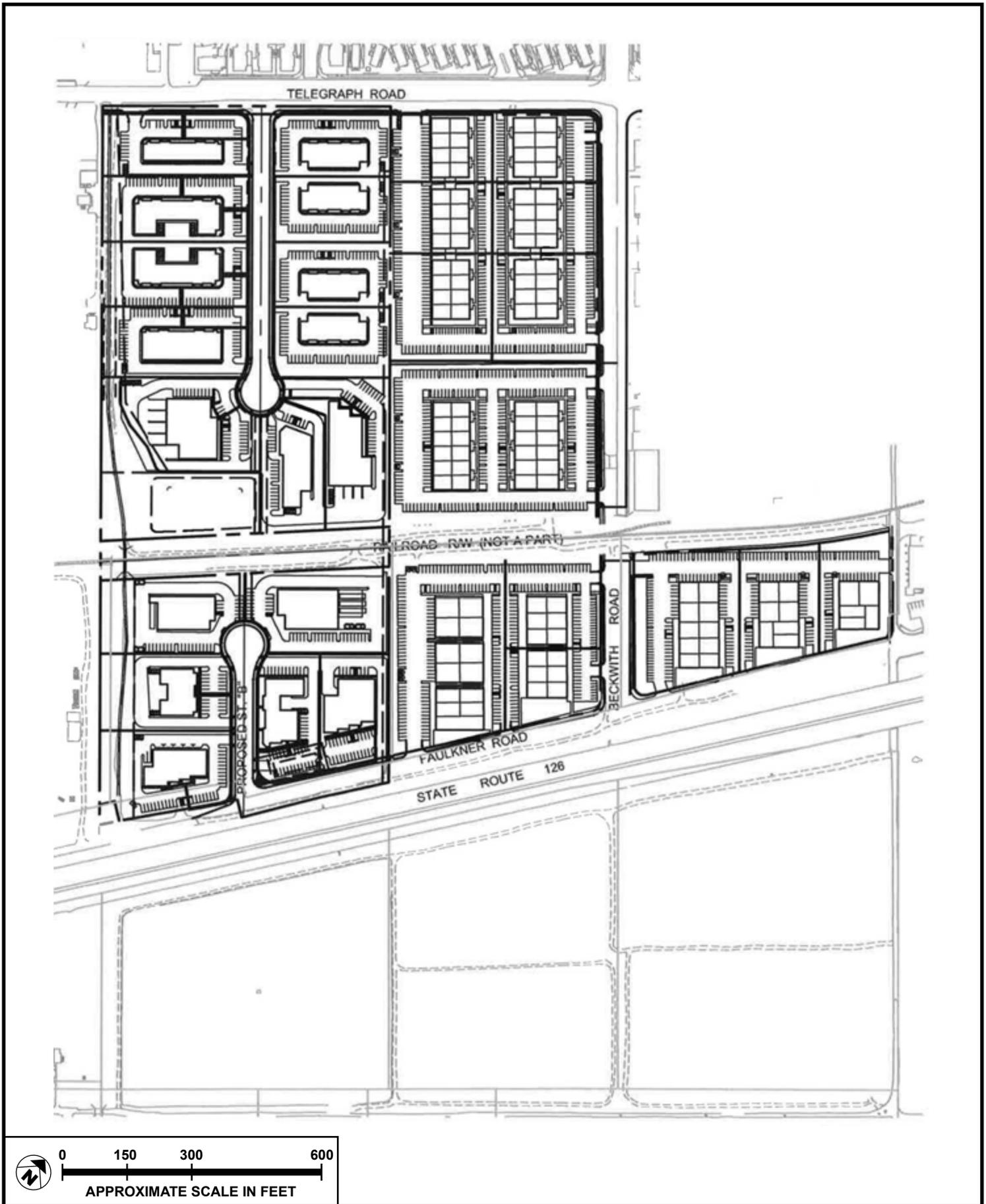
SOURCE: Meridian Consultants – March 2014

FIGURE 1



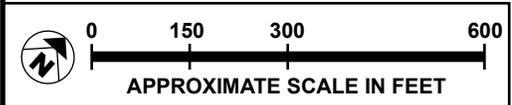
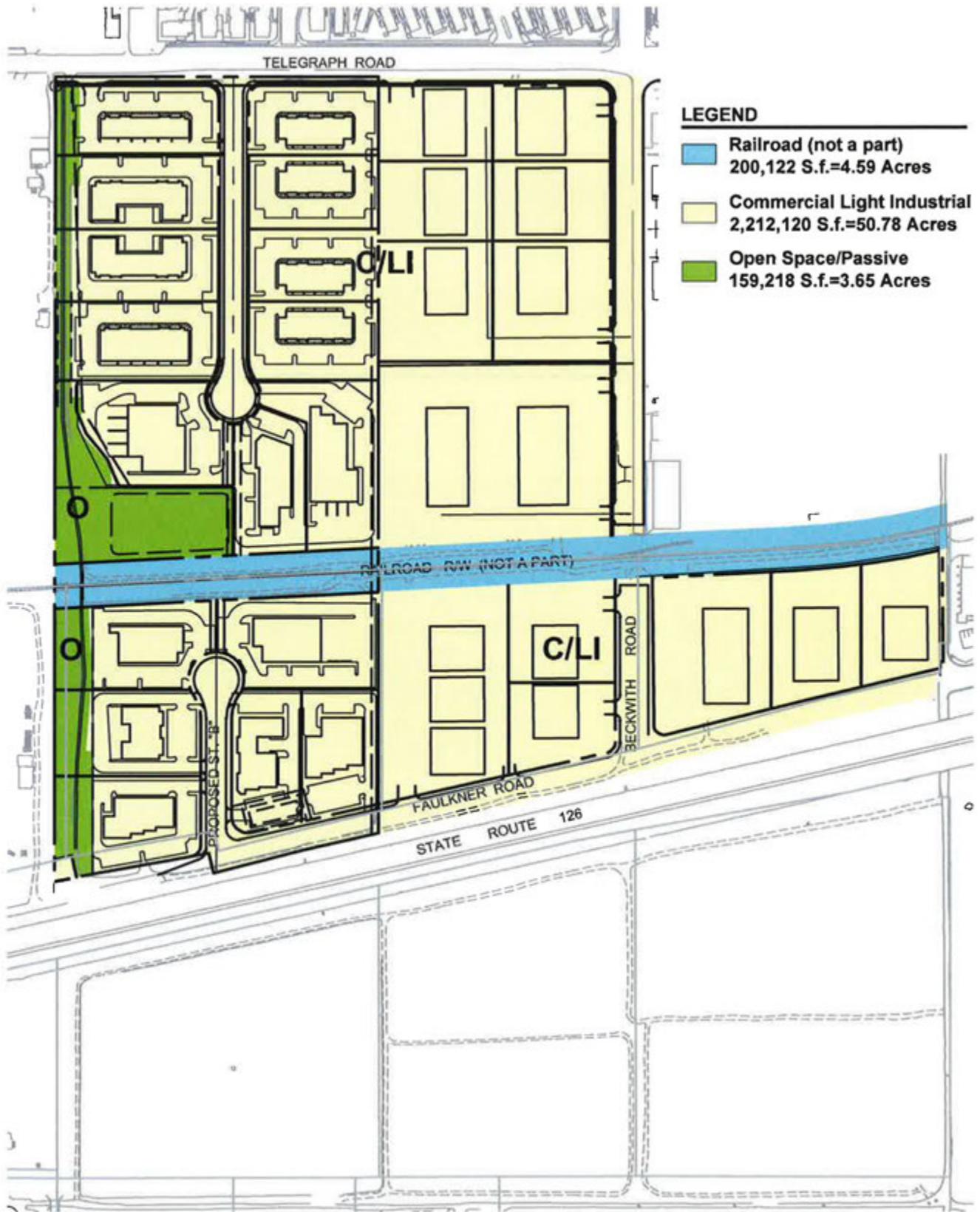
SOURCE: Jensen Design and Survey – May 2014

FIGURE 2



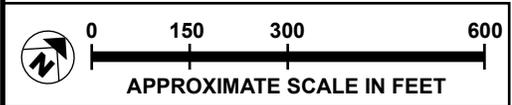
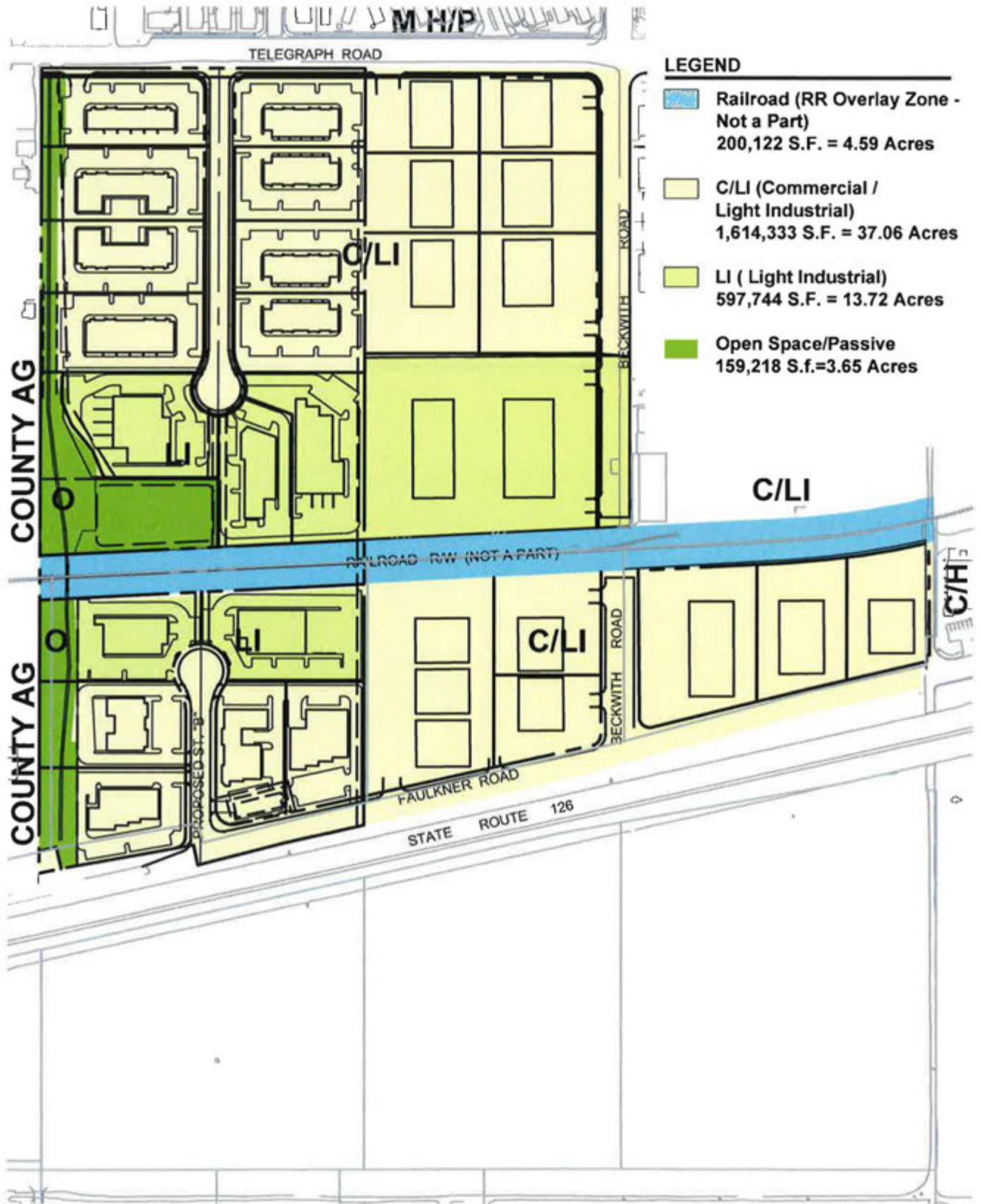
SOURCE: Jensen Design and Survey – May 2014

FIGURE 3



SOURCE: Jensen Design and Survey – May 2014

FIGURE 4



SOURCE: Jensen Design and Survey – May 2014

FIGURE 5

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov



*Serious drought.  
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September 8, 2014

Mr. Straits Perros  
City of Santa Paula  
P.O.Box 569  
Santa Paula, CA. 94061-0569

RE: IGR/CEQA No. 140905/NY  
NOP/Santa Paula West Business Park Specific Plan  
Vicinity: VEN/126/8.91-10.38

Dear Mr. Straits:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Santa Paula West Business Park Specific Plan, which will develop 2,212,120 SF of Commercial Light Industrial Space in the city of Santa Paula.

To fully analyze and evaluate the impacts of this project on the State transportation system, a traffic study in advance of the DEIR should be prepared. Please reference the Caltrans Traffic Impact Study Guide, which can be accessed on the Internet at:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

Listed below are some elements of what should be included in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to SR-126, Briggs Road & Peck Road interchanges impacted by this project.
2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.
3. Analysis of ADT, AM, and PM peak-hour volumes for both existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects and any plan-horizon years.

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, **cumulative traffic generated from all specific approved developments in the area**, and traffic growth other than from the project and developments. For example: existing + project + other projects + other growth.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
  - description of transportation infrastructure improvements
  - financial costs, funding sources and financing
  - sequence and scheduling considerations
  - implementation responsibilities, controls and monitoring

Any mitigation involving transit, HOV, or TDM must be justified and its effects conservatively estimated.

6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: Additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the projects equitable share responsibility.

For purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth.

We look forward to reviewing the DEIR and expect to receive a copy from the State Clearinghouse. However, to expedite the review process, you may send a copy in advance to the undersigned.

If you have any questions regarding this response, please call Mr. Nerses Yerjanian, the Project Engineer/Coordinator, at (213) 897-6536 and refer to IGR/CEQA # 140905/NY.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief  
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse



# DEPARTMENT OF CONSERVATION

## DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

1000 S. Hill Road, Suite 116 • Ventura, CALIFORNIA 93003

PHONE 805 / 654-4761 • FAX 805 / 654-4765 • WEB SITE [conservation.ca.gov](http://conservation.ca.gov)

September 29, 2014

Mr. Stratis Perros  
Deputy Planning Director  
City of Santa Paula  
P.O. Box 569  
Santa Paula, CA 94061-0569



**Subject: Santa Paula West Business Park Specific Plan  
Notice of Preperation of a Draft Environmental Impact Report**

Dear Mr. Perros:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Department offers the following comments for your consideration.

Based on information provided in the Specific Plan there are no oil wells located within the proposed project. Well locations can be found on the Division's website at [www.conservation.ca.gov](http://www.conservation.ca.gov), go to "Oil, Gas, and Geothermal", and then go to the link "Online Mapping System".

Furthermore, if any plugged or abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

The Division also recommends the wells within or in close proximity to project boundaries be accurately plotted on all future maps of this project, and a legible copy of the final project map be submitted to the Division.

The possibility for future problems from oil and gas wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division suggests that a diligent effort be made to avoid building over any plugged and abandoned well.

**Santa Paula West Business Park Specific Plan**  
**Notice of Preperation of a Draft Environmental Impact Report**  
Page 2 of 2

To ensure proper review of projects, the Division has available an informational packet entitled, "Construction-Site Plan Review Program. This document is available on the Division's website at [www.conservation.ca.gov](http://www.conservation.ca.gov)., go to "Oil, Gas, and Geothermal", then go to "Construction Site Review".

Prior to commencing operations, the project applicant should consult with our office for information on the wells located in the project area.

Thank you for the opportunity to comment on the proposed Santa Paula West Business Park Specific Plan. If you have any questions, please contact me at (805) 654-4761 or via email at [bhesson@consvr.ca.gov](mailto:bhesson@consvr.ca.gov).

Sincerely,



Bruce H. Hesson, P.E.  
District Deputy - Ventura

cc: DOGGR- HQ, Adele Lagomarsino



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

*EDMUND G. BROWN JR., Governor*  
*CHARLTON H. BONHAM, Director*



September 26, 2014

Mr. Stratis Perros  
Deputy Planning Director  
City of Santa Paula  
P.O. Box 569  
Santa Paula, CA 94061-0569  
[sperros@spcity.org](mailto:sperros@spcity.org)

**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Santa Paula West Business Park Specific Plan, Ventura County, SCH#2014081104**

Dear Mr. Perros:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Santa Paula West Business Park Specific plan Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*.

The proposed Specific Plan contains a comprehensive set of plans, exhibits, regulations, conditions and programs for orderly development of the Santa Paula West Business Park, which is designed to contain a combination of professional office, manufacturing, research and development, and limited commercial uses on approximately 54 acres located along the western edge of the City of Santa Paula. In addition to regulating land use, the Specific Plan addresses vehicular circulation, landscaping, pedestrian walkways, and infrastructure. The proposed Specific Plan area is bounded to the north by Telegraph Road, to the east by existing industrial and commercial development within the existing Santa Paula City limits, to the south by agriculture, and to the west by Adams Barranca. The Adams Barranca, located along the western boundary of the business park, would be zoned Open Space/Passive. The Specific Plan area also contains frontage along State Route 126 and Telegraph Road, and is bisected by the Ventura County Transportation Commission railroad right-of-way.

The Department offers the following comments and recommendations to assist the City in avoiding or minimizing potential project impacts on biological resources.

## Specific Comments

The Land Use Master Plan in the NOP (Figure 4) illustrates and reports that 3.65 acres of Open Space/Passive area would be adjacent to the Adams Barranca. The Department concurs with the Open Space zoning to facilitate stream habitat function and use of the barranca as a wildlife travel corridor. The Department recommends a minimum setback of 100-150 feet from the edge of riparian habitat. The Department also concurs with the need for biological field surveys and recommends a thorough biological assessment be completed for the Adams Barranca adjacent to the proposed Specific Plan area (see Section 4 below for more details). A review of the California Natural Diversity Database reveals that approximately 1 mile south of the proposed Specific Plan area, where the Adams Barranca drains into the Santa Clara River, the State and Federally listed Endangered least Bell's vireo (*Empidonax traillii extimus*), the California Species of Special Concern two-striped garter snake (*Thamnophis hammondi*), and Pallid bat (*Antrozous pallidus*) have been observed.

## General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or habitat values and a loss in wetland function, unless, at a minimum, project mitigation assures there will be "no net loss" of wetland habitat values, function, or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and function and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to riparian corridors must be included in the DEIR and must compensate for the loss of riparian function, value, and its use as a wildlife corridor.
  - a) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.<sup>1</sup> Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

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<sup>1</sup> Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

- b) The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or “entity”) must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department will determine whether a Lake and Streambed Alteration (LSA) Agreement with the applicant is required prior to conducting the proposed activities. The Department’s issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction’s (Lead Agency’s) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.<sup>2</sup>
2. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

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<sup>2</sup> A notification package for a LSA may be obtained by accessing the Department’s website at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend the following information be included in the DEIR:
  - a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
  - b) A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

#### Biological Resources within the Project's Area of Potential Effect

4. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DEIR should include the following information:
  - a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region.
  - b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008<sup>3</sup>). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
  - c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at

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<sup>3</sup>Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2<sup>nd</sup> ed.

[www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

- d) An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

#### Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:
  - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
  - b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas and refugia, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
  - c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
  - d) A cumulative effects analysis as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant

communities and wildlife habitats.

#### Mitigation for the Project-related Biological Impacts

6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human disturbance, etc.
9. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season, which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Dan Blankenship, Senior Environmental Scientist Specialist, at (661) 259-3750 or [Daniel.Blankenship@wildlife.ca.gov](mailto:Daniel.Blankenship@wildlife.ca.gov).

Sincerely,



Betty J. Courtney  
Environmental Program Manager I

ec: Christine Found-Jackson, CDFW, Glendale  
Jeff Humble, CDFW, Ventura  
Scott Morgan (State Clearinghouse)



## VENTURA LOCAL AGENCY FORMATION COMMISSION

COUNTY GOVERNMENT CENTER • HALL OF ADMINISTRATION

800 S. VICTORIA AVENUE • VENTURA, CA 93009-1850

TEL (805) 654-2576 • FAX (805) 477-7101

WWW.VENTURA.LAFCO.CA.GOV

Dear Prospective LAFCo Applicant:

Local Agency Formation Commissions (LAFCos) are independent governmental agencies responsible for promoting orderly development through the logical formation and determination of local agency boundaries. LAFCos implement the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000 et seq.), which grants them broad authority to review, consider, modify, condition, and approve or disapprove requests for changes of organization, including annexations.

In reviewing any request for a change of organization, LAFCos must consider numerous factors such as, but not limited to, land use; the need for organized community services; the effect on the cost and adequacy of services in the area and adjacent areas; the ability of the city or district to provide services; the availability of water supplies; consistency with regional transportation plans and city/county general and specific plans; and the effects on agricultural lands. In addition, LAFCos must comply with laws pertaining to environmental protection, land conservation, public records, open meetings and taxation. The Ventura LAFCo has also adopted local policies which must be given great weight as part of its consideration of proposals. These policies, along with LAFCo's operational rules and regulations, are set forth in the *Commissioner's Handbook*, which is available on the LAFCo website: [www.ventura.lafco.ca.gov](http://www.ventura.lafco.ca.gov).

Regardless of your agency's level of familiarity or experience with the LAFCo application process, we strongly encourage all prospective applicants to consult with Ventura LAFCo staff prior to submitting an application. Although the LAFCo application requirements are generally the same for each boundary change proposal, there may be exceptions depending on the complexity, scope, and location. During the pre-application consultation, a detailed explanation of the application requirements and all information necessary to process the request will be provided. Meeting all of the requirements in the initial application submittal is the best way to minimize processing time and costs. Generally speaking, it takes between three and four months from the time an application is submitted to the time it can be recorded (for proposals that are approved). However, it can take significantly longer if the application does not include all of the required information.

Pre-application consultations are available free of charge in most cases unless multiple meetings are required. Optimally, the consultation process should occur before your agency initiates the environmental review process and well before a resolution to initiate a change of organization is adopted. Please take advantage of the LAFCo staff to help make your LAFCo experience as efficient and cost effective as possible.

Sincerely,  
Ventura Local Agency Formation Commission



## VENTURA LOCAL AGENCY FORMATION COMMISSION

COUNTY GOVERNMENT CENTER • HALL OF ADMINISTRATION

800 S. VICTORIA AVENUE • VENTURA, CA 93009-1850

TEL (805) 654-2576 • FAX (805) 477-7101

WWW.VENTURA.LAFCO.CA.GOV

September 30, 2014

Mr. Stratis Perros, Deputy Planning Director  
City of Santa Paula  
P.O. Box 569  
Santa Paula, CA 94061-0569

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for Santa Paula West Business Park Specific Plan

Dear Mr. Perros:

Thank you for providing the Ventura Local Agency Formation Commission (LAFCo) with the opportunity to review the NOP for the Santa Paula West Business Park Specific Plan Draft EIR. As a responsible agency under the California Environmental Quality Act (CEQA), LAFCo is charged with ensuring that environmental documents prepared by lead agencies address the issues that relate to LAFCo's scope of authority. Please note that these comments are solely those of the LAFCo staff, and the NOP has not been reviewed by the Commission.

### **Project Description**

The project involves the approval of a Specific Plan for the development of a "Business Park" (i.e., a combination of office, manufacturing, research and development, and other commercial uses) on an approximately 54-acre area located west of and contiguous to the City of Santa Paula. The proposed development requires that the project area be annexed to the City of Santa Paula. The majority of the site is being used for agriculture, and the entire project area has a County General Plan designation of Agricultural – Urban Reserve. The City's General Plan designates the project area as Mixed Use Commercial/Light Industrial.

Annexation of the proposal area to the City requires LAFCo approval of several changes of organization, collectively referred to as a reorganization. The project description should include the following necessary components of the reorganization:

- Annexation to the City of Santa Paula
- Detachment from the Ventura County Resource Conservation District
- Detachment from County Service Area Nos. 32 and 33
- Detachment from the Ventura County Fire Protection District

Therefore, the EIR should identify LAFCo as a responsible agency whose approval is required in conjunction with the development of the proposed project.

Additionally, the project description should specify the Assessor's Parcel Numbers (APNs) that are the subject of the Specific Plan. If any portion of the proposal area to be annexed to the City is located outside of the City's sphere of influence, an amendment to the City's sphere will be required, and LAFCo policies pertaining to sphere amendments will apply.

### **LAFCo Policies**

LAFCo's purposes are to (1) discourage urban sprawl, (2) preserve open space and prime agricultural land, (3) efficiently provide government services, and (4) encourage the orderly formation and development of local agencies, such as cities (Government Code § 56301). The Ventura LAFCo has adopted local policies that it must consider when making decisions on reorganization proposals. Specifically, the policies found in Division 3 of the Ventura LAFCo Commissioner's Handbook ("Handbook") apply to the proposed project. The Handbook is available on the Ventura LAFCo website at [www.ventura.lafco.ca.gov](http://www.ventura.lafco.ca.gov), and can be found under the "Policies" tab.

The topics identified for study in the EIR appear to be sufficient to address those general topics and items important to LAFCo review, including the following:

#### *Proposed City Boundaries*

It appears that the railroad, which bisects the project area, is not proposed as part of the Specific Plan or for annexation to the City. Exclusion of the railroad right-of-way from the proposed reorganization may be inconsistent with Handbook policies that would create the distortion of existing boundaries [Handbook Sections 3.3.1.2(a) and 3.3.2.2(c)]. Note that all portions of the railroad right-of-way that are surrounded on both sides by the City are located within the City.

#### *Flooding*

Handbook Section 3.3.1.2(h) discourages approval of a proposal that would accommodate new development within a hazardous area, unless the hazard can be adequately mitigated. The EIR should include an evaluation of flooding hazards, and should specifically address flooding of Adams Barranca, a drainage channel that is located along the western boundary of the project site.

#### *Agricultural Land*

In making determinations regarding reorganization proposals (and sphere of influence amendments), LAFCo is required to apply the definition of prime agricultural land found in Government Code § 56064. Based on a preliminary review of the project area, it appears that the entire proposal area consists of prime agricultural land that would be converted in order to accommodate the proposed development. Handbook Section 3.3.5 includes policies that apply to proposals involving the conversion of agricultural land to other uses. Because the project site is located on land qualifying as prime

agricultural land, in order for LAFCo to approve the reorganization, LAFCo must determine, among other things, that “insufficient non-prime agricultural or vacant land exists” within the City [Handbook Section 3.3.5.1(c)] and make findings pursuant to Section 3.3.5.2. Vacant land in the City, along the City’s southern boundary between Highway 126 and the Santa Clara River, might be able to accommodate development similar to that proposed, and should be evaluated for consistency with Handbook Section 3.3.5.

The EIR should evaluate loss of agricultural land in general, and prime agricultural land in particular. If agricultural land would be lost or otherwise impacted by the project, regardless of whether the development is located on the proposed site or on an alternative site, the City should incorporate into the project description and evaluate in the EIR feasible mitigation measures that reduce the potential impacts to agricultural resources, including agricultural buffers that would minimize conflicts between agricultural and non-agricultural uses.

#### *Utilities and Service Systems*

The NOP states that the EIR will include a water supply assessment. The evaluation should also contain an assessment of potable and non-potable water demand, as well as wastewater supply and demand.

#### **Additional Comments**

Since development of alternative sites may require LAFCo action, LAFCo staff suggests that the EIR include an evaluation of each potential project site’s consistency with LAFCo policies. If the EIR does not address LAFCo’s policies, LAFCo staff will require this information from the City before any application for reorganization can be accepted by LAFCo as complete for filing purposes.

The Ventura LAFCo encourages prospective applicants to meet with LAFCo staff early in the planning process (see the attached letter from the Commission). We find that such consultation and on-going communication is helpful to clarify the nuances of LAFCo requirements and to avoid delays later in the process.

LAFCo staff requests to be notified when the Draft EIR is available for review, and will provide further comments at that time, if necessary.

Please feel free to contact me should you have any questions.

Sincerely,



Andrea Ozdy  
Analyst

Attachment

## PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500  
LOS ANGELES, CA 90013  
(213) 576-7083



September 24, 2014

Stratis Perros  
City of Santa Paula  
P.O. Box 569  
Santa Paula, CA 94061

Dear Mr. Perros:

Re: SCH 2014081104 Santa Paula West Business Park Specific Plan - NOP

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Branch (RCEB) is in receipt of the *Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)* from the State Clearinghouse for the proposed City of Santa Paula (City) West Business Park Specific Plan.

The project areas are located on both sides and within the vicinity of an active railroad track. Beckwith Road is situated north of the Ventura County Transportation Commission (VCTC) rail tracks. An existing private at-grade crossing, Todd Lane, is located approximately one (1) block further east. According to the NOP, the areas along the VCTC railroad right-of-way (ROW) would be improved with landscaped screening along the railroad corridor, and the at-grade crossing will be realigned approximately 100 feet to the east to align with Beckwith Road.

Construction of any new rail crossing for public use will require a formal application to the Commission for approval. More information can be found on the Commission's website: <http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/formalapps.htm>. In addition, RCEB recommends that the City add language to the Specific Plan so that any future development adjacent to or near the railroad/light rail ROW is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

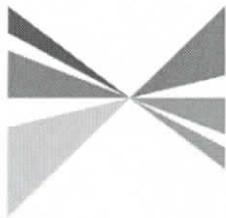
If you have any questions in this matter, please contact me at (213) 576-7076, [ykc@cpuc.ca.gov](mailto:ykc@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Chiang".

Ken Chiang, P.E., Utilities Engineer  
Rail Crossings Engineering Branch  
Safety and Enforcement Division

C: State Clearinghouse



**ASSOCIATION of GOVERNMENTS**

**Main Office**

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October 3, 2014

Mr. Stratis Perros, Deputy Planning Director  
City of Santa Paula  
P.O. Box 569  
Santa Paula, California 94061-0569  
Telephone: (805) 933-4214  
E-mail: [sperros@spcity.org](mailto:sperros@spcity.org)

**RE: SCAG Comments on the Notice of Preparation of an Environmental Impact Report for Santa Paula West Business Park Specific Plan [SCAG NO. IGR8179]**

Dear Mr. Perros,

Thank you for submitting the Notice of Preparation of an Environmental Impact Report for Santa Paula West Business Park Specific Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of an Environmental Impact Report for Santa Paula West Business Park Specific Plan. The proposed project contains a comprehensive set of plans, exhibits, regulations, conditions and programs for orderly development of the Business Park, which is designed to contain a combination of office, manufacturing, research and development, professional office, and limited commercial uses. Additionally, the proposed project would address vehicular circulation, landscaping, pedestrian walkways and infrastructure.

**When available, please send environmental documentation to SCAG's office in Los Angeles or by email to [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov) providing, at a minimum, the full public comment period for review.** If you have any questions regarding the attached comments, please contact Lijin Sun, Senior Regional Planner, at (213) 236-1882 or [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov). Thank you.

Sincerely,

Jonathan Nadler,  
Manager, Compliance and Performance Assessment

<sup>1</sup> SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF  
AN ENVIRONMENTAL IMPACT REPORT FOR  
SANTA PAULA WEST BUSINESS PARK SPECIFIC PLAN [SCAG NO. IGR8179]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

**2012 RTP/SCS Goals**

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 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 socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

<b>SCAG 2012 RTP/SCS GOALS</b>	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS Goals		
Goal		Analysis
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
etc.		etc.

**RTP/SCS Strategies**

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

**Regional Growth Forecasts**

At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

Forecast	Adopted SCAG Region Wide Forecasts		Adopted City of Santa Paula Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	35,400	38,800
Households	6,458,000	7,325,000	10,000	11,100
Employment	8,414,000	9,441,000	9,700	10,500

**MITIGATION**

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR AppendixG ExampleMeasures.pdf>

**From:** Calderon, Eduardo  
**To:** [Stratis Perros](#)  
**Subject:** Santa Paula Business Park Plan  
**Date:** Thursday, September 04, 2014 11:43:58 AM  
**Attachments:** [image001.jpg](#)

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Hi,

Just to let you know that we received the Notice of Preparation for Santa Paula West Business Park.

When you receive the SCE plans or any plans that show a type of joint trench, can you send it to TWC? We would like to place our conduit in for future.

Let me know if you have questions.

Thank you



Eduardo Calderon

Zone 2 Construction Coordinator

2525 Knoll Dr, Ventura CA 93003

O. 805.477.4410

C. 805.391.3207

F. 805.644.9324

[eduardo.calderon@twcable.com](mailto:eduardo.calderon@twcable.com)

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**PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic, Advance Planning & Permits Division  
MEMORANDUM**

**DATE:** September 11, 2014

**TO:** RMA – Planning Division  
Attention: Laura Hocking

**FROM:** Transportation Department *Bow*

**SUBJECT: REVIEW OF DOCUMENT 14-019** Notice of Preparation of Draft Environmental Impact Report (NOP/DEIR)  
Project: **Santa Paula West Business Park Specific Plan**  
Lead Agency: **City of Santa Paula**  
Specific Plan for 54-acre business park development within sphere of influence and CURB of the City of Santa Paula (city).  
West of Faulkner Road (city segment), west of Beckwith Road, south of Telegraph Road, east of Adams Barranca, and north of State Route 126.

Pursuant to your request, the Public Works Agency Transportation Department has reviewed the NOP/DEIR for the Santa Paula West Business Park Specific Plan.

The project is a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) to evaluate the environmental impacts of the Santa Paula West Business Park Specific Plan. The environmental document will contain a comprehensive set of plans, exhibits, regulations, conditions, and programs for the orderly development of the Business Park with office, manufacturing, research and development, professional, and limited commercial land uses on approximately 54 acres located west of the city limits within the Sphere of Influence and City Urban Restriction Boundary (CURB). The anticipated land uses are commercial/light industrial (37.48 acres, 68.8%), roadways (13.3 acres, 24.5%), and open space (3.65 acres, 6.7%). The project plans to extend easterly the city portion of Faulkner Road, screen a railroad corridor with landscaping, and realign an at-grade railroad crossing to align with Beckwith Road. The project has frontage on two (2) County-maintained roadways: the County portion of Faulkner Road at the southwest corner of the development (350 feet), and Telegraph Road at the northwest corner of the development (250 feet).

We offer the following comments:

1. The Traffic Study for the DEIR should address the site-specific and cumulative traffic impacts the project may have on the County Regional Road Network and local public roads at full build out. Of particular interest are the County-maintained portions of Faulkner Road and Telegraph Road adjacent to the development.
2. The cumulative impact of this project, when considered with the cumulative impact of all other approved (or anticipated) development projects in the County, is potentially significant. The condition for paying the County Traffic Impact Mitigation Fee (TIMF) to

address the cumulative impacts of this project on the County Regional Road Network should be included in the DEIR in accordance with the terms of the Reciprocal Traffic Agreement between the City of Santa Paula and the County.

3. The Ventura Local Agency Formation Commission (LAFCo) will consider annexation of the site to the City of Santa Paula. LAFCo guidelines under Section 3.2.1 state that cities shall annex entire roadway sections and complete intersections adjacent to the territory proposed to be annexed. The DEIR should require conditions for annexing County roadways adjacent to this development, namely: Faulkner Road and Telegraph Road.
4. Please send us the DEIR when it becomes available for our review and comment.

Our review is limited to the impacts this project may have on the County's Regional Road Network.

T:\Planning\Land Development\Non\_County\14-019 (SP).doc



**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
PLANNING AND REGULATORY DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Sergio Vargas, Deputy Director – (805) 650-4077

**MEMORANDUM**

DATE: September 26, 2014

TO: Laura Hocking, RMA/Planning Technician

FROM: Sergio Vargas, P.E. – Deputy Director *S.V.*

SUBJECT: RMA 14-019 – Notice of Preparation of a Draft EIR for Santa Paula West Business Park Specific Plan, City of Santa Paula Adams Canyon, Santa Clara River Watershed, Zone 2

Pursuant to your request, this office has reviewed the subject Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) to evaluate the Santa Paula West Business Park Specific Plan forwarded by the City of Santa Paula and dated August 27, 2014. The City of Santa Paula is requesting that the Ventura County Watershed Protection District assist in identifying the scope and content of the environmental information deemed to be relevant to the statutory responsibilities of the District which should be contained and addressed in the EIR.

**PROJECT LOCATION**

The Santa Paula West Business Park Specific Plan area is bounded by Telegraph Road to the north, Beckwith Road and Todd lane to the east, State Route 126 to the south, and Adams Canyon to the west.

**PROJECT DESCRIPTION**

The Santa Paula West Business Park is a planned development consisting of a mix of light manufacturing, research and development, professional office and commercial uses that are consistent with the Commercial/Light Industrial and Light Industrial zones as defined in the City of Santa Paula Zoning Ordinance. Adams Canyon delineates the westerly boundary of the Specific Plan area, much of which is proposed to be zoned Open Space/Passive in the Specific Plan.

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

Adams Canyon is a Ventura County Watershed Protection District (District) jurisdictional red line channel and is subject to the Ventura County Watershed Protection District Ordinance WP-2 effective October 10, 2013. A significant portion of the Specific Plan area has been mapped by the Federal Emergency Management Agency (FEMA) as a 1% annual chance (100-year) floodplain for Adams Canyon; specifically an "Approximate/Unnumbered A Zone". This is evidenced on FEMA digital Flood Insurance Rate Maps 06111C0778E and 06111C0779E, effective

January 2010. The Adams Canyon floodplain extends easterly into the subject lands between 225-feet (State Route 126) and 304-feet (Telegraph Road). The District requests that the following items be addressed in the environmental document:

1. The City of Santa Paula should use the latest available floodplain information for Adams Canyon to determine the flood hazard on the subject property, this being the U.S. Army Corps of Engineers' June 2012 report entitled "Santa Clara River Watershed Feasibility Study without Project Conditions Overflow Analysis Report" prepared by CDM Smith. The City should contact the USACE or the District and request a copy of this floodplain analysis. Otherwise, the City should retain the services of a California licensed Civil Engineer to undertake an Approximate/ Unnumbered Zone A floodplain analysis to accurately determine the boundaries of the Adams Canyon Regulatory Floodway and 1% annual chance floodplain including Q100 flood elevations (Base Flood Elevations). To undertake the engineering analysis, please use the technical methodologies presented in FEMA Publication 265 "Managing Floodplain Development in Approximate Zone A Areas, (1995)". Upon completion, please circulate the engineering analysis to the District for technical review and comment. The DEIR and subsequent environmental documents should include the findings of the engineering analysis.
2. Please include a discussion in the DEIR that states the following:  
*"Adams Canyon is a Ventura County Watershed Protection District jurisdictional red line channel. In accordance with Ventura County Watershed Protection District Ordinance WP-2 effective October 10, 2013, no person shall impair, divert, impede or alter the characteristics of the flow of water running in a watercourse, or establish any new drainage connection to a District jurisdictional channel, without first obtaining a written permit from the District. Where applicable, Watercourse or Encroachment Permit applications must be submitted to the District for any proposed work. Permits are required from the District for anything proposed in, on, under, over and across a jurisdictional channel. It is the District's standard that the peak flow after development cannot exceed the peak flow under existing conditions for any frequency of event."*
3. Please include the Ventura County Watershed Protection District in the list of jurisdictional agencies that will require permits for development proposed within the bed, banks and overflow areas of Adams Canyon.

Thank you for the opportunity to comment. Feel free to contact me for any further information or if you have further questions.

**End of Text**

**VENTURA COUNTY**  
**AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Laura Hocking/Lori Gregory, Planning      DATE: September 23, 2014

FROM: Alicia Stratton

SUBJECT: Request for Review of Notice of Preparation for a Draft Environmental Impact Report for the Santa Paula West Business Park Specific Plan, City of Santa Paula (Reference No. 14-019)

Air Pollution Control District staff has reviewed the subject notice of preparation (NOP) for a draft environmental impact report (DEIR), which is a proposal for a specific plan containing a comprehensive set of plans, exhibits, regulations, conditions and programs for orderly development of the Business Park. The Business Park would contain a combination of office, manufacturing, research and development, professional office, and limited commercial uses on approximately 54 acres. The project location is unincorporated land west of the City of Santa Paula, south of Telegraph Road, and east of the Adams Barranca.

Air quality is identified in Attachment B of the NOP as an area of potential adverse impact from the project. District staff recommends that the DEIR evaluates all potential air quality impacts that may result from the project. Specifically, the air quality assessment should consider reactive organic compound, nitrogen oxide and particulate emissions from all project-related motor vehicles and construction equipment.

A carbon monoxide screening analysis should be conducted for any project-impacted roadway intersection that are currently operating, or that are expected to operate at, Levels of Service D, E, or F, or at any project-impacted roadway intersection that may be a CO hotspot. If a potential hotspot is identified, the District recommends that a complete CALINE3 or CALINE4 carbon monoxide analysis be conducted for that intersection.

This project will involve a large amount of grading of soil. The California Air Resources Board (CARB) has identified diesel exhaust particulate matter as a Toxic Air Contaminant (TAC). Diesel exhaust includes hundreds of different gaseous and particulate components, many of which are toxic. The earthmoving equipment has the potential to expose sensitive populations in the vicinity to elevated levels of diesel exhaust. We recommend that a screening health risk assessment be conducted for the project to assess the potential health risks on any nearby sensitive receptors, such as schools, hospitals, day care centers, retirement homes, and residences. Mitigation

measures should also be identified and discussed if the assessment indicates a significant risk. Additional information on TACs can be obtained from the District's website at [http://www.vcapcd.org/air\\_toxics.htm](http://www.vcapcd.org/air_toxics.htm). If you have any general questions regarding air toxics, please contact Terri Thomas of the APCD at (805) 645-1405 or by email at [terri@vcapcd.org](mailto:terri@vcapcd.org).

If the project is determined to have a significant impact on regional and/or local air quality, the DEIR should include all feasible mitigation measures. Moreover, any project design features that mitigate air quality impacts should also be described in the DEIR.

If you have any questions, please call me at (805) 645-1426.

# county of ventura

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September 29, 2014

City of Santa Paula  
Mr. Stratis Perros, Deputy Planning Director  
P.O. Box 569  
Santa Paula, CA 94061-0569

E-mail: [sperros@spcity.org](mailto:sperros@spcity.org)

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report, Santa Paula West Business Park Specific Plan

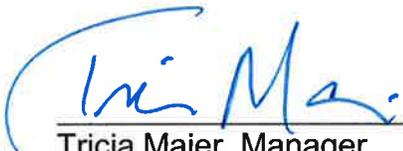
Dear Mr. Perros:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,

  
\_\_\_\_\_  
Tricia Maier, Manager  
Planning Programs Section

Attachments

County RMA Reference Number 14-019





**City of Santa Paula**  
**Santa Paula West Business Park Specific Plan**  
**EIR Scoping Meeting**  
 September 9, 2014

Please Sign In (print)

Name	Address	City/Zip Code	Phone	E-Mail Address
ILAN BENDER	957 FAULKNER RD, S.P	S P 93060	818 3790916	ILAN@BENDERFARMS.COM
Rosa Rodriguez	957 Faulkner Rd Suite 112	Santa Paula 93060	805-331-0152	rosar@benderfarms.com
Tony Locacciatto	860 Hampshire Rd. Westlake	Westlake 91361	805-367-5720	tllocacciatto@mendianconsultantsllc.com
CHAD PENROD	860 HAMPSHIRE RD STE U	WESTLAKE VILLAGE 91311	805-373-8800	C.PENROD@PARKSTONEINC.COM
MIKE PENROD	" "	" "	" "	M.PENROD@PARKSTONEINC.COM
STEVEN LATTIMORE	1146 SAN ROAD	SANTA PAULA 93060	805-575-6088	LATTIMORE@HUMNET.UCLA.EDU
Stratis Perros	200 S. 10th St. San	Santa Paula 93060	805-933-4214	sperros@spcity.org
BRIAN MCCORMACK	680 HAMPSHIRE RD. WESTLAKE	91361	805 367 5700	bmcormack@mendianconsultantsllc.com