



Volume I Final Program Environmental Impact Report

Santa Paula
2040 General Plan Update
State Clearinghouse #2017111033

Lead Agency:
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061

Contact: James Mason,
Community Development Director
805-933-4214 x251

March 4, 2020



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City of Santa Paula
2040 General Plan Update
Final Program EIR

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1. Introduction

This Final Environmental Impact Report (Final EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines (§15132). The City of Santa Paula (City) is the lead agency for the environmental review of the proposed 2040 General Plan (the “proposed Project”). The City has the principal responsibility for approving the proposed Project.

1.1 Background and Purpose of the EIR

The following is an overview of the environmental review process for the proposed Project that led to the preparation of this Final EIR.

Notice of Preparation

A Notice of Preparation (NOP) for the Draft EIR was issued February 1, 2017. The NOP was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments. A revised NOP was published on November 8, 2017. The revised NOP reflected comments received on the original NOP. Both NOPs and the comment letters received are included in Appendix A (contained in Volume III) of the Final EIR. Public scoping meetings were held on March 2, 2017 and November 28, 2017 regarding the NOP and Revised NOP, respectively.

Draft EIR

A Notice of Availability for the Draft EIR was posted on the City’s website (www.mysantapaula.com) and distributed to interested parties on December 20, 2019. The Draft EIR was released for public and agency review for a 49-day review period ending on February 7, 2020. A public workshop to review the Draft General Plan and Draft EIR was conducted on February 27, 2020, and the Planning Commission held public hearings on January 28 and February 25, 2020, to receive comments on the Draft EIR. Comments received during the public review period are addressed in Section 2 below.

The Draft EIR contains a description of the proposed Project, a description of the environmental setting, identification of Project impacts, and mitigation measures that could reduce impacts found to be significant, as well as an analysis of alternatives to the Project.



Final EIR

The City received comment letters from public agencies and the public regarding the Draft EIR. The City's responses to those comments are presented in Section 2, below, as required by CEQA. As prescribed by CEQA Guidelines §15088 and §15132, the City as lead agency is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This Final EIR contains individual responses to each comment received during the public review period for the Draft EIR. In accordance with CEQA Guidelines §15088(c), the written responses describe the disposition of significant environmental issues raised. The City has provided a good faith effort to respond in appropriate detail to all significant environmental issues raised by the comments. In many cases, the responses to comments also include revisions to the Draft EIR, which are presented in Volume II, the Revised Draft EIR in ~~strikeout~~/underline format. Volume III includes the EIR Appendices. Together, the three volumes constitute the Final EIR.

Certification of the Final EIR and Consideration of Project Approval

Prior to making a decision to approve the Project, the City must review and consider the Final EIR. The Santa Paula City Council is the final decision-maker for the proposed Project, and the Planning Commission has authority to make recommendations to the City Council regarding the Project. If the City finds that the Final EIR is "adequate and complete," the City may certify the Final EIR. The rule of adequacy generally holds that the EIR can be certified if it: 1) shows a good faith effort at full disclosure of environmental information; and 2) provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may take action to adopt, revise, or reject the proposed Project. A decision to approve the Project must be accompanied by written findings in accordance with CEQA Guidelines §15091 and §15093. *California Public Resources Code* §21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. In the case of the Santa Paula 2040 General Plan, no mitigation measures are included in the EIR, because all feasible strategies to reduce potentially significant impacts have been incorporated into the General Plan as policies and programs. Therefore, a mitigation monitoring and reporting program is not required.

1.2 Intended Uses of the EIR

This Final EIR is intended to evaluate the environmental impacts of the Santa Paula 2040 General Plan in accordance with CEQA Guidelines §15120 et seq. and will be used as a primary environmental reference document to evaluate subsequent planning and permitting actions.



2. Comments and Responses

2.1 Requirements for Responding to Comments on a Draft EIR

CEQA Guidelines §15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the project's significant effects might be avoided or mitigated. The Guidelines also note that commenters should include an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines §15064, an effect is not considered significant in the absence of substantial evidence supporting such a conclusion.

CEQA Guidelines §15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines §15204).

CEQA Guidelines §15088 recommends that where a response to comments results in revisions to the Draft EIR, those revisions be incorporated as a revision to the Draft EIR or as a separate section of the Final EIR. The Revised Draft EIR incorporating changes in response to comments is incorporated as Volume II of this Final EIR and changes that have been made to the Draft EIR are shown in ~~strikeout~~/underline format. Those changes also include clerical corrections and revisions made by the City to improve the clarity of the analysis.

Some comments addressed the content of the Draft 2040 General Plan but not the Draft EIR. Comments on the Draft General Plan that are not germane to the analysis of environmental impacts do not require detailed responses in this Final EIR, as provided under CEQA. However, general responses are included for completeness and to inform the decision-making process.



2.2 List of Commenters

Table 2-1 below lists the agencies and individuals who submitted written comments on the Draft General Plan and EIR during the public review period.

Table 2-1 Comments Received on the Draft 2040 General Plan and Draft EIR

Commentor	Date
Public Agencies	
Ventura County Resource Management Agency/Public Works/Watershed Protection	1/22/2020
Ventura County Air Pollution Control District	1/27/2020
Caltrans District 7	2/3/2020
Ventura Local Agency Formation Commission	2/3/2020
Ventura County Resource Management Agency /Biological Resources	2/6/2020
Ventura County Resource Management Agency /Public Works-Watershed Protection	2/6/2020
Ventura County Resource Management Agency /Planning Division/General Plan Update Section	2/6/2020
Ventura County Resource Management Agency /Planning/Planning Programs	2/7/2020
Ventura County Resource Management Agency /Planning Division/Long Range Planning Section	2/7/2020
Ventura County Transportation Commission	2/7/2020
Individuals	
John Kular, P.E.	1/6/2020
S.S. Newby	1/23/2020
330 ½ S. 8 th St (online comment - name not provided)	2/1/2020
428 Anacapa Terrace (online comment - name not provided)	2/3/2020
428 Anacapa Terrace (online comment - name not provided)	2/11/2020

2.3 Comments and Responses

Written comments submitted on the Draft EIR are reproduced on the following pages, and responses to those comments are provided in **Table 2-2** at the end of this section. Margin notes that correlate with the response numbers in Error! Reference source not found. have been added to the comment letters.



Ventura County Resource Management Agency
January 22, 2020



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

MEMORANDUM

DATE: January 22, 2020
TO: Anthony Ciuffetelli, RMA Planner
County of Ventura
FROM: Sergio Vargas, Deputy Director *SV*
SUBJECT: RMA17-007-2 Santa Paula 2040 General Plan
Zone 2
Watershed Protection Project Number: WC2019-0046

Pursuant to your request dated December 23, 2019, this office has reviewed the submitted materials and provides the following comments. Please note that we responded to a similar request on our memo dated August 8, 2019.

PROJECT LOCATION:

City of Santa Paula

PROJECT DESCRIPTION:

This General Plan is a comprehensive vision statement about how the City of Santa Paula desires to grow, reflecting community priorities and values for the future. The General Plan is also the legal foundation for all City land use decisions.

WATERSHED PROTECTION DISTRICT COMMENTS:

1. Much of the regional drainage infrastructure within the City of Santa Paula is deficient. For example, Peck Road drain has been identified as deficient and in need of rehabilitation. New development and major redevelopment should consider the drainage needs of the larger system and funding mechanisms to contribute to needed capital improvements. VCWPD suggests amending Program HPS 2.b (Master Plan of Storm Drains) to include a discussion of funding mechanisms or creating a new policy to directly support funding for storm water infrastructure. Please consider updating the Draft General Plan Programs and Policies to address this topic.
2. Page 5-8 states: *“The VCWPD has authority over “redline” channels, which are those containing runoff with a peak flow rate of 500 cubic feet per second (cfs) or more during a 100-year storm. VCWPD has authority to maintain and construct flood control facilities on all major channels, including...”*. VCWPD has jurisdiction

VCWP-1

VCWP-2



RMA17-007-2 Santa Paula 2040 General Plan
January 22, 2020
Page 2 of 2

over all redline channels as described in Ordinance WP-2. VCWPD maintains facilities within its right of way but does not maintain all jurisdictional channels. Please revise this section to accurately describe the District's responsibility.

VCWP-2

3. Page 5-10 states: *VCWPD ensures compliance with the National Flood Insurance Program (NFIP) through permit review of structures and evaluation of site plans for developments in floodplains.* Please revise. The Ventura County Public Works Agency administers the NFIP within the County unincorporated area. The City of Santa Paula administers the NFIP for areas within the incorporated limits.

VCWP-3

END OF TEXT



Ventura County Air Pollution Control District
January 27, 2020



Ventura County
Air Pollution
Control District

669 County Square Dr
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Dr. Laki Tisopoulos, P.E.
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Jeff Mitchem, City of Santa Paula Planning Manager

DATE: January 27, 2020

FROM: Nicole Collazo, Air Quality Specialist

SUBJECT: Public Comment Review Period for City of Santa Paula 2040 Draft
General Plan Update and Draft Environmental Impact Report (DEIR)
(Reference No. County RMA 17-007-2)

Air Pollution Control District (District) staff has reviewed the prepared DEIR for the Draft 2040 General Plan Update (GPU) for the City of Santa Paula (City). The General Plan will address the City’s vision for development to the horizon year of 2040 and contains goals, objectives, and policies that will govern the growth of the City of Santa Paula and the management of its resources. The Lead Agency is the City of Santa Paula.

APCD staff reviewed the Air Quality and Greenhouse Gases Section of the DEIR for the GPU. The following are APCD’s comments pursuant to the California Government Code §65302.1(d).

We would like to note that our public comment submitted on July 30, 2019 is not attached to the project’s document labelled “Public Comments & Responses- Prelim Draft 2040 General Plan- July 2019” located in the project website’s Documents Section. For convenience, we have attached the public comment to this memo.

Section 4.4- Air Quality and Greenhouse Gas Emissions

Item 1- Several of the references that contain weblinks are invalid and documents are not accessible. These include reference nos. 27, 28, 30, 35, and 37. Pursuant to CEQA Guidelines §150150(b), incorporated references shall at a minimum be made available to the public in an office of the Lead Agency and the EIR should state where the incorporated documents will be made available to the public. The project’s website does not contain these incorporated referenced documents.

APCD-1



Item 2- The City’s DEIR states that “The discussion of environmental impacts considers both direct and indirect impacts of the proposed Plan as well as short-term impacts (primarily during construction) and long-term impacts related to ongoing operations” (Page 2-3) and that “The 2040 planning horizon requires that individual projects assumed to occur under the Plan are identified at a conceptual level.” (Page 2-2). The emissions presented (Table 4.4-8, -10, -11, -12) are based on SCAG’s 2016 Regional Transportation Plan (RTP) and are county-wide for Ventura, not specific to the City of Santa Paula. The emissions inventories are only specific to transportation sources and the county’s total emission estimates of indirect sources (electricity, natural gas usage, water) and does not include commercial/industrial stationary sources (concrete batch plants, hospitals, auto-body shops, oil and gas production), direct wastewater treatment sources, solid waste, and landscape equipment currently operating within the City of Santa Paula for baseline (existing) conditions and projected future growth (project). According to the SCAG 2016 RTP Final Environmental Impact Report (FEIR), “It is important to note that the Plan is not responsible for addressing sectors beyond transportation, building, and water-related energy consumption. This is due to the fact that the Plan is primarily a transportation plan with land use development strategies.” and only account for 70% of emissions (Page 84). Emission inventories and air quality impacts have been estimated for adopted General Plan Updates such as the City of Simi Valley¹ and pending General Plan Updates such as the County of Ventura².

APCD-2

Item 3- Program ECR 2.a includes avoiding “locating sensitive receptors near sources of pollutant emissions such as high-volume roadways”. The DEIR air quality section on toxics acknowledges that the SR-126 through the City is not yet considered a high-volume roadway (48,000 trips per day in 2014), as recommended by the California Air Resources Board (CARB) (Page 4.4-26). However, as a GPU with a planning horizon year of 2040, we recommend this discussion or Program to include the projected year of when the City’s portion of the SR-126 would become a high-volume roadway, or if it has already reached this daily amount. We note that the CARB does not have a definition for rural or urban road as it relates to the recommended advisory. According to the US Census information, the City of Santa Paula is considered a rural city³.

APCD-3

Thank you for the opportunity to review your City’s Draft General Plan and Draft Environmental Impact Report. If you have any questions, please call me at (805) 645-1426 or email nicole@vcapcd.org.

¹<https://www.simivalley.org/departments/environmental-services/planning-division/documents-applications-and-development-activity/general-plan>

² <https://vcrma.org/vc2040.org/review/documents>

³ https://www.ers.usda.gov/webdocs/DataFiles/53180/25559_CA.pdf?v=0



Ventura County
Air Pollution
Control District

669 County Square Dr
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcopcd.org

Michael Villegas
Air Pollution Control Officer

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: James Mason, City of Santa Paula Planning Director
DATE: July 30, 2019
FROM: Nicole Collazo, Air Quality Specialist
SUBJECT: Review of Draft 2040 General Plan Update for City of Santa Paula Project No. 14-CI-03, (Reference No. RMA 17-007-1)

Air Pollution Control District (District) staff has reviewed the prepared Draft 2040 General Plan Update for the City of Santa Paula (City). The General Plan will address the community’s vision for development to the horizon year of 2040 and contains goals, objectives, and policies that will govern the growth of the City of Santa Paula and the management of its resources.

APCD staff reviewed the Air Quality and Greenhouse Gases Section C of the Draft 2040 General Plan, along with its related Policies and Programs. The following are APCD’s comments pursuant to the California Government Code §65302.1(d).

Greenhouse Gases

District staff could not find a discussion of why a Climate Action Plan (CAP) is not being proposed for the City’s community vision until horizon year 2040. Although not a requirement to include in a General Plan Update, a CAP can satisfy “the criteria in [the State CEQA Guidelines §15183.5], can be used to streamline the CEQA analysis of future projects and can make it easier to manage both implementation and consistency discussions as required in general plans and general plan EIRs” (OPR, General Plan Guidelines, Climate Change). In addition, most city jurisdictions in Ventura County have either adopted a CAP, Energy Action Plan, or Sustainability Report (Thousand Oaks, Simi Valley, Oxnard, Moorpark), are actively seeking funding (Moorpark), or are in the process of adopting one (Ventura, County of Ventura). For more information on guidance and a step-by-step approach to adopting a CAP or similar document, please see the Office of Planning and Research’s General Plan Guidelines’ Climate Change Chapter (PDF link [here](#)).

APCD-4



Policies and Programs

Regarding Program ECR 2.d, the District would like to make the City aware of its Incentive Programs that are directed at reducing emissions of criteria pollutants by reducing the amount of NO_x generated from mobile sources. NO_x when combined with ROC (VOCs) can react with sunlight to create ground-level smog. The two types of programs, Incentive Programs and Transportation Outreach Program, have a co-benefit in indirectly reducing GHG emissions as older, dirtier equipment and vehicles are traded in for newer engines that have stricter air quality emission standards or as Vehicle Miles Travelled (VMT) are reduced due to an increase in alternative modes of transportation. More information can be found [here](#) on our District Incentive Programs Website Page and [here](#) on the Transportation Outreach Program. These existing programs may be included in the City's General Plan Update in the implementation programs discussion for Program ECR 2.d, if the City should qualify for funding. Some of these programs include Lower Emission School Bus Program, EV Charging Stations Funding and Funding Agricultural Replacement Measures for Emission Reductions (FARMER).

APCD-5

The District would also like to encourage additional Programs and Implementation Measures that will further reduce the generation of mobile emissions in your jurisdiction. Many of the specific mitigation measures at the project level can be promoted at the plan level through zoning ordinances, parking standards, and design guidelines. These measures are discussed in Section 7.3, *Plan Level Mitigation* and 7.5.2 *Operational Mitigation Measures* of the APCD Air Quality Assessment Guidelines and can include the increased use of bicycle lanes, park-and-ride lots, establishing an employee rideshare program, and supporting a multi-modal transportation system in conjunction with mixed-land use practices.

APCD-6

Thank you for the opportunity to review your City's Draft General Plan. If you have any questions, please call me at (805) 645-1426 or email nicole@vcapcd.org.



**State of California – Department of Transportation, District 7
February 3, 2020**

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

February 3, 2020

Jeff Mitchem, Planning Manager
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061

RE: Santa Paula General Plan Update - Draft
Environmental Impact Report (DEIR)
Vic. VEN-150 & VEN-126, Citywide
SCH# 2017111033
GTS# 07-VEN-2017-00353

Dear Jeff Mitchem,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project is a General Plan update for the City of Santa Paula. The general plan addresses the community's vision for development in the future. The general plan includes a map of proposed urban boundaries and planned land uses. It also contains goals, objectives and policies that will govern the growth of the city of Santa Paula and the management of its resources.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. SB 743's goals include supporting infill land use, reducing greenhouse gas emissions, and supporting active transportation. As required by SB 743, Caltrans recommends the Lead Agency develop a verifiable performance-based VMT criteria. Please reference the Governor's Office of Planning and Research (OPR) for more information:
<http://opr.ca.gov/ceqa/updates/guidelines/>

CT-1

The nearest State facilities to the proposed project are SR-150 and SR-126. After reviewing the DEIR, Caltrans has the following comments:

CT-2

1. Revise Exhibit 4.17-9 to show the Class II bike lanes on 10th Street.
2. Caltrans does not identify a standard for LOS on Urban Streets, and the City's proposed standard of LOS D would only apply to City streets and intersections. Therefore, Caltrans

CT-3

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*



Jeff Mitchem
February 3, 2020
Page 2

concurs that the proposed LOS changes on Urban Streets would not conflict with Caltrans standards within the city of Santa Paula.

CT-3

- 3. As shown in Table 4.17-17, all freeway segments within Santa Paula are projected to operate at LOS D or better in the 2040 General Plan horizon year. Also, Caltrans considers LOS E acceptable for freeways and State highways. While Caltrans concurs that this will result in less than significant impacts, a VMT analysis proving a reduction in per capita VMT would result in a more appropriate impact determination.

CT-4

Further information included for your consideration;

Caltrans seeks to promote safe, accessible multimodal transportation. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

CT-5

Regarding parking, Caltrans recommends carefully considering the amount of parking required. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation suggests that the amount of car parking supplied can undermine a project's ability to encourage public transit use. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) improvement measures.

CT-6

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

CT-7

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-VEN-2017-00353.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"



Ventura Local Agency Formation Commission
February 3, 2020



VENTURA LOCAL AGENCY FORMATION COMMISSION

801 S. VICTORIA AVENUE, SUITE 301 • VENTURA, CA 93003
TEL (805) 654-2576 • FAX (805) 477-7101
WWW.VENTURA.LAFCO.CA.GOV

February 3, 2020

SENT VIA E-MAIL

Jeff Mitchem, Planning Manager
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061

Subject: Notice of Availability of the Draft 2040 Santa Paula General Plan and a Draft Environmental Impact Report (DEIR) for the Draft 2040 Santa Paula General Plan

Dear Mr. Mitchem:

Thank you for providing the Ventura Local Agency Formation Commission (LAFCo) with the opportunity to review the City of Santa Paula’s Draft 2040 General Plan and associated DEIR. The City’s effort to prepare these documents is evident and appreciated.

While LAFCo is not a responsible agency under the California Environmental Quality Act with regard to adoption of the General Plan update, it would be a responsible agency for future proposals within the General Plan’s project area that require LAFCo action. LAFCo may rely on the City’s environmental document for proposed changes of organization (e.g., annexations to the City) and amendments of the City’s sphere of influence. The comments that follow are solely those of LAFCo staff; they do not reflect determinations made by the Commission.

LAFCo-1

Project Description

The project involves a comprehensive update of the City’s existing General Plan adopted in 1998. The General Plan establishes the allowed land uses within the City, and includes a plan for future growth within and adjacent to the City (within and beyond the City’s sphere of influence¹). Components of the project include a statement of the community’s vision for development through 2040, as well as land uses, policies, and programs to govern the City’s growth and management of its resources. Among other things, the proposed General Plan is intended to promote economic development within the City’s downtown district, support infrastructure improvements and public services, encourage a wide range of housing opportunities, and update roadway design standards within the City.

¹ A sphere of influence is defined in Government Code § 56076 as the probable physical boundary and service area of a local agency, as determined by the Commission.



Jeff Mitchem
February 3, 2020
Page 2 of 4

LAFCo Law

LAFCo's purposes are to (1) discourage urban sprawl, (2) preserve open space and prime agricultural land, (3) encourage the efficient provision of government services, and (4) encourage the orderly formation and development of local agencies, such as cities (Government Code § 56301).

Although LAFCo approval is not required for the City to amend its General Plan, the City's Draft General Plan and DEIR appropriately acknowledge LAFCo's role in establishing the City's sphere of influence and acting on changes of organization (e.g., annexation of territory to the City). The General Plan should further recognize LAFCo's approval authority over new or extended services provided by the City outside its jurisdictional boundary, pursuant to Government Code § 56133.

LAFC-2

Draft General Plan and DEIR

LAFCo staff identified several sections of the Draft General Plan and DEIR that should be updated or would otherwise be improved with the inclusion of additional clarification and/or detail.

Planning Within Expansion Areas

Throughout the Draft General Plan and DEIR, there are several references to the City's requirement for specific plans to be prepared for all expansion areas prior to development. While LAFCo acknowledges the City's requirement, the Draft General Plan is inadequate as it applies to these expansion areas.

The Draft General Plan references Government Code § 65302(a), which requires that a land use element designate the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, etc. The City's planning of the Adams Canyon Expansion Area and Fagan Canyon Expansion Area designated in the City's updated General Plan does not meet these requirements. The General Plan should set forth a plan that guides future development of the City's expansion areas in compliance with Government Code § 65302. Specifically, it should provide detail with regard to the following:

- types of land use (i.e., proposed general distribution and general location and extent of the uses of the land);
- circulation (i.e., general location and extent of existing and proposed major thoroughfares and transportation routes);
- infrastructure and public facilities (i.e., general location and extent);
- hazards (e.g., seismically-induced surface rupture, ground-shaking, slope instability leading to mudslides and landslides, flooding, and wildland and urban fires); and
- open space planning.

LAFC-3



Jeff Mitchem
February 3, 2020
Page 3 of 4

Ventura-Santa Paula Greenbelt Agreement

Greenbelt agreements are voluntary agreements between the County and one or more cities that protect open space and agricultural lands from being prematurely converted to urban uses. The discussion of the Ventura-Santa Paula Greenbelt Agreement relies on an outdated description of the Greenbelt (pages 2-51 and 4-3 of the Draft General Plan and page 4.11-9 of the DEIR). The description should be updated to reflect that the Greenbelt is bounded on the north by the Ojai Area of Interest, on the east by the City’s Adams Canyon Expansion Area, on the south by the Las Posas Area of Interest (generally), and on the west by the Ventura Area of Interest.

LAFC-4

Water Supply

The analysis of future water supply identifies State Water Project (SWP) water as a potential source of additional water supply for the City (page 6-24 of the Draft General Plan); however, SWP water is not discussed in the DEIR or included in the table of projected potable water supplies (Table 4.18-4 on page 4.18-6 of the DEIR). The discussion of SWP water should either be elaborated to include the likelihood and potential methods of obtaining SWP water, or should be removed entirely.

LAFC-5

Schools

The Santa Paula Unified School District provides public education to the Santa Paula community. The DEIR documents that a potential school site has been identified in the Adams Canyon Expansion Area, and that although new residential development would result in the addition of students and place greater demand on existing schools, Government Code § 65995(h) considers development fees authorized by Senate Bill 50 to be “full and complete mitigation” of impacts related to school facilities. The environmental analysis should include an evaluation of the expected increase in the demand on school facilities that would occur as a result of the anticipated land uses within the updated General Plan, even if school fees qualify as financial mitigation for the deficiency in school facilities and the need for additional schools has been identified.

LAFC-6

Additional Comments

LAFCo staff identified several minor errors within the Draft General Plan and DEIR (e.g., “sphere of influence” is sometimes labeled as “sphere of interest”). Please contact me if you would like our list of minor corrections to the Draft General Plan and DEIR. Additionally, for your reference, the LAFCo Commissioner’s Handbook is available on the Ventura LAFCo website at ventura.lafco.ca.gov, and can be found under the *Policies and Laws* tab.

LAFC-7

Please contact me if you have any questions.



Jeff Mitchem
February 3, 2020
Page 4 of 4

Sincerely,

Andrea Ozdy

Andrea Ozdy
Deputy Executive Officer



**Ventura County Resource Management Agency, Planning Division
February 6, 2020**



Memorandum

County of Ventura • Resource Management Agency • Planning Division
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • ventura.org/rma/planning

DATE: February 6, 2020
TO: City of Santa Paula
FROM: Abigail Convery, Ventura County Planning Division Staff Biologist
SUBJECT: Notice of Availability of a Draft Program Environmental Impact Report & General Plan. RMA 17-007-2.

I have reviewed the City of Santa Paula's Draft Program Environmental Impact Report (PEIR) and General Plan (RMA 17-007-2), which covers areas adjacent and within unincorporated Ventura County.

Biological Resource Analysis

1. Regional Habitat Connectivity and Wildlife Corridor

Santa Paula Creek is a part of the network of regional wildlife corridors associated with the Santa Monica-Sierra Madre Connection and the Santa Clara River Connection within Ventura County's Habitat Connectivity and Wildlife Corridors. The Santa Paula Creek corridor connects various core habitat areas throughout the County and beyond. The creek is particularly important connector for southern steelhead trout, in addition to other sensitive species within the County's watershed.

The County's General Plan includes the regional Habitat Connectivity and Wildlife Corridor location and description within all our planning documents (i.e., the General Plan's Background Information, Resource Appendix, Definitions related to the Corridor in Glossary, and Policies in Section 1.5 (Biological Resources)). Since the portion of Santa Paula Creek runs through Santa Paula, there is a gap in the recognition of this important regional corridor in planning documents. The County respectfully requests that the City also incorporate Santa Paula Creek as a regional wildlife corridor within the City's General Plan. For more information on cited text and the Habitat Connectivity and Wildlife Corridor, please see the County's website at:

<https://vcrma.org/habitat-connectivity-and-wildlife-movement-corridors> and
<https://vcrma.org/ventura-county-general-plan>

Within expansion areas, important connectivity features for wildlife movement (e.g., streams, riparian area, ridgelines) between core habitats within the County's regional corridor should be mapped and incorporated within planning documents to evaluate

VC-Bio-1



impacts on wildlife movement from future development and maintain it in a condition to promote wildlife movement (Program ECR 3.a – Development Review). In combination, these factors have important implications for native fish and wildlife populations as well as other aspects of environmental quality.

The biological resource analysis for wildlife connectivity did not contain an analysis or references associated with impacts to native aquatic populations (e.g., Steelhead Trout (*Oncorhynchus mykiss*). The Santa Paula Creek linkage is a very important waterway for southern steelhead spawning areas within the unincorporated County. These proposed growth plans may add additional stress to the creek’s ability to sustain native fish populations, due to potential water quality problems and changes to the creek’s physical character. Please see “Santa Paula Creek Watershed Assessment and Steelhead Restoration Plan” prepared for the Santa Paula Creek Fish Ladder Authority and pg. 88 in the South Coast Missing Linkages Project: Santa Monica-Sierra Madre Connection Report (June 2006). Both reports can be accessed at:

Santa Paula Creek Watershed Assessment and Steelhead Restoration Plan
http://parkway.scrwatershed.org/wkb/scrbiblio/techreportreference.2011-02-02.3181965656/attachment_download/RBF%20Santa%20Paula%20Creek%20Watershed%20Plan.pdf

The South Coast Missing Linkages Project: Santa Monica-Sierra Madre Connection Report (June 2006)
http://www.scwildlands.org/reports/SCML_SantaMonica_SierraMadre.pdf

While, the Draft PEIR provides a discussion of wildlife movement and policy measures to minimize impacts to wildlife movement, the analysis did not identify or discuss impacts created by proposed land use changes (e.g., proposed land use change from commercial/light industrial to residential single family in the eastern triangle of East Area 1 and 2, open space to industrial along the Santa Clara River) and changes to development densities along the Santa Paula Creek corridor. For example, residential impacts are different from industrial uses (during and after construction), such as human disturbance and predation from pets. The change from Open Space to Industrial would allow for things such as dog kennels adjacent to the Santa Clara River, which could have indirect impacts on wildlife movement associated with noise. Impacts to core habitat areas where the regional habitat connectivity and wildlife corridor overlaps within the expansion areas can be mitigated using recommendations from pgs. 97-105 in the South Coast Missing Linkages Project (link above) and other sources.

2. Impacts to Special Status Species

The analysis of all adverse impacts to listed species within unincorporated County areas of Santa Clara River and Santa Paula Creek and within the expansion zones did not provide sufficient detail of impacts to these adjacent populations, particularly

VC-Bio-1

VC-Bio-2



those reliant on the aquatic ecosystems. Information on these populations can be found at:

US Fish and Wildlife – Species Profiles
<https://www.fws.gov/ventura/endangered/species/speciesProfiles.html>
 California Department of Fish and Wildlife
<https://wildlife.ca.gov/Conservation/SSC#394871322-what-elements-are-found-in-an-ssc-document>
<https://wildlife.ca.gov/Conservation/CESA/Resources>

VC-Bio-2

Please see General Comments on General Plan Policies and Programs under Program ECR 3.a Development Review for further comments that may impact the PEIR analysis as written.

3. Analysis of Project Alternatives

The alternatives analysis concludes that planned development within the expansion areas would result in similar development under County policies and standards for impacts to biological resources. However, this may not be true when County development standards are applied. Does the City's General Plan provide equal protections for biological resources and water resources as the County currently provides in the expansion zones? Please also consider the County's Habitat Connectivity and Wildlife Corridor Overlay zone, protections afforded to Locally Important Species and Trees, and the policy and standards associated with the Water Protection District.

VC-Bio-3

4. General Comments on General Plan Policies and Programs

While we recognize that comments are for revisions to the draft EIR, Planning Division staff has a few comments to the City's General Plan policies and programs to mitigate adverse impacts to biological resources in the unincorporated County and adjacent areas as follows:

- Policy ECR 3.2 Exotic Invasive Species. The spread of invasive species within the County is an issue of concern to the County. Please see: <http://bosagenda.countyofventura.org/sirepub/cache/2/r03zogtdlnvz13slpa5yjt1y/143081202052020022430193.PDF>. The County strongly supports the City's efforts to address the spread of invasive species through the new policy. Many invasive plants (e.g., Pampas grass) use wind to disperse across the landscape. When a Santa Ana wind occurs, these invasives can be spread miles away whether or not they are located adjacent to a natural area. By expanding the policy to prohibit the intentional planting of invasive and watch list species as documented by the California Invasive Plant Council at: <http://www.cal-ipc.org> the City can mitigate adverse impacts associated with their spread such as the increase of wildfire risk, erosion, water consumption, productivity of agricultural lands, etc. within the City Urban Restriction Boundaries and expansion areas. In addition, encouraging projects to incorporate best management practices to reduce the spread of invasive plants during construction activities would also help limit the impact of infestations within the County.

VC-Bio-4



- Policy ECR 3.3 Flood Control Channels. The incorporation of language that provides fish passage and wildlife movement designs within flood control projects is important for the survival of southern steelhead trout and other species within the County's watershed.
- Program ECR 3.a Development Review. The County commends the City on strong standards associated with development review and recommends the following changes:
 - *Buffer zones of at least 100 feet should be maintained between urban development and sensitive native habitats*. By including the qualifier "urban" development, the interpretation of this standard may lead someone to think that it does not apply to rural development occurring in expansion zones and other open space areas. Without this correction, the EIR analysis would need to be adjusted to address additional impacts on biological resources within these areas.
 - *Lighting shall be shielded to avoid spillover into sensitive habitat areas and wildlife corridors*. By including language that requires outdoor lighting to be directed downward and placed on a shut off timer it will further mitigate adverse impacts to the movements of nocturnal species.
 - *Horse hitchracks and bicycle racks shall be located away from sensitive resource areas. Horses should be excluded from wetland and riparian areas*. The standard is missing impacts to streams (bed and bank).
 - *Homebuyers in Adams Canyon and Fagan Canyon shall be provided with educational literature describing....* The description of educational material should talk about consulting with experts on development of such materials and recommendations to protect livestock from predators.

VC-Bio-4

Thank you for the opportunity to comment on the Draft PEIR. If you have questions regarding the information set forth in this memo, please contact Abigail Convery at 805-654-2489 or via email at Abigail.Convery@ventura.org.



**Ventura County Resource Management Agency, Watershed Protection
February 6, 2020**



**WATERSHED PROTECTION
MEMORANDUM**

DATE: February 6, 2020

TO: Anthony Ciuffetelli, RMA/Planning/EDR Coordinator

FROM: James Maxwell, Groundwater Specialist *jm*

SUBJECT: RMA 17-007-2 – City of Santa Paula, Draft Environmental Impact Report (DEIR), Santa Paula 2040 General Plan

The Ventura County Public Works Agency, Water Resources Division (VCWRD) reviewed the DEIR and supporting documents submitted by the City of Santa Paula.

PROJECT DESCRIPTION

The revised Draft General Plan contains a statement of the community's vision for development to the year 2040, including planned land uses, policies and programs to govern the City's growth and management of its resources. The draft has been updated to incorporate public comments from the Preliminary Draft General Plan published in May 2019. The DEIR examines the potential environmental impacts that could be expected to occur as a result of adoption and implementation of the 2040 General Plan.

ENVIRONMENTAL IMPACT ANALYSIS

The DEIR lists water supply and wastewater treatment as areas of potential concern. The project site overlies the Santa Paula Subbasin (Department of Water Resources [DWR] Basin No. 4-004.04), designated as a very low-priority subbasin.

The City of Santa Paula obtains water solely from five groundwater wells it operates in the Santa Paula Subbasin. A 1996 groundwater basin adjudication allows for the use of groundwater between the City of Ventura and the Santa Paula Basin Pumpers Association (SPBPA). The SPBPA is allocated to pump 27,515-acre feet per year (AFY), with the City of Santa Paula allocated to pump 5,488-AFY. Total City water demand in 2015 was 3,907-AF. The City of Santa Paula *Urban Water Management Plan 2016 Update* (UWMP) projects that total water demands will increase to 4,589-AF in 2020, with a total anticipated increase in demand of 2,474-AF between 2020 and 2040. Listed options for meeting future water demands include long-term and short-term transfer of water rights, use of State Water Project (SWP) water, use of recycled water and water demand management programs.

Recharge to the basin occurs via percolation from the Santa Clara River and other tributaries, subsurface inflow from the Fillmore Subbasin, precipitation, local runoff, and agricultural/landscape return flows.

VCWP-4



Groundwater Response RMA 17-007-2
February 6, 2020
Page 2 of 2

Groundwater quality concerns within the basin include elevated concentrations of manganese, iron, sulfate and total dissolved solids. The City operates a centralized water conditioning facility (Steckel Plant) to address manganese and iron concerns.

Wastewater from the Water Recycling Facility and other industrial facilities is regulated through the Regional Water Quality Control Board (RWQCB) Waste Discharge Requirements (WDRs). The Los Angeles RWQCB requires owners of irrigated farmland to utilize water quality management plans and monitor agricultural runoff that could potentially infiltrate to the underlying basin. The *City of Santa Paula Wastewater System Master Plan (WSMP)* provides recommendations and an implementation plan for future needs and improvements for the City's sanitary sewer collection system.

VCWP-4

The DEIR determined that there are foreseeable significant cumulative impacts to the groundwater supplies (Impact HYD-2). However, the DEIR considered this less than significant because "proposed policies and programs along with existing regulations would substantially reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable." The DEIR identifies the existing policies and programs established to reduce the depletion of groundwater supplies which is inclusive of the UWMP and its successive updates, development reviews, and water conservation and management practices.

REFERENCES

City of Santa Paula. June 2017. *Urban Water Management Plan 2016 Update*.

City of Santa Paula. June 2012. *City of Santa Paula Wastewater System Master Plan*.



**Ventura County Resource Management Agency, General Plan Update Section
February 6, 2020**



Memorandum

County of Ventura • Resource Management Agency • Planning Division
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • ventura.org/rma/planning

DATE: February 6, 2020

TO: City of Santa Paula

FROM: Susan Curtis, Ventura County Planning Division, General Plan Update Section

SUBJECT: Notice of Availability of a Draft Environmental Impact Report & General Plan. RMA 17-007-2.

This memorandum includes review and comment on the City of Santa Paula 2040 General Plan draft Environmental Impact Report (EIR). The Planning Division, General Plan Update Section has made the following recommended revisions to the draft EIR for your consideration.

Pursuant to the California Environmental Quality Act (CEQA), the draft EIR should analyze potential impacts of development under the 2040 General Plan through 2040, which is approximately 20 years from when approval of the 2040 General Plan is expected plus a reasonably foreseeable forecast period. This analysis should include the East Area 3, West Area 2, Fagan Canyon and Adams Canyon expansion areas described in Table 2-3 Expansion Area Statistical Summary of the 2040 General Plan as listed below.

VCPD-1

Table 2-3 Expansion Area Statistical Summary

Expansion Area	Development Potential
Adams Canyon (5,412.9 acres)	<ul style="list-style-type: none"> • 495 dwelling units; • 40 acres/1 school site; • 100 acres public recreation facilities; • 1 destination resort hotel; • 1 golf course; and • 200 acres/passive open space.
Fagan Canyon (2,173.5 acres)	<ul style="list-style-type: none"> • 450 SF dwelling units (1,953 acres); • 76,230 SF Neighborhood Commercial (5 acres @ 0.35 FAR); • 7 acres/active parks; and • 208 acres/passive open space.
East Area 3 (25.6 acres)	<ul style="list-style-type: none"> • 14.6 acres Commercial (0.35 FAR); and • 11.0 acres Industrial Park (0.25 FAR).



Notice of Availability of a Draft Environmental Impact Report & General Plan.
RMA 17-007-2.
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Expansion Area	Development Potential
West Area 2 (173.5 ac total)	
Santa Paula Business Park West Specific Plan (46.9 acres)	<ul style="list-style-type: none"> • 42.0 acres Commercial/Light Industrial (0.35 FAR); and • 4.9 acres passive open space.
Remainder of West Area 2 (126.6 acres)	<ul style="list-style-type: none"> • 122 acres Light Industrial/R&D (0.35 FAR). This total includes land within flood hazard areas and the development area will be determined by a future specific plan; and • 4.6 acres railroad overlay.
South Mountain (2,191.0 acres)	<ul style="list-style-type: none"> • 15 acres / active parks (6 soccer fields); • Approx. 100 acres regional park (staging area for canyon hiking trails); • Remainder to retain current uses

VCPD-1

The EIR indicates that specific plans would be required for the Adams Canyon, Fagan Canyon, East Area 3, West Area 2, and South Mountain expansion areas prior to their annexation and development. The EIR notes that these specific plans will, amongst other things, identify mitigation of environmental impacts and design standards for new development. However, CEQA Section 15064(d) requires that in evaluating the significance of environmental effects of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project. Consequently, all sections of the draft EIR should include analysis of the development potential described in Table 2-3 above. Currently, analysis of the expansion areas is limited to the below:

Chapter 4 Environmental Setting and Impact Analysis: Includes analysis of the following expansion areas and impact areas:

- 4.2 Aesthetics (Adams and Fagan Canyon Expansion Areas)
- 4.3 Agriculture and Forestry Resources (Adams and Fagan Canyon expansion areas)
- 4.5 Biological Resources (Adams and Fagan Canyon expansion areas)
- 4.9 Hazards and Hazardous Materials (Adams Canyon expansion areas)
- 4.15 Public Services (Adams Canyon expansion area)
- 4.18 Utility and Services (Adams Canyon, Fagan Canyon, East Area 2, and West Area 2 expansion area)



Notice of Availability of a Draft Environmental Impact Report & General Plan.
RMA 17-007-2.
Page 3 of 7

The County recommends that the Adams Canyon, Fagan Canyon, East Area 3, West Area 2, and South Mountain expansion areas be evaluated to determine their reasonably foreseeable indirect physical changes in the environment for all impact areas identified in Chapter 4 Environmental Setting and Impact Analysis and listed below:

- 4.2 Aesthetics
- 4.3 Agriculture
- 4.4 Air Quality and Greenhouse Gas Emissions
- 4.5 Biological Resources
- 4.6 Cultural and Tribal Resources
- 4.7 Energy
- 4.8 Geology and Soils
- 4.9 Hazards and Hazardous Materials
- 4.10 Hydrology and Water Quality
- 4.11 Land Use and Planning
- 4.12 Mineral Resources
- 4.13 Noise
- 4.14 Population and Housing
- 4.15 Public Services
- 4.16 Recreation
- 4.17 Transportation
- 4.18 Utility and Services
- 4.19 Wildfire

The draft EIR relies upon 2040 General Plan preliminary development policies and standards that would apply to the expansion areas, and which must be refined as part of a future specific plan, as mitigation measures to reduce environmental impacts (see Table 4.2-1 General Plan Policies and Programs that Would Substantially Reduce Potential Impacts to Scenic Vistas (page 4.2-7)). These preliminary development policies and standards are not included within the goals, policies or programs of the 2040 General Plan, rather they are included in a discussion in the Specific Plans and Expansion Areas section (see Adams Canyon Expansion Area (Page 2-41), Fagan Canyon Expansion Area (Page 2-43), East Area 3 Expansion Area (Page 2-39), West Area 2 (page 2-38), and South Mountain (Page 2-39). Given that these preliminary development policies and standards are subject to deferral and further refinement as part of a future specific plan, it is unclear how they may be relied upon in the draft EIR as feasible mitigation measures.

Therefore, the County recommends that the draft EIR include Section VI. Land Use Plan Implementation Measures Nos. 39 (Adams Canyon and Fagan Canyon expansion areas), 39a (Adams Canyon expansion areas), 41 (East Area 2 - referred to as East Area 3 in the draft EIR), and 43 (West Area 2) from the City of Santa Paula General Plan Land Use Element (last amended 1/22/13) as feasible mitigation measures that would reduce the environmental impacts associated with the expansion areas in Sections 4.2 through 4.19 of Chapter 4 Environmental Setting and Impact Analysis. These proposed mitigation measures are listed below:



Notice of Availability of a Draft Environmental Impact Report & General Plan.
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Mitigation Measure Implementation Adams Canyon Expansion Area: The following Development Standards shall be implemented through a Specific Plan(s) and subsequent development approvals

- Require dedication of 100 acres for public recreation facilities and 200 acres of passive public open space with all improvements to be paid for by developer consistent with Table 2-3 Expansion Area Statistical Summary.
- Require dedication of 40 acres for a school site consistent with Table 2-3 Expansion Area Statistical Summary.
- Require dedication of a roadway right of way to connect with Fagan Canyon.
- Allow for the development of a destination resort hotel.
- Allow for the development of a golf course.
- Encourage a broad range of housing types to meet the housing needs of the city.
- Allow a density bonus for housing meeting the standards for the "low" and "very low" income level housing.
- Development shall be designed and sited to maintain the character of significant open spaces, to maintain views and vistas and to protect natural habitat.
- Integrate a north/south road connection to serve the canyon areas.
- Require the use of architectural design themes that complement and do not dominate the setting.
- Use building materials, colors, and forms that blend into the environment and contribute to a neighborhood character.
- Clustering of development is required to provide a variety of housing types and protect open space, agriculture, and habitat.
- Use extensive landscaping, xeriscaping, etc. Forty percent (40%) of lots/development shall be landscaped or natural open space.
- Oil seeps shall be contained and buffered.
- A combination of golf courses, equestrian centers, tennis facilities, or similar public recreational facilities should be provided.
- Require a geologic study for all development sites and roadways to address slope stability, faults and landslides.
- Locate building pads and develop the sites and roadways with minimized grading and reduced amounts of cut and fill slopes.
- Require the inclusion of drainage and flood control improvements designed to be natural in appearance.
- Require the use of fire-retardant landscaping, adequate clearings, and fire retardant/fireproof building materials.
- Require circulation system to tie in with the existing circulation system.

VCPD-1



Notice of Availability of a Draft Environmental Impact Report & General Plan.
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- Require pedestrian accessibility to all new commercial developments for nearby residential developments.
- Avoid ridgeline development on prominent ridgelines.
- Require new lighting that is part of any proposed development to be oriented away from sensitive uses and shielded to the extent possible to minimize glare and spill over. (LU IM 39, 39a)

Mitigation Measure Implementation Fagan Canyon Expansion Area: The following Development Standards shall be implemented through a Specific Plan(s) and subsequent development approvals:

- Require dedication of seven acres for active parks with all improvements to be paid for by developer consistent with Table 2-3 Expansion Area Statistical Summary.
- Require dedication of 208 acres of passive public open space with all improvements to be paid for by developer consistent with Table 2-3 Expansion Area Statistical Summary.
- Encourage a broad range of housing types to meet the housing needs of the City.
- Allow a density bonus for housing meeting the standards for the "low" and "very low" income level housing.
- Development shall be designed and sited to maintain the character of significant open spaces, to maintain views and vistas and to protect natural habitat.
- Integrate a north/south road connection to serve the canyon areas.
- Require the use of architectural design themes that complement and do not dominate the setting.
- Use building materials, colors, and forms that blend into the environment and contribute to a neighborhood character.
- Clustering of development is required to protect open space, agriculture, and habitat.
- Use extensive landscaping, xeriscaping, etc. Forty percent (40%) of lots/development shall be landscaped or natural open space.
- Oil seeps shall be contained and buffered.
- A combination of golf courses, equestrian centers, tennis facilities, or similar public recreational facilities should be provided.
- Require a geologic study for all development sites and roadways to address slope stability, faults and landslides.
- Locate building pads and develop the sites and roadways with minimized grading and reduced amounts of cut and fill slopes.
- Require the inclusion of drainage and flood control improvements designed to be natural in appearance.
- Require the use of fire-retardant landscaping, adequate clearings, and fire retardant/fireproof building materials.



Notice of Availability of a Draft Environmental Impact Report & General Plan.
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- Require circulation system to tie in with the existing circulation system.
- Require pedestrian accessibility to all new commercial developments for nearby residential developments.
- Avoid ridgeline development on prominent ridgelines.
- Require new lighting that is part of any proposed development to be oriented away from sensitive uses and shielded to the extent possible to minimize glare and spill over. (LU IM 39, 39a)

Mitigation Measure West Area 2 Expansion Area: The following Development Standards shall be implemented through a Specific Plan(s) and subsequent development approvals:

- Establish a design theme for the area. This theme should consider Santa Paula's existing outstanding architecture and an agricultural theme.
- Hide parking between and behind buildings. Use smaller, scattered parking lots.
- Provide setbacks with tree-lined streets.
- Provide landscaping screening for buildings and parking lots.
- Development shall incorporate architectural details on buildings fronting SR 126.
- Development shall be pedestrian friendly. A mix of uses should be located within walking distance of each other.
- Require new lighting that is part of any proposed development to be oriented away from sensitive uses and shielded to the extent possible to minimize glare and spill over. (LU IM 43)

Mitigation Measure East Area 3 Expansion Area: The following Development Standards shall be implemented through a Specific Plan(s) and subsequent development approvals:

- Establish a design theme for the area. This theme should consider Santa Paula's existing outstanding architecture and capitalize on an agricultural theme and small town character.
- Hide parking between and behind buildings. Use smaller, scattered parking lots.
- Provide setbacks with tree-lined streets.
- Development shall incorporate architectural details on buildings fronting SR 126.
- Provide landscape screening for buildings and parking lots.
- Development shall be pedestrian friendly. A mix of uses should be located within walking distance of each other.



Notice of Availability of a Draft Environmental Impact Report & General Plan.
RMA 17-007-2.
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- Require new lighting that is part of any proposed development to be oriented away from sensitive uses and shielded to the extent possible to minimize glare and spill over. (LU IM 41)

Mitigation Measure South Mountain Expansion Area: The following Development Standards shall be implemented through a Specific Plan(s) and subsequent development approvals:

- Coordinate with outside agencies for all bridges across the Santa Clara River.
- Ensure existing and new residential development conforms to City development standards, when applicable.
- On residential lots having sufficient size, provide for small-scale agriculture and animal husbandry options.
- Encourage the development of light industrial and agricultural support business on appropriately designated lots.
- Provide setbacks for potential future bridge and road widening.
- Provide landscaping screening for buildings and parking lots.
- Development shall incorporate architectural details on buildings fronting public roads.
- Development shall be pedestrian friendly. A mix of uses should be located within walking distance of each other.
- Require new lighting that is part of any proposed development to be oriented away from sensitive uses and shielded to the extent possible to minimize glare and spill over.

VCPD-1

Chapter 8 Cumulative Impacts of the draft EIR indicates that the analysis of cumulative impacts presented in the SCAG 2016-2040 RTP/SCS Program EIR is incorporated by reference pursuant to CEQA Guidelines §15130(d). However, the SCAG 2016-2040 RTP/SCS Program EIR did not analyze the development potential of the expansion areas noted in Table 2-3 (above) by the City of Santa Paula. Therefore, the draft EIR should include a cumulative impact analysis for the Adams Canyon, Fagan Canyon, East Area 3, West Area 2, and South Mountain expansion areas.

VCPD-2

Thank you again for the opportunity to provide comments on the draft EIR. If you have any questions regarding these comments, please do not hesitate to contact me at (805) 654-2497 or susan.curtis@ventura.org.

Sincerely,

Susan Curtis, Manager, General Plan Update Section



**Ventura County Resource Management Agency, Planning Programs Section
February 7, 2020**

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division
Dave Ward, AICP
Director

February 7, 2020

Jeff Mitchem, Planning Manager
City of Santa Paula
PO Box 569
Santa Paula, CA 93061

Subject: Draft 2040 General Plan and Draft EIR

Dear Mr. Mitchem,

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 Anthony Ciuffetelli, 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 Anthony Ciuffetelli at (805) 654-2443.

VCPCD-3

Sincerely,

Denice Thomas, AICP, Manager
Planning Programs Section

Attachments

County RMA Reference Number 17-007-2



**Ventura County Resource Management Agency, Long Range Planning Section
February 7, 2020**

RESOURCE MANAGEMENT AGENCY
county of ventura

PLANNING DIVISION
Dave Ward, AICP
Director

February 7, 2020

Mr. Jeff Mitchem, Planning Manager
City of Santa Paula
PO Box 569
Santa Paula, CA 93061

Subject: Draft Program Environmental Impact Report for the Santa Paula 2040 General Plan, RMA 17-007-2

Dear Mr. Mitchem:

Thank you for the opportunity to provide input and comments on the Draft Program Environmental Impact Report for the Santa Paula 2040 General Plan. The Long Range Section of the Ventura County Planning Division reviewed the Draft Program EIR and provides the following response:

- 1. City Urban Restriction Boundary (CURB).** The Draft Program EIR describes the scope of the 2040 Santa Paula General Plan to be within the limits of the current Sphere of Influence as approved by LAFCo in 2018. However, in various sections throughout the document, the City Urban Restriction Boundaries (also noted as "expansion areas"), are also referenced as boundaries. For example, under **5.3-2 Analysis of Alternatives, Alternative #2:** *"The major difference between this alternative and the Proposed Plan is that urban development as described in the draft Land Use Element would not occur in Adams Canyon or Fagan Canyon because those areas would remain in unincorporated Ventura County."*

VCPD-4

This suggests that the Proposed Plan includes (the potential) of Adams Canyon and Fagan Canyon to be annexed into the City of Santa Paula. In reviewing **4.11 Land Use and Planning** within the Draft Program EIR, there is no discussion or analysis of Adams Canyon and Fagan Canyon.

This inconsistency is further complicated by **3.4 Project Characteristics**, specifically Table 3.4-8 Potential Development by General Plan Land Use Category. The table provides data for development potential within the category of "City" (Santa Paula) and "Sphere Of Influence & Expansion Areas". It is unclear if the projected figures under the "Sphere Of Influence & Expansion Areas" are representative of development in those areas as part of the City of Santa Paula or development that could potentially occur under their current land use designation within unincorporated Ventura County. If the table represents potential development as a result of annexation of the expansion areas, a comprehensive impact analysis should be completed in each section of the environmental document with this as the baseline. Development projections in these expansion areas would be contrary to the City's

VCPD-5



800 South Victoria Avenue, L# 1740, Ventura, CA 93009
Phone (805) 654-2481 • Fax (805) 654-2509 • vcrma.org/divisions/planning





RMA 17-007-2 Santa Paula GP Draft PEIR
February 6, 2020
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actions in 2018 to remove these expansion areas from the City's Area of Interest (AOI) processed through LAFCo.

VCPD-5

If the table captures development potential within and as part of unincorporated Ventura County, the purpose of providing these projections is unclear. However, if this information describes projections for areas in unincorporated Ventura County to remain in unincorporated Ventura County, please clarify this in the environmental document.

VCPD-6

- 2. **LAFCo.** In **Table 3.5-1, Public Agencies Expected to Use this EIR**, LAFCo is identified as an agency with which Permits/Other Approvals/Consultation is needed for "Amendments to the Sphere of Influence and annexations." Are amendments to the City's sphere of influence or annexations proposed as part of the 2040 Santa Paula General Plan? Also, County of Ventura Planning Division is not identified on this table. If any amendments to the City's sphere of influence or annexations occur which involve land within unincorporated Ventura County, the Ventura County Planning Division shall be consulted in addition to LAFCo.

VCPD-7

Thank you again for the opportunity to comment. Should you have any questions about the contents of this letter, please contact me at 805-654-3327 or via email at linda.blackburn@ventura.org

Sincerely,

Linda Blackburn, Senior Planner
Long Range Planning Section
Ventura County Planning Division



Ventura County Transportation Commission
February 7, 2020



Jeff Mitchem
Planning Manager
City of Santa Paula
PO Box 569
Santa Paula, California 93061

February 7, 2020

Subject: Revised Draft 2040 City of Santa Paula General Plan and Program Environmental Impact Report

Dear Mr. Mitchem,

Thank you for the opportunity to review and comment on the Revised Draft 2040 General Plan and Environmental Impact Report for the City of Santa Paula. Ventura County Transportation Commission (VCTC) applauds the City of Santa Paula for your efforts to incorporate State and regional planning priorities that integrate land use, transportation and housing by encouraging compact growth near transit, incorporating mobility network improvements and complete streets policies, and supporting Downtown revitalization.

VCTC-1

Within the Land Use Element, VCTC concurs with proposed policy LU 1.11 (Railroad corridor), which encourages adjacent land uses that are compatible with recreational use of the corridor. As the owner of the Santa Paula Branch Line railroad corridor, VCTC looks forward to collaboration with the City of Santa Paula on future study of the Railroad Corridor Special Study Area, recognizing ongoing consideration of future options for the Branch Line.

With regard to the Circulation and Mobility Element, VCTC appreciates the many policies and programs throughout the Draft 2040 General Plan that promote a balanced, multi-modal transportation system for Santa Paula, including an expanded Downtown multi-modal hub, mobility network improvements, and transit-supportive development policies. These policies and programs help to meet regional transportation goals to improve mobility, foster efficient land use, encourage walking, biking and use of other active transportation modes, and reduce dependency on single occupant vehicles.

VCTC-2

As the designated Airport Land Use Commission for Ventura County, VCTC also concurs with policy LU 3.12 (Santa Paula Airport), which encourages land use designations that conform with the Ventura County Airport Comprehensive Land Use Plan (CLUP). Within the Aviation Safety section of the Hazards and Public Safety Element, we concur with the proposed policy regarding consistency with the CLUP and programs to address existing incompatible land uses and legal nonconforming uses (HPS 5.1 and HPS 5.a, 5.b, 5.c, and 5.d).

VCTC-3

Should you have any questions concerning this review, please feel free to contact me at (805) 642-1591 (ext. 103) or by email at: afagan@goventura.org.

Sincerely,
Amanda L. Fagan

Amanda Fagan
Director of Planning and Policy

950 County Square Dr., Suite 207 • Ventura, California 93003 • (805) 642-1591 • fax (805) 642-4860 • www.goventura.org



John Kular, P.E.
January 6, 2020

From: John Kular PE <johnkularpe@gmail.com>
Sent: Monday, January 06, 2020 1:00 PM
To: Ron Gallagher
Subject: FEMA

I spoke with Frank Mansell, FEMA Region 9 Planner. He is familiar with Santa Maria Street Industrial Park and its history (2012 No-Rise certificate, Pending LOMR-F).

Frank reviewed the FEMA flood study approval process for revising FIRM maps.

1. Preliminary FIS (Flood Information Study including revised FIRMs) Approval
2. 90-day appeal period
3. Appeal information incorporated into Revised FIS
4. Determination of Validity
5. 6-month implementation period
6. FIS and Revised FIRMs are effective

Usually local agencies revise their land use and general plan maps based on the new FIRMs after step 6.

The Santa Clara River FIS made it through step 1 (above) before significant changes were required based on local agencies input. The changes were significant enough to start the process over again. It has not been re-published as Preliminary yet. Based on a separate call from FEMA in Alexandria, Va. that is likely to occur in March 2020.

Frank promised to have someone from the FEMA Hydraulics Section look into the appropriateness of the City using preliminary FIS maps to revise their 2020 General Plan at this time.

Regards,

John Kular, P.E.
John Kular Consulting
890 Lindamere Ct.
Simi Valley, CA 93065
661-302-1292



S.S. Newby
January 23, 2020

S.S. Newby
126 North 7th Street
Santa Paula, CA 93060



January 23, 2020

City of Santa Paula Planning Department
% Mr. Jeff Mitchem
970 Ventura Street
Santa Paula, CA 93060

Dear Mr. Mitchem and Planning Department of the City of Santa Paula, California:

Thank you, Mr. Mitchem, for speaking with me earlier this month about the zoning changes to occur on the **100 block of North 7th Street, Santa Paula, California**. Per your statement, both sides of the 100 block will be changed to reflect this tiny neighborhood as **"residential only,"** not commercial/residential and not residential/office. This is a more accurate description of said neighborhood: it primarily is residential, having on said block only one misplaced business, the Moose Lodge, which is cornered between residences. It is my understanding that the other two non-residential buildings (the lovely, peace-abiding Masonic Temple and the too-often-rented-out-for-social-affairs property, identified as St. Paul's Episcopal Church) on this block are considered institutions, making them neither residential nor commercial.

While we are pleased that this block alas will reflect an appropriate zone – residential (only) – concern remains about including it and other residential areas near Main Street in a designation known as "downtown Santa Paula." Said inclusion of residential streets in the proposed new "downtown" area crafts the potential for Santa Paula's city officials eventually to force these residents to be responsible in some way for **expenditures that should only apply to downtown businesses**. Businesses existing on Main Street or elsewhere in Santa Paula should be totally responsible for the upkeep of the area upon where their business enterprises are erected; or otherwise, that responsibility should be **divided equally among "all" who reside in Santa Paula**...not merely the poorer element who reside in the proposed "new downtown area" of Santa Paula! The intended "downtown" designation further separates Santa Paula into distinct classifications, whereof the richer element of this City reside above or outside of the intended "downtown" lines and the more impoverished residents seemingly are settled compacted within the proposed downtown area: a class of segregation, or so it seems. It already seems that those who reside away from the proposed downtown area receive favoritism. When the City sets out to make improvements or to offer protection, or to free its citizens from trash, noise, and other similar disturbing events, it appears that the more affluent neighborhoods, such as those upon the hills, ... those areas outside of the intended "downtown area" ... are given preferential treatment, while those in the lower sections of Santa Paula often have their concerns dismissed or their peace and tranquility intruded upon. For example, our tiny neighborhood often is forced to endure events held on it by those who want to host their noisy, multiple-car-parking affairs away from their own homes, without feeling the slightest inhibition about bringing their affairs to where we reside; nor are they concerned about encroaching upon spaces in front of or near our residences where we must park when we return home: moral adjustments need to be made in this City, and they cannot occur if we are further separated into classes by planning distinctions such as "Downtown Santa Paula," when those distinctions further impose ill-favorably upon the poorer residents living among us!

In your reclassification of Santa Paula, you might consider the soon-to-be-vacant building and lot where K-Mart now sits. That land might be ideal for further development for those who want to attend party-type affairs. It probably would have plenty of parking for the multiple groups of party-attendees who currently refuse to keep their affairs away from residential neighborhoods in which they do not reside. It would be a perfect place for the Moose Lodge to relocate! Santa Paula also might consider building other shops there as well that would attract those party goers, bringing in desperately needed funds to the City. In fact...why not make that area where K-Mart now is erected as the **"NEW DOWNTOWN SANTA PAULA"!!!**

Again, thank you for your consideration of these thoughts, and for speaking with me the other day. Something has to be done to brighten the outlook for residents of this City!

Cordially,

S. S. Newby

New-1



330½ S. 8th Street (online comment, name not provided)
February 1, 2020

From: no-reply@weebly.com <no-reply@weebly.com>
Sent: Saturday, February 1, 2020 10:42 AM
To: General Plan Update <gpupdate@spcity.org>
Subject: New Form Entry: General Plan Comments (English)

You've just received a new submission to your [General Plan Comments \(English\)](#).
[Mark as Spam](#)

Submitted Information:

Are you a resident of Santa Paula?
Yes

If Yes, please provide your street address:
330 1/2 S 8th St

Which General Plan Update element, goal, policy or program does this comment reference?
Land Use

If Other, please specify briefly:

Please provide your comments:
I would like the Kmart in Santa Paula to be replaced by Target so we can still have a good retail store near my home,

Which below best describes what should be done about the General Plan Update element, goal, policy or program referenced in your comment?

Approve, retain as written

If Other, please specify briefly:_1

8th-1



**429 Anacapa Terrace (online comment, name not provided)
February 3, 2020**

From: no-reply@weebly.com <no-reply@weebly.com>
Sent: Monday, February 3, 2020 8:57 AM
To: General Plan Update <gpupdate@spcity.org>
Subject: New Form Entry: General Plan Comments (English)

You've just received a new submission to your [General Plan Comments \(English\)](#).
[Mark as Spam](#)

Submitted Information:

Are you a resident of Santa Paula?

Yes

If Yes, please provide your street address:

428 Anacapa Terrace

Which General Plan Update element, goal, policy or program does this comment reference?

Land Use

If Other, please specify briefly:

Please provide your comments:

The link I provided in the comment about sand and gravel mining was incorrect. The correct link is:

Why would SP want sand and gravel mining in open spaces? Have we forgotten the Broad Beach restoration project and the lawsuits which SP lost? The beach will require sand ad infinitum which means trucks and trucks hauling SP sand to Malibu. Does this

make sense?

http://www.malibutimes.com/news/article_a2efdc2a-b9af-11e7-9869-3736a6dc27fd.html

Which below best describes what should be done about the General Plan Update element, goal, policy or program referenced in your comment?

Replace as noted in comment

If Other, please specify briefly: _1

disallow mining in open spaces

Ana-1



428 Anacapa Terrace (online comment, name not provided)
February 11, 2020

From: no-reply@weebly.com <no-reply@weebly.com>
Sent: Tuesday, February 11, 2020 8:35 AM
To: General Plan Update <gpupdate@spcity.org>
Subject: New Form Entry: General Plan Comments (English)

You've just received a new submission to your [General Plan Comments \(English\)](#).
[Mark as Spam](#)

Submitted Information:

Are you a resident of Santa Paula?
Yes

If Yes, please provide your street address:
428 Anacapa Terrace

Which General Plan Update element, goal, policy or program does this comment reference?
Land Use

If Other, please specify briefly:

Please provide your comments:
RE: Sand/Gravel mining in Open Space :bad idea:

...This makes "beach nourishment" difficult to sustain. Adding 240,000 cubic yards of sand — the amount, for example, to make a half-mile-long beach about 100 feet wide — requires 24,000 dump trucks full of sand. Even working seven days a week, it would take more than 16 months to bring in that much sand. Depending on how fast the sand washes away, a project of this scale would need to be repeated every few years, according to reports by Gary Griggs, who has studied coastal systems across...
<https://www.latimes.com/projects/la-me-sea-level-rise-california-coast/>

Which below best describes what should be done about the General Plan Update element, goal, policy or program referenced in your comment?
Replace as noted in comment

If Other, please specify briefly:_1

Ana-2



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Table 2-2 Responses to Comments

Comment Number	Commentor/ (Date)	Comment Summary	City Response
Public Agency Comments			
VCWP-1	VCRMA/Public Works/ Watershed Protection (1/22/2020)	Much of the regional drainage infrastructure within the City of Santa Paula is deficient. For example, Peck Road drain has been identified as deficient and in need of rehabilitation. New development and major redevelopment should consider the drainage needs of the larger system and funding mechanisms to contribute to needed capital improvements. VCWPD suggests amending Program HPS 2.b (Master Plan of Storm Drains) to include a discussion of funding mechanisms or creating a new policy to directly support funding for storm water infrastructure.	Policy HPS 2.3 has been revised to include a reference to funding mechanisms to contribute to needed storm water infrastructure improvements. Program HPS 2.c (Capital Improvement Program) also includes a reference to funding sources.
VCWP-2		Page 5-8 states: "The VCWPD has authority over "redline" channels, which are those containing runoff with a peak flow rate of 500 cubic feet per second (cfs) or more during a 100-year storm. VCWPD has authority to maintain and construct flood control facilities on all major channels, including...". VCWPD has jurisdiction over all redline channels as described in Ordinance WP-2. VCWPD maintains facilities within its right of way but does not maintain all jurisdictional channels. Please revise this section to accurately describe the District's responsibility.	This clarification has been made on p. 5-8 as requested.
VCWP-3		Page 5-10 states: VCWPD ensures compliance with the National Flood Insurance Program (NFIP) through permit review of structures and evaluation of site plans for developments in floodplains. Please revise. The Ventura County Public Works Agency administers the NFIP within the County unincorporated area. The City of Santa Paula administers the NFIP for areas within the incorporated limits.	This clarification has been made on p. 5-10 as requested.
APCD-1	Ventura County Air Pollution Control District (1/27/2020)	Item 1. Several of the references that contain weblinks are invalid and documents are not accessible. These include reference nos. 27, 28, 30, 35, and 37. Pursuant to CEQA Guidelines §150150(b), incorporated references shall at a minimum be made available to the public in an office of the Lead Agency and the EIR should state where the incorporated documents will be made available to the public. The project's website does not contain these incorporated referenced documents.	From time to time web URL references are revised by the publishing entities. The cited references have been updated in the EIR, and copies of those documents are also available for review at the Santa Paula Planning Department.
APCD-2		Item 2. The emissions presented (Table 4.4-8, -10, -11, -12) are based on SCAG's 2016 Regional Transportation Plan (RTP) and are county-wide for Ventura, not specific to the City of Santa Paula. The emissions inventories are only specific to transportation sources and the county's total emission estimates of indirect sources (electricity, natural gas usage, water) and does not include commercial/industrial stationary sources (concrete batch plants, hospitals,	As noted in the DEIR (Section 4.4-3, Methodology), air quality and GHG are regional in nature, and the appropriate geographic scope for the analysis of Project impacts is Ventura County as a whole, while the geographic scope for cumulative impacts is the



Comment Number	Commentor/ (Date)	Comment Summary	City Response
		<p>auto-body shops, oil and gas production), direct wastewater treatment sources, solid waste, and landscape equipment currently operating within the City of Santa Paula for baseline (existing) conditions and projected future growth (project). According to the SCAG 2016 RTP Final Environmental Impact Report (FEIR), "It is important to note that the Plan is not responsible for addressing sectors beyond transportation, building, and water-related energy consumption. This is due to the fact that the Plan is primarily a transportation plan with land use development strategies." and only account for 70% of emissions.</p>	<p>entire SCAG region. SCAG's projections of future air quality and GHG emissions for Ventura County and the region as a whole are a reasonable representation of conditions in Santa Paula because the proposed 2040 General Plan is consistent with the RTP/SCS and there are no unusual characteristics that would make conditions in Santa Paula substantially different than the county and region.</p> <p>Although transportation represents the largest source of GHG emissions, this comment correctly notes that SCAG's emissions estimates do not include other sources that represent approximately 30 percent of total GHG emissions. Section 4.4-3 of the DEIR has been revised to clarify the analysis of this issue.</p>
APCD-3		<p>Item 3. Program ECR 2.a includes avoiding "locating sensitive receptors near sources of pollutant emissions such as high-volume roadways". The DEIR air quality section on toxics acknowledges that the SR-126 through the City is not yet considered a high-volume roadway (48,000 trips per day in 2014), as recommended by the California Air Resources Board (CARB) (Page 4.4-26). However, as a GPU with a planning horizon year of 2040, we recommend this discussion or Program to include the projected year of when the City's portion of the SR-126 would become a high-volume roadway, or if it has already reached this daily amount.</p>	<p>The EIR has been revised to indicate that although SR-126 is not currently considered a high-volume roadway, over the 2040 General Plan horizon period traffic volumes on SR-126 could exceed 50,000 vehicles/day (p. 4.4-26). No changes to the General Plan are required because policies and programs have been incorporated that would substantially reduce potential exposure of sensitive receptors to pollutant concentrations along major roadways such as SR-126.</p>
APCD-4	<p>Ventura County Air Pollution Control District (7/30/2019)</p>	<p><i>(Note: The comments in this letter are regarding the May 2019 Preliminary Draft General Plan, not the Draft EIR)</i></p> <p>District staff could not find a discussion of why a Climate Action Plan (CAP) is not being proposed for the City's community vision until horizon year 2040. Although not a requirement to include in a General Plan Update, a CAP can satisfy "the criteria in [the State CEQA Guidelines §15183.5], can be used to streamline the CEQA analysis of future projects and can make it easier to manage both implementation and consistency discussions as required in general plans and general plan EIRs" (OPR, General Plan Guidelines, Climate Change). In addition, most city jurisdictions in Ventura County have either adopted a CAP, Energy Action Plan, or Sustainability Report (Thousand Oaks, Simi Valley, Oxnard, Moorpark), are actively</p>	<p>The City appreciates this information. As noted in the comment, CAPs are not currently required as part of a General Plan update.</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
		seeking funding (Moorpark), or are in the process of adopting one (Ventura, County of Ventura). For more information on guidance and a step-by-step approach to adopting a CAP or similar document, please see the Office of Planning and Research's General Plan Guidelines' Climate Change Chapter.	
APCD-5		Regarding Program ECR 2.d, the District would like to make the City aware of its Incentive Programs that are directed at reducing emissions of criteria pollutants by reducing the amount of NOx generated from mobile sources. NOx when combined with ROC (VOCs) can react with sunlight to create ground-level smog. The two types of programs, Incentive Programs and Transportation Outreach Program, have a co-benefit in indirectly reducing GHG emissions as older, dirtier equipment and vehicles are traded in for newer engines that have stricter air quality emission standards or as Vehicle Miles Travelled (VMT) are reduced due to an increase in alternative modes of transportation. More information can be found on our District Incentive Programs Website Page. These existing programs may be included in the City's General Plan Update in the implementation programs discussion for Program ECR 2.d, if the City should qualify for funding. Some of these programs include Lower Emission School Bus Program, EV Charging Stations Funding and Funding Agricultural Replacement Measures for Emission Reductions (FARMER).	The City appreciates this information. Program ECR 2.d has been revised to include consideration of VCAPCD incentive programs that are directed at reducing emissions of criteria pollutants.
APCD-6		The District would also like to encourage additional Programs and Implementation Measures that will further reduce the generation of mobile emissions in your jurisdiction. Many of the specific mitigation measures at the project level can be promoted at the plan level through zoning ordinances, parking standards, and design guidelines. These measures are discussed in Section 7.3, Plan Level Mitigation and 7.5.2 Operational Mitigation Measures of the APCD Air Quality Assessment Guidelines and can include the increased use of bicycle lanes, park-and-ride lots, establishing an employee rideshare program, and supporting a multi-modal transportation system in conjunction with mixed-land use practices.	The City appreciates this information and the Draft 2040 General Plan supports emissions reductions through many proposed policies and programs that encourage non-motorized mobility, parking management, ridesharing, multi-modal transportation and mixed use (see DEIR Tables 4.4-7, 4.4-8 and 4.4-9 for examples of these policies and programs).
CT-1	Caltrans District 7 (2/3/2020)	Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. SB 743's goals include supporting infill land use, reducing greenhouse gas emissions, and supporting active transportation. As required by SB 743, Caltrans recommends the Lead Agency develop a verifiable performance-based VMT criteria.	The City appreciates Caltrans' comments and recommendations and supports Caltrans' mission to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. As noted in DEIR Section 4.17 (Transportation) under Impact T-4, the Santa Paula General Plan update and related transportation analysis was initiated in 2017, more than a year before adoption of the current CEQA Guidelines in



Comment Number	Commentor/ (Date)	Comment Summary	City Response
			<p>December 2018 and approximately 3 years before implementation of Section 15064.3(c) related to VMT analysis will become mandatory on July 1, 2020. Therefore, VMT analysis is not required as part of the General Plan and EIR. This determination was recently upheld by California's 3rd District Court of Appeal in Citizens for Positive Growth & Preservation v. City of Sacramento.</p> <p>Although VMT analysis is not required, the Draft 2040 General Plan incorporates several policies and programs intended to reduce VMT, as noted in EIR Table 4.17-24:</p>
CT-2		<p>The nearest State facilities to the proposed project are SR-150 and SR-126. After reviewing the DEIR, Caltrans has the following comments:</p> <ol style="list-style-type: none"> 1. Revise Exhibit 4.17-9 to show the Class II bike lanes on 10th Street. 	<p>The final General Plan will incorporate this revision.</p>
CT-3		<ol style="list-style-type: none"> 2. Caltrans does not identify a standard for LOS on Urban Streets, and the City's proposed standard of LOS D would only apply to City streets and intersections. Therefore, Caltrans concurs that the proposed LOS changes on Urban Streets would not conflict with Caltrans standards within the city of Santa Paula. 	<p>Caltrans concurrence is appreciated.</p>
CT-4		<ol style="list-style-type: none"> 3. As shown in Table 4.17-17, all freeway segments within Santa Paula are projected to operate at LOS D or better in the 2040 General Plan horizon year. Also, Caltrans considers LOS E acceptable for freeways and State highways. While Caltrans concurs that this will result in less than significant impacts, a VMT analysis proving a reduction in per capita VMT would result in a more appropriate impact determination. 	<p>Please see the first Caltrans response above regarding VMT analysis.</p>
CT-5		<p>Caltrans seeks to promote safe, accessible multimodal transportation. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometries. These methods include the construction of physically separated facilities such as Class IV bike lanes, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.</p>	<p>The City appreciates Caltrans' recommendations for enhancing safety and accessibility. The 2040 General Plan includes several policies and design measures in the Circulation and Mobility Element including Tables 3-4 and 3-5 and Policies CM 3.2 through 3.6 that are intended to reduce pedestrian and bicyclist exposure to vehicles.</p>
CT-6		<p>Regarding parking, Caltrans recommends carefully considering the amount of parking</p>	<p>The City appreciates Caltrans' recommendations</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
		<p>required. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation suggests that the amount of car parking supplied can undermine a project's ability to encourage public transit use. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) improvement measures.</p>	<p>regarding how parking policies affect driving and use of transit. Section E (Transportation Demand Management and Parking) of the Circulation and Mobility Element includes numerous policies and programs intended to effectively manage congestion and encourage transit use.</p>
CT-7		<p>Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.</p>	<p>The City appreciates Caltrans' recommendations regarding the use of oversized-transport vehicles on State highways. Section F (Goods Movement) of the Circulation and Mobility Element includes numerous policies and programs intended to effectively manage truck traffic, and Program CM 5.a has been expanded as follows:</p> <p><i>CM 5.a Regional coordination. In cooperation with Caltrans and VCTC, establish truck routes in Santa Paula to facilitate the <u>safe movement of goods while minimizing conflicts with other road users and sensitive land uses. Require that over-sized vehicles comply with all Caltrans and local regulations, and limit large truck trips to off-peak commute periods whenever feasible.</u></i></p>
LAFCo-1	Ventura LAFCo (2/3/2020)	<p>While LAFCo is not a responsible agency under the California Environmental Quality Act with regard to adoption of the General Plan update, it would be a responsible agency for future proposals within the General Plan's project area that require LAFCo action. LAFCo may rely on the City's environmental document for proposed changes of organization (e.g., annexations to the City) and amendments of the City's sphere of influence. The comments that follow are solely those of LAFCo staff; they do not reflect determinations made by the Commission.</p>	<p>The City appreciates LAFCo staff's review of the draft General Plan and DEIR and acknowledges LAFCo authority regarding future actions such as annexations and sphere of influence amendments.</p>
LAFCo-2		<p><u>LAFCo law</u>: Although LAFCo approval is not required for the City to amend its General Plan, the City's Draft General Plan and DEIR appropriately acknowledge LAFCo's role in establishing the City's sphere of influence and acting on changes of organization (e.g., annexation of territory to the City). The General Plan should further recognize LAFCo's approval authority over new or extended services provided by the City outside its jurisdictional boundary, pursuant to Government Code § 56133.</p>	<p>The Draft General Plan has been revised to also note LAFCo's role in reviewing new or extended services (p. 1-7).</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
LAFC-3		<p><u>Expansion areas</u>: The Draft General Plan references Government Code §65302(a), which requires that a land use element designate the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, etc. The City's planning of the Adams Canyon Expansion Area and Fagan Canyon Expansion Area designated in the City's updated General Plan does not meet these requirements. The General Plan should set forth a plan that guides future development of the City's expansion areas in compliance with Government Code §65302. Specifically, it should provide detail with regard to the following:</p> <ul style="list-style-type: none"> • types of land use (i.e., proposed general distribution and general location and extent of the uses of the land); • circulation (i.e., general location and extent of existing and proposed major thoroughfares and transportation routes); • infrastructure and public facilities (i.e., general location and extent); • hazards (e.g., seismically-induced surface rupture, ground-shaking, slope instability leading to mudslides and landslides, flooding, and wildland and urban fires); and • open space planning. 	<p>The City respectfully disagrees with LAFCo's characterization that the Draft General Plan does not meet State requirements with regard to the Adams Canyon and Fagan Canyon Expansion Areas. The Draft General Plan establishes standards for the general distribution, location and extent of land uses in these expansion areas, and further establishes clear policies and procedures to ensure that all relevant issues will be addressed as part of the subsequent Specific Plan and annexation process prior to development approval, including those issues that are subject to LAFCo jurisdiction.</p>
LAFC-4		<p><u>Ventura-Santa Paula Greenbelt agreement</u>: The discussion of the Ventura-Santa Paula Greenbelt Agreement relies on an outdated description of the Greenbelt (pages 2-51 and 4-3 of the Draft General Plan and page 4.11-9 of the DEIR). The description should be updated to reflect that the Greenbelt is bounded on the north by the Ojai Area of Interest, on the east by the City's Adams Canyon Expansion Area, on the south by the Las Posas Area of Interest (generally), and on the west by the Ventura Area of Interest.</p>	<p>The City appreciates this information, and the Draft General Plan and EIR have been revised to reflect the current greenbelt boundary description.</p>
LAFC-5		<p><u>Water supply</u>: The analysis of future water supply identifies State Water Project (SWP) water as a potential source of additional water supply for the City (page 6-24 of the Draft General Plan); however, SWP water is not discussed in the DEIR or included in the table of projected potable water supplies (Table 4.18-4 on page 4.18-6 of the DEIR). The discussion of SWP water should either be elaborated to include the likelihood and potential methods of obtaining SWP water, or should be removed entirely.</p>	<p>The City appreciates this information, and the Draft General Plan has been revised to clarify that although the State Water Project (SWP) is a long-term potential source of domestic water for Santa Paula, the City does anticipate receiving SWP water during the 2040 timeframe of the General Plan.</p>
LAFC-6		<p><u>Schools</u>: The Santa Paula Unified School District provides public education to the Santa Paula community. The DEIR documents that a potential school site has been identified in the Adams Canyon Expansion Area, and that although new residential development would result in the addition of students and place greater demand on existing schools, Government Code § 65995(h) considers development fees authorized by Senate Bill 50 to be "full and complete mitigation" of impacts related to school facilities. The environmental analysis should include an</p>	<p>The City appreciates this information, and the Draft EIR (p. 4.15-13) has been revised to include an estimate of the number of additional students that would be expected in Santa Paula based on standard student generation rates published by the State of California.</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
		<p>evaluation of the expected increase in the demand on school facilities that would occur as a result of the anticipated land uses within the updated General Plan, even if school fees qualify as financial mitigation for the deficiency in school facilities and the need for additional schools has been identified.</p>	
LAFCo-7		<p>LAFCo staff identified several minor errors within the Draft General Plan and DEIR (e.g., “sphere of influence” is sometimes labeled as “sphere of interest”). Please contact me if you would like our list of minor corrections to the Draft General Plan and DEIR. Additionally, for your reference, the LAFCo Commissioner’s Handbook is available on the Ventura LAFCo website at ventura.lafco.ca.gov, and can be found under the Policies and Laws tab.</p>	<p>The City appreciates this information and corrections to clerical errors have been made in the Draft EIR.</p>
VC-Bio-1	VCRMA/Biological Resources (2/6/2020)	<p>1. Regional Habitat Connectivity and Wildlife Corridor. Santa Paula Creek is a part of the network of regional wildlife corridors associated with the Santa Monica-Sierra Madre Connection and the Santa Clara River Connection within Ventura County’s Habitat Connectivity and Wildlife Corridors. The County respectfully requests that the City also incorporate Santa Paula Creek as a regional wildlife corridor within the City’s General Plan. Within expansion areas, important connectivity features for wildlife movement (e.g., streams, riparian area, ridgelines) between core habitats within the County’s regional corridor should be mapped and incorporated within planning documents to evaluate impacts on wildlife movement from future development and maintain it in a condition to promote wildlife movement (Program ECR 3.a – Development Review). In combination, these factors have important implications for native fish and wildlife populations as well as other aspects of environmental quality. The biological resource analysis for wildlife connectivity did not contain an analysis or references associated with impacts to native aquatic populations (e.g., Steelhead Trout (<i>Oncorhynchus mykiss</i>)). The Santa Paula Creek linkage is a very important waterway for southern steelhead spawning areas within the unincorporated County. These proposed growth plans may add additional stress to the creek’s ability to sustain native fish populations, due to potential water quality problems and changes to the creek’s physical character. While, the Draft PEIR provides a discussion of wildlife movement and policy measures to minimize impacts to wildlife movement, the analysis did not identify or discuss impacts created by proposed land use changes (e.g., proposed land use change from commercial/light industrial to residential single family in the eastern triangle of East Area 1 and 2, open space to industrial along the Santa Clara River) and changes to development densities along the Santa Paula Creek corridor. Impacts to core habitat areas where the regional habitat connectivity and wildlife corridor overlaps within the expansion areas can be mitigated using recommendations from pgs. 97-105 in the South Coast Missing Linkages Project and</p>	<p>The City appreciates these comments from the County’s staff biologist. It should be noted that the City’s DEIR discussion of regional habitat connectivity and wildlife corridors incorporated information regarding habitat connectivity and wildlife corridors contained in the County’s General Plan Background Report, and the DEIR also incorporates the County’s Wildlife Corridor map (Exhibit 4.5-3). The County Background Report does not mention Santa Paula Creek in the Habitat Connectivity/Wildlife Corridors section.</p> <p>The DEIR (p. 4.5-6) has been revised to include reference to Santa Paula Creek as a component of the Santa Monica-Sierra Madre Connection and the Santa Clara River Connection, as well as the references to documents and sources cited in this comment letter. In addition, policies and programs have been revised to include additional provisions recommended by RMA.</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
VC-Bio-2		<p>other sources.</p> <p>2. Impacts to Special Status Species. The analysis of all adverse impacts to listed species within unincorporated County areas of Santa Clara River and Santa Paula Creek and within the expansion zones did not provide sufficient detail of impacts to these adjacent populations, particularly. Within expansion areas, important connectivity features for wildlife movement (e.g., streams, riparian area, ridgelines) between core habitats within the County's regional corridor should be mapped and incorporated within planning documents to evaluate those reliant on the aquatic ecosystems.</p>	<p>Additional references for technical information have been added to the DEIR as suggested. The City respectfully disagrees with the statement that the analysis did not provide sufficient detail regarding impacts. CEQA Guidelines §15146 (Degree of Specificity) states: <i>"The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR."</i></p> <p>(a) <i>An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.</i></p> <p>(b) <i>An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow."</i></p> <p>The primary purpose of the General Plan and the General Plan EIR is to provide general guidance for the review and approval of subsequent specific development projects, and more detailed analysis and mitigation will be required in connection with those subsequent development proposals.</p>
VC-Bio-3		<p>3. Analysis of Project Alternatives. The alternatives analysis concludes that planned development within the expansion areas would result in similar development under County policies and standards for impacts to biological resources. However, this may not be true when County development standards are applied. Does the City's General Plan provide equal protections for biological resources and water resources as the County</p>	<p>This comment refers to the DEIR analysis of Alternative 2, which compares the Proposed General Plan to conditions that would be anticipated if the Adams and Fagan Canyon Expansion Areas remained in unincorporated Ventura County. The</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
		<p>currently provides in the expansion zones? Please also consider the County's Habitat Connectivity and Wildlife Corridor Overlay zone, protections afforded to Locally Important Species and Trees, and the policy and standards associated with the Water Protection District.</p>	<p>DEIR correctly notes that large-lot development could occur under County regulations, but the extent of such development is too speculative to quantify. The DEIR has been revised (p. 5-18) to include a reference to the County's Habitat Connectivity and Wildlife Corridor Overlay zone, protections afforded to Locally Important Species and Trees, and the policy and standards associated with the Water(shed) Protection District. However, the DEIR's conclusion that Alternative 2 "would reduce but not eliminate these (biological) impacts since large-lot development could still occur" remains valid.</p>
VC-Bio-4		<p>4. General Comments on General Plan Policies and Programs. While we recognize that comments are for revisions to the draft EIR, Planning Division staff has a few comments to the City's General Plan policies and programs to mitigate adverse impacts to biological resources in the unincorporated County and adjacent areas as follows:</p> <ul style="list-style-type: none"> • Policy ECR 3.2 Exotic Invasive Species. The spread of invasive species within the County is an issue of concern to the County. The County strongly supports the City's efforts to address the spread of invasive species through the new policy. Many invasive plants (e.g., Pampas grass) use wind to disperse across the landscape. When a Santa Ana wind occurs, these invasives can be spread miles away whether or not they are located adjacent to a natural area. By expanding the policy to prohibit the intentional planting of invasive and watch list species as documented by the California Invasive Plant Council at: http://www.cal-ipc.org the City can mitigate adverse impacts associated with their spread such as the increase of wildfire risk, erosion, water consumption, productivity of agricultural lands, etc. within the City Urban Restriction Boundaries and expansion areas. In addition, encouraging projects to incorporate best management practices to reduce the spread of invasive plants during construction activities would also help limit the impact of infestations within the County. • Policy ECR 3.3 Flood Control Channels. The incorporation of language that provides fish passage and wildlife movement designs within flood control projects is important for the survival of southern steelhead trout and other species within the County's watershed. • Program ECR 3.a Development Review. The County commends the City on strong standards associated with development review and recommends the following 	<p>The City appreciates these suggestions and Policies ECR 3.2 and ECR 3.4 and Program ECR 3.a have been revised to include additional requirements that will help protect biological resources (p. 4-13).</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
		<p>changes:</p> <ul style="list-style-type: none"> • Buffer zones of at least 100 feet should be maintained between urban development and sensitive native habitats. By including the qualifier “urban” development, the interpretation of this standard may lead someone to think that it does not apply to rural development occurring in expansion zones and other open space areas. Without this correction, the EIR analysis would need to be adjusted to address additional impacts on biological resources within these areas. • Lighting shall be shielded to avoid spillover into sensitive habitat areas and wildlife corridors. By including language that requires outdoor lighting to be directed downward and placed on a shut off timer it will further mitigate adverse impacts to the movements of nocturnal species. • Horse hitchracks and bicycle racks shall be located away from sensitive resource areas. Horses should be excluded from wetland and riparian areas. The standard is missing impacts to streams (bed and bank). • Homebuyers in Adams Canyon and Fagan Canyon shall be provided with educational literature describing.... The description of educational material should talk about consulting with experts on development of such materials and recommendations to protect livestock from predators. 	
VCWP-4	VCRMA/Public Works- Watershed Protection (2/6/2020)	This comment references information and conclusions related to water supply and wastewater treatment presented in the DEIR.	The City appreciates this comment. No changes to the DEIR or the General Plan are requested or required.
VCPD-1	VCRMA/Planning Division/ General Plan Update Section (2/6/2020)	This comment asserts that the draft EIR should analyze potential impacts of development under the 2040 General Plan through 2040 and should include all impacts related to the expansion areas. The comment also references preliminary development policies and standards that would apply to the expansion areas, and which must be refined as part of a future specific plan, as mitigation measures to reduce environmental impacts, and states: “These preliminary development policies and standards are not included within the goals, policies or programs of the 2040 General Plan, rather they are included in a discussion in the Specific Plans and Expansion Areas section. ... Given that these preliminary development policies and standards are subject to deferral and further refinement as part of a future specific plan, it is unclear how they may be relied upon in the draft EIR as feasible mitigation measures.” The County also recommends that the preliminary development policies and standards described for each Expansion Area should be included as mitigation measures in the DEIR.	Government Code §65300 requires that “ <i>Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency’s judgment bears relation to its planning.</i> ” (emphasis added) The Land Use Element notes that the designated Expansion Areas are currently within unincorporated Ventura County, which has jurisdiction over land use and development in those areas. The City of Santa Paula has identified Expansion Areas to be included in the City’s 2040 General Plan because those areas “bear relation” to the City’s long-range



Comment Number	Commentor/ (Date)	Comment Summary	City Response
			<p>planning, in part due to the fact that portions of those Expansion Areas have been designated by the voters as being within the Santa Paula “City Urban Restriction Boundary.” However, only after annexation by the City would land use authority over the Expansion Areas be transferred from Ventura County to the City. Therefore, no development can occur (and no impacts would result) unless and until those areas are annexed into Santa Paula.</p> <p>Section 2.1 (p. 2-2) of the Draft EIR notes that “The focus of the environmental analysis in the PEIR is on citywide cumulative impacts of implementation of the Plan. The 2040 planning horizon requires that individual projects assumed to occur under the Plan are identified at a conceptual level. This PEIR addresses environmental impacts to the level that they can be assessed without undue speculation (CEQA Guidelines §15145) and acknowledges the uncertainty in such an analysis.” This concept of a “programmatic” level of detail in the environmental analysis prepared for a long-range plan is a long-standing principle of CEQA.</p> <p>As stated in the Draft Land Use Element (p. 2-34) “Expansion Area boundaries and development assumptions are based upon prior planning studies and preliminary assessments of development constraints.” The description of each Expansion Areas contained in the Land Use Element establishes City policies for those Expansion Areas that would apply in the event those areas are annexed to Santa Paula. Those policies would be in addition to any applicable citywide policies and programs established in each General Plan element. The specific policies listed for Expansion Areas carry the same weight as any other general policy in the event of annexation. Because</p>



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			<p>detailed, site-specific land planning has not been done for the Expansion Areas, the stated policies and standards are characterized as “preliminary” and must be refined through the preparation of subsequent Specific Plans. Subsequent CEQA review will be required for Expansion Area Specific Plans, and the proponents of those projects will be required to demonstrate how those Specific Plans comport with all General Plan policies, including the preliminary Expansion Area policies and other citywide policies set forth in each element of the General Plan. To eliminate any ambiguity, the following statement will be added to the Expansion Area section of the Land Use Element (p. 2-34): “Each Expansion Area Specific Plan must demonstrate consistency with both the preliminary development standards and policies set forth herein as well as any other relevant policies of this General Plan.”</p> <p>Based on these facts and circumstances, no additional analysis is required at this time.</p>
VCPD-2		<p>Chapter 8 Cumulative Impacts of the draft EIR indicates that the analysis of cumulative impacts presented in the SCAG 2016-2040 RTP/SCS Program EIR is incorporated by reference pursuant to CEQA Guidelines §15130(d). However, the SCAG 2016-2040 RTP/SCS Program EIR did not analyze the development potential of the expansion areas noted in Table 2-3 (above) by the City of Santa Paula. Therefore, the draft EIR should include a cumulative impact analysis for the Adams Canyon, Fagan Canyon, East Area 3, West Area 2, and South Mountain expansion areas.</p>	<p>The SCAG 2016-2040 RTP/SCS Program EIR analyzed the cumulative impacts of projected development as described in the 2040 Regional Growth Forecast (an Appendix to the RTP/SCS). As noted in Chapter 3 of the Santa Paula 2040 General Plan DEIR (beginning on p. 3-22) the anticipated level of development analyzed in the DEIR (including the Expansion Areas) is consistent with the SCAG 2040 Regional Growth Forecast, upon which the RTP/SCS Program EIR is based. Therefore, the cumulative impact analysis presented in the DEIR already includes potential development in the Expansion Areas and no additional analysis is required.</p>



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VCPD-3	VCRMA/Planning/Planning Programs (2/7/2020)	This comment is a cover transmittal memo for other County comments. No substantive comments are contained in this letter.	No response is necessary
VCPD-4	VCRMA/Planning Division/ Long Range Planning Section (2/7/2020)	1. This comment questions the geographic scope of the 2040 General Plan, and specifically whether it includes the current Sphere of Influence approved by LAFCo in 2018 and whether development estimates shown in Table 3.4-8 for the Sphere of Influence and Expansion Areas are based upon the current County land use and zoning designations.	For clarification, the proposed Expansion Area map and statistical summary table from the Draft 2040 General Plan have been added in Section 3.4-2 of the DEIR (beginning on p. 3-7) and a cross-reference has been added in the Land Use and Planning chapter of the DEIR (p. 4.11-1). In addition, footnote 7 has been added to renumbered Table 3.4-9 clarifying that development estimates for the Expansion Areas are based upon Draft General Plan designations, not current County plans and zoning.
VCPD-5		This comment also states: "If the table represents potential development as a result of annexation of the expansion areas, a comprehensive impact analysis should be completed in each section of the environmental document with this as the baseline. Development projections in these expansion areas would be contrary to the City's actions in 2018 to remove these expansion areas from the City's Area of Interest (AOI) processed through LAFCo."	As noted in the responses to comments from the RMA/General Plan Update Section, above, the Draft General Plan includes proposed land use designations for territory outside current City boundaries that in the City's judgment bears relation to its planning, as allowed by State law. The EIR analysis reflects potential development in those areas, and notes that "The proposed 2040 General Plan reflects Santa Paula's current Sphere of Influence as adopted by LAFCo on February 21, 2018 (Exhibit 3.4-1 on page 3-6). The proposed Land Use Element notes that prior to development in Expansion Areas that are outside the current SOI, such as Adams or Fagan Canyons, LAFCo approval of an amendment to the SOI as well as annexation to the City would be required." (p. 4.11.14) For clarification, this statement has also been added in Section 3.4-2 (p. 3-7).
VCPD-6		"If the table captures development potential within and as part of unincorporated Ventura County, the purpose of providing these projections is unclear. However, if this information describes projections for areas in unincorporated Ventura County to remain in unincorporated Ventura County, please clarify this in the environmental document."	The estimated level of development includes potential development that could occur in the SOI and Expansion Areas based upon the City's Proposed 2040 General Plan if those areas are annexed into



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			Santa Paula.
VCPD-7		2. LAFCo. In Table 3.5-1, Public Agencies Expected to Use this EIR, LAFCo is identified as an agency with which Permits/Other Approvals/Consultation is needed for "Amendments to the Sphere of Influence and annexations." Are amendments to the City's sphere of influence or annexations proposed as part of the 2040 Santa Paula General Plan? Also, County of Ventura Planning Division is not identified on this table. If any amendments to the City's sphere of influence or annexations occur which involve land within unincorporated Ventura County, the Ventura County Planning Division shall be consulted in addition to LAFCo.	The Proposed 2040 General Plan anticipates that SOI amendments and annexations will be proposed over the General Plan time horizon consistent with the Land Use Element; however, no new annexations or SOI amendments are proposed at this time. The timing of future annexation or SOI amendment proposals will be influenced by property owner objectives and market conditions. Table 3.5-1 has been revised to include consultation with Ventura County Planning Division in connection with any future annexation or SOI amendment proposals.
VCTC-1	Ventura County Transportation Commission (2/7/2020)	VCTC supports the City's efforts to incorporate compact growth near transit, mobility network improvements, and complete streets policies and Downtown revitalization into the General Plan.	The City appreciates VCTC's comments. No revisions to the DEIR or Draft General Plan are required.
VCTC-2		VCTC also supports Policy LU 1.11 encouraging compatible land uses along the Railroad Corridor, as well as Circulation and Mobility Element policies and programs to promote a balanced multi-modal transportation system.	The City appreciates VCTC's comments. No revisions to the DEIR or Draft General Plan are required.
VCTC-3		In its capacity as the designated Airport Land Use Commission for Ventura County, VCTC also supports land use designations that conform with the Airport Comprehensive Land Use Plan, and programs to address existing incompatible land uses and legal nonconforming uses.	The City appreciates VCTC's comments. No revisions to the DEIR or Draft General Plan are required.
Individual Comments			
Kular-1	John Kular, P.E. (1/6/2020)	FEMA is in the process of updating the Flood Information Study (FIS) and Flood Insurance Rate Maps (FIRMs) for the Santa Clara River. FEMA is looking into the appropriateness of the City using preliminary FIS maps in the new General Plan at this time.	Please note that the Land Use Map published in the Final Program EIR (Figure 3.4-1) and in the Final Draft 2040 General Plan Update (Figure 2-1) depicts Floodway Hazard Area as per City's estimation of eventual (un-adopted) FIRM 06111C0779F. However, the Flood Hazard Zones Map published in the Final Program EIR (Figure 4.10-2) and in the Final Drafter 2040 General Plan Update (Figure 5-3) depicts



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			<p>Floodway Hazard Area as specified per FIRM 06111C0779E (Dated January 20, 2010) and shown as current map on FEMA Flood Hazards website (URL).</p> <p>Acknowledging the afore-mentioned estimation of un-adopted FIRM 06111C0779F, the Land Use Maps (EIR Figure 3.4-1 and General Plan Figure 2-1) contain the following notation: <i>The information displayed on this map is intended for general reference purposes only, and is not warranted for completeness or accuracy or intended for use in flood hazard assessment.</i></p> <p>During the preparation of the 2040 General Plan Update and Program EIR, City Staff have sought to ensure that all technical data incorporated into, or referenced within, are the most recent available at the time of document publication. Please be aware that FEMA data, like all technical data, will continue to be updated after the certification of the Program EIR and adoption of the 2040 General Plan Update. In order to ensure the most recent technical data guides City Staff decision-making in the future, Table 4.10-4 General Plan Policies and Programs Related to Stormwater Flood Hazards specifies Policies and Programs explicitly requiring all development to comply with existing regulations intended to reduce flood hazards. Specifically: <i>HPS 2.a. Update regulations. Review flood hazard maps and data annually and ensure that the most recent regulations and sources of information are used in reviewing development proposals.</i></p> <p>In addition, FEMA regulations and the National Flood Insurance Program (NFIP) help to reduce the potential for flood damage by avoiding development in flood-prone areas. The City is a participating</p>



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			<p>community in the NFIP. The City's Municipal Code also includes land use and building regulations that mitigate potential impacts related to flood hazards. These regulations include Title XV, Chapter 151 (Flood Damage Prevention), Title XVI, Chapter 16.80 (subdivision regulations), Title XVI, Chapters 16.96, 16.97 and 16.98 (grading regulations), and Title XV, Chapter 150 (building codes).</p>
Newby-1	S.S. Newby (1/23/2020)	<ul style="list-style-type: none"> -Designated land uses in the 100 block of N. 7th Street should be residential. -Concern regarding including residential areas within the "Downtown" designation -Concern regarding events that impact this residential area (traffic, parking, noise) -Suggest the former K-Mart property be used for events or a new downtown 	<p><i>(Note: This comment is not regarding the Draft EIR)</i></p> <p>Staff concur with this concern related to the compatibility of commercial office land use within the single-family residential context of N 7th St and recommend that the land use designation be changed to a residential designation consistent with that of abutting properties to the north (Medium-High Density Residential) which would allow residential uses to a maximum of 21 units per acre. Though the land use designation of parcels on the east side of N 7th St will remain Commercial, this area is proposed to be included within the Downtown Plan District Overlay, featuring policies prioritizing housing development. Please note that the overlay is a planning tool to induce compatible residential infill and mixed-use development (reinforcing existing architectural character), upgrade infrastructure (streets, utilities, parking, etc) and improve conditions for pedestrians (safer crossings, pocket parks, etc) without altering the underlying land use designation. Future updates to the Development Code will be proposed in order to comply with the General Plan designation.</p> <p>Regarding this concern related to residential development within the Downtown Plan District</p>



Comment Number	Commentor/ (Date)	Comment Summary	City Response
			<p>Overlay being “responsible in some way for expenditures that should only apply to downtown businesses”, Staff point out that General Plan Land Use designations are in no way linked to funding assessments such as the recently approved Property-Based Improvement District (PBID). The Downtown Plan District Overlay is a long-range planning tool that is part of the general blueprint for the growth of the City, while the PBID is a short-term administrative tool that assesses opted-in member properties for site-specific improvements such as lighting, signage, accessibility provisions, paving, etc., and encompasses a much smaller area.</p> <p>Staff will take into advisement this suggestion that the former K-Mart property on Faulkner Rd be designated for more intensified uses.</p>
8th-1	330½ S. 8 th St (2/1/2020)	K-Mart in Santa Paula should be replaced by Target	<p><i>(Note: This comment is not regarding the Draft EIR)</i></p> <p>The General Plan guides the types of uses that are appropriate in different areas but does not determine which specific tenants or businesses will locate in particular properties. Those decisions are made by property owners and tenants.</p>
Ana-1 and Ana-2	428 Anacapa Terrace (2/3/2020 & 2/11/2020)	<p>Why would SP want sand and gravel mining in open spaces? Have we forgotten the Broad Beach restoration project and the lawsuits which SP lost? The beach will require sand ad infinitum which means trucks and trucks hauling SP sand to Malibu. Does this make sense? Mining should not be allowed in open spaces.</p> <p>RE: Sand/Gravel mining in Open Space :bad idea: This makes “beach nourishment” difficult to sustain. Adding 240,000 cubic yards of sand — the amount, for example, to make a half-mile-long beach about 100 feet wide — requires 24,000 dump trucks full of sand. Even working seven days a week, it would take more than 16 months to bring in that much sand. Depending on how fast the sand washes away, a project of this scale would need to be repeated every few years, according to reports by Gary Griggs, who has studied coastal systems across...</p>	<p><i>(Note: This comment is not regarding the Draft EIR)</i></p> <p>Surface mining is currently allowed by conditional use permit (CUP) in Santa Paula’s Open Space zones. The proposed change would reconcile an inconsistency between the General Plan and the Development Code. In addition, this designation would be consistent with Ventura County policy (surface and in-river mining is an allowable use subject to discretionary review in the ECU-Open Space land use designation per the Draft Ventura</p>



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		<p>https://www.latimes.com/projects/la-me-sea-level-rise-california-coast/</p>	<p>County General Plan dated January 2020). As part of the CUP review process the City has authority to establish conditions and mitigation requirements on mining operations to address the issue of sand transport.</p> <p>To further address this issue, revisions are proposed in the Policy ECR 5.1 and Program 5.b of the Environmental and Cultural Resources Element of the 2040 General Plan:</p> <p>ECR 5.1 Mineral resource management. Ensure proper management of mineral resource lands in conformance with State law to facilitate long-term production while minimizing environmental impacts and incompatibilities with adjacent uses. <u>The City shall require discretionary development for all mining activities in streams and rivers to incorporate all feasible measures to mitigate beach sand replenishment impacts.</u> Incompatible uses should not be allowed adjacent to mineral and petroleum resource areas. Compatible interim uses such as outdoor storage, lumber yards, plant nurseries and recreation that do not preclude extraction uses may be allowed in mineral resource areas.</p> <p>ECR 5.b Permit review. As part of the permit process, require existing and proposed mining and petroleum operations to comply with State and City regulations, and demonstrate that they will not create significant aesthetic, noise, odor or dust impacts on adjacent uses, <u>and incorporate all feasible measures to mitigate beach sand replenishment impacts.</u> Permit requirements shall include submittal and approval of a Mineral Reclamation Plan in accordance with the California Surface Mining and Reclamation Act (SMARA).</p>



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3. Revisions to the Draft EIR

Revisions to the Draft EIR are presented in ~~strikeout~~/underline format Volume II-Revised Draft EIR. These revisions are in response to comments received during the Draft EIR public review period as well as staff-initiated changes and clerical corrections. These revisions correct minor errors, clarify or amplify environmental information, do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis.



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4. City Council Resolutions and NOD

Attached hereto are the City Council resolutions certifying the Final EIR and approving the Santa Paula 2040 General Plan and the filed Notice of Determination.



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RESOLUTION NO. 2020-7246

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA PAULA CERTIFYING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (SCH NO. 2017111033) AND ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE SANTA PAULA 2040 GENERAL PLAN UPDATE

The City Council of the City of Santa Paula does resolve follows:

SECTION 1: The City Council finds and declares that:

- A. In accordance with California Government Code §65400, the City of Santa Paula has prepared a comprehensive and long-term General Plan Update (“GPU”) to guide development and provide a basis for decision-making for the City through the year 2040;
- B. The City of Santa Paula is the Lead Agency for the GPU, as defined by Section 21067 of the California Environmental Quality Act (“CEQA”) Statutes (Public Resources Code Section 21000 et seq.);
- C. On February 1, 2017, the City disseminated a Notice of Preparation (“NOP”) to solicit comments on the scope and content of the environmental analysis for the Proposed GPU. The NOP was sent to the California Office of Planning and Research, State Clearinghouse (“SCH”), responsible and trustee agencies; noticed in the Santa Paula Times on February 1, 2017; and emailed to individuals who subscribed to receive General Plan Update notifications. The NOP was circulated for a review period that commenced on February 1, 2017 and ended on March 17, 2017;
- D. On November 8, 2017, the City disseminated a Revised Notice of Preparation (NOP) to solicit comments on the scope and content of the Program Environmental Impact Report (PEIR) for the Proposed GPU. The NOP was sent to the SCH, responsible and trustee agencies; noticed in the Santa Paula Times on Wednesday, November 8, 2017; and emailed to individuals who subscribed to receive General Plan Update notifications. The NOP was circulated for a review period that commenced on November 8, 2017 and ended on December 11, 2017;
- E. Upon receipt of the Revised NOP, the SCH assigned the following reference number for all transmittals associated with the PEIR: 2017111033;
- F. On March 2, 2017 and November 28, 2017 Scoping Meetings were held at Santa Paula City Hall, City Council chambers;

- G. Comments were submitted in response to the NOP and the Revised NOP by public agencies, public interest organizations and individuals, which were considered and incorporated where appropriate into the Draft General Plan Update and/or Draft PEIR documents;
- H. A Draft PEIR was prepared by the City of Santa Paula, as Lead Agency, incorporating all of the mandated contents pursuant to CEQA Guidelines Section 15120 et seq.;
- I. On December 20, 2019, upon completion of the Draft PEIR, a Notice of Completion ("NOC") was filed with SCH pursuant to CEQA Guidelines Section 15085, and a Notice of Availability ("NOA") was distributed pursuant to CEQA Guidelines Sections 15086 and 15087. The Draft EIR was concurrently made available for public review on the City's General Plan website (www.mysantapaula.com) and at Santa Paula City Hall and the Santa Paula Public Library;
- J. A 45-day public review period for the Draft PEIR extended from December 20, 2019 to February 7, 2020, during which time written comments were received on the Draft PEIR;
- K. After receiving public comments on the Draft PEIR, the City prepared a Final PEIR for the Proposed GPU. The Final PEIR includes the written comments received on the Draft PEIR, the City's responses to those comments, and proposed revisions, clarifications and minor corrections to the PEIR made in response to comments received on the Draft PEIR as well as minor corrections to the documents that have been identified by City staff;
- L. On February 13, 2020 notification of the February 25, 2020 public hearing before the Planning Commission and the public hearing before the City Council on March 4, 2020 for the Proposed GPU and Final PEIR was published in the Santa Paula Times, posted on the City website, and sent via email to the City's GPU interest list;
- M. On February 21, 2020 the Final PEIR was made available for public review at Santa Paula City Hall and on the City's GPU website, and notice was provided to each public agency that submitted comments on the Draft PEIR of the availability of the Final PEIR, in conformance with CEQA Guidelines Section 15088;
- N. On February 25, 2020 the Planning Commission conducted a duly noticed public hearing and solicited testimony from all interested persons regarding the Final PEIR, as well as the Proposed GPU, and concluded said hearing on that date.
- O. By adoption of Resolution No. 3806 on February 25, 2020, the Planning Commission recommended that the City Council certify the PEIR.
- P. All legal prerequisites to the adoption of this resolution have occurred;

- Q. The documents and materials constituting the administrative record of the proceedings upon which the Planning Commission's and City Council's decisions are based are located at the City of Santa Paula, Community Development Department, 200 S. 10th Street, Santa Paula, CA 93060.

SECTION 2: Program Environmental Impact Report (PEIR) SCH No. 2017111033 has been prepared according to the requirements of the California Environmental Quality Act (CEQA) and guidelines promulgated thereunder.

SECTION 3. All potentially significant impacts will be reduced to a level of less than significant through policies and programs contained in the GPU with the exception of the following:

- a. Aesthetics – Implementation of the Proposed GPU would result in a substantial adverse effect on a scenic vista. [Impact AES-1]
- b. Aesthetics – Implementation of the Proposed GPU would result in a substantial adverse effect regarding degradation of the existing visual character or quality of public views of the site and its surroundings in non-urbanized areas; or conflict with applicable zoning and other regulations governing scenic quality in an urbanized area. [Impact AES-3]
- c. Aesthetics – Implementation of the Proposed GPU would result in creation of a new source of substantial light or glare. [Impact AES-4]
- d. Agriculture and Forestry Resources – Implementation of the Proposed GPU would convert important farmland to non-agricultural use. [Impact AG-1]
- e. Air Quality – Implementation of the Proposed GPU would result in a short-term 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. [Impact AQ/GHG-2]
- f. Air Quality – Implementation of the Proposed GPU would expose sensitive receptors to substantial pollutant concentrations. [Impact AQ/GHG-3]
- g. Biological Resources – Implementation of the Proposed GPU would result in a substantial adverse effect on a candidate, sensitive, or special status species. [Impact BIO-1]
- h. Biological Resources – Implementation of the Proposed GPU would result in a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. [Impact BIO-2]
- i. Biological Resources – Implementation of the Proposed GPU would interfere substantially with the movement of 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. [Impact BIO-4]

- j. Hazards and Hazardous Materials – Implementation of the Proposed GPU would result in a safety hazard for people residing or working in the project area within an airport land use plan or within two miles of a public airport or public use airport or within the vicinity of a private airstrip. [Impact HAZ-4]
- k. Noise – Implementation of the Proposed GPU would result in a significant temporary increase in noise levels. [Impact N-1]
- l. Noise – Implementation of the Proposed GPU would result in a significant permanent increase in traffic noise levels. [Impact N-2]
- m. Noise – Implementation of the Proposed GPU would result in the generation of excessive groundborne vibration or noise. [Impact N-3]
- n. Wildfire – Implementation of the Proposed GPU would exacerbate wildfire risk and related exposure to pollutants. [Impact WF-1]
- o. Wildfire – Implementation of the Proposed GPU would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. [Impact WF-2]
- p. Wildfire – Implementation of the Proposed GPU would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. [Impact WF-3]

SECTION 4: In accordance with CEQA Section 21081, specific overriding economic, legal, social, technological, or other benefits of the project have been identified that outweigh the significant effects on the environment. The City Council adopts the findings set forth in Exhibit A, CEQA Findings and Statement of Overriding Considerations.

SECTION 5. The City Council finds that the Final EIR, attached hereto as Exhibit B, constitutes an accurate and complete statement of the environmental impacts of the proposed project and reflects the independent judgment of the City Council. The City Council hereby certifies the Final EIR.

SECTION 6: The documents and materials that constitute the record of proceedings on which this Resolution is based are located at the City of Santa Paula, Community Development Department, 200 S. Tenth Street, Santa Paula, CA 93060.

SECTION 6: This Resolution will remain effective until superseded by a subsequent resolution.

PASSED AND ADOPTED this 4th day of March, 2020



Richard Araiza, Mayor

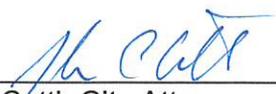
ATTEST:



Rose Chaparro, Deputy City Clerk
City of Santa Paula



APPROVED AS TO FORM



John Cotti, City Attorney

APPROVED AS TO CONTENT



Dan Singer, City Manager

Exhibit A: CEQA Findings and Statement of Overriding Considerations
Exhibit B: Final Program EIR

EXHIBIT A

CEQA FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS SANTA PAULA 2040 GENERAL PLAN FINAL PROGRAM EIR

The following findings are made pursuant to the California Environmental Quality Act (CEQA - Public Resources Code Section 21081) and CEQA Guidelines Sections 15088.5, 15089, 15090, 15091, 15092 and 15093.

1. CONTENTS OF THE FINAL ENVIRONMENTAL IMPACT REPORT

Pursuant to CEQA Guidelines Section 15132, the Final Environmental Impact Report (FEIR) for the Santa Paula 2040 General Plan Update (the "Project") is comprised of the following:

- a. Draft EIR (DEIR) with revisions
- b. A list of agencies or persons who submitted comments on the DEIR
- c. Comments received on the DEIR
- d. City responses to significant environmental points raised in the DEIR comments

2. FULL DISCLOSURE

The FEIR constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The FEIR has been completed in compliance with CEQA and Tribal Consultation requirements pursuant to State law. The omission of some detail or aspect of the FEIR does not mean that it has been rejected by the City.

3. LOCATION OF RECORD OF PROCEEDINGS

The documents and other materials that constitute the record of proceedings upon which the City's decisions regarding the 2040 General Plan are based are in the custody of the City Clerk, City of Santa Paula, 970 Ventura Street, Santa Paula, CA 93060.

4. FINDINGS REGARDING THE DRAFT 2040 GENERAL PLAN AND THE FINAL EIR

In response to comments from individuals and public agencies, changes have been incorporated into the Project subsequent to publication of the DEIR. The changes to the DEIR are described in Volume II of the FEIR. On the basis of the City's review and consideration of the FEIR, the following findings are made:

- a. Factual corrections and minor changes have been set forth as clarifications and modifications to the DEIR;
- b. The factual corrections and minor changes to the DEIR are not substantial changes in the DEIR that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project, a feasible way to mitigate or avoid such an effect, or a feasible project alternative;
- c. The factual corrections and minor changes to the DEIR will not result in new significant environmental effects or substantially increase the severity of the previously identified significant effects disclosed in the DEIR;
- d. The factual corrections and minor changes in the DEIR will not involve mitigation measures or alternatives that are considerably different from those analyzed in the DEIR that would substantially reduce one or more significant effect on the environment; and

- e. The factual corrections and minor changes to the DEIR do not render the DEIR so fundamentally inadequate and conclusory in nature that meaningful public review and comment would be precluded.

Pursuant to Section 15088.5 of the CEQA Guidelines, the changes would not result in any new significant environmental impacts nor substantially increase the severity of significant impacts described in the DEIR. Therefore, none of the conditions set forth in CEQA requiring recirculation of a DEIR have been met. Incorporation of the factual corrections and minor changes to the DEIR into the FEIR does not require the DEIR to be circulated again for public comment.

5. NATIVE AMERICAN CONSULTATION

In accordance with California Government Code Section 65352.3 and California Public Resources Code Section 21080.3.1 et seq., the City of Santa Paula requested a list of Tribal Organization contacts from the Native American Heritage Commission, and the City subsequently sent notification letters to those tribal organizations in compliance with State law. No requests to conduct formal consultation were received by the City from any of the tribal representatives contacted; therefore, no tribal consultation was conducted or required.

6. FINDINGS ADDRESSING THE ISSUES ANALYZED IN THE FEIR

6.1 FINDINGS THAT CERTAIN UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

The FEIR identifies impacts that cannot be fully mitigated and are therefore considered significant and unavoidable. Such impacts are acceptable when weighed against the overriding social, economic, legal, technical, and other considerations, including the beneficial effects of the project as described in the Statement of Overriding Considerations included herein. For each of these significant and unavoidable impacts identified in the FEIR, feasible changes or alterations have been required in, or incorporated into, the Project to avoid or substantially lessen the significant environmental effect, as summarized below:

a. Impact AES-1: Substantial adverse effect on a scenic vista.

Project impacts.

Development consistent with the 2040 General Plan would convert substantial undeveloped areas to urban or suburban uses. Adams Canyon and Fagan Canyon would be the most highly impacted, as these areas currently support primarily agriculture and/or open space. Additional infill development within the urbanized portions of the city would result in incremental visual changes.

Cumulative impacts.

Development throughout the region would result in the conversion of open space to urban uses, and impacts of the proposed Project to scenic vistas would be cumulatively considerable.

Mitigation Measures:

All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs, as described in FEIR Table 4.2-1.

Finding:

The proposed policies and programs would enhance the visual character of development in undeveloped areas and also encourage cluster development, open space protection, and the use of natural materials. However, future development, particularly in the hill and canyon areas north of the city, would change the essential character of undeveloped areas from rural to suburban. No additional mitigation measures are available to address this impact, which would be significant and unavoidable.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts on scenic vistas within the Santa Paula area, incremental impacts would be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

b. Impact AES-3: Degradation of the existing visual character or quality of public views of the site and its surroundings in non-urbanized areas; or conflict with applicable zoning and other regulations governing scenic quality in an urbanized area.

Project impacts.

Development consistent with the 2040 General Plan would convert substantial undeveloped areas that are within public viewsheds to urban or suburban uses. The Expansion Areas would be the most highly impacted, as these areas currently support primarily agriculture and natural open space. As noted above under Impact AES-1, although the proposed policies and programs summarized in Table 4.2-1 would substantially reduce potential impacts to the existing visual character or quality of undeveloped expansion areas, impacts would still be significant and unavoidable.

Cumulative impacts.

Anticipated new growth and development throughout the SCAG region would change the character of the region over time, and impacts of the proposed Project to existing visual character would be cumulatively considerable.

Mitigation Measures:

All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs, as described in FEIR Table 4.2-1.

Finding:

The proposed policies and programs incorporated into the Project as described in FEIR Table 4.2-1 would enhance the visual character of development in undeveloped areas, and also encourage cluster development, open space protection, and the use of natural materials. However, future development, particularly in the hill and canyon areas north of the city, would change the essential character of undeveloped areas from rural to suburban. No additional mitigation measures are available to address this impact, which would be significant and unavoidable.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts to the existing visual character within the Santa Paula area, incremental impacts would be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

c. Impact AES-4: Creation of a new source of substantial light or glare

Project impacts.

New development as contemplated in the proposed General Plan would result in new sources of light and glare, particularly in undeveloped Expansion Areas. Measures to control light spillage from new outdoor lighting fixtures such as street lighting, pedestrian lighting, recreational facilities lighting and security lighting are required by Section 16.42.050 of the Development Code, as described in FEIR Section 4.2-1. In addition, proposed General Plan policies and programs that would address this issue are listed in Table 4.2-2.

Cumulative impacts.

Anticipated new growth and development throughout the SCAG region would result in additional sources of light and glare, and impacts of the proposed Project would be cumulatively considerable.

Mitigation Measures:

All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs, as described in FEIR Table 4.2-2.

Finding:

Although the proposed General Plan policies and programs together with existing regulations such as §16.42.050 of the Development Code, which establishes standards for outdoor lighting, including lighting intensity and shielding to prevent light spillage onto adjacent properties, would substantially reduce potential impacts to the existing visual character or quality of the Planning Area, impacts are still considered to be significant due to the potential for urban development in Expansion Areas where no major sources of light and glare currently exist.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts related to light and glare, incremental impacts would be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

d. Impact AG-1: Convert important farmland to non-agricultural use

Project impacts.

As seen in Table 4.3-1 and Exhibit 4.3-1, approximately 646 acres within the city and over 12,000 acres in the entire Area of Interest is designated Prime or Unique Farmland or

Farmland of State or Local Significance. Portions of the Adams Canyon and Fagan Canyon Expansion Areas also support high quality soils, mostly within their lower reaches and particularly in natural drainage areas. Since the precise location of future development within the Expansion Areas has not been established, prime soils within these areas or other areas within the Sphere of Influence could be impacted by future development. This is a potentially significant impact.

Cumulative impacts.

Anticipated new growth and development throughout the SCAG region would result in the loss and disturbance of agricultural lands, and impacts of the proposed Project would be cumulatively considerable.

Mitigation Measures:

All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs, as described in FEIR Table 4.3-2.

Finding:

While the General Plan policies listed in Table 4.3-2 would substantially reduce this potential impact, they would not ensure the preservation of all important farmland; therefore, this impact is considered significant and there are no feasible mitigation measures other than the proposed General Plan policies that could further reduce the impact to a level that is less than significant.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts to important farmland within the Santa Paula area, incremental impacts would be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

e. Impact AQ/GHG 2: 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

Project impacts.

Construction activities associated with the proposed General Plan would occur over many years and would generate short-term emissions of criteria air pollutants. The primary sources of particulate matter (PM₁₀ and PM_{2.5}) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary source of VOC emissions is the application of architectural coatings and emissions associated with asphalt paving. Because the proposed General Plan is a long-term policy document and the timing of specific developments is not known, it is not possible to quantify air pollutant emissions associated with construction activity. However, on a citywide basis it is possible that construction emissions could exceed the significance thresholds established in the Ventura County Air Quality Assessment Guidelines. Therefore, short-term impacts would be potentially significant.

Cumulative impacts.

Development and infrastructure projects within the SCAG region and surrounding areas

would have the potential to result in a significant cumulative impact with regard to violating an air quality standard or contributing substantially to an existing or projected air quality violation due to short-term construction emissions, and impacts of the proposed Project would be cumulatively considerable.

Mitigation Measures:

Proposed 2040 General Plan policies that will help to reduce potential short-term impacts from construction are listed in Table 4.4-9. In addition, the control measures, regulations, incentives and smart growth policies established by VCAPCD will also substantially reduce these impacts.

Finding:

Although the control measures, regulations, incentives and smart growth policies established by VCAPCD together with policies and programs incorporated into the 2040 General Plan would substantially reduce short-term emissions, these impacts are considered significant and unavoidable.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts to short-term emissions, incremental impacts would be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

f. Impact AQ/GHG 3: Expose sensitive receptors to substantial pollutant concentrations

Project impacts.

Substantial concentrations of air pollutants over a long period of time are linked to adverse health effects especially when located in proximity to sensitive receptors. Certain populations, such as children and the elderly, are more sensitive to air pollution. Sensitive receptors include residential areas, schools, medical facilities, senior centers, and nursing homes.

Sources of substantial pollutant concentrations could include stationary sources, such as industrial and commercial facilities, and mobile sources, such as highways and rail lines. The major source of mobile pollutants is diesel particulate matter (DPM) from heavy trucks on highways. DPM emissions have been associated with acute (short-term) and chronic (long-term) health effects, such as the worsening of heart and lung diseases. State and federal requirements such as low-sulfur diesel fuel and tighter emissions standards for heavy-duty diesel trucks will reduce these emissions over time as older vehicles are replaced with new, cleaner vehicles. However, in order to reduce exposure of sensitive populations to DPM, the California Air Resources Board (CARB) recommends that local governments avoid locating new sensitive land uses within 500 feet of high-volume roadways.

The SR-126 freeway is the roadway with the highest traffic volumes in Santa Paula. In comparison to other freeways in Southern California, traffic volumes on SR-126 are relatively low. For example, 2014 average traffic volume on SR-126 was approximately 48,000 vehicles/day compared to 134,000 vehicles/day on the SR-101 freeway in Oxnard.

“High-volume roadways” are defined as those that, on an average day, have traffic in excess of 50,000 vehicles in a rural area and 100,000 vehicles in an urban area (*Public Resources Code* §21151.8). Santa Paula is considered a rural area; therefore, no high-volume roadways are currently within Santa Paula. However, over the 2040 General Plan horizon period traffic volumes on SR-126 could exceed 50,000 vehicles/day.

The majority of existing land uses on the south side of SR-126 in Santa Paula are commercial or industrial and are not considered sensitive receptors. However, residential neighborhoods are located adjacent to SR-126 between Shell Road and Steckel Drive. On the north side, a substantial portion of the land within 500 feet of the freeway between Peck Road and 13th Street is developed with existing residential neighborhoods. Although SR-126 is not currently considered to be a high-volume roadway under State law, sensitive uses near the freeway may still experience elevated levels of air contaminants.

Table 4.4-9 lists proposed General Plan policies and programs that would substantially reduce potential exposure of sensitive receptors to pollutant concentrations along major roadways such as SR-126. However, since sensitive land uses would continue to exist within 500 feet of SR-126 under the proposed Plan impacts would be considered significant and unavoidable.

Cumulative impacts.

Regional growth consistent with the RTP/SCS would result in a significant cumulative impact by exposing sensitive receptors to substantial pollutant concentrations. The proposed 2040 General Plan is consistent with the RTP/SCS and impacts of the proposed General Plan would be cumulatively considerable.

Mitigation Measures:

Existing State and federal requirements such as low-sulfur diesel fuel and tighter emissions standards for heavy-duty diesel trucks will reduce pollutant emissions over time as older vehicles are replaced with new, cleaner vehicles. Table 4.4-9 lists proposed General Plan policies and programs that would substantially reduce potential exposure of sensitive receptors to pollutant concentrations along major roadways such as SR-126.

Finding:

Although the control measures, regulations, incentives and smart growth policies established by VCAPCD together with policies and programs incorporated into the 2040 General Plan would substantially reduce short-term emissions, these impacts are considered significant and unavoidable.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts to short-term emissions, incremental impacts are considered to be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

g. Impact BIO-1: Substantial adverse effect on a candidate, sensitive, or special status species

Project impacts.

Future development under the proposed General Plan could result in significant impacts on sensitive species due to disturbance or removal of the critical habitat of sensitive species during grading, excavation, and construction activities, or permanently from the ongoing operation and/or maintenance. Indirect impacts could result from elevated dust or noise levels, sediment and pollutants in runoff from construction activities, alteration in stream hydrology, or exterior lighting.

Fire clearance or fuel modification zones are typically required for construction within high fire hazard areas. Such clearing could result in the direct loss of oaks and other significant native trees, as well as other native plants. Secondary impacts would include the invasion of non-native plants into disturbed areas, which could then invade adjacent natural open space areas, further reducing habitat values.

Under the proposed General Plan, most of the Santa Clara River channel, as well as the Santa Paula Creek channel are designated Open Space. The Open Space land use designation is intended to preserve, manage, and protect natural resources, open space land, cultural and historic resources, geologic hazard areas, parks and recreational resources, and scenic resources. The Open Space designation would limit allowable uses and maintain natural resources along the channel.

Policies in the proposed General Plan that would reduce potential impacts on special status species from future development are listed in Table 4.5-1. These policies and programs would be implemented through the City's development review process and regulatory permitting required by existing Federal and State laws regarding special status species of plants or animals. Although these policies and programs would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.

Cumulative impacts.

Incremental impacts of development throughout the region to biological resources, when considered with related past, present, or reasonably foreseeable, probable future projects in the SCAG region and surrounding Southern California region, would be expected to result in a significant cumulative impact with regard to biological resources because these projects would contribute to an increase in habitat fragmentation and development upon native habitats. The incremental effects of the proposed 2040 General Plan on sensitive species would be cumulatively considerable.

Mitigation Measures:

Under the proposed General Plan, most of the Santa Clara River channel, as well as the Santa Paula Creek channel are designated Open Space. The Open Space land use designation is intended to preserve, manage, and protect natural resources, open space land, cultural and historic resources, geologic hazard areas, parks and recreational resources, and scenic resources. The Open Space designation would limit allowable uses and maintain natural resources along the channel.

Policies in the proposed General Plan that would reduce potential impacts on special status species from future development are listed in Table 4.5-1. These policies and programs would be implemented through the City's development review process and regulatory permitting required by existing Federal and State laws regarding special status

species of plants or animals. Although these policies and programs would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.

Finding:

Although General Plan policies and programs would substantially reduce impacts to biological resources, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas. These impacts are considered significant and unavoidable.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts, incremental impacts to biological resources are considered to be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

h. Impact BIO-2: 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 Wildlife or U.S. Fish and Wildlife Service

Project impacts.

The Planning Area includes riparian habitat and other sensitive natural areas, as shown in Exhibit 4.5-2. Future development under the proposed General Plan has the potential to impact these areas through direct disturbance as discussed under Impact BIO-1 above, and through invasion of exotic species into habitat areas, increased urban runoff containing pollutants, and impacts from increased human activity (such as encroachment into sensitive areas and impacts from increased lighting). Impacts from urban runoff are addressed in Section 4.10 - Hydrology and Water Quality. Potential impacts would be substantially reduced through the proposed General Plan policies listed in Table 4.5-1, as well as by provisions of the Municipal Code regarding control of lighting impacts as discussed in Section 4.2, Aesthetics. Although these policies and programs together with other requirements in the Municipal Code would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.

Cumulative impacts.

Anticipated development in the SCAG region is expected to result in significant cumulative impacts on sensitive plant communities and riparian habitat as a result of an incremental loss of habitat. The incremental effects of the proposed 2040 General Plan on riparian habitat or other sensitive areas would be cumulatively considerable.

Mitigation Measures:

Policies in the proposed General Plan that would substantially reduce potential impacts on special status species from future development are listed in Table 4.5-1. These policies and programs would be implemented through the City's development review process and regulatory permitting required by existing Federal and State laws regarding special status species of plants or animals. Although these policies and programs would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could

result in significant impacts due to the predominantly natural condition of these areas.

Finding:

Although the General Plan policies and programs would substantially reduce impacts to riparian habitat or other sensitive natural community, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas. These impacts are considered significant and unavoidable.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts, incremental impacts to biological resources are considered to be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

i. Impact BIO-4: 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

Project impacts.

When habitat linkages are too small or narrow, they may collapse ecologically due to encroachment or edge effects. An example is a corridor intended for deer movement that is so narrow that adjacent residential lighting is too bright for deer to tolerate crossing open pools of light. For small mammals, such as rodents and reptiles, habitat linkages need to be sufficiently wide to decrease the predatory effects of domestic dogs and cats associated with suburban development. In general, the larger a link is, the better it functions for the movement of animals and genetic material between major areas of open space.

Development and land use changes in the Expansion Areas could impact local movement pathways and migratory routes such as Santa Paula Creek and Adams and Fagan Barrancas, which provide connections to the Santa Clara River. While the proposed General Plan policies and programs listed in Table 4.5-1 would substantially reduce this impact, it would remain significant.

Cumulative impacts.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts on migratory corridors and nursery sites as a result of an incremental loss of habitat and habitat fragmentation. Although the policies and programs proposed in the 2040 General Plan would reduce incremental effects on wildlife movement and nursery sites, impacts would be cumulatively considerable.

Mitigation Measures:

Policies in the proposed General Plan that would substantially reduce potential impacts on special status species from future development are listed in Table 4.5-1. These policies and programs would be implemented through the City's development review process and regulatory permitting required by existing Federal and State laws regarding special status species of plants or animals. Although these policies and programs would substantially

reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.

Finding:

Although the General Plan policies and programs would substantially reduce impacts to wildlife movement or nursery sites, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas. These impacts are considered significant and unavoidable.

While the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts, incremental impacts to wildlife movement are considered to be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

j. Impact HAZ-4: 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 or within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Project impacts.

Santa Paula Airport, a general aviation facility privately owned and operated by the Santa Paula Airport Association, is located in the south-central portion of the city. The airport property is designated Airport in the proposed Land Use Plan (Exhibit 3.4-1 and Figure LU-1 of the Land Use Element). Risks associated with Santa Paula Airport include those to people and property located near the airport and persons aboard an aircraft. Risk is reduced through land use policies and regulations that limit the types of uses and number of people within crash hazard zones and by protecting airspace from land uses that could create flight hazards.

The Airport Comprehensive Land Use Plan (CLUP) for Ventura County seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that structures and activities do not encroach upon or adversely affect the use of navigable airspace. Air safety zones applicable to Santa Paula Airport are designated in the CLUP as described in the Regulatory Setting section and are shown in Exhibit 4.9-1 and Figure 5-7 of the draft Hazards and Public Safety Element.

To the west of the airport, the eastern portion of Rancho Santa Paula Mobile Home Park, which is located west of Steckel Drive and south of SR-126, is within the designated Outer Safety Zone. According to the CLUP, all residential uses are classified as Unacceptable within an Outer Safety Zone.

Any existing structures or uses that were lawfully established or constructed prior to the adoption of the CLUP and that are inconsistent with current air safety zones are considered legal nonconforming uses and are subject to the regulations contained in Chapter 16.110 - Nonconformities of the Development Code (SPMC Title XVI). Those regulations are intended to encourage the city's continuing improvement by limiting the

extent to which nonconforming structures and uses may continue to be used, expanded, or replaced, while improving the health, safety, and welfare of residents without creating an economic hardship for individual property or business owners.

Conformance with proposed Hazards and Public Safety Element Program HPS 5.d would help to facilitate the modification or replacement of nonconforming uses such as Rancho Santa Paula Mobile Home Park in order to reduce or eliminate incompatibilities with the CLUP. However, the proposed 2040 General Plan would not ensure that this incompatibility will be eliminated. Therefore, this existing incompatibility is considered a significant adverse impact.

Mitigation Measures:

Policies in the proposed General Plan that would substantially reduce potential impacts related to air safety hazards are listed in Table 4.9-3. These policies and programs would be implemented through the City's development review process. Although these policies and programs would substantially reduce impacts, potential impacts would be considered significant and unavoidable.

Finding:

Although General Plan policies and programs would substantially reduce impacts related to air safety hazards, existing non-conforming uses would be considered a significant unavoidable impact.

Although this impact would be significant and unavoidable, it is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

k. Impact N-1: Temporary increase in noise levels

Project impacts.

Although no specific development projects are proposed as part of the 2040 General Plan, future construction activities anticipated in the Plan would result in temporary noise. During site preparation and construction, the use of heavy equipment could cause temporary noise that may affect sensitive uses near the construction site. In order to minimize disturbance, the City's Noise Ordinance (SPMC Chapter 93) limits the allowable hours of construction to between 8:00 a.m. and 6:00 p.m. Monday through Friday with limited exceptions such as emergency work. In addition, the 2040 General Plan policies and programs listed in Table 4.13-4 would help to mitigate short-term noise impacts. While the current Noise Ordinance and proposed General Plan policies would substantially reduce short-term noise impacts from development anticipated under the 2040 General Plan, it is possible that in some sensitive locations and circumstances, particularly infill development, such impacts could remain significant.

Cumulative impacts.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts related to temporary construction noise. Although the policies and programs proposed in the 2040 General Plan would reduce incremental effects of construction noise, these impacts would be cumulatively considerable.

Mitigation Measures:

The City's existing Noise Ordinance together with policies and programs in the proposed General Plan would substantially reduce potential impacts related to short-term noise. These policies and programs would be implemented through the City's development review process.

Finding:

Although existing City regulations and General Plan policies and programs would substantially reduce impacts related to short-term noise, these impacts are considered significant and unavoidable.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts related to temporary construction noise. Although existing City regulations together with the policies and programs proposed in the 2040 General Plan would substantially reduce incremental effects of construction noise, these impacts would be cumulatively considerable.

Although these impacts would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

I. Impact N-2: Permanent increase in noise levels

Project impacts.

Traffic is the major long-term source of unwanted noise in most areas of Santa Paula. As described in Section 4.17 – Transportation, future development consistent with the 2040 General Plan would result in an incremental increase in traffic volumes along many roadways. The increase in traffic volumes would result from additional development within Santa Paula and from cumulative regional growth. An increase in traffic volume is typically accompanied by higher noise levels adjacent to roads.

The exterior noise standards shown in Exhibit 4.13-3 are recommended by OPR and have been adopted by the City in the current Noise Element. These exterior standards are based upon the interior noise levels that are typically achieved. As noted in Table 4.13-1, standard construction techniques result in interior noise levels that are approximately 25 to 30 dB lower than exterior levels. State law establishes an interior noise limit of 45 dBA for habitable rooms. The 2040 General Plan would continue to utilize these standards. The acceptability of ambient exterior noise levels is dependent on the type of land use, with noise-sensitive uses such as residential and hotels/motels having the lowest "normally acceptable" noise levels. Commercial and industrial uses are considered less noise-sensitive and have higher tolerances for exterior noise. In new developments it is desirable to locate noise-sensitive uses away from heavily-traveled streets; however, many older communities such as Santa Paula were developed prior to the adoption of noise compatibility standards, and residential uses are often found along busy streets where noise levels are considered unacceptable under current standards.

Based upon traffic characteristics, noise levels along roadways have been estimated for both current (2016) and 2040 General Plan horizon year conditions. The level of significance for exterior noise generated by traffic is determined through a comparison of noise levels and the type of adjacent land use. Based upon the Noise/Land Use Compatibility Matrix (Exhibit 4.13-3), the proposed 2040 Land Use Plan (Exhibit 3.4-1) and

the estimated noise levels shown in Table 4.13-5, there are 23 road segments where the projected 2040 noise level would exceed the “normally acceptable” level for the type of adjacent land use. In all but four of these segments the projected increase in noise levels expected to occur by 2040 is less than 3 dB CNEL, which is typically not perceptible. However, because noise would exceed the level considered “normally acceptable” this is considered a potentially significant impact for purposes of General Plan analysis.

In three of the 23 road segments where the 2040 noise level is projected to exceed adopted standards the projected increase is greater than 5 dB CNEL. Although an increase of 5 dB would be perceptible to most people, this change would occur over a long period of time. However, because noise would exceed the level considered “normally acceptable” this is considered a potentially significant impact for purposes of General Plan analysis. In addition, one segment (Peck Road from the SR-126 eastbound ramps to its southern terminus) has a projected noise increase of greater than 5 dB CNEL. Although the projected 2040 noise level would not exceed standards and the increase would occur over a long period of time, this is also considered a potentially significant impact because a 5 dB increase would be perceptible to most people.

Cumulative impacts.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts related to long-term traffic noise. Although the policies and programs proposed in the 2040 General Plan would reduce incremental effects of traffic noise, these impacts would be cumulatively considerable.

Mitigation Measures:

The 2040 General Plan includes policies and programs (Table 4.13-5) requiring new noise-sensitive uses located in areas where noise levels exceed “normally acceptable” levels to demonstrate that they have incorporated design features to reduce interior noise to acceptable levels.

Finding:

Although existing City regulations and General Plan policies and programs would substantially reduce potential long-term traffic noise impacts for new developments to a level that is less than significant, existing noise-sensitive uses may continue to be impacted by noise levels that exceed current standards. Over time, these uses may be remodeled or replaced with new structures incorporating noise mitigation. However, the continuing exposure of existing uses to noise levels that exceed current standards is considered to be a significant impact with no feasible mitigation available in the near term.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts related to long-term traffic noise. Although the policies and programs proposed in the 2040 General Plan would reduce incremental effects of traffic noise, these impacts would be cumulatively considerable.

Although impacts related to long-term traffic noise would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

m. Impact N-3: Generation of excessive groundborne vibration or noise

Project impacts.

As with air-borne noise, ground-borne vibration or noise can result from construction activities or ongoing operations. Sensitive receptors for vibration are the same as for noise, with one exception that is particularly relevant for Santa Paula. Historic structures can be particularly sensitive to damage from excessive vibration because they tend to be more fragile than modern construction.

Construction of new developments anticipated by the 2040 General Plan could generate ground-borne vibration and noise on and adjacent to construction sites. Effects on buildings in the vicinity of a construction site can range from imperceptible effects at the lowest levels, to low rumbling sounds and perceptible vibrations at minor levels, and structural damage at very high vibration levels. Historic buildings are more susceptible to damage from vibration, and some types of construction equipment, such as pile drivers, have the potential to cause substantial disturbance or physical damage to nearby uses. Long-term activities, such as heavy truck or rail traffic and some kinds of industrial operations, can also generate ground-borne vibration of varying degrees. These impacts are potentially significant.

Cumulative impacts.

Anticipated development in the SCAG region would be expected to result in potentially significant cumulative impacts related to ground-borne vibration. Although the proposed policies and programs would reduce the effects of implementation of the 2040 General Plan, incremental effects related to ground-borne vibration would remain cumulatively considerable.

Mitigation Measures:

The 2040 General Plan includes policies and programs (Table 4.13-4 and Table 4.13-5) intended to reduce the effects of noise and vibration. In most cases, these policies and programs would reduce potential impacts to a level that is less than significant. However, it is possible that some types of activities such as construction requiring the use of pile drivers or compactors, particularly near historic buildings, could result in significant impacts even with adherence to these policies and programs.

Finding:

Although existing City regulations and General Plan policies and programs would substantially reduce potential impacts related to ground-borne noise and vibration, such impacts are considered significant with no feasible mitigation available.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts related to ground-borne noise and vibration. Although the policies and programs proposed in the 2040 General Plan would substantially reduce incremental effects, these impacts would be cumulatively considerable.

Although impacts related to ground-borne noise and vibration would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

n. Impact WF-1: Exacerbate wildfire risk and related exposure to pollutants

Project impacts.

As shown in Exhibit 4.19-1, portions of Santa Paula's Expansion Areas (primarily Adams Canyon and Fagan Canyon) are located within Moderate, High and Very High Fire Hazard State Responsibility Areas, and some areas within the City limits and Sphere of Influence along the northern City boundary are designated Very High Fire Hazard Local Responsibility Areas or Moderate, High or Very High Fire Hazard State Responsibility Areas. New development within designated fire hazard zones would exacerbate risk from wildfire and related pollutants by placing additional structures and people in those high-risk areas. This is a potentially significant impact.

Cumulative impacts.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts related to wildland fire hazards. Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan, impacts would remain cumulatively considerable.

Mitigation Measures:

Policies and programs in the proposed General Plan (Table 4.19-1) would substantially reduce wildfire risk by requiring new developments within the fire hazard areas to include effective mitigation to minimize wildland fire risks in compliance with State and local regulations. However, while implementation of these policies and programs would substantially reduce risk, impacts resulting from new development within the Very High Fire Hazard Zone as proposed in the General Plan would still be considered significant.

Finding:

Although implementation of proposed General Plan policies and programs would substantially reduce wildfire risk, impacts resulting from new development within the Very High Fire Hazard Zone as proposed in the General Plan would still be considered significant with no feasible mitigation available.

Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan related to wildfire risk, impacts would remain cumulatively considerable.

Although impacts related to wildfire risk would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

o. Impact WF-2: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment

Project impacts.

New development in designated fire hazard areas as proposed in the 2040 General Plan would require installation and maintenance of infrastructure such as roads, water tanks and electrical power lines. As shown by recent wildfires such as the Thomas Fire, some infrastructure, particularly electrical power lines, have the potential to exacerbate risk of wildfire under some conditions. This is considered a potentially significant impact. Other impacts that could be caused by the construction of infrastructure, such as soil erosion, water pollution, disturbance of sensitive wildlife habitat, etc., are addressed in other topical

sections of the FEIR.

Cumulative impacts.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts due to wildfire risk related to the installation or maintenance of infrastructure. Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan, impacts would remain cumulatively considerable.

Mitigation Measures:

Policies and programs in the proposed General Plan (Table 4.19-1) would substantially reduce wildfire risk related to infrastructure by requiring effective mitigation to minimize wildland fire risks in compliance with State and local regulations.

Finding:

Although implementation of proposed General Plan policies and programs would substantially reduce wildfire risk, impacts related to infrastructure within the Very High Fire Hazard Zone as proposed in the General Plan would still be considered significant with no feasible mitigation available.

Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan related to infrastructure in wildfire hazard areas, impacts would remain cumulatively considerable.

Although impacts related to wildfire risk would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

p. Impact WF-3: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

Project impacts.

As noted under Impacts WF-1 and WF-2, new development in designated fire hazard areas as proposed in the 2040 General Plan could expose people and structures to risk of wildfire. As seen from recent wildfires such as the Thomas Fire, the destruction of vegetative cover and physical changes to soil due to intense heat can exacerbate slope instability, flooding and mudflows during rainstorms in burned areas. Although the policies and programs in the proposed General Plan (Table 4.19-1) would substantially reduce such risk, this is considered a potentially significant impact.

Cumulative impacts.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts due to wildfire risk and related post-fire slope instability. Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan, potential impacts would remain cumulatively considerable.

Mitigation Measures:

Policies and programs in the proposed General Plan (Table 4.19-1) would substantially

reduce impacts related to wildfire and post-wildfire slope instability by requiring effective mitigation to minimize wildland fire risks in compliance with State and local regulations.

Finding:

Although implementation of proposed General Plan policies and programs would substantially reduce wildfire risk and related post-fire slope instability, impacts would still be considered significant with no feasible mitigation available.

Anticipated development in the SCAG region would be expected to result in significant cumulative impacts due to wildfire risk and related post-fire slope instability. Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan, impacts would remain cumulatively considerable.

Although impacts related to wildfire risk and post-fire slope instability would be significant and unavoidable, they are acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 9, below).

7. FINDING THAT MITIGATION OF CERTAIN IMPACTS IS WITHIN THE RESPONSIBILITY AND JURISDICTION OF ANOTHER PUBLIC AGENCY

There are no mitigation measures identified in the FEIR that are within the responsibility or jurisdiction of another public agency. However, implementation of some proposed General Plan policies and programs will involve review by, and City coordination with, other Federal, State or local agencies.

8. FINDINGS THAT IDENTIFIED PROJECT ALTERNATIVES OR MITIGATION MEASURES ARE NOT FEASIBLE

Where potentially significant impacts have been identified, all feasible mitigation strategies have been incorporated into General Plan policies and programs discussed herein. Where potential mitigation has been deemed infeasible, it is discussed in the FEIR and the above sections.

The FEIR examines two alternatives:

- Alternative 1 – No Project: Retention of the Existing General Plan
- Alternative 2 – Development within the current Sphere of Influence

Section 5 of the FEIR presents the City's analysis of potential alternatives to the proposed General Plan, including the rationale for the selection of alternatives, a relative comparison of impacts of each alternative, the ability of each alternative to meet the City's objectives for the 2040 General Plan, and the identification of the environmentally superior alternative. This alternatives analysis is summarized below.

a. Alternative 1 - No Project: Retention of the Existing General Plan

Summary of the Alternative:

CEQA requires the evaluation of the No Project Alternative. The purpose of describing

and analyzing a No Project alternative is to allow decision-makers to compare the impacts of approving the Proposed Project with the impacts of not approving the project (CEQA Guidelines §15126.6(e)). When the Proposed Project is the revision of an existing land use or regulatory plan, the No Project alternative will be the continuation of the existing plan or regulation into the future. CEQA Guidelines §15126.6(e)(3)(C) states that the Lead Agency should analyze the impacts of the No Project alternative by projecting what would reasonably be 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.

Consistent with these requirements, the No Project alternative compares the environmental effects of future development consistent with the current General Plan to development as proposed in the 2040 General Plan.

Findings:

Comparison of Environmental Impacts

As shown in FEIR Table 5.4-1, Alternative 1 (No Project) would result in impacts that are similar to the Proposed Project for most topics. With regard to transportation, the No Project Alternative would result in conflicts with adopted policies because several road segments would not meet the current LOS C standard.

Ability to Meet Project Objectives

This alternative would be less likely to meet project objectives regarding consistency with the 2016-2040 RTP/SCS, transportation/mobility, economic development and revitalization of Downtown, as shown in FEIR Table 5.4-2.

Feasibility

Alternative 1 is considered to be feasible as it would retain existing City policy. However, it would be less successful in addressing changed circumstances such as recent State requirements related to greenhouse gases, transportation and mobility, and environmental justice, as well as City objectives related to economic development and Downtown revitalization.

b. Alternative 2 - Development within the current Sphere of Influence

Summary of the Alternative:

Under this alternative, urban development would be limited to areas within the Sphere of Influence (SOI) as adopted by LAFCo in 2018. The major difference between this alternative and the Proposed Plan is that urban development as described in the draft Land Use Element would not occur in Adams Canyon or Fagan Canyon because those areas would remain in unincorporated Ventura County. It should be noted that if the Adams Canyon and Fagan Canyon Expansion Areas are not annexed to the City of Santa Paula, many types of development would still be permitted under County land use regulations. Under the current County General Plan, the majority of the Adams and Fagan Canyon areas are designated Open Space-Urban Reserve (10 acre minimum) while a small portion is designated Agricultural-Urban Reserve (40 acre minimum). Therefore, under this alternative the Adams and Fagan Canyon Expansion Areas could potentially be subdivided into large lots. Under current County zoning regulations, a variety of structures

and uses are allowed in the Open Space and Agriculture zones, including agricultural service and storage facilities, packing houses, wineries, single-family homes (one per lot), accessory structures such as barns, farmworker housing complexes, residential care facilities, boarding houses, bed and breakfast inns, and equestrian centers. Together, Adams and Fagan Canyons encompass nearly 7,600 acres, which if subdivided into 10- to 40-acre parcels could potentially result in construction of a substantial number of new housing units and other structures contingent upon County review and approval. The County Habitat Connectivity and Wildlife Corridor Overlay Zone, protections afforded to Locally Important Species and Trees, and the policy and standards associated with the Watershed Protection District would help to reduce potential impacts of development. However, such large-lot development could result in impacts similar to the Proposed Project depending on the number of lots created and the nature of development, although such impacts are highly speculative.

Findings:

Comparison of Environmental Impacts

As shown in FEIR Table 5.4-1, Alternative 2 would avoid or reduce impacts in several topical areas because it would substantially reduce development in the Adams and Fagan Canyon Expansion Areas, which are predominantly agricultural and open space uses.

Ability to Meet Project Objectives

As shown in FEIR Table 5.4-2, this alternative would make it more difficult for the city to accommodate the level of residential development assumed in the 2016-2040 RTP/SCS due to the elimination of 945 potential housing units in the Adams and Fagan Canyon Expansion Areas. In addition, this alternative would significantly reduce opportunities for move-up housing.

Feasibility

Alternative 2 is considered to be feasible as it would be similar to the proposed Plan in all respects other than proposed development outside current City boundaries. However, it would be less successful in meeting project objectives, as described above.

Environmentally Superior Alternative:

An EIR must identify an “environmentally superior” alternative among those examined, and where the No Project Alternative is identified as environmentally superior, the EIR must identify an environmentally superior alternative from the other alternatives. The environmental impacts of each alternative are compared to the Proposed Project and evaluated as to whether their impacts would be similar to the Proposed Project, greater, or less than the Proposed Project.

As discussed in Section 5.4 of the FEIR, Alternative 2 (Development Within the Current Sphere of Influence) has been identified as the environmentally superior alternative. However, it would be less likely to meet basic project objectives of providing a full range of living options for residents of all ages and income levels, including move-up executive homes, and could be less likely to enhance the City’s fiscal sustainability through higher tax revenues. Due to the reduction in potential housing units in the Adams Canyon and Fagan Canyon Expansion Areas, this alternative could also hinder residential development consistent with the regional population and housing forecast assumed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy as compared

to the proposed 2040 General Plan.

9. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to CEQA Section 21081(b) and CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed 2040 General Plan against the unavoidable adverse impacts associated with the proposed project and has incorporated all feasible mitigation measures into the General Plan policies and programs. The City has also examined alternatives to the proposed project and has determined that adoption and implementation of the proposed project is the most desirable, feasible, and appropriate action.

9.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 5.1-3 of the FEIR summarizes the unavoidable significant impacts that would be expected to result from adoption and implementation of the proposed 2040 General Plan.

9.2 PROJECT BENEFITS

The City has balanced the proposed Project's benefits against its significant and unavoidable impacts. The City finds that the proposed Project's benefits outweigh the significant and unavoidable impacts and, therefore, that those impacts are acceptable in light of the proposed Project's benefits. The City finds that each of the following benefits is an overriding consideration, independent of the other benefits, that warrants approval of the proposed Project notwithstanding the proposed Project's significant and unavoidable impacts. The proposed Project would provide the following public benefits:

- a. The proposed 2040 General Plan provides a comprehensive update to the City's General Plan, last updated comprehensively in 1998, to reflect the community's values and vision for Santa Paula, provides updated policy directives to guide development to the 2040 horizon year, and addresses topics that have emerged as important priorities since the last update including greenhouse gas emissions, complete streets, non-motorized mobility, and environmental justice.
- b. The proposed Plan comprehensively addresses changed conditions in the city, and would implement smart growth principles, concepts of sustainable development and resource management, and environmental protection.
- c. The proposed Plan preserves the city's small-town character through policies and standards that maintain buildings at an appropriate scale and enhance the economic sustainability of Downtown.
- d. The proposed Plan enhances and supports a strong, diverse, and vibrant local economy through policies that stimulate sustainable businesses and jobs, enhance safe and attractive commercial corridors, and provide convenient services to residents, employees, and visitors.
- e. The proposed Plan promotes healthy and active lifestyles through land use and transportation improvements that enhance pedestrian, transit, and bicycle safety and access to a variety of destinations in the city.
- f. The proposed Plan fosters stewardship of Santa Paula's environmental resources, including air quality, water quality, open space, biological habitat and other natural resources.
- g. The proposed Plan will help reduce greenhouse gas emissions by encouraging active transportation, diverting solid waste from landfills, conserving water and improving the efficiency of energy use and utilizing renewable energy sources, benefitting the local

and global environment.

- h. The Plan's circulation system enhances mobility to make efficient use of the existing roadway capacity through the promotion of a multi-modal circulation system, including improvements to public transit and pedestrian and bicycle facilities.
- i. The Plan enhances Santa Paula's economic vitality through strategies that support Downtown revitalization, the efficient provision of infrastructure and public services, and expanded employment opportunities for local residents.

Finding:

The proposed 2040 General Plan represents a balance between several competing objectives of the City of Santa Paula. In consideration of the specific economic, legal, social, and technological, and other benefits of the proposed project, the unavoidable adverse environmental impacts are found to be acceptable in light of the specific project benefits listed above.

Based on the foregoing findings and the information contained in the record it is hereby determined that:

- a. All significant adverse effects on the environment that would result from approval of the project have been eliminated or substantially lessened to the extent feasible; and
- b. Any remaining unavoidable significant effects on the environment are found to be acceptable when balanced against the project benefits described above.

EXHIBIT "B"

SANTA PAULA 2040 GENERAL PLAN FINAL PROGRAM EIR
(posted at www.MySantaPaula.com)

Hard copies available at:

Community and Economic Development Department
(200 S 10th Street)

Blanchard Community Library
(119 N 8th Street)

City Council Chambers
(during hearing)

RESOLUTION NO. 2020-7247

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA PAULA ADOPTING THE SANTA PAULA 2040 GENERAL PLAN UPDATE

The City Council of the City of Santa Paula does resolve follows:

SECTION 1: The City Council finds and declares that:

- A. Local governments are authorized by Government Code §§ 65350 et. seq. to prepare, adopt and amend general plans;
- B. In accordance with California Government Code §65400, the City of Santa Paula has prepared a comprehensive and long-term plan to guide development and provide a basis for decision-making for the City through the year 2040;
- C. The Santa Paula 2040 General Plan Update (“GPU”) was developed through a combined effort involving community members, City staff, stakeholders, and consultants to establish goals, policies, and programs that will implement the vision of the community;
- D. The GPU includes the following mandatory general plan elements required by State law:
 - *Land Use Element* – Addressed in Chapter 2 - Land Use;
 - *Circulation Element* – Addressed in Chapter 3 - Circulation and Mobility;
 - *Conservation Element* – Addressed in Chapter 4 – Environmental and Cultural Resources;
 - *Open Space Element* – Also addressed in Chapter 4 – Environmental and Cultural Resources;
 - *Noise Element* – Addressed in Chapter 5 – Hazards and Public Safety;
 - *Safety Element* – Also addressed in Chapter 5 – Hazards and Public Safety;
- E. The GPU address the requirements of State law related to Environmental Justice throughout the GPU, as summarized in Table 2-1 of Chapter 2 – Land Use;
- F. The GPU incorporates without change the existing Santa Paula 2013-2021 Housing Element, previously adopted by the Santa Paula City Council on August 19, 2013;
- G. The GPU includes two optional elements: Chapter 6 – Public Services and Utilities and Chapter 7 – Economic Development and Downtown;

- H. Each Element of the GPU contains diagrams, data, analysis, standards and policies as required by State law; and the degree of specificity and level of detail for each Element of the GPU reflect local conditions and circumstances;
- I. The GPU is consistent with the Airport Comprehensive Land Use Plan for Ventura County, which was adopted by the Ventura County Airport Land Use Commission on July 7, 2000;
- J. The GPU and its Elements comprise a logical, integrated, internally consistent and compatible statement of goals, policies and objectives;
- K. The GPU contains specific programs that the City of Santa Paula intends to pursue in implementing the various Elements of the GPU;
- L. Pursuant to the California Environmental Quality Act (California Public Resources Code §§ 21000 et seq.) and the State California Environmental Quality Act Guidelines (14 California Code of Regulations §§ 15000 et seq.) (collectively, "CEQA"), the City has determined that a Program Environmental Impact Report ("PEIR") should be prepared in order to analyze the potential adverse environmental impacts of the GPU;
- M. The City prepared a PEIR in accordance with the requirements of CEQA;
- N. The PEIR identifies environmental impacts, including environmental impacts that are potentially significant but which the City finds can be substantially lessened through the imposition of feasible mitigation strategies that are incorporated into GPU policies and programs as identified in the PEIR;
- O. On February 25, 2020, the Planning Commission of the City of Santa Paula held a duly noticed public hearing to discuss the GPU and PEIR, and at such hearing the Planning Commission heard testimony from all interested persons regarding the GPU and the PEIR;
- P. By adoption of Resolution No. 3806 on February 25, 2020, the Planning Commission recommended that the City Council certify the PEIR;
- Q. By adoption of Resolution No. 3807 on February 25, 2020, the Planning Commission has recommended that the City Council adopt the 2040 General Plan Update;
- R. The March 4, 2020 staff report and supporting materials are found to be true, are adopted as findings, and are incorporated by reference into this Resolution; and,
- S. All other legal prerequisites to the adoption of this Resolution have occurred.

SECTION 2: Based on the entire record before the City Council and all written and oral evidence presented, including the staff report, and the information contained in the GPU and PEIR, the City Council makes the following findings pursuant to State law:

1. All Elements of the GPU provide for and promote overall objectives and policies that are compatible with each other, integrated, and internally consistent.
2. The GPU is reasonably related to the public health, safety and welfare because it guides and accommodates land uses, housing and circulation infrastructure in accordance with adopted regional and local population growth projections.
3. The proposed amendment is in the public interest, and there will be a community benefit resulting from the GPU.
4. Changes to the GPU Land Use Policy Map will not adversely affect surrounding properties.
5. The GPU does not require voter approval in accordance with either the SOAR Initiative or the 81 Acre Initiative because no development project would be authorized by the GPU.

SECTION 3. Based upon its adoption of Resolution No. 7246, the City Council finds that the GPU complies with CEQA, for the reasons more particularly set forth in Resolution No. 7246.

SECTION 4. Based upon the entire record before the City Council and the findings set forth herein, the City Council hereby approves the Santa Paula 2040 General Plan Update, attached hereto as **Exhibit "A"** to this Resolution.

SECTION 5. The documents and materials that constitute the record of proceedings on which this Resolution is based are located at the City of Santa Paula, Community Development Department, 200 S. Tenth Street, Santa Paula, CA 93060.

SECTION 6. This Resolution will remain effective until superseded by a subsequent resolution.

PASSED AND ADOPTED this 4th day of March, 2020



Richard Araiza, Mayor

ATTEST:



Rose Chaparro, Deputy City Clerk
City of Santa Paula



APPROVED AS TO FORM



Best Best & Krieger LLP

APPROVED AS TO CONTENT



Dan Singer, City Manager

Exhibit A: Santa Paula 2040 General Plan Update

EXHIBIT "A"

SANTA PAULA 2040 GENERAL PLAN UPDATE
(posted at www.MySantaPaula.com)

Hard copies available at:

Community and Economic Development Department
(200 S 10th Street)

Blanchard Community Library
(119 N 8th Street)

City Council Chambers
(during hearing)

2020 ENVIRONMENTAL FILING FEE CASH RECEIPT

Complete the information and submit with each set of documents presented for filing. Please provide an original set and (3) three sets of copies for filing.



20200320-10005453-0 1/1

Ventura County Clerk and Recorder
 MARK A. LUNN
 03/20/2020 11:40:50 AM
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RECEIPT NUMBER: 56 __ 03/04/20 __ 00
STATE CLEARINGHOUSE NUMBER (If applicable) 2017111033

LEAD AGENCY Santa Paula	LEAD AGENCY EMAIL jmitchem@spcity.org	DATE 03/17/2020
COUNTY/STATE AGENCY OF FILING Ventura, CA	DOCUMENT NUMBER	
PROJECT TITLE Santa Paula 2040 General Plan Update (Project #14-CI-03)		
PROJECT APPLICANT NAME Jeff Mitchem	PROJECT APPLICANT EMAIL jmitchem@spcity.org	PHONE NUMBER (805) 933-4214
PROJECT APPLICANT ADDRESS 970 Ventura St	CITY Santa Paula	STATE CA
		ZIP CODE 93060

PROJECT APPLICANT (Check appropriate box)

Local Public Agency
 School District
 Other Special District
 State Agency
 Private Entity

CHECK APPLICABLE FEES:

<input checked="" type="checkbox"/> Environmental Impact Report (EIR)	\$3,343.25	\$ 3,343.25
<input type="checkbox"/> Mitigated/Negative Declaration (MND)(ND)	\$2,406.75	\$ _____
<input type="checkbox"/> Certified Regulatory Program document (CRP)	\$1,136.50	\$ _____
<input type="checkbox"/> Exempt from fee		
<input type="checkbox"/> Notice of Exemption (attach)		
<input type="checkbox"/> CDFW No Effect Determination (attach)		
<input type="checkbox"/> Fee previously paid (attach previously issued cash receipt copy)		
<input type="checkbox"/> Water Right Application or Petition Fee (State Water Resources Control Board only)	\$850.00	\$ _____
<input checked="" type="checkbox"/> County documentary handling fee	\$50.00	\$ 50.00
<input type="checkbox"/> Other		\$ _____

PAYMENT METHOD:

Cash
 Credit
 Check
 Other

TOTAL RECEIVED \$ 3,393.25

SIGNATURE 	AGENCY OF FILING PRINTED NAME AND TITLE Jeff Mitchem, Planning and Economic Development Manager
Date 03/17/2020	Telephone Number (805)933-4214

DO NOT WRITE BELOW THIS LINE

The following will be completed by the County Clerk's Office

Signature of person receiving payment: _____, Total Recieved: \$ 3293.25
 Deputy County Clerk

Posted: MAR 20 2020 through MAY 06 2020

