

Comment Number	Commentor/ (Date)	Comment Summary	City Response
<b>Public Agency Comments</b>			
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, 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	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 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

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		<p>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>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	Ventura County Air Pollution Control District (7/30/2019)	<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 seeking funding (Moorpark), or are in the process of adopting one (Ventura, County of</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>

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		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

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			<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 &amp; 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"> <li>1. Revise Exhibit 4.17-9 to show the Class II bike lanes on 10th Street.</li> </ol>	<p>The final General Plan will incorporate this revision.</p>
CT-3		<ol style="list-style-type: none"> <li>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.</li> </ol>	<p>Caltrans concurrence is appreciated.</p>
CT-4		<ol style="list-style-type: none"> <li>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.</li> </ol>	<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>

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CT-6		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.	The City appreciates Caltrans' recommendations 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.
CT-7		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>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</u> movement of goods while minimizing conflicts with other road users and sensitive land uses. <u>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)	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.	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.
LAFCo-2		<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	The Draft General Plan has been revised to also note LAFCo's role in reviewing new or extended services (p. 1-7).

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

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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 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>	<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>
LAFc-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 <a href="http://ventura.lafco.ca.gov">ventura.lafco.ca.gov</a>, 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	<p>VCRMA/Biological Resources (2/6/2020)</p>	<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</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</p>

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		<p>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 other sources.</p>	<p>additional provisions recommended by RMA.</p>
VC-Bio-2		<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</p>

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			<p>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 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>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 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"> <li>• 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</li> </ul>	<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>

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		<p>planting of invasive and watch list species as documented by the California Invasive Plant Council at: <a href="http://www.cal-ipc.org">http://www.cal-ipc.org</a> 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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Program ECR 3.a Development Review. The County commends the City on strong standards associated with development review and recommends the following changes: <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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).</li> <li>• 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.</li> </ul> </li> </ul>	
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.

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VCPD-1	VCRMA/Planning Division/ General Plan Update Section (2/6/2020)	<p>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.</p>	<p>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 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</p>

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			<p>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 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</p>

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			<p>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>
VCPD-3	VCRMA/Planning/Planning Programs (2/7/2020)	<p>This comment is a cover transmittal memo for other County comments. No substantive comments are contained in this letter.</p>	<p>No response is necessary</p>
VCPD-4	VCRMA/Planning Division/ Long Range Planning Section (2/7/2020)	<p>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.</p>	<p>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.</p>
VCPD-5		<p>This comment also states: “If the table represents potential development as a result</p>	<p>As noted in the responses to comments from the</p>

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		<p>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."</p>	<p>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).</p>
VCPD-6		<p>"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."</p>	<p>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 Santa Paula.</p>
VCPD-7		<p>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.</p>	<p>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.</p> <p>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.</p>

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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.
<b>Individual Comments</b>			
	Ojai Rd (6/6/2019)	<p>I have lived here almost my entire life! Went to school here, our kids went to school here, I worked at the police department for over 20 years...we have a business here and try to go to stores and businesses in town instead of out of town.</p> <p>I would love to see a venue like the Santa Barbara Bowl (or something on a smaller scale) where we can have public concerts, weddings, celebrations in an outdoor setting...maybe in East Area Limoniera. We need space to have some cool things here like Ventura has Olivias Adobe where they have outdoor concerts in the summer...we always go there every year and wonder why we don't have similar???</p> <p>MAKE IT EASIER FOR BUSINESSES TO OPEN HERE! Hillgrillies' isn't open yet??? Now all of a sudden they are told to retro fit the building??? We need motivated people, with neat businesses to open up here!!! Why</p> <p>Fix downtown, fix up the 150 corridor, attract people going to Ojai to stop and eat/shop here!!! Open up a city-run old packing house to allow for cool shops, restaurants like Grand Central Station in LA...we need to do something...</p> <p>Fix our horrible roads--Virginia Terr, Harvard Blvd, streets north of Virginia Terr/east of Ojai Rd--those roads are horrible!!!</p>	<p>The draft General Plan includes a new Economic Development &amp; Downtown Element (Chapter 7) that includes many of these suggestions for encouraging tourism and boosting the local economy, and any additional specific suggestions would be much appreciated.</p> <p>One of the main objectives of the General Plan is to streamline the permit review process for developments that conform to the Plan and benefit the City. After completion of the General Plan update, the City intends to review the development standards and permit procedures contained in the Development Code in order to minimize delays for property owners and businesses.</p> <p>Some types of building improvements are required by State law and building codes to protect public safety, and the City has little or no authority to override those requirements.</p>

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			<p>The Circulation &amp; Mobility Element includes policies and programs to identify funding for road maintenance, such as State and Federal grants. Each year the City Council reviews revenues and infrastructure needs as part of the annual budget and Capital Improvement Program and the allocation of limited City funds is prioritized. All cities are struggling to keep up with necessary road maintenance with available revenues.</p>
	(6/6/2019)	Keep the Santa Paula Police Department under city control.	<p>Jurisdictional control of the Police Department is not within the scope of the General Plan. It is ultimately the responsibility of the City Council to determine the best way to provide public services such as public safety and law enforcement.</p>
	(6/11/2019)	<p>Up wind from my home across the street (142 north 11th street) is auto body shop, at times me and everyone else that lives on the west side of 11th street are subjected to heavy paint fumes, so bad that at times it irritates our eyes. In the past we've contacted the city but no results. WHY HAVE A AUTO PAINT SHOP SO NEAR TO OUR HOMES.</p>	<p>The subject site is designated Commercial by the existing and proposed General Plan. Automotive uses are presently permitted in this designation. However, please be aware that this site lies within the Downtown District Overlay, which encourages Development Code provisions to ensure land use compatibility.</p>
	141 Davis St (6/12/2019)	<p>I own the building at 141 Davis Street and received a notice of potential change to the General Plan. I accessed the map online and could find only a map with an overlay described as 'DD'. Can you provide any specific information on this address and how future changes to the GP would affect this property? I do not live in Santa Paula but wish to be informed of any potential changes.</p> <p>In regards to changes to consider, personally I would advocate for a change in zoning to live/work for this address (and others) since this street already has a mix of housing and commercial buildings. We wanted to change the building to live/work at one time but do to the existing GP that required a 'yard space' we couldn't. This prevents in-fill housing and a robust downtown retail scene for which the city advocates but makes difficult and costly. Thanks in advance for your response.</p>	<p>Provided brief summary of the proposed land use designation changes to subject property. In brief, note that the Downtown District is an optional "overlay" and will not change your existing land use designation. The fundamental purpose of the overlay is to encourage compatible residential infill and mixed-use development (like live-work), upgrade infrastructure (streets, utilities, etc) and improve conditions for pedestrians (safer crossings, pocket parks, etc). General Plan land use designations are intentionally conceptual in nature and constitute policy that will be</p>

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			advanced in greater detail in the form of changes to zoning standards early next year. Those zoning standards contain the detailed framework to guide development at the site scale.
	126 W Main St (6/17/2019)	<p>We own rental property in Santa Paula and were outraged that you are considering changing our area from Mixed Use: Office/Res to Med-Hi Dens Residential.</p> <p>Main Street is a busy traffic street with cars, trucks and children and people walking to and from the school. There is NO parking on the street because it is crowded with people living in the apartments in the area that do not provide parking for their tenants.</p> <p>Santa Paula has been overbuilt for years, even down in the river bed. We remember the flooding years ago where homes near the river were destroyed. The Thomas Fire burned through Santa Paula and you were lucky that it didn't burn down homes and kill people. Water is a rare resource, we have had several years of drought. Where are you going to get water for all these high density apartments? Ration the current residents?</p> <p>Please do not add to the overcrowding in Santa Paula by changing our property zoning to Residential Medium-High Density. This will devalue our property and impose a hardship on our tenants with the noise of people living in these high density apartments.</p>	Staff acknowledge the concern regarding limiting land use options to residential and will explore a potential alternate "mixed-use corridor" designation (Medium Density, Planned Development, Mixed-use, etc.) to allow mixed-use. Staff notes the significant constraint to development (other than status-quo which is predominately single-family) relating to the lack of utilities infrastructure, streets, septic, etc.
	428 Anacapa Terrace (6/17/2019)	<p>The 2005 Water Master Plan identified a centralized softening system which would encourage residents to discontinue use of water softeners which are causing elevated chlorides at the waste water plant. The RFP and RFQ for the new plant did not specify chloride compliance. So now the city has no plan to re-use water and reduce chlorides. For the latter, they are considering a pipe to Limoneira from the Waste water plant. Why would Limoneira want that highly chlorinated water?</p> <p>The city has made no plans for recycling water. Other than in EA1, no dual piping has been specified in Public Works projects. This must be rectified starting immediately with the two projects in design: cross town pipeline and Harvard upgrade.</p>	In 2006, the City approved Ordinance No. 1160 which prohibits the installation or replacement of Self-Regenerating Water Softening Appliances (SRWS) or "Water Softeners," in a residence located within the City's jurisdiction. In September 2015, Public Works established a Water Softener Buyback Program. This is a rebate program that incentivizes customers to remove any existing units with a goal to reduce chloride levels in the wastewater discharge system.

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		<p>The State of California has a goal of 2032 for a potable water reuse framework. Read about that here <a href="https://watereuse.org/">https://watereuse.org/</a></p> <p>The GP must be in sync with this framework specifying dual pipes and upgrades to the waste water plant.</p>	<p>In February 2018, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued a new Wastewater Discharge Requirement (WDR) Permit for the City of Santa Paula's Water Recycling Facility (SPWRF). The permit includes milestones to address Chloride levels in the treated effluent that discharge to the percolation ponds. The City drafted a Water Recycling Master Plan. The City has established a 5-Year Capital Improvement Project (CIP) that includes a Recycling Water Distribution project.</p>
	<p>220 N Mill Street (6/17/2019)</p>	<p>The General Land Use Plan Map needs to exclude property north of the Railroad tracks. These are primarily residential areas and churches. Some of the homes are also on the historical register. These properties should not be considered for downtown mixed use zoning.</p> <p>Change boundaries to exclude residential areas north of railroad tracks.</p>	<p>Staff have considered the many similar comments relating to the northern boundary of the Downtown District Overlay. Staff concur, and will amend the proposed northern boundary to be Railroad Ave. Further, Staff advise that the railroad right of way be included in the overlay in order to best incentivize redevelopment – public open space, infill housing, etc.</p>
	<p>428 Anacapa Terrace (6/18/2019)</p>	<p>"Water and sewer should conform to this plan....</p> <p><a href="https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/direct_potable_reuse.html">https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/direct_potable_reuse.html</a></p> <p>This plan recognizes dangers in pathogens and chemicals that must be addressed by local systems going forward.</p> <p>Water reuse goal. Three levels identified in the plan: direct, indirect and potable."</p>	<p>The City is formulating response to this issue which will be incorporated into the Draft General Plan and EIR.</p>
	<p>228 N. Mill Street (6/18/2019)</p>	<p>I attended the Workshop on June 17, 2019 and was disappointed to find out that Santa Paula was not going to apply for a Downtown designation to obtain federal funding in order to preserve the historic feeling and buildings in around the downtown area. It doesn't appear that preserving what has made Santa Paula a special to be is worth saving.</p>	<p>Staff have considered the many similar comments relating to the northern boundary of the Downtown District Overlay. Staff concur, and will amend the proposed northern boundary to be Railroad Ave. Further, Staff advise that the railroad right of way be included in the overlay in order to best incentivize redevelopment – public</p>

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		<p>I do not understand the properties included in the downtown designation north of Railroad. I was told we could opt out of the downtown designation, but my neighbor was told we could only express our opinions.</p> <p>I don't agree with direction the General Plan update is looking to take Santa Paula in. I think the sustainability is being overlooked. Affordable housing wasn't built into the new housing tracts, as its being done in so many other areas. There is no reason to make one section of town your affordability corridor.</p> <p>Parking is already a problem on several days of the week in our area because of the number of churches and growing congregations. While that is a good thing for the churches, it's not such a good thing for the people who live in the neighborhood and have no parking other than the street. None of that seems to have been addressed other than to tell us we could rent monthly parking spaces. It would seem to me that the actual residents in the neighborhood shouldn't be punished, but that the people coming to the location should have other parking options.</p> <p>I'll be at the June 25th workshop. I'm hoping some of what was said on Monday night will have been revised.</p> <p>I think there are many revisions that need to be made in the General Plan Update relating to the Downtown Designation overlay area.</p> <p>Thank you.</p>	<p>open space, infill housing, etc.</p> <p>The topic of Sustainability (both environmental and fiscal) is addressed in several parts of the draft General Plan. The following new goal statement has been added in the Land Use Element (Chapter 2, p. 2-3):</p> <p><b><i>LU 6 Sustainability, Resilience, and Environmental Justice.</i></b> <i>Land use and development decisions should encourage active engagement by all stakeholders, enhance sustainability and resilience related to changes in climate and economic conditions, and foster environmental justice.</i></p> <p>This issue is discussed further on pages 2-17 and 18, and Appendix B provides a detailed analysis of how the draft General Plan supports the regional Sustainable Communities Strategy.</p> <p>Goal LU-4 (p. 2-3) addresses fiscal sustainability:</p> <p><b><i>Goal LU 4 Infill and Urban Expansion.</i></b> <i>A balance of infill and urban expansion should be encouraged in appropriate locations and densities to accommodate new development commensurate with Santa Paula's desired growth in a manner that contributes to the City's long-term fiscal sustainability.</i></p> <p>The Economic Development &amp; Downtown Element (Chapter 7) addresses the issue of fiscal sustainability. This is a new element of the General Plan. This element contains an extensive discussion of how the City can</p>

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			<p>enhance fiscal and economic conditions for both residents and businesses.</p> <p>The issue of affordable housing is addressed primarily in the Housing Element, which is not part of the current General Plan update because State law establishes a separate schedule for housing elements. Santa Paula's Housing Element was last updated in 2013 and will be revised again in 2021. The Land Use Element supports affordable housing by providing more opportunities for infill housing. The new development currently under construction in East Area 1 does not preclude below-market housing if interested non-profit developers were able to secure sufficient grant funds to make such projects feasible.</p> <p>An overlay is a planning tool used by cities 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>
	17958 E. Telegraph Rd. (6/19/2019)	I have grown up at the address listed my entire life. It was once a thriving auto shop with our home on the property as well. If the general plan for land use goes through, this area will be zoned residential, which will impact the use of the building on my property as a business. I highly suggest that this are of Santa Paula remain as is so that the residents who live on these properties can continue to do so and if they have a building used as a business they should be allowed to continue to do so as well as this is their source of income. Changing this area to residential only will displace a lot of families who rely on their land as their source of income. I would	Staff acknowledge the concern regarding limiting land use options to residential and will explore a potential alternate designation (Medium Density, Planned Development, Mixed-use, etc.) to allow mixed-use. Staff notes the significant constraint to development (other than status-quo which is predominately single-family)

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		<p>like to see this area remain zoned as commercial and have the homes grandfathered in, or I suggest finding a way to zone it as commercial/residential so that families do not get displaced. I believe it is in the best interest of the Santa Paula community who own land/property/businesses/homes in this area for them to continue as it has been for the last several years.</p> <p>Either keep it as it currently is, or change it so that residents and business can both occupy the area.</p>	<p>relating to the lack of utilities infrastructure, streets, septic, etc.</p>
	<p>624 Teague Dr. (6/19/2019)</p>	<p>Without addressing crime/gang activity and homelessness as a top priority, all other plans are a waste of time.</p> <p>In May of 2015, Chief McLean provided statistics in regard to the Santa Paula crime rate indicating that we have the highest violent crime rate per 1,000 residents in Ventura County. I would be interested in seeing some updated statistics in regard to this problem.</p> <p>First, without the ability of the police to enforce the laws, including misdemeanors, no changes will occur. This requires lawful cooperation from victims, victim business owners, prosecutors, judges and the jail to support law enforcement efforts. A large order to be sure, but it should be a top priority necessitating "Environment Justice" (??) be put way down on the list of priorities.</p> <p>Second, the homeless in our city, a large percentage of which suffers from drug addiction and/or mental illness. There are churches /individuals in town that are currently making efforts to assist in this regard but need the City/Police.</p> <p>Obviously, if our residents /business owners do not feel safe in this city, there will be an exodus, and potential new residents/business owners will not replace those who leave.</p> <p>Our city has great potential, but safety and law enforcement must be top priorities.</p> <p>I have not seen the "General Plan" so am not sure these specific concerns have been addressed in detail. I have read the Executive Summary in its entirety.</p>	<p>The problem of crime is broad and spans multiple levels and agencies of government. With regard to law enforcement, the City's General Plan primarily focuses on the provision of physical facilities (such as police stations) and how land uses and physical design can support law enforcement. The issue of police protection is addressed in Chapter 6-Public Services and Utilities beginning on p. 6-3. Policy PSU 1.1 describes strategies for protecting people and property from criminal activity, Policy PSU 1.2 supports adequate funding for police protection, and Program PSU 1a through 1d describe specific actions the City intends to implement in support of law enforcement. The City Police Department is responsible for developing operational plans that are not a part of the General Plan.</p> <p>Homelessness is a growing problem in most cities throughout the country that has multiple facets including mental health, housing costs and economic opportunity. Under State law, cities are required to help address the problem of homelessness primarily through policies and programs in the Housing Element of the General Plan. Because the Housing Element must be updated on a separate State-mandated schedule, it is not being revised as part of this</p>

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			<p>General Plan update. The next Housing Element update is scheduled for 2021. The current Housing Element, adopted in 2013, addresses the issue of homelessness primarily through land use regulations that identify appropriate locations and standards for the establishment of emergency shelters. The City of Santa Paula has limited resources for addressing the root causes of homelessness, and primary responsibility for serving the needs of homeless persons falls upon charitable organizations such as Spirit of Santa Paula with some funding assistance provided by State and Federal government.</p>
	<p>428 Anacapa Terrace (6/26/2019)</p>	<p>On 2-36 you state.... Remainder of West Area 2 (126.6 acres) Any area this large requires a SOAR vote of the electorate. No such vote occurred, so West Area @ is NOT in the CURB.</p>	<p>As shown in Fig. 2-2, the remainder portion of the West Area 2 Expansion Area (i.e., excluding Santa Paula Business Park West Specific Plan) is not within the CURB; therefore, a vote to amend the CURB would be necessary prior to annexation and development of this area. This comment is correct, but no change to the draft General Plan is necessary.</p>
	<p>428 Anacapa Terrace (6/26/2019)</p>	<p>The Draft states that all expansion areas are in the CURB, but...  CURB? I find no evidence the CURB was modified for the 125 West Expansion Area. The lack of history is a RED FLAG. The CURB was modified 7 times. I have identified five of the modifications:  -Resolution 6459 2008 EA1 -Resolution 6411 2007 Measure A7 vote Adams -Resolution 6236 2005 resolution not founds, need resolution text -Resolution 6241 2005 Land for new (current) WRF plant, council action -Resolution 5592 2003 Peck/Foot Hill subdivision - by vote -Resolution 5407 2000 Initial SOAR vote - need map . Based on this link, there is no mention of West Expansion Area. Need text of resolution. <a href="http://www.ci.santa-paula.ca.us/planning/GeneralPlan.htm">http://www.ci.santa-paula.ca.us/planning/GeneralPlan.htm</a></p>	<p>The Expansion Areas section of Chapter 2-Land Use (p. 2-32) states: "Of the six Expansion Areas, three have portions that extend beyond the current CURB line: West Area 2, South Mountain and Adams Canyon. East Area 3 and Fagan Canyon are entirely within the CURB." Therefore, this comment is correct but no change to the draft General Plan is necessary.  All City Council resolutions are filed by the City Clerk and copies may also be obtained from the Community Development Department. The most recent SOAR/CURB measure, adopted in November 2016, is included as Appendix C of the draft 2040 General Plan.</p>

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		<p>-Curb Vote 2016 - modified for a small piece south of 126. ... cutout noted in article...<a href="http://citizensjournal.us/santa-paula-curb-the-soar/">http://citizensjournal.us/santa-paula-curb-the-soar/</a></p> <p>Records must be produced for the two missing resolutions.</p>	
	990 Coronado Cir (7/16/2019)	Questions about plans for Fagan Canyon.	Fagan Canyon is an Expansion Area as described in Chapter 2 (p. 2-34). Expansion Areas are beyond the current City limits and are considered to have potential for future annexation and development. All Expansion Areas are currently within unincorporated Ventura County, which has jurisdiction over land uses. Only after annexation by the City would Ventura County relinquish land use authority. Presently, the City knows of no speculative or active development plans for Fagan Canyon.
	220 S. 10 <sup>th</sup> St (7/16/2019)	Questions about plans for 10 <sup>th</sup> St Corridor	S 10 <sup>th</sup> St between E Harvard Blvd and the Railroad right-of-way is within the proposed Downtown District Overlay. An overlay is a planning tool used by cities 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.
	17983 Ferris Ln (7/16/2019)	Unsure how options for use of property will be affected by proposed changes.	This site is within an area proposed to be re-designated from Highway Commercial to Single Family Residential. Staff acknowledge the concern regarding limiting land use options to residential and will explore a potential alternate designation (Medium Density, Planned Development, Mixed-use, etc.) to allow mixed-use. Staff notes the significant constraint to

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			development (other than status-quo which is predominately single-family) relating to the lack of utilities infrastructure, streets, septic, etc.
	(7/16/2019)	I support the downtown district proposal. I would like to see policy updates that simplify the development process and help with the development of affordable housing. Approve, retain as written.	Acknowledged.
	744 E Main St (7/16/2019)	Will the proposed downtown district be subject to assessments like an improvement district?	<p>No. The Downtown District proposal would provide a new General Plan land use designation only.</p> <p>They are totally separate initiatives of different City departments. The new Downtown District overlay is a long-range planning tool that is part of the general blueprint for the growth of the City. An improvement district 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>
	405 S 5 <sup>th</sup> St (7/16/2019)	I have general questions regarding the proposed land use designation changes on 5th St. Approve, retain as written.	The proposed land use change for properties on S 5 <sup>th</sup> St seeks to change from Industrial to Airport. Most of these properties support legally non-conforming SFRs that will remain so under the new airport designation. Presently, there existing public safety hazards associated with the proximity of residential land use abutting the airport. The fundamental purpose of the change is to encourage long-term land use compatibility associated with airport related land uses and activities. Additionally, the City has had an disproportionately high amount of manufacturing land uses (processing or treatment of products which produces, causes or emits any fumes, odor, dust, smoke, gas, noise or vibrations)

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			<p>which are known to be detrimental to public health, safety and welfare. The proposed change is part of a broader City-wide strategy to better align housing and employment land use supply by incentivizing affordable housing infill in more compatible areas closer to the goods and services of downtown.</p>
Kular-1	John Kular, P.E. (1/6/2020)	<p>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.</p>	<p>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 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</p>

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			<p>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 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"> <li>-Designated land uses in the 100 block of N. 7<sup>th</sup> Street should be residential.</li> <li>-Concern regarding including residential areas within the "Downtown" designation</li> <li>-Concern regarding events that impact this residential area (traffic, parking, noise)</li> <li>-Suggest the former K-Mart property be used for events or a new downtown</li> </ul>	<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</p>

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			<p>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 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 <sup>th</sup> St	K-Mart in Santa Paula should be replaced by Target	<i>(Note: This comment is not regarding the Draft</i>

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	(2/1/2020)		<p><i>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><a href="https://www.latimes.com/projects/la-me-sea-level-rise-california-coast/">https://www.latimes.com/projects/la-me-sea-level-rise-california-coast/</a></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 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</u></p>

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			<p><u>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>