

Contents

1. Original NOP issued February 1, 2017
2. Responses to the February 1, 2017 NOP
3. Revised NOP issued November 8, 2017
4. Responses to the November 8, 2017 revised NOP

This page intentionally left blank



Notice of Preparation

To: Public Agencies and Interested Parties

**From: Planning Department
City of Santa Paula
P.O. Box 569
Santa Paula, California 93061**

Date: February 1, 2017

Subject: Notice of Preparation of a Supplemental Environmental Impact Report

Project Title: Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

The City of Santa Paula will be the Lead Agency and will prepare an environmental impact report for the Santa Paula 2040 General Plan Update, which is summarized in more detail in Attachment A (Project Description) and Attachment B (Initial Study). At the present time, the City anticipates that a Supplemental Environmental Impact Report ("Supplemental EIR", or "SEIR"), as outlined in Section 15163 of the CEQA Guidelines, will be prepared. This SEIR will use key information from a previously certified Environmental Impact Report (SCH# 97081084, certified March 4, 1998), as long as that information is still current, adequate and applicable to the present project.

The City is seeking the views of affected agencies and other interested parties as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by the City of Santa Paula when considering your permit or other approval for the project. As you will note in the attached materials, the City is proactively soliciting input from public agencies and interested parties as to the scope and content of this Supplemental EIR. Note, where relevant, the City's request for input ("Comments Specifically Requested"), in the attached materials.

Attachment A presents the Project Description, including location, objectives, characteristics, and intended uses of the EIR. A copy of the Initial Study, presenting the City's preliminary analysis of potential environmental effects to be studied in the EIR, is provided in Attachment B. These documents may be viewed on the City website at: www.mysantapaula.com/documents.html

Due to the time limits mandated by State law, your response is requested at the earliest possible date but not later than **March 17, 2017**.

Please send your response to Ms. Janna Minsk, AICP, Santa Paula Planning Director at the address shown above. Please provide the name for the appropriate contact person in your agency.

A public Scoping Meeting regarding this project is scheduled for 5:30 P.M. on Thursday, March 2, 2017 at Santa Paula City Hall in the City Council chambers, 970 Ventura Street, Santa Paula. All parties are invited to attend this meeting to provide comments and input on the contents of the Draft EIR.

Signature Janna Minsk
Title City of Santa Paula Planning Director
Telephone (805) 933-4214

The General Plan addresses the community's vision for development to the horizon year of 2040. 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. All of the mandated General Plan Elements (Govt. Code Section 65302) are included in this comprehensive update with the exception of the Housing Element, which was adopted in 2013 pursuant to the schedule for housing element updates established in state law.

Section 15082 of the CEQA Guidelines specifies the minimum content requirements of a Notice of Preparation, intended to provide "sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response."

To meet this direction, and for the reader's convenience, the City of Santa Paula has structured the following Project Description for this Notice of Preparation, to generally correspond to the requirements of Section 15124 of the CEQA Guidelines:

1. Precise Location and Boundaries

The City of Santa Paula is located approximately 65 miles northwest of Los Angeles and 14 miles east of Ventura. It is at the geographical center of Ventura County in the rich agricultural Santa Clara River Valley. The City is surrounded by rolling hills and rugged mountain peaks, in addition to orange, lemon, and avocado groves. Figure 1 presents a Regional Location Map for the Santa Paula planning area.

Figure 2 presents a variety of currently adopted boundaries, which may influence planning within the Santa Paula Planning Area. Current as of January 1, 2017, these boundaries are:

- a. Santa Paula's "Area of Interest" which was established in 2009 by Ventura County LAFCo, Ventura County and all its incorporated cities. Santa Paula's Area of Interest encompasses approximately 74 square miles bounded on the south by the ridgeline of South Mountain and on the north by the ridge line of Sulphur Mountain between Santa Paula and the Upper Ojai area. On the west, the Area of Interest boundary is between Wheeler Canyon and Aliso Canyon. To the east, the Area of Interest boundary is Hall Road near the Sycamore Tree Monument.
- b. The Sphere of Interest, as adopted by Ventura County LAFCo, in accordance with Section 56425 of the California Government Code. The Sphere of Influence designates the probable ultimate urban boundaries for the City for the foreseeable future.
- c. The Santa Paula City Urban Restriction Boundary (CURB), as adopted by the voters.
- d. The current City Limits, as adopted by Ventura County LAFCo, in accordance with the California Government Code

Comments Specifically Requested:

1. **Ventura County LAFCO:** Please verify that the current city limits and Sphere of Influence are accurately portrayed in Figure 2.
2. **All:** What issues within the Area of Interest or other identified boundaries that are germane to your agency's responsibility should be considered in the Santa Paula 2040 General Plan Update?

2. Statement of Objectives

As required by Section 15124(b) of the CEQA Guidelines, Project Objectives will be presented in the Supplemental EIR, based in part on the responses received on this Notice of Preparation.

For reference, the following narrative from the previous General Plan EIR describes the Project Objectives developed at that time:

California State Law, Government Code Section 65300, requires that each city and county adopt a comprehensive general plan. The proposed project fulfills this requirement by updating the City's existing General Plan, which was last comprehensively updated in 1978. This document defines the framework by which the City's physical and economic resources are to be managed and used in the future. This General Plan's planning horizon is the year 2020. City decision makers will use the plan as a blueprint for:

- *Choices about the use of land;*
- *Conservation and development of new housing;*
- *Provision of supporting infrastructure and public and human services;*
- *Protection of environmental resources;*
- *Protection of people and property from natural and man-made hazards;*
- *Allocation of fiscal resources; and*
- *Expansion of City boundaries.*

The General Plan clarifies and articulates the City's intentions with respect to the rights and expectations of the community, including residents, property owners, and businesses. Through the Plan, the City informs these groups of its goals, policies, and standards, thereby communicating expectations of the public and private sectors for meeting community objectives.

3. Project Characteristics

Section 2.4 of the previous General Plan EIR describes the Characteristics for the General Plan developed at that time. For reference, the following narrative from the previous General Plan EIR is presented as follows:

The EIR analysis will focus on two primary components of the proposed General Plan update: physical buildout potential, and proposed policies/ implementation measures. Physical buildout potential (including proposed roadway modifications) will form the basis of potential impacts related to resource use, traffic, public services, utilities, agricultural conversion and other issues directly affected by increased development. The physical changes envisioned by the General Plan are described primarily within the Land Use and Circulation Elements.

Proposed General Plan goals, objectives, policies and implementation measures are also part of the proposed project, and are included to guide how development occurs. Many of these directly address potential environmental impacts that could result from growth. Within the framework of the EIR, the policies and implementation measures will be discussed as part of an overall mitigation strategy, if applicable for a given issue. Many of the mitigation measures proposed in this document will either be additional policies or implementation measures that should be incorporated into the proposed General Plan, or modifications of those already proposed. Proposed policies discussed in this EIR are drawn from each element under consideration within the General Plan update process.

The Supplemental EIR will update this narrative to reflect the Project Characteristics of the 2040 General Plan Update.

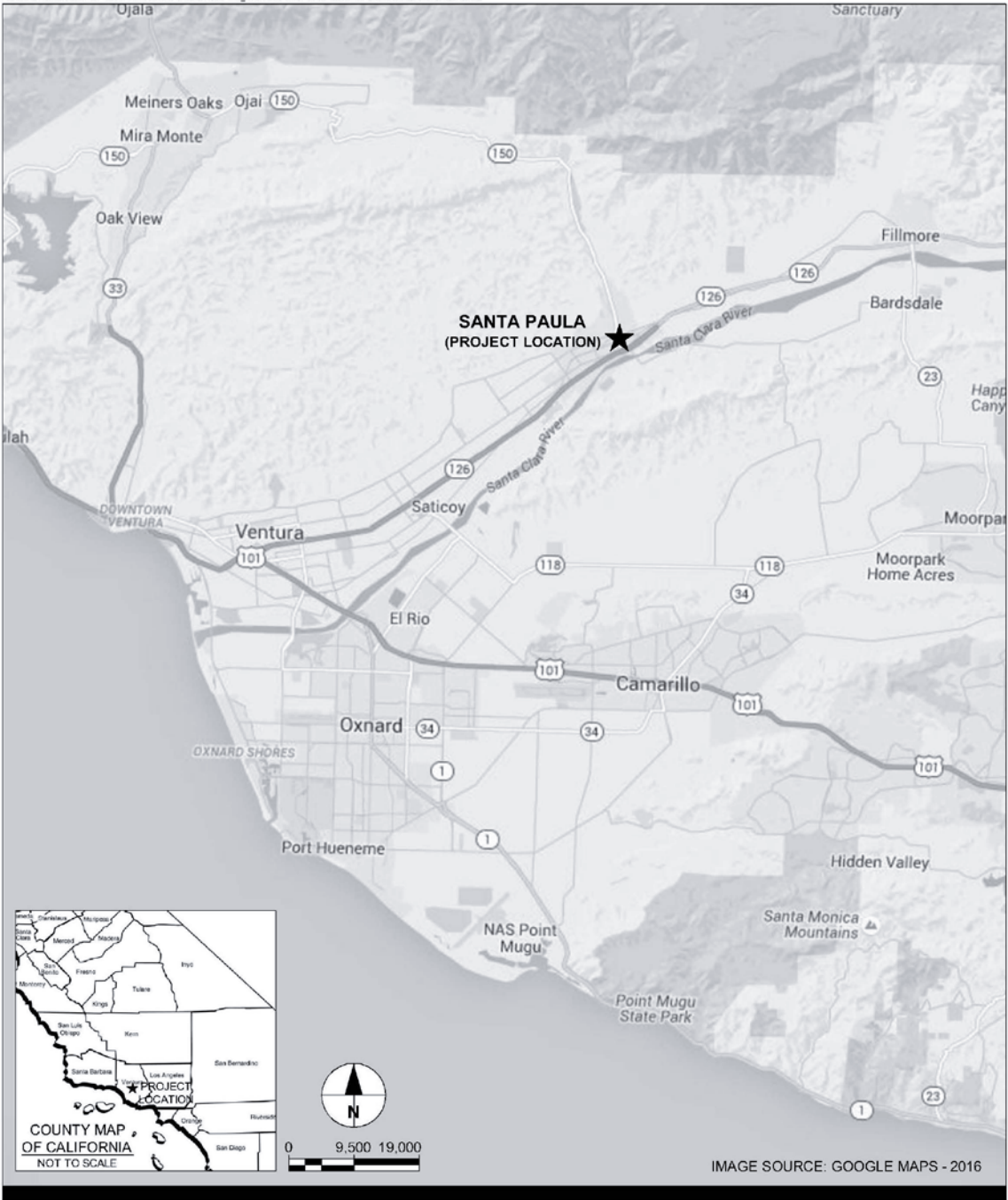
4. Intended Uses of the EIR

The following information will be presented in the Supplemental EIR, based on the responses received on the Notice of Preparation:

- a. List of agencies expected to use the Supplemental EIR in their decisionmaking
- b. Permits and other approvals required to implement the General Plan
- c. List of related environmental review and consultation requirements

Comments Specifically Requested:

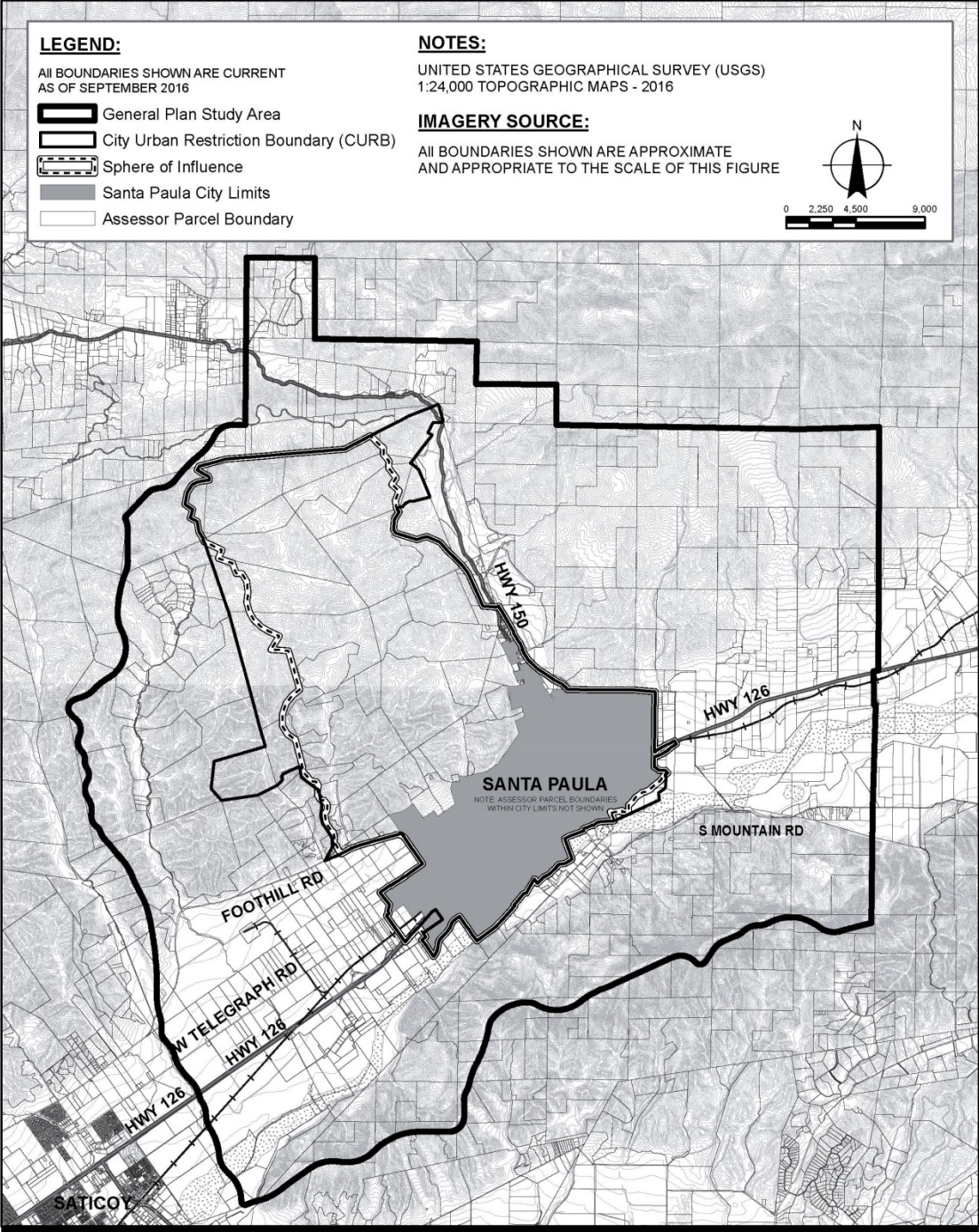
All: The above information is a critical outcome of this Notice of Preparation process. Please be as specific as possible in identifying the “permits and other approvals” that your agency may use in implementing projects or activities undertaken within City’s planning area.



SANTA PAULA GENERAL PLAN UPDATE
CITY PROJECT NO.: 14-C103

REGIONAL LOCATION MAP

AECOM
FIGURE 1



SANTA PAULA GENERAL PLAN UPDATE
CITY PROJECT NO.: 14-CI-03

PLANNING AREAS



FIGURE 2

I. SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT ANTICIPATED

CEQA and the CEQA Guidelines establish the type of environmental documentation that is required when changes to a project occur or new information arises after an EIR is certified for a project. CEQA Guidelines Section 15162 establishes criteria for determining whether more detailed information, such as the preparation of a Subsequent or Supplemental EIR, is needed, and Section 15163 defines the appropriate use of a Supplement to a previous EIR.

CEQA Guidelines Section 15162(a) states:

When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project, which will require major revisions in the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(2) Substantial changes occur with respect to the circumstances under which the project is to be undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(3) New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:

a. The project will have one or more significant effects not discussed in the EIR.

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure; or

d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more effects on the environment but the project proponents decline to adopt the mitigation measure.

CEQA Guidelines Section 15163(b) states: “The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.”

The City anticipates that a Supplemental Environmental Impact Report (“Supplemental EIR”, or “SEIR”), as outlined in Section 15163 of the CEQA Guidelines, will be prepared. This Supplemental EIR will use key information from the previously certified Environmental Impact Report (SCH# 97081084), as long as that information is still current, adequate and applicable to the present project.

In general, there are three primary concepts which will guide the development of this Supplemental EIR:

- The time horizon for the General Plan will be extended, from 2020 to 2040.
- Certain legal requirements have been incorporated into the Public Resources Code (California Environmental Quality Act) since the Prior EIR was certified in 1998. Examples of these new requirements are: Greenhouse Gas Emissions (Section 21083.05); Tribal Consultation (Section 21080.3.1); and the location of hazardous materials near schools (Section 21151.4).

- Other federal, state and/or local policies related to the physical environment may have also changed since 1998, when the Previous EIR was certified.

The Initial Study (Section V., below) presents the City's preliminary analysis of the potential environmental impacts that could result from the 2040 General Plan Update. A key purpose of this NOP is to focus the environmental review process on significant impacts resulting from the 2040 General Plan Update that were not previously analyzed or would be substantially more severe than shown in the previous EIR.

II. PUBLIC INPUT REQUESTED

Comments from public agencies and interested parties are requested as to the scope and content of the Supplemental EIR for the General Plan Update.

Please note that if a given environmental issue was addressed in the previous EIR for the current Santa Paula General Plan and no new significant impacts are anticipated from the 2040 General Plan Update due to 1) substantial changes to the project, 2) substantial changes to circumstances, or 3) new information not previously considered, the City of Santa Paula does not propose to study that issue in this Supplemental EIR pursuant to Public Resources Code Sec. 21166 and CEQA Guidelines Sec. 15163. Respondents to this Notice of Preparation are invited to comment on the adequacy of this approach.

III. BACKGROUND/PURPOSE

The City of Santa Paula is proactively initiating the environmental review process at this time, for three primary reasons:

- To identify public agencies which may have valuable insight as to the development of the updated General Plan
- To allow interested parties, as well as public agencies, the early opportunity to identify issues which can guide development of the updated General Plan
- To focus the environmental review of the updated General Plan on those issues which may have not been identified earlier, but are now relevant, and/or which reflect new environmental concerns that were not analyzed in the prior General Plan EIR (e.g., Greenhouse Gas Emissions, etc.)

This proactive outreach is endorsed by the Governor's Office of Planning and Research (OPR), as explained in the following excerpts from OPR's General Plan Guidelines:

- *"CEQA should be integrated into planning processes and guide development of the plan itself... Information developed as part of the CEQA process should influence the development of general plan policies."*
- *"The purpose of preparing an environmental analysis is not only to inform decision-makers and the public of a general plan's potential adverse environmental impacts, but also to allow environmental considerations to influence the design of the plan itself. To accomplish this purpose, the CEQA analysis should be prepared in coordination with the development of the general plan."*
- "Careful coordination between the CEQA process and the general plan process can also minimize unnecessary duplication of work."

In summary, the City is proactively soliciting input from all public agencies and interested parties as to the scope and content of this Supplemental EIR. Note, where relevant, the City's request for input on this approach from specific agencies ("Comments Specifically Requested").

IV. ENVIRONMENTAL SETTING - ASSUMPTIONS

A. BASELINE

According to Section 15125 of the CEQA Guidelines, the publication date of the Notice of Preparation can serve as the baseline date for the environmental setting. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. For the purpose of this Supplemental EIR analysis, the baseline date shall be assumed to be the publication date of this NOP.

Comments Specifically Requested:

- 1 **County of Ventura, Planning Division:** Is this Baseline date consistent with your current expectations and planning programs?

B. PROJECT BUILDOUT

The Previous EIR assumed the residential buildout potential of the Santa Paula General Plan, in the horizon year 2020, to be 10,493 dwelling units. While buildout potential for the updated General Plan has not been established yet, the City of Santa Paula does not expect it to exceed the forecast of 11,500 households, as adopted by the Southern California Council of Governments in the 2040 RTP/SCS for the horizon year 2040.

Comments Specifically Requested:

- 1 **County of Ventura, Planning Division:** Is this Buildout Potential consistent with your current expectations and planning programs?
- 2 **Southern California Association of Governments/Growth Forecasting:** Is this Buildout Potential consistent with your current expectations and planning programs?

V. ENVIRONMENTAL ISSUES TO BE STUDIED

As presented below, the following issues have been identified for study in this Supplemental EIR:

A. AESTHETICS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Have a substantial adverse effect on a scenic vista?			X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X

Discussion:

- Scenic Vistas for the Santa Paula planning area have been documented in Section 4.2.1 of the Prior EIR. The Prior EIR notes that development under the General Plan would introduce new development along sensitive viewing corridors; however, the Land Use and Conservation/Open Space Elements contain numerous policies and implementation measures (see EIR pages 4.2-5 through 4.2-9) that substantially reduce visual impacts. No changes to those policies and implementation measures are anticipated in the new General Plan that would change the conclusions in the previous EIR; therefore, this issue will not be addressed in the SEIR.
- Scenic Resources for the Santa Paula planning area have been documented in Section 4.2.1 of the Prior EIR. The Conservation/Open Space Element states *"All of the Santa Clara River Valley may be considered a scenic resource. SR 126 and SR 150 are eligible state scenic highways."* Other scenic resources include Adams Canyon and Fagan Canyon. The Conservation/Open Space Element includes goals, objectives and policies (p. CO-51) as well as Implementation Measures 41 through 46 (p. CO-60) that substantially reduce potential impacts to scenic resources to a level that is less than significant. Substantial changes to these policy statements are not anticipated in the new General Plan; therefore, this issue will not be addressed in the SEIR.
- The visual character of the Santa Paula planning area is documented in Section 4.2.1 of the Prior EIR. The Prior EIR notes that development under the General Plan would alter the visual character of Santa Paula, and although the Land Use Element contains policies and

implementation measures (see EIR pages 4.2-11 through 4.2-12) to mitigate those impacts, they would remain significant and unavoidable. This issue will not be addressed in the SEIR.

- d. Light and Glare impacts are discussed in in Section 4.2.2 of the Prior EIR (Impact AES-2). The analysis concluded that although buildout under the General Plan would introduce new sources of light and glare, Land Use Element policies and implementation measures would reduce those impacts (EIR p. 4.2-10). In addition, Municipal Code Sec. 16.42.050 (Light and Glare) includes performance standards that substantially reduce such impacts; therefore, this issue will not be addressed in the SEIR.

B. AGRICULTURE AND FOREST RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	X		
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	X		
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	X		
d) Result in the loss of forest land or conversion of forest land to non-forest use?	X		
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	X		

Discussion:

- a. The information presented in Section 4.1.1 of the Prior EIR will be updated to reflect the most recent Important Farmlands Inventory.
- b. The information presented in Section 4.1.1 of the prior EIR will be updated to reflect the current status of existing Land Conservation contract ("Williamson Act") contracted lands.

- c. Forest land is addressed in Section 4.1.2 of the Prior EIR for the present General Plan. However, this information does not reflect recent changes to Public Resources Code Section 12220(g) and Government Code Section 51104(g). This information will be updated.
- d. Agricultural conversion, related to the current "Save Open-space and Agricultural Resources (SOAR) Santa Paula City Urban Restriction Boundary", will be updated and addressed in the Supplemental EIR.

Comments Specifically Requested:

1. **California Resources Agency/Farmland Mapping and Monitoring Program**: Please refer us to the most recent agricultural maps relating to the Santa Paula area.
2. **California Department of Fish and Wildlife/Timberland Conservation Program**: Please refer us to the most recent forest/timberland maps relating to the Santa Paula area.

C. AIR QUALITY

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Conflict with or obstruct implementation of the applicable air quality plan?	X		
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	X		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	X		
d) Expose sensitive receptors to substantial pollutant concentrations?	X		
e) Create objectionable odors affecting a substantial number of people?	X		

Discussion:

- a/b/c. The Ventura County APCD's 2007 Air Quality Management Plan, together with the 2015 Triennial Assessment and Plan Update, will be used to analyze air quality impacts of the General Plan Update.
- d. Information regarding Sensitive Receptors, presented in Section 4.4.1 (d) of the Prior EIR, will be updated as necessary.

- e. "Objectionable odors" is not analyzed in the Prior EIR, and will be addressed in the Supplemental EIR.

Comments Specifically Requested:

1. **Cal EPA/Air Resources Board:** Please refer us to the most recent policy documents that apply to the City of Santa Paula's air quality.
2. **Ventura County Air Pollution Control District:** Please confirm whether the 2007 AQMP and 2015 Triennial Update are the most recent documents relevant to the Santa Paula General Plan Update.

D. BIOLOGICAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	X		
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	X		
d) 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?			X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		X	

Discussion:

- a. Special status species, and their habitat, as presented in Section 4.8.1 of the Prior EIR, will be updated as necessary to reflect any biological surveys conducted within the Santa Paula planning area since 1997. According to the State Department of Fish and Wildlife, the Second Edition of "A Manual of California Vegetation" (2009) provides a standardized, systematic classification and description of vegetation in the State.
- b. Riparian habitat and other sensitive natural communities, as presented in Section 4.8.1 of the Prior EIR, will be updated as necessary to reflect any biological surveys conducted within the Santa Paula planning area since 1997. According to the State Department of Fish and Wildlife, the Second Edition of "A Manual of California Vegetation" (2009) provides a standardized, systematic classification and description of vegetation in the State.
- c. Federally protected wetlands are discussed in section 4.8.1 of the Prior EIR. According to the Prior EIR, wetlands occur in the bottom of ravines and adjacent to intermittent and perennial drainages within Adams Canyon, Fagan Canyon, and along both sides of the Santa Clara River corridor. This information will be updated as necessary, based upon discussions with appropriate federal resource agencies.
- d. Section 4.8.1 of the Prior EIR states the following, regarding movement opportunities:

Of the riparian corridors that traverse the study area, the Santa Clara River provides unrestricted movement opportunities for fish and wildlife (with the exception of the Freeman Diversion, located southwest of the study area, and which includes a fish ladder). The Adams Canyon barranca is a natural and man-made open channel to the River, with large box culverts that are sufficient for large mammal movement located under major roadways and SR 126. Fagan Canyon barranca enters an underground storm water drainage system at Main Street, continuing toward the River. Thus, this drainage does not provide wildlife movement opportunities between the foothills and the River and South Mountain. Orcutt Canyon and Haun Creek, in the eastern portion of the study area, convey drainage via aboveground manmade systems to the River with large culverts under roadways, and therefore provide nearly unrestricted movement opportunities between the foothills and the River. Many other smaller drainages enter the River from the South Mountain vicinity, generally flowing through culverts under roadways and otherwise remaining relatively unrestricted. (p. 4.8-5)

Additional discussion of wildlife movement corridors is provided in the Prior EIR on p. 4.8-12. Impact B-9 (p. 4.8-21) concluded that impacts to wildlife corridors and habitat linkages resulting from buildout of the General Plan would be an unavoidable significant adverse impact. Mitigation measures B-9(a) through B-9(c) were identified to reduce this impact, and are reflected in the following implementation measures of the Conservation and Open Space Element (p. CO-58):

29f. *Culverts under roadways shall be sized to allow the passage of wildlife, and shall be designed such that daylight is visible at both ends (wildlife will not pass through a culvert unless daylight is visible).*

29k. *Natural migration corridors shall be protected and preserved, with planning for the safe passage of wildlife under busy roadways. Adams Barranca, which presently offers nearly unrestricted movement opportunities from the foothills to the Santa Clara River drainage, shall be maintained in a condition to promote wildlife movement.*

29l. *New passages intended for use as wildlife movement corridors (i.e., under roadways) must be designed to direct or 'funnel' large animals toward the passageway. This may be achieved through a combination of fencing and dense barrier plantings, as well as the placement of drinking water and vegetative screening for cover.*

29m. Homebuyers of property in the Adams Canyon and Fagan Canyon shall be issued educational literature describing the types of wildlife habitat in which they live, and the appropriate methods of interacting with such animals, including coyotes, deer, mountain lions and various smaller mammals, birds, reptiles and amphibians. Appropriate methods of reducing disturbance to such animals, including lighting, landscaping and fencing methods, shall be addressed. Such literature shall be developed at the expense of the developers of these areas. This measure must be included in Specific Plans for expansion areas.

The General Plan Update is not anticipated to alter this analysis of wildlife movement opportunities or the related policies and implementation measures included in the Conservation and Open Space Element; therefore, this issue will not be evaluated in the Supplemental EIR.

- e. The Prior EIR, and the current General Plan (Conservation and Open Space Element), describe a variety of local policies to protect biological resources, including the Tree Preservation Ordinance (Municipal Code Sec. 156.580 et seq.). The General Plan Update is not expected to alter those policies or regulations; therefore, this issue will not be addressed in the Supplemental EIR.
- f. According to the California Department of Fish and Wildlife, (CALIFORNIA REGIONAL CONSERVATION PLANS August 2015), there are no Regional Conservation Plans (RCPs) located within Ventura County. This issue will not be addressed in the Supplemental EIR.

Comments Specifically Requested:

- 1. **California Department of Fish and Wildlife**: Please verify that there are no Regional Conservation Plans (RCPs) located within Ventura County.
- 2. **California Department of Fish and Wildlife**: Please provide information regarding any biological surveys conducted within the Santa Paula planning area since 1997.
- 3. **County of Ventura Planning Division**: Please provide information regarding any biological surveys the County has conducted within the Santa Paula planning area since 1997.

E. CULTURAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	X		

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X		
d) Disturb any human remains, including those interred outside of formal cemeteries?	X		

Discussion:

- a. The historical resources presented in Section 4.9.1 of the Prior EIR, which was derived from the General Plan Update Baseline Conditions Assessment (1994) and the technical report prepared by Wlodarski (1997), will be updated as necessary to reflect any historic surveys conducted within the Santa Paula planning area since 1997.
- b. The archaeological resources presented in Section 4.9.1 of the Prior EIR, which was derived from the General Plan Update Baseline Conditions Assessment (1994) and the technical report prepared by Wlodarski (1997), will be updated as necessary to reflect any cultural resource surveys conducted within the Santa Paula planning area since 1997. Tribal consultation, if requested as provided in Public Resources Code Section 21080.3.1, will be reflected in the Supplemental EIR.
- c. "Unique" paleontological resources were not addressed in the Prior EIR and will be analyzed in the Supplemental EIR.
- d. Disturbance of human remains was not addressed in the Prior EIR and will be analyzed in the Supplemental EIR.

Comments Specifically Requested:

1. **Native American Heritage Commission:** Please identify appropriate persons or organizations to contact regarding archaeological, historical, and/or tribal resources.
2. **County of Ventura Planning Division:** Please identify appropriate persons or organizations to contact regarding archaeological, historical, and/or tribal resources.

F. GEOLOGY AND SOILS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X
ii) Strong seismic ground shaking?			X
iii) Seismic-related ground failure, including liquefaction?			X
iv) Landslides?			X
b) Result in substantial soil erosion or the loss of topsoil?			X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?		X	

Discussion:

- a. Potential impacts due to earthquake faults, seismic ground shaking and landslides are addressed in Section 4.6.2 of the Prior EIR. The current General Plan Safety Element includes an extensive list of policies and implementation measures (see EIR p. 4.6-17 to 4.6-19) to reduce these impacts below the level of significance. The General Plan Update is not expected to alter those policies or regulations; therefore, this issue will not be addressed in the Supplemental EIR.
- b/c/d. Potential impacts due to landslides, subsidence, liquefaction and other soil-related conditions are addressed in Section 4.6.2 of the Prior EIR. The current General Plan Safety Element

includes an extensive list of policies and implementation to reduce these impacts, and additional mitigation measures were adopted to reduce impacts below the level of significance. In addition, Municipal Code Chapter 16.96-Grading Permits establishes regulations to enforce the policies and objectives set forth in the General Plan, including preparation of a Geotechnical Report and structural recommendations to mitigate soil conditions when determined necessary by the City Engineer. The General Plan Update is not expected to alter those policies or regulations; therefore, this issue will not be addressed in the Supplemental EIR.

- e. Septic systems are not allowed in the city and all developments are required to connect to a wastewater treatment system; therefore, this issue will not be addressed in the Supplemental EIR

Comments Specifically Requested:

1. **California Department of Conservation/California Geological Survey:** Please refer us to the most recent Alquist-Priolo Earthquake Fault Zoning Map for the Santa Paula area.
2. **California Department of Conservation:** Please refer us to the most recent policies and regulations dealing with soil erosion and stability.
3. **Ventura County Public Works Agency:** Are new septic systems allowed within the Santa Paula planning area?

G. GREENHOUSE GAS EMISSIONS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X		
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X		

Discussion:

- a. The Prior EIR was certified in 1998 and as such, does not reflect the analysis of Greenhouse Gas emissions, as required by Section 15064.4 of the CEQA Guidelines (2010). Generation of Greenhouse Gases will be analyzed in the Supplemental EIR.
- b. The Prior EIR was certified in 1998 and as such, does not reflect the analysis of Greenhouse Gas emissions, as required by Section 15064.4 of the CEQA Guidelines (2010). Consistency with applicable plan(s), adopted for the purpose of reducing the emissions of greenhouse gases, will be analyzed in the Supplemental EIR. For this purpose, the City of Santa Paula proposes to rely upon relevant sections of the "2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS)", adopted by SCAG on April 7, 2016. According to the Southern California Association of Governments, the RTP/SCS is a long-range visioning plan that

balances future mobility and housing needs with economic, environmental and public health goals.

Comments Specifically Requested:

1. **Cal EPA/Air Resources Board:** Please refer us to the most recent Scoping Plan that applies to the City of Santa Paula's air quality. Has the Scoping Plan update been completed?
2. **Ventura County Air Pollution Control District:** The City of Santa Paula proposes to use the "2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS)", adopted by SCAG on April 7, 2016, as the applicable plan adopted for the purpose of reducing the emissions of greenhouse gases. Do you agree?
3. **Southern California Association of Governments:** The City of Santa Paula proposes to use the "2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS)", adopted on April 7, 2016, as the applicable plan adopted for the purpose of reducing the emissions of greenhouse gases. Do you agree?

H. HAZARDS AND HAZARDOUS MATERIALS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X		
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	X		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	X		

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	X		
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	X		

Discussion:

- a/b. Transportation, use and disposal of hazardous materials are addressed in Section 4.6.2 of the Prior EIR (p. 4.6-12 to 4.6-14 and 4.6-32 to 4.6-35). Hazardous materials are regulated by state and county agencies and locally enforced by the Santa Paula Fire Department. The Safety Element includes policies and implementation measures that mitigate potential impacts from hazardous materials, such as requiring submittal of business plans by local businesses that use or store hazardous materials, as well as emergency response plans. Because of this regulatory framework, no changes are anticipated in the General Plan that would require additional analysis. This issue will not be addressed in the Supplemental EIR.
- c. Section 21151.4 of the Public Resources Code, regarding the location of hazardous materials near schools, was adopted in 2008, subsequent to the certification of the Prior EIR. This new requirement will be addressed in the Supplemental EIR.
- d. The Hazardous Materials sites List, maintained pursuant to Section 65962.5 of the Government Code, will be consulted for any relevant updates.
- e/f. The "Airport Comprehensive Land Use Plan Update for Ventura County (2000)" will be consulted as necessary, for any relevant analysis in the Supplemental EIR.
- g. Emergency response is addressed in Section 4.6.2 of the Prior EIR. The Safety Element includes policies and implementation measures (e.g., Implementation Measures 53 to 57 shown on p. 4.6-33 of the EIR) that mitigate these potential impacts to a less-than-significant level. This issue will not be addressed in the Supplemental EIR.
- h. Wildland fire hazards are analyzed in Section 4.10.2 (p. 4.10-10 and 4.10-11) of the Prior EIR. The Supplemental EIR will update the analysis to reflect current Fire Hazard Zones and related policies and procedures.

Comments Specifically Requested:

1. **Governor's Office of Planning and Research/State Clearinghouse**: Please refer us to the appropriate agencies for dealing with hazardous materials.
2. **County of Ventura Environmental Health Division**: Please refer us to the appropriate contacts for dealing with hazardous materials.
3. **Ventura County Transportation Commission**: Please confirm whether the 2000 Airport Comprehensive Land Use Plan is the most current document for the Santa Paula airport.
4. **California Department of Forestry and Fire Protection**: Please refer us to the current Fire Hazard Zone map for the Santa Paula planning area. Are there any further fire protection policies that should be incorporated into the Supplemental EIR, beyond the General Plan Safety Element policies expressed on pages 4.10-10 and 4.10-11 of the Prior EIR?

I. HYDROLOGY AND WATER QUALITY

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Violate any water quality standards or waste discharge requirements?			X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	X		
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	X		
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	X		
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	X		
f) Otherwise substantially degrade water quality?			X

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	X		
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	X		
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	X		
j) Inundation by seiche, tsunami, or mudflow?	X		X

Discussion:

- a. Compliance with water quality standards and waste discharge requirements is addressed in Section 4.7.2 of the Prior EIR. The EIR concluded that impacts to water quality would be less than significant; however, the following Mitigation Measure was recommended:

F-3(a) Ventura Storm Water Quality Management Program. Santa Paula should continue to actively participate in the Ventura Countywide Stormwater Quality Management Program and to implement the measures recommended by that program, thereby mitigating non-point sources of pollutants.

That mitigation measure is implemented through Objective 9(c) of the Conservation and Open Space Element, and no changes are anticipated to that objective as part of the General Plan Update.

Since 1998, some changes have occurred in the regulatory framework for water quality. For example, in 2012 the Regional Water Quality Control Board – Los Angeles Region (LARWQCB) adopted a Municipal Stormwater Permit (Order No. R4-2012-0175) introducing new regulations including the new requirements for the non-stormwater discharge prohibition. In addition, the Ventura County Stormwater Quality Management (SWQM) Ordinance has been updated to revise the hydromodification manual to meet requirements of the new Municipal Stormwater Permit as required by the LARWQCB.

Santa Paula Municipal Code Chapter 54 (Stormwater Quality Management) implements regulations mandated by state and federal law to effectively prohibit non-stormwater discharges into the storm drain system, flood control channels, and debris and detention basins, and to reduce the discharge of pollutants in stormwater to the maximum extent practicable. The SPMC's intent is to ensure the health, safety, and general welfare of citizens and protect and enhance

water quality by controlling the contribution of urban pollutants to runoff which enter the storm drain system and watercourses of the City of Santa Paula.

Because the Municipal Code requires conformance with current state and federal law, no new significant impacts to water quality would result from anticipated changes to the General Plan. Therefore, this issue will not be addressed further in the Supplemental EIR.

- b. Depletion of ground water supplies, including references to the Santa Paula Ground Water Basin Adjudication Agreement, is addressed in Section 4.11.1 of the Prior EIR. That analysis will be updated in the SEIR.
- c. Erosion and/or siltation issues, due to altered drainage patterns, are addressed in Section 4.7.2(a) of the Prior EIR. That analysis will be updated in the SEIR.
- d. Flooding issues, due to altered drainage patterns, are addressed in Section 4.7.2 of the Prior EIR. That analysis will be updated in the SEIR.
- e. Capacity of stormwater drainage systems is addressed in Section 4.7.1 of the Prior EIR. That analysis will be updated in the SEIR.
- f. Degradation of water quality is addressed in Section 4.7.1 of the Prior EIR and Item a, above. No new significant impacts to water quality would result from anticipated changes to the General Plan; therefore, this issue will not be addressed further in the Supplemental EIR.
- g. Housing within a 100-year Flood Hazard Boundary is addressed in Section 4.7.2 of the Prior EIR. That analysis will be updated in the SEIR.
- h. Impedance and/or redirection of flood flows are addressed in Section 4.7.2 of the Prior EIR. That analysis will be updated in the SEIR.
- i. Flooding as a result of the failure of a levee or dam is addressed in Section 4.7.2 of the Prior EIR. That analysis will be updated in the SEIR.
- j. There are no lakes, ponds or dams within the Planning Area; therefore, the risk that the Project Site would be inundated by a seiche is considered negligible and this issue will not be addressed in the SEIR. The Planning Area is approximately 14 miles inland from the Pacific Ocean and is approximately 250 to 300 feet above mean sea level (AMSL); therefore, potential impacts associated with tsunami is less than significant and this issue will not be addressed in the SEIR. However, potential impacts due to mudflow will be analyzed in the SEIR.

Comments Specifically Requested:

1. **State Water Resources Control Board:** Are there any recent changes in water quality standards and waste discharge requirements affecting the Santa Paula planning area that you believe should be analyzed in the Supplemental EIR for the updated General Plan?
2. **Ventura County Watershed Protection District:** Are there any recent changes in flooding issues, plans or regulations affecting the Santa Paula planning area that should be analyzed in the Supplemental EIR for the updated General Plan?

J. LAND USE AND PLANNING

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Physically divide an established community?			X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	X		
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?		X	

Discussion:

- Santa Paula's "Area of Interest" was established in 2009 by Ventura County LAFCo, Ventura County and all its incorporated cities, as part of the "Guidelines for Orderly Development." The purpose of these Guidelines is to maintain consistent development patterns throughout the region. No changes are anticipated in the General Plan Update that would have the potential to physically divide an established community, and this issue will not be addressed in the Supplemental EIR.
- This issue will be analyzed in the Supplemental EIR.
- According to the California Department of Fish and Wildlife, (CALIFORNIA REGIONAL CONSERVATION PLANS August 2015), there are no Regional Conservation Plans (RCPs) located within Ventura County. This issue will not be addressed in the Supplemental EIR.

Comments Specifically Requested:

- County of Ventura Planning Division:** Do you agree that the Guidelines for Orderly Development adequately address land use and planning issues, as stated in this Section?
- Ventura County Local Agency Formation Commission/Executive Officer:** Do you agree that the Guidelines for Orderly Development adequately address land use and planning issues, as stated in this Section?
- California Department of Fish and Wildlife:** Please verify that there are no Regional Conservation Plans (RCPs) located within Ventura County.

K. MINERAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	X		
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	X		

Discussion:

- a. Mineral resources are described in Section II-G of the Conservation and Open Space Element of the present General Plan. However, these resources were not addressed in the Prior EIR and will be addressed in the SEIR.
- b. Mineral resources are described in Section II-G of the Conservation and Open Space Element of the present General Plan. However, these resources were not addressed in the Prior EIR and will be addressed in the SEIR.

Comments Specifically Requested:

1. **California Department of Conservation/State Mining and Geology Board:** please refer us to the most recent maps and regulations pertaining to the designation of mineral lands in the Ventura County area.
2. **County of Ventura Planning Division:** please refer us to the most recent maps and regulations pertaining to the designation of mineral lands in the Ventura County area. Do you have a record of mining permits/reclamation plans issued since 1998 within the Santa Paula Planning Area?

L. NOISE

Would the City of Santa Paula General Plan Update and its implementation result in:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	X		
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	X		
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?			X

Discussion:

- The Future Noise Contours presented in Section 4.5.2 and Figure 1.5-3 of the Prior EIR only extended to the year 2020. Future Noise Contours will be updated in the Supplemental EIR as necessary to reflect an extended time horizon of 2040.
- Groundborne vibrations and groundborne noise levels are not addressed in Section 4.5 of the Prior EIR and will be analyzed in the Supplemental EIR.
- Permanent increases in ambient noise levels are addressed as Impact N-1 in the Prior EIR and will be updated in the Supplemental EIR as necessary to reflect an extended time horizon of 2040.
- Temporary noise impacts due to construction are addressed as Impact N-5 in the Prior EIR (p. 4.5-14 and 4.5-15). Policies and implementation measures were identified to mitigate potential impacts to a level that is less than significant. In addition, the City's Noise Ordinance (Municipal Code Chapter 93) establishes regulations for temporary noise sources such as construction. No

changes are anticipated in the General Plan Update that would require additional analysis; therefore, this issue will not be addressed in the Supplemental EIR.

e/f. Exposure to noise levels related to airports is addressed in Section 4.5.2 of the Prior EIR (see Impact N-7) and none of the conditions that would require new analysis is anticipated. This issue will not be addressed in the Supplemental EIR.

Comments Specifically Requested:

1. **Governor's Office of Planning and Research/State Clearinghouse**: What sources should we contact for the noise analysis, since the Office of Noise Control no longer exists?
2. **County of Ventura Planning Division**: Can we use the noise contours in the present County General Plan or do you plan significant changes through the General Plan update?
3. **Ventura County Transportation Commission**: Please confirm whether the 2000 Airport Comprehensive Land Use Plan is the most current document for the Santa Paula airport..

M. POPULATION AND HOUSING

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	X		
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?		X	
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?		X	

Discussion:

- a. Growth Inducing Impacts, as discussed in Section 5.2 of the Prior EIR, will be updated as necessary to reflect an extended time horizon of 2040. The Previous EIR assumed the Buildout Potential of the Santa Paula General Plan, in the horizon year of 2020, to be 10,493 dwelling units. While Buildout Potential for the updated General Plan has not been established yet, the City does not expect Buildout to exceed the forecast of 11,500 households, as adopted by the Southern California Association of Governments in the 2016-2040 RTP/SCS, for the horizon year of 2040.
- b. No changes are anticipated in the General Plan Update that would result in the displacement of substantial numbers of existing housing units. It is anticipated that the General Plan, as updated,

will accommodate housing growth through the horizon year of 2040, as projected in the Regional Growth Forecast adopted by the Southern California Association of Governments as part of the 2040 Regional Transportation Plan. This issue will not be addressed in the Supplemental EIR.

- c. No changes are anticipated in the General Plan Update that would result in the displacement of substantial numbers of people. It is anticipated that the General Plan, as updated, will accommodate population growth through the horizon year of 2040, as projected in the Regional Growth Forecast adopted by the Southern California Association of Governments as part of the 2040 Regional Transportation Plan. This issue will not be addressed in the Supplemental EIR.

Comments Specifically Requested:

1. **Southern California Association of Governments/Growth Forecasting:** The City proposes to reference the population and household forecast adopted as part of the 2016-2040 RTP/SCS in analyzing impacts of the General Plan update. Please confirm that this is the appropriate forecast to be used.

N. PUBLIC SERVICES

Would the City of Santa Paula General Plan Update and its implementation result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Fire protection?	X		
b) Police protection?	X		
c) Schools?	X		
d) Parks?	X		
e) Other public facilities?	X		

Discussion:

- a. Fire protection issues, as addressed in Section 4.10.1(a) of the Prior EIR will be updated to reflect the extended time horizon of 2040, and any new operating policies adopted since 1998, the date the Prior EIR was certified. Any new analysis will be focused on the "substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities."
- b. Police protection issues, as addressed in Section 4.10.1 (b) of the Prior EIR will be updated to reflect the extended time horizon of 2040, as any new operating policies adopted since 1998, the date the Prior EIR was certified. Any new analysis will be focused on the "substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities."

- c. School impacts are addressed in Section 4.10.2 of the Prior EIR. The analysis will be updated to reflect the extended time horizon of 2040, and any changed circumstances since 1998.
- d. Parks, as addressed in Section 4.10.1(c) of the Prior EIR will be updated to reflect the extended time horizon of 2040, and any new operating policies adopted since 1998, the date the Prior EIR was certified. Any new analysis will be focused on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”
- e. Other public facilities, as addressed in Sections 4.10.1 (e) and 4.10.1(f) of the Prior EIR will be updated to reflect the extended time horizon of 2040, as any new operating policies adopted since 1998, the date the Prior EIR was certified. Any new analysis will be focused on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”

Comments Specifically Requested:

1. **Ventura County Local Agency Formation Commission**: Is the 2012 Municipal Service Review (MSR) for Santa Paula, dated November 14, 2012, the most current document? Given that the General Plan is a long-range planning document, what information from that MSR should be addressed in the Supplemental EIR?
2. **School districts**: Please direct us to your current facilities master plan.

O. RECREATION

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	X		
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	X		

Discussion:

- a. Neighborhood and regional parks, as addressed in Section 4.10.2 (see Impact P-5) of the Prior EIR will be updated to reflect the extended time horizon of 2040, and any new operating policies adopted since 1998, the date the Prior EIR was certified. Any new analysis will be focused on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”
- b. Recreational facilities, as addressed in Section 4.10.2 (see Impact P-5) of the Prior EIR will be updated to reflect the extended time horizon of 2040, and any new operating policies adopted

since 1998, the date the Prior EIR was certified. Any new analysis will be focused on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”

Comments Specifically Requested:

1. **County of Ventura:** Please indicate whether any changes to regional parks or recreational facilities have occurred since 1998 or are proposed in the Santa Paula Planning Area, and the appropriate source document.

P. TRANSPORTATION

Note: SB 743 (effective January 1, 2014) creates a process to change the way transportation impacts are analyzed under CEQA. Specifically, the law requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.” The alternative criteria would not become effective until the State Resources Agency amends the CEQA Guidelines to implement SB743. Once the Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA.

OPR's draft revisions to the CEQA Guidelines, published in January 2016, would provide a 2-year period after adoption during which use of the new methodology would be optional. At this time, OPR is still considering details of the revised methodology. Due to the uncertain timeframe for adoption of new methodology under SB 743, the City of Santa Paula is proposing to analyze transportation impacts of the General Plan Update using the current CEQA Guidelines.

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	X		
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	X		

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?		X	
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X		
e) Result in inadequate emergency access?	X		
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	X		

Discussion:

- a. This issue will be evaluated in the SEIR.
- b. The most recent Congestion Management Program adopted by VCTC will be evaluated in the SEIR.
- c. At this time, no substantial changes to air traffic patterns would be anticipated to occur as a result of the General Plan Update, and therefore this issue is not proposed to be evaluated. However, if changes to the General Plan are proposed that could result in a change in air traffic, this issue will be addressed in the SEIR.
- d. This issue will be evaluated in the SEIR.
- e. This issue will be evaluated in the SEIR.
- f. This issue will be evaluated in the SEIR.

Comments Specifically Requested:

1. **Ventura County Transportation Commission:** Please confirm whether the 2009 Congestion Management Plan is the most recent CMP document, and identify any other VCTC plans or documents that should be considered in the SEIR. Please confirm whether any substantial changes in air traffic patterns are anticipated related to Santa Paula Airport.
2. **County of Ventura Planning Division:** What methodology does the County intend to utilize in its CEQA analysis of the County's General Plan Update?

Q. UTILITIES AND SERVICE SYSTEMS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081 084); therefore, issue will not be studied in this SEIR
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X		
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X		
d) Have sufficient water supplies available to serve the buildout of the Santa Paula General Plan from existing entitlements and resources, or are new or expanded entitlements needed?	X		
e) Result in a determination by the wastewater treatment provider which serves or may serve the City of Santa Paula that it has adequate capacity to serve the General Plan's projected demand in addition to the provider's existing commitments?	X		
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	X		
g) Comply with federal, state, and local statutes and regulations related to solid waste?	X		

Discussion:

- a. Compliance with water quality standards and waste discharge requirements is addressed in Section 4.7.2 (p. 4.7-4 and 4.7-10) of the Prior EIR. Wastewater treatment requirements are established by the State Water Resources Board and Regional Water Quality Control Boards through NPDES permits for "point source" discharges. Because wastewater discharges must comply with these regulations, the Prior EIR concluded that impacts would be less than significant. No changes are anticipated in the General Plan Update that would result in new, potentially significant impacts; therefore, this issue will not be addressed in the Supplemental EIR.
- b. Water and Wastewater information, presented in Section 4.11.2 of the Prior EIR, will be updated to reflect the General Plan time horizon of 2040.

- c. Stormwater drainage systems, addressed in Section 4.7.1 of the Prior EIR, will be updated to reflect the General Plan time horizon of 2040.
- d. Water Supply information, presented in Section 4.11 (Impact PU-5) of the Prior EIR, will be updated to reflect the General Plan time horizon of 2040.
- e. Wastewater treatment information, presented in Section 4.11 (PU-6) of the Prior EIR, will be updated to reflect the General Plan time horizon of 2040.
- f. Information regarding Solid Waste, presented in Section 4.11 (Impact PU-3 and Impact PU-4) of the Prior EIR, will be updated to reflect the General Plan time horizon of 2040.
- g. Regulatory information regarding Solid Waste, presented in Section 4.11 (Impact PU-3 and Impact PU-4) of the Prior EIR, will be updated to reflect the General Plan time horizon of 2040.

Comments Specifically Requested:

- 1. **State Water Resources Control Board**: Are there any recent changes in the waste discharge requirements that would adversely affect future development in the Santa Paula planning area?
- 2. **County of Ventura Public Works Agency**: Please refer us to the most recent information and any future plans related to Ventura County you may have for public facilities within the time horizon year 2040. Are you aware of any changed capacity issues for stormwater drainage systems that could adversely affect future development in the Santa Paula planning area?
- 3. **California Dept. of Resources Recycling and Recovery (CalRecycle)**: Please refer us to the most recent information and any future plans related Ventura County you may have for landfill and solid waste facilities within the time horizon year 2040.

VI. LONG TERM IMPACTS

Given the extended time horizon of 2040 for the updated General Plan, Section 5.0 of the Prior EIR will be updated as necessary for the Supplemental EIR. The issues to be reviewed are as follows:

- A. Internal Policy Inconsistencies (Section 5.1)
- B. Growth Inducing Effects (Section 5.2)
- C. Significant and Irreversible Environmental Effects (Section 5.3)
- D. Short-term Uses vs, Long-term Productivity (Section 5.4)

VII. ALTERNATIVES

Section 6.0 of the Prior EIR will be updated as necessary. If any new Alternatives are proposed, they shall "focus on alternatives to the project [i.e., the General Plan, as updated] or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Section 15126.6(b))

STATE OF CALIFORNIA

Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC

CITY OF SANTA PAULA



FEB 13 2017

RECEIVED

February 6, 2017

Janna Minsk
City of Santa Paula
P. O. Box 569
Santa Paula, CA 93061

sent via e-mail:
plan@spcity.org

RE: SCH# 1997081084; Santa Paula General Plan Update (Project No. 14-CI-03) Project, Notice of Preparation for Draft Environmental Impact Report, Ventura County, California

Dear Ms. Minsk:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).

- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)). *This process should be documented in the Cultural Resources section of your environmental document.*

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason,

we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,



Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse



VENTURA COUNTY
WATERSHED PROTECTION DISTRICT
WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009
E. Zia Hosseinipour, Manager, Advanced Planning – (805) 654-2454

DATE: February 10, 2017

TO: Janna Minsk, Planning Director
City of Santa Paula

FROM: E. Zia Hosseinipour, Manager of Advanced Planning

A handwritten signature in black ink, appearing to read "E. Zia Hosseinipour", is written over the "FROM:" line.

SUBJECT: RMA17-007, Project No. 14-CI-03
Notice of Preparation (NOP) of a Supplemental Environmental Impact
Report (SEIR) for the Santa Paula 2040 General Plan Update
Request for Comments
Watershed Protection District Project Number: WC2017-0012

Pursuant to your request dated February 1, 2017, the Ventura County Watershed Protection District (District) has reviewed the NOP and Initial Study for preparation of a SEIR for the Santa Paula 2040 General Plan Update, and offers the following comments which we would appreciate being addressed in the SEIR and the Santa Paula 2040 General Plan Update.

1. Ventura County Watershed Protection District Redline Channels and Facilities

There are several watercourses situated within the General Plan Study Area (Page A-5 of the SEIR Figure 2: Planning Areas) that are under the jurisdictional authority of the Ventura County Watershed Protection District (District). These jurisdictional redline channels include Santa Clara River, Todd Barranca, Cummings Road Drain, Briggs Road Drain, Haines Barranca, Adams Barranca, Saltmarsh Canyon, Sisar Creek, Camp Bartlett Creek, Peck Road Drain, Fagan Canyon, Santa Paula Creek, Magnolia Drive Creek, Mud Creek Canyon, Anlauf Canyon, Orcutt Canyon, Timber Canyon, O'Leary Creek, and Balcom Canyon Wash.

Please include an Exhibit in the final SEIR and in the General Plan Update (Safety Element & the Conservation and Open Space Element) that identifies the District's jurisdictional redline channels and specifies the District's jurisdictional authority as follows:

"In accordance with Ventura County Watershed Protection District Ordinance WP-2 enacted October 13, 2013, it is the District's standard that a Project can not impair, divert, impede or alter the characteristics of the flow of water running in any jurisdictional redline channel or facility. To the extent that development impacts District channels and facilities, compliance with District criteria is required. In such

February 10, 2017

RMA17-007, Project No. 14-CI-03: NOP of a SEIR: General Plan Update

Page 2 of 3

cases engineering studies should verify compliance with District hydrology data and flood studies. In addressing peak attenuation, stormwater runoff after development must not exceed the peak flow under existing conditions for any frequency of event; any additional flow (peak, volume) must be contained on the development site.

Further, any development activity including drainage connections and site grading that is proposed in, on, under, or across any jurisdictional redline channel or facility including the bed, banks, and overflow areas will require a permit from the Ventura County Watershed Protection District."

Please revise the General Plan to reference the District as the "Ventura County Watershed Protection District" instead of the "Ventura County Flood Control District" to reflect our official name change that occurred on January 1, 2003.

2. SEIR Attachment B – Initial Study (I. Hydrology and Water Quality)

The District concurs that items (c, d, e, g, h and i) could result in Potentially Significant environmental impacts and should be analyzed in the SEIR.

3. Recent Flooding Issues in the Santa Paula Planning Area

The District and the City of Santa Paula are currently working with project proponents and the Federal Emergency Management Agency (FEMA) on new/updated flood risk mapping studies in the Santa Paula Planning Area. These studies should be reviewed and addressed as part of the General Plan Update:

- Santa Clara River Watershed Flood Insurance Study
- Orcutt Canyon Flood Insurance Study

Please refer to FEMA's Flood Map Service Center website for technical background including modeling and mapping. In addition, the City of Santa Paula Engineering Department and the District are currently undertaking technical reviews of the following Conditional Letters of Map Revisions submitted by project proponents. The District requests that these flood hazard studies also be taken into consideration as part of the SEIR and General Plan Update.

- Clearwater/Pierce Development CLOMR (APNs: 107-0-011-21; -22)
- Santa Maria Street Industrial Park LOMR (APN: 104-0-140-415)
- Santa Paula Creek Flood Control Project LOMR

4. Flood Hazards Analysis Considerations

The District requests that the Santa Paula 2040 General Plan Update and associated SEIR address the issue of flood hazard analysis standards and appropriate use of current supporting data. CEQA impact analyses often rely

February 10, 2017

RMA17-007, Project No. 14-CI-03: NOP of a SEIR: General Plan Update

Page 3 of 3

primarily or solely upon FEMA's Flood Insurance Rate Maps (FIRMs) for analyzing flood hazard issues. However, many of the currently effective FIRMs are now outdated, having been generated during the 1980's using technologies and hydrologic and topographic data available from that time. They represent a historical snap shot in time condition that may not accurately reflect current land use development conditions. Land use planning and CEQA require the projects to evaluate not only present but future land use changes to address cumulative impacts and provide appropriate flood protection measures. Thus, major development projects should consider the most recent available information regarding flood hazards. This means that in addition to the currently effective FIRMs, flood hazard analyses should consider recent floodplain analyses, hydrology and hydraulic modeling reports, and flood risk studies applicable to the project area that have been prepared by the District as part of its long range planning efforts.

5. Master Drainage Plan Update

As part of the Santa Paula 2040 General Plan Update, the District requests that the City of Santa Paula consider updating their Master Drainage Plan. The purpose of a Master Drainage Plan is to address the current and future drainage needs of a community and it should be regularly updated to reflect current conditions and needs. A Master Drainage Plan should identify and discuss a variety of infrastructure options, including channels, storm drains, levees, basins, dams, wetlands or other conveyances capable of economically relieving flooding problems within the community. District staff are available to coordinate with the City of Santa Paula on a Master Drainage Plan update to help identify areas of concern and assess options for relieving potential flooding problems. The plan update should include cost estimates and economic analyses, as well as exploring potential funding options for implementing drainage infrastructure improvements. Financial mechanisms, such as area drainage plans that impose fees on new development based on total impervious acreage created, should be considered to prevent existing taxpayers from having to shoulder the cost burden of cumulative land development impacts on community drainage infrastructure.

End of Text



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
08EVEN00-2017-CPA-0044

February 14, 2017



Janna Minsk, AICP
Santa Paula Planning Director
Planning Department
City of Santa Paula, P.O. Box 569
Santa Paula, California 93061

Subject: Notice of Preparation of a Supplemental Environmental Impact Report for the
City of Santa Paula's 2040 General Plan Update

Dear Ms. Minsk:

We have reviewed the Notice of Preparation of a Supplemental Environmental Impact Report (Supplemental EIR) for the Santa Paula 2040 General Plan Update. The Supplemental EIR would update the previous General Plan Environmental Impact Report to reflect the project characteristics of the 2040 General Plan Update and will list: agencies expected to use the Supplemental EIR in their decision-making; permits and other approvals required to implement the General Plan; and related environmental review and consultation requirements.

The mission of the U.S. Fish and Wildlife Service (Service) is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. To assist in meeting this mandate, the Service provides comments on public notices issued for projects that may have an effect on those resources, especially federally-listed plants and wildlife. The Service's responsibilities also include administering the Endangered Species Act of 1973, as amended (Act). Section 9 of the Act prohibits the taking of any federally listed endangered or threatened wildlife species. "Take" is defined at Section 3(19) of the Act to mean "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." The Act provides for civil and criminal penalties for the unlawful taking of listed wildlife species. Such taking may be authorized by the Service in two ways: through interagency consultation for projects with Federal involvement pursuant to section 7, or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act.

Janna Minsk

2

Our review of the General Plan update indicates that the area that would be affected may support the following listed species and critical habitats:

Common name	Scientific Name	Threatened or Endangered
Least Bell's vireo	<i>Vireo bellii pusillus</i>	Endangered
Southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	Endangered
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened

Critical habitat

Southwestern willow flycatcher

We recommend that you consider these species as you proceed with the General Plan update. As you receive permit requests for future development projects in the areas affected by the changes, we recommend that focused surveys for these species be conducted during the appropriate season, following acceptable protocols, at each project area. If any of these species are detected or are known to be present in a project area, you should contact us to help determine what measures may be appropriate to conserve the species and their habitats. We can also provide guidance on the steps that may be needed to comply with the Act.

If you have any questions, please contact Kendra Chan of my staff at (805) 644-1766, or by electronic mail at kendra_chan@fws.gov.

Sincerely,



Stephen P. Henry
Field Supervisor

March 2, 2017

Janna Minsk, Planning Director
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061

SENT VIA E-MAIL

Subject: Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (EIR) for the Santa Paula 2040 General Plan Update

Dear Ms. Minsk:

Thank you for providing the Ventura Local Agency Formation Commission (LAFCo) with the opportunity to review the subject NOP.

While LAFCo is not a responsible agency under the California Environmental Quality Act (CEQA) with regard to adoption of the General Plan Update, it would be a responsible agency for those future proposals within the "General Plan Study Area" (as mapped in Figure 2 of the NOP) that require LAFCo action. LAFCo may rely on the City's environmental document for proposed reorganizations that include annexation to the City of Santa Paula and Out of Agency Service Agreements (OASAs) for new or extended municipal services outside the City's jurisdictional boundaries. The comments that follow are solely those of the LAFCo staff; the NOP has not been reviewed by the Commission.

Project Description

The project involves an update of the City's General Plan (except for the Housing Element). The City's current General Plan has a horizon year of 2020 and the update will address "the community's vision for development to the horizon year of 2040." According to the NOP, the City intends to incorporate additional information into the environmental analysis based on new applicable legal requirements since the EIR for the current General Plan was adopted in March 1998, and plans to focus its environmental review on impacts that "were not previously analyzed or would be substantially more severe than shown in the previous EIR."

Figure 2 of the NOP includes the delineation of the current city limits and sphere of influence¹. Although the sphere of influence boundary is partially obscured by the mapped City Urban

¹ LAFCo law defines a sphere of influence as the probable physical boundaries and service area of a local agency, as determined by the Commission (Government Code § 56076).

Restriction Boundary line, it appears that the map is generally in conformance with the boundaries of the City and its sphere of influence as established by LAFCo.

The project description and maps included in the NOP do not provide information regarding future development within the currently-unincorporated territory that is within the City's sphere of influence (especially territory to the north of the City). Given that no details are provided regarding such future development, it is unclear how the initial study that was prepared for the General Plan update could offer a meaningful analysis of impacts.

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 update its General Plan, the EIR prepared for the update should acknowledge that future LAFCo action would be necessary in order for the City to provide any new or extended services (by annexing territory or through OASAs).

Environmental Document

In 1998, the City of Santa Paula adopted its current General Plan ("City of Santa Paula General Plan Vision 2020") and certified the associated EIR. The City proposes to prepare a supplemental EIR for the General Plan update, pursuant to California Public Resources Code § 21166 and California Environmental Quality Act (CEQA) Guidelines § 15163. CEQA Guidelines § 15163 states that preparation of a supplemental EIR may be prepared when a subsequent EIR is required but only minor changes or additions to the previous EIR would be necessary for it to remain applicable in the changed situation. A supplemental EIR under CEQA Guidelines § 15163 does not appear to be appropriate for the proposed project, as discussed below.

1. In September 2015, LAFCo reviewed the City's sphere of influence and voted to retain the Fagan Canyon and Adams Canyon "Expansion Areas" (as designated in the City's current General Plan) within the City's sphere. This determination was made following testimony given by members of the Santa Paula City Council, who stated that the City planned to soon begin the process to update its General Plan which would include planning within the Expansion Areas. Based on this testimony, LAFCo expects that the Expansion Areas will be studied and evaluated as part of the update to the General Plan.

As noted above, the current General Plan designates several "Expansion Areas" for future growth of the City, including two large areas to the north of the City known as Fagan Canyon [2,173 acres (3.4 square miles)] and Adams Canyon [(5,413 acres (8.5 square miles))]. Annexation of this area to the City would result in the tripling in size of the City [the City is currently 3,653 acres (5.7 square miles)], and would include the

addition of nearly 12 square miles of undeveloped agricultural land and steep open space areas to the City. However, other than delineating the location of Fagan Canyon and Adams Canyon and identifying them as Expansion Areas, the City did not prepare or evaluate a plan for how this area would be integrated into the City. The General Plan lacks a land use plan, circulation plan, infrastructure/public facilities plan, and open space plan for Fagan Canyon and Adams Canyon. Any evaluation of the Expansion Areas would likely exceed the threshold of a minor change or addition to the existing evaluation certified by the City in 1998. Therefore, the project does not appear to qualify for the preparation of a supplemental EIR under CEQA Guidelines § 15163.

2. CEQA requires that an EIR must include feasible measures that could minimize significant adverse environmental impacts [CEQA Guidelines § 15126.4(a)(1)]. As the majority of issue areas evaluated in the Initial Study were identified as being potentially significant and would require further study in the EIR, it is likely that the EIR will include a discussion of mitigation measures intended to minimize environmental impacts. The implementation of new mitigation measures for a large number of issue areas (including agricultural resources, land use and planning, population and housing, public services, and utilities and service systems) is unlikely to result in only a minor change or addition to the existing EIR.
3. The EIR to be supplemented is 19 years old. As the environmental analysis is intended to support the City's General Plan to the horizon year 2040, reliance (even in part) on the existing EIR would result in an environmental analysis that contains data more than 40 years old at the time the General Plan has reached its intended horizon.

Note: Government Code § 15163(d) states that a supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR. If the City decides to proceed with the preparation of a supplemental EIR, please indicate where a copy of the original EIR can be accessed (ideally, on the City's General Plan Update website).

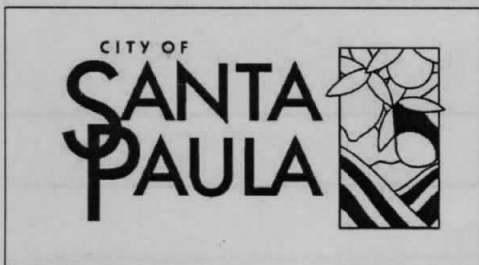
For the reasons discussed above, LAFCo staff encourages the City to prepare a new comprehensive EIR, rather than a supplemental EIR, for the update to its General Plan.

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

Sincerely,



Andrea Ozdy
Analyst



mySantaPaula

COMMENT FORM

GENERAL PLAN EIR NOTICE OF PREPARATION

Upon my review of the Notice of Preparation for the General Plan Update EIR, I would like the City of Santa Paula to consider my comments concerning the following:

- BREADTH of Issues to be discussed in the EIR:

Additional topics

- DEPTH of Issues to be discussed in the EIR:

Page B-14 Hazards & Hazardous Materials

*Item G. Please consider looking at
Ventura County Hazard Mitigation Plan,
new FEMA Flood Zone Maps, and
consulting Ventura County Watershed
Protection District*

*Other plan to consider for review is County EOP Known as
Ventura County Multi-Hazard Functional Plan FYI only*

-continued on reverse-

- ADDITIONAL SOURCES to be consulted in the preparation of this EIR:

- OTHER COMMENTS:

Name: Laura D. Hernandez
Organization: Soteria Emergency Management Services
Address: 2420 Captains Ave.
Port Hueneme, Ca
93041

Date: March 2, 2017
Phone: (805) 844-1720
Email: laurah@soteriaem.com

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division

Kimberly L. Prillhart
Director

March 7, 2017

Ms. Janna Minsk, Planning Director
City of Santa Paula
P.O. Box 589
Santa Paula, CA 93061

SENT USPS AND VIA EMAIL TO: Plan@ci.santa-paula.ca.us

Subject: Notice of Preparation of a Supplemental Environmental Impact Report
Project Title: Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

Dear Ms. Minsk:

On February 1, 2017, the City of Santa Paula (City) issued a Notice of Preparation (NOP) for a Supplemental Environmental Impact Report (SEIR) to evaluate the potential environmental impacts of the proposed Santa Paula 2040 General Plan Update (GPU).

The NOP states that a SEIR will be prepared for the 2040 GPU based on the information presented in the City of Santa Paula General Plan Environmental Impact Report (State Clearinghouse Number. 97081084, certified March 4, 1998) if this information is still current, adequate and applicable to the present project.

The Initial Study prepared for the 2040 GPU references information, analysis and mitigation measures presented in the 1998 General Plan EIR referenced above. For example, Section A(d). Aesthetics of the Initial Study states that:

Light and glare impacts are discussed in Section 4.2.2 of the prior EIR (Impact AES-2). The analysis concluded that although buildout under the General Plan would introduce new sources of light and glare, Land use Element policies and implementation measures would reduce those impacts (EIR p.4.2-10). In addition, Municipal Code Sec. 16.42.050 (Light and Glare) includes performance standards that substantially reduce such impacts; therefore, this issue will not be addressed in the SEIR.

The NOP provides no information regarding where the public may view a copy of the 1998 General Plan EIR. Additionally, in searching the City of Santa Paula website and the 2040 GPU webpage, Planning Division staff was unable to find an electronic copy of the 1998 General Plan EIR. Finally, during the Thursday, March 2, 2017, NOP Scoping Meeting, the project consultant, John Douglas acknowledged that the 1998 General Plan EIR had not yet been uploaded to the City of Santa Paula website. As of the date



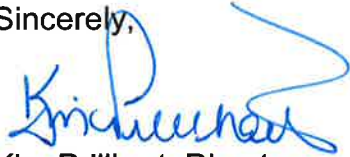
of this letter, the 1998 General Plan EIR was still unavailable on the City of Santa Paula website.

Absent the 1998 General Plan EIR, the Planning Division is unable to evaluate whether the issue areas eliminated from further analysis in the proposed SEIR were adequately analyzed, and as such merit exclusion.

The Planning Division respectfully requests that the NOP public comment period be extended for an additional 30-days and that the 1998 General Plan EIR be made immediately available on the City of Santa Paula website.

If you have any questions regarding this request, please contact Susan Curtis, General Plan Update Manager at (805) 654-2497 or susan.curtis@ventura.org.

Sincerely,



Kim Prillhart, Director
Ventura County Planning Division

cc: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044



Ventura County Watershed Protection District Groundwater Resources

MEMORANDUM

DATE: March 8, 2017

TO: Ms. Janna Minsk, AICP, Planning Department, City of Santa Paula,
P.O. Box 569, Santa Paula, CA 93061

FROM: Alma Quezada, Watershed Protection District, Groundwater Section

SUBJECT: RMA Ref. # 17-007, Notice of Preparation of a Supplemental
Environmental Impact Report, City of Santa Paula 2040 General Plan
Update

The Ventura County Watershed Protection District (VCWPD) – Groundwater Resources Section has reviewed the Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) dated February 1, 2017. The Initial Study in the NOP (Attachment B) is requesting specific comments from the County of Ventura Public Works Agency regarding whether new septic systems are allowed within the Santa Paula planning area as described in Attachment A of the NOP.

The Groundwater Section provides the following comments addressing new septic systems.

PROJECT LOCATION

The City of Santa Paula is geographically located at the center of Ventura County, approximately 14 miles east of the City of Ventura and 65 miles northwest of the City of Los Angeles. The General Plan Study Area boundaries are depicted in Attachment A, Figure 2, page A-5 of the NOP.

PROJECT DESCRIPTION

The City of Santa Paula is updating their General Plan and soliciting comments from responsible agencies to guide the preparation of a SEIR. An EIR was prepared and certified in 1997 (SCH #1997081084) and changes to the project along with new information is now available requiring the need for a SEIR that incorporates minor additions necessary to make the previous EIR applicable. Santa Paula's General Plan addresses the community's vision for development to the horizon year 2040 and includes proposed urban boundaries and planned land uses. The General Plan also addresses Santa Paula's goals, objectives and policies that will govern the management of its resources and growth of the city.

ENVIRONMENTAL IMPACT ANALYSIS – Groundwater Quality

As population grows, land use designations and/or zoning may change and create physical buildout potential that may require the installation of onsite wastewater treatment systems (OWTS) in unincorporated areas outside of the City of Santa Paula.

OTWS's are allowed in certain Planning Department zone designations and summarized in the Ventura County Non-Coastal Zoning Ordinance. OTWS's allow habitation at locations where a connection to a centralized wastewater treatment system is unavailable. Septic systems have the potential to pollute groundwater, however, if properly sited, designed, operated and maintained, the impact to the environment can be significantly reduced.

Permits for new septic systems installations in unincorporated areas are administered by the County of Ventura Environmental Health Division (EHS), Liquid Waste Section. Areas where new septic systems are allowed depending on the land use zone type, would need one of the following three permits: (1) a ministerially approved permit from the County, (2) a Planning Commission approved Conditional Use Permit, or (3) a Board of Supervisors approved Conditional Use Permit. General septic tank regulations, design, and maintenance, are detailed in the State's OWTS Policy, the 2016 Ventura County Building Codes and the Ventura County Onsite Wastewater Treatment System Technical Manual.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9391
FAX (213) 897-1337
www.dot.ca.gov



*Serious Drought.
Serious drought.
Help save water!*

March 14, 2017

Ms. Janna Minsk, AICP
Planning Department
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061

RE: Santa Paula 2014 General Plan Update
(Project No. 14-CI-03)
Vic. VEN-126 GP Boundary
VEN-150 GP Boundary
SCH # 1997081084
GTS # VEN-2017-00046AL-NOP

Dear Ms. Minsk:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City will prepare an environmental impact report for the Santa Paula 2030 General Plan Update. The General Plan addresses the community's vision for development to the horizon year of 2040. All of the mandated General Plan Elements are included in this comprehensive update with the exception of the Housing Element, which was adopted in 2013.

If this is a new update for the General Plan, then a new SCH # should be assigned since 1997 is 20 years ago. Caltrans may request a copy of the document (SCH # 1997081084) if this is a continue review in the environmental process. Normally when a Lead Agency is updating its General Plan, a new SCH # is assigned.

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. However, the County may use the Level of Service (LOS) methodology until The Governor's Office of Planning and Research (OPR) complete its CEQA Guideline to implement SB743 (https://www.opr.ca.gov/s_sb743.php).

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Caltrans understands that the current General Plan and new transportation performance measures and CEQA thresholds have not been updated to VMT (Vehicle Miles Traveled) at the time. Caltrans is concerned that when traffic generated by the General Plan project, along with cumulative traffic is expected to use an off-ramp that is operating at or near capacity, the additional traffic may potentially exceed the off-ramps capacity and back up onto the mainline freeway segments on SR-126.

If the City is still using LOS methodology when conducting the traffic impact analysis, to assist Caltrans in evaluating the impacts of this project on State transportation facilities, the following comments should be considered and the project's traffic consultant should be referred to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

On page B-24 of the Initial Study, Supplemental EIR Notice of Preparation, the General Plan Update and its implementation would potentially significantly "conflict with an applicable plan, ordinance or policy establishing measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit." Therefore, we request a complete traffic study on the State facilities.

Listed below are some elements of what is generally expected in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to SR-126, SR-150, and all on/off ramps within the project General Plan limit vicinity including the following locations and intersections.
 - WB/EB on/off-ramps at SR-126 and SR-150 (10th St.)
 - WB/EB on/off-ramps at SR-126 and S Palms Avenue
 - WB/EB on/off-ramps at SR-126 and S Peck Rd.
 - WB/EB on/off-ramps at SR-126 and S Briggs Rd.
 - SR-126 and Hallock Dr. Intersection
 - SR-126 and Toland Dr. (at Santa Clara Elementary School) Intersection
 - All major intersections on SR-150

The traffic consultant should work with Caltrans to identify and confirm study locations and freeway segments prior to the preparation of the traffic study. The traffic study should also analyze the storage for left-turn pocket at on-ramps when available.

An off-ramp queuing analysis should be conducted utilizing the Highway Capacity Manual (HCM). The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point (25 feet per car preferred) with some safety factor or

referenced to Highway Design Manual at 23' point (Figure 504.2A Single Lane Freeway Entrance) or other methods approved in advance by Caltrans. The existing queue length should be calculated from the traffic counts and the percent of truck assignments with an adequate passenger car equivalent factor. The analyzed result may need to be calibrated with actual signal timing when available. It is also recommended that the Lead Agency determine whether the existing, existing plus project, and project-related plus cumulative traffic are expected to cause long queues on the on and off-ramps. Please include mitigation measures if forecasted vehicle queues are expected to exceed available storage capacity with reasonable safety factor.

2. Discussion on controlling traffic weaving and merging from all access points within the General Plan limits along both side of the highway segment of SR-126 east of Hallock Dr.
3. Discussion on controlling cross-median movement maneuvers of traffic existing and entering properties along both sides of SR-126. Trucks, trailers, and farming machinery and equipment are existing the driveways, crossing over the center island perpendicular to the roadway center line and reversing direction. This movement is the main cause for the potential collisions.
4. List of speed control strategies along SR-126 within the General Plan study limits.
5. Project travel modeling should be consistent with other regional and local modeling forecasts and travel data. Caltrans uses the indices to verify the results and any differences or inconsistencies must be thoroughly explained. Please submit modeling assumptions for Caltrans review and comment.
6. Trip generation rates for the project should be based on the nationally recognized recommendations contained in "Trip Generation" manual, 9th edition, published by the Institute of Transportation Engineers (ITE).
7. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area with and without project. Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions should include build-out of all projects and any plan-horizon years.
8. The analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.
9. A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts should also be included. Any mitigation involving transit or Transportation Demand Management (TDM) should be justified and the results conservatively estimated.
10. A fair share contribution toward pre-established or future improvements on the State Highway System is considered acceptable mitigation. (Please see Appendix "B" of the Guide for more information). Please note that for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes, which include build-out of all approved and not yet approved projects and other sources of growth.

Ms. Janna Minsk, AICP
March 14, 2017
Page 4

Caltrans encourages the Lead Agency to work with County and communities to resolve cumulative significant traffic impacts on the State facilities. A plan to work with County and communities should be discussed in the General Plan or a new Resolution/Policy should be passed such as but not limit to the following suggested policy languages:

- The Lead Agency will work with neighboring agencies to address cumulative significant traffic impact on SR-126 and SR-150.
- The Lead Agency will continue to work with Caltrans to identify potential cumulative traffic impact and mitigation measures.
- The Lead Agency will form a fair share fee program working with neighboring cities to improve the State facilities.
- The Lead Agency's existing traffic impact fees (if any) will include any State facility improvement as part of the cumulative traffic impact. Procuring funds toward freeway segments, freeway interchanges, freeway on/off-ramps, as well as for bus and rail transit facilities will be in the goals of the Lead Agency.

Although we expect to receive the DEIR from the State Clearinghouse, if you would like to expedite the review process or receive early feedback, please feel free to send a copy of the DEIR directly to our office.

Caltrans would like to request a formal scoping meeting with the Lead Agency and traffic consultant for the project to discuss the preparation of the traffic analysis, potential traffic impacts, and proposed mitigation on the State facilities. If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # VEN-2017-00046AL-NOP.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: email to Scott Morgan, State Clearinghouse



**County of Ventura
GENERAL SERVICES AGENCY
MEMORANDUM
Parks Department**

DATE: March 15, 2017

TO: Clay Downing, RMA Planning

FROM: Theresa Lubin, Parks Manager

SUBJECT: DOCUMENT REVIEW RMA 17-007

Thank you providing an opportunity to review the attached documents related to the Santa Paula 2040 General Plan Update. The following information is in response to the request for comments related to changes in regional parks and recreational facilities since 1998 or changes that are proposed.

There are two regional parks that fall within the study area as shown on Figure 2. They are Steckel Park located at 8080 Mistletoe Road and Toland Park located at 525 Toland Road. The operating policies for both properties are unchanged since 1998 and include providing public regional recreational opportunities consisting of day use and camping activities.

Please contact me at (805) 654-3968 or theresa.lubin@ventura.org with any questions concerning the above information.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Memorandum

Date: March 16, 2017
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 1997081084
Santa Paula 2040 General Plan Update

Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **April 17, 2017** to accommodate the review process. All other project information remains the same.

cc: Janna Minsk
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061

TOP Distribution List

County: Ventura

SCH#

1997084084

Regional Water Quality Control Board (RWQCB)

Resources Agency
Nadell Gayou

☐ Fish & Wildlife Region 1E
Laurie Harnsberger

☒ OES (Office of Emergency Services)
Monique Wilber

☐ Caltrans, District 8
Mark Roberts

☐ RWQCB 1
Cathleen Hudson
North Coast Region (1)

☐ Dept. of Boating & Waterways
Denise Peterson

☐ Fish & Wildlife Region 2
Jeff Drongesen

☒ Native American Heritage Comm.
Debbie Treadway

☐ Caltrans, District 9
Gayle Rosander

☐ RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

☐ California Coastal Commission
Elizabeth A. Fuchs

☐ Fish & Wildlife Region 3
Craig Weightman

☒ Public Utilities Commission
Supervisor

☐ Caltrans, District 10
Tom Dumas

☐ RWQCB 3
Central Coast Region (3)

☐ Colorado River Board
Lisa Johansen

☐ Fish & Wildlife Region 4
Julie Vance

☐ Santa Monica Bay Restoration
Guangyu Wang

☐ Caltrans, District 11
Jacob Armstrong

☐ RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

☐ Dept. of Conservation
Crina Chan

☐ Fish & Wildlife Region 5
Heidi Calvert
Inyo/Mono, Habitat Conservation Program

☐ State Lands Commission
Jennifer Deleong

☐ Caltrans, District 12
Maureen El Harake

☒ RWQCB 5
Central Valley Region (5)

☐ California Energy Commission
Eric Knight

☐ Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program

☐ Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

☐ Air Resources Board
Airport & Freight
Cathi Slaminski

☐ RWQCB 6
Central Valley Region (6)

☐ Cal Fire
Dan Foster

☐ Fish & Wildlife Region 6 IM
Heidi Calvert
Inyo/Mono, Habitat Conservation Program

☒ Cal State Transportation Agency CalSTA

☒ Transportation Projects
Nesamant Kalandiyur

☐ RWQCB 7
Colorado River Basin Region (7)

☐ Central Valley Flood Protection Board
James Herota

☐ Dept. of Fish & Wildlife M
William Paznokas
Marine Region

☒ Caltrans - Division of Aeronautics
Phillip Crimmins

☐ State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

☐ RWQCB 8
Santa Ana Region (8)

☐ Office of Historic Preservation
Ron Parsons

☐ Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture

☒ Caltrans - Planning
HQ LD-IGR
Christian Bushong

☐ State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water

☐ RWQCB 9
San Diego Region (9)

☐ Dept. of Parks & Recreation
Environmental Stewardship Section

☐ Dept. of General Services
Cathy Buck
Environmental Services Section

☐ California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

☐ State Water Resources Control Board
Div. Drinking Water # 6

☐ RWQCB 5R
Central Valley Region (5)
Redding Branch Office

☐ California Department of Resources, Recycling & Recovery
Sue O'Leary

☐ Delta Stewardship Council
Kevan Samsam

☐ Caltrans, District 1
Rex Jackman

☐ State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

☐ RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

☐ S.F. Bay Conservation & Dev't. Comm.
Steve Goldbeck

☐ Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

☐ Caltrans, District 2
Marcelino Gonzalez

☐ State Water Resources Control Board
Phil Crader
Division of Water Rights

☐ RWQCB 6
Lahontan Region (6)

☐ Dept. of Water Resources
Nadell Gayou

☐ Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

☐ Caltrans, District 4
Patricia Maurice

☐ Dept. of Toxic Substances Control
CEQA Tracking Center

☐ RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

☐ Fish and Game
Scott Flint
Environmental Services Division

☐ Independent Commissions, Boards
Delta Protection Commission
Erik Vink

☐ Caltrans, District 5
Larry Newland

☐ Department of Pesticide Regulation
CEQA Coordinator

☐ RWQCB 6
Central Valley Region (6)

☐ Fish & Wildlife Region 1
Curt Babcock

☐ Caltrans, District 6
Michael Navarro

☐ Caltrans, District 7
Dianna Watson

☐ Other *Stanford Lucia*

☐ RWQCB 7
Colorado River Basin Region (7)

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 7
Colorado River Basin Region (7)

☐ Caltrans, District 8
Santa Ana Region (8)

☐ Caltrans, District 9
San Diego Region (9)

☐ RWQCB 8
Santa Ana Region (8)

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 9
San Diego Region (9)

☐ Caltrans, District 10
Tom Dumas

☐ Caltrans, District 11
Jacob Armstrong

☐ Caltrans, District 12
Maureen El Harake

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 1
Rex Jackman

☐ Caltrans, District 2
Marcelino Gonzalez

☐ Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

☐ Caltrans, District 4
Patricia Maurice

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 5
Larry Newland

☐ Caltrans, District 6
Michael Navarro

☐ Caltrans, District 7
Dianna Watson

☐ Caltrans, District 8
Santa Ana Region (8)

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 9
San Diego Region (9)

☐ Caltrans, District 10
Tom Dumas

☐ Caltrans, District 11
Jacob Armstrong

☐ Caltrans, District 12
Maureen El Harake

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 1
Rex Jackman

☐ Caltrans, District 2
Marcelino Gonzalez

☐ Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

☐ Caltrans, District 4
Patricia Maurice

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 5
Larry Newland

☐ Caltrans, District 6
Michael Navarro

☐ Caltrans, District 7
Dianna Watson

☐ Caltrans, District 8
Santa Ana Region (8)

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 9
San Diego Region (9)

☐ Caltrans, District 10
Tom Dumas

☐ Caltrans, District 11
Jacob Armstrong

☐ Caltrans, District 12
Maureen El Harake

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 1
Rex Jackman

☐ Caltrans, District 2
Marcelino Gonzalez

☐ Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

☐ Caltrans, District 4
Patricia Maurice

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 5
Larry Newland

☐ Caltrans, District 6
Michael Navarro

☐ Caltrans, District 7
Dianna Watson

☐ Caltrans, District 8
Santa Ana Region (8)

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 9
San Diego Region (9)

☐ Caltrans, District 10
Tom Dumas

☐ Caltrans, District 11
Jacob Armstrong

☐ Caltrans, District 12
Maureen El Harake

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 1
Rex Jackman

☐ Caltrans, District 2
Marcelino Gonzalez

☐ Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

☐ Caltrans, District 4
Patricia Maurice

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 5
Larry Newland

☐ Caltrans, District 6
Michael Navarro

☐ Caltrans, District 7
Dianna Watson

☐ Caltrans, District 8
Santa Ana Region (8)

☐ Fish and Wildlife Region 1
Curt Babcock

☐ Caltrans, District 9
San Diego Region (9)

☐ Caltrans, District 10
Tom Dumas

☐ Caltrans, District 11
Jacob Armstrong

☐ Caltrans, District 12
Maureen El Harake

1997081084



CITY OF SANTA PAULA
970 VENTURA STREET
SANTA PAULA, CALIFORNIA 93060

Governor's Office of Planning & Research
MAR 15 2017
STATE CLEARINGHOUSE

DATE: March 10, 2017
TO: Responsible Agencies and Interested Parties
FROM: Janna Minsk, AICP, Planning Director (805) 933-4214 JMinsk@spcity.org
SUBJECT: Extension of Public Review Period
Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report
for the Santa Paula 2040 General Plan Update

Please note that the public review period for the General Plan NOP has been extended an additional 30 days to **April 17, 2017**. If your agency has already submitted comments, you are invited to submit any additional comments you may have during this extended review period.

Also please note that the Notice of Preparation and the previous General Plan EIR are available for public review at the City Planning Department, 970 Ventura Street, Santa Paula, CA as well as on the General Plan website at: <http://www.mysantapaula.com/documents.html>

Comments should be submitted to:

Janna Minsk, AICP, Planning Director
City of Santa Paula
PO Box 569
Santa Paula, California 93061
JMinsk@spcity.org

Para información en español, hable al numero y pregunte por Anna Arroyo (805) 933-4214 x214

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Clay Downing, Planning DATE: March 17, 2017

FROM: Alicia Stratton

SUBJECT: Request for Review of Notice of Preparation for a Supplemental
Environmental Impact Report for the Santa Paula 2040 General Plan
Update, Project No. 14-CI-03, City of Santa Paula (Reference No. 17-007)

Air Pollution Control District staff has reviewed the subject notice of preparation (NOP) for a supplemental environmental impact report (SEIR), which is a which is a general plan addressing Santa Paula's vision for development to the horizon year of 2040. The general plan includes a map of proposed urban boundaries and planned land uses including physical buildout potential and proposed policies/implementation measures. It also contains goals, objectives and policies that will govern the growth of the city and management of its resources.

Section C of the NOP addresses air quality. This discussion indicates that air quality impacts from the proposed General Plan Update would be potentially significant and will be studied in the SEIR. We recommend that the SEIR is updated using the 2016 AQMP. District and the SEIR evaluates all potential air quality impacts that may result from the project.

Thank you for the opportunity to review this project. If you have any questions, please call me at (805) 645-1426 or email alicia@vcapcd.org.



March 17, 2017

Ms. Janna Minsk, AICP, Planning Director
City of Santa Paula
P.O. Box 569
Santa Paula, California 93061
Phone: (805) 933-4214
E-mail: jminsk@spcity.org

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
818 West 7th Street, 12th Floor
Los Angeles, CA 90017
Tel: (213) 236-1800
Tel: (213) 236-1825
www.scag.ca.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Santa Paula 2040 General Plan Update [SCAG NO. IGR9157]

Dear Ms. Minsk,

REGIONAL COUNCIL OFFICERS

President
Michele Martinez, Santa Ana
Vice President
Margaret E. Finlay, Duarte
Second Vice President
Alan Wapner, Ontario
Immediate Past President
Cheryl Viegas-Walker, El Centro

COMMITTEE CHAIRS

Executive/Administration
Michele Martinez, Santa Ana
Community, Economic & Human Development
Bill Jahn, Big Bear Lake
Energy & Environment
Carmen Ramirez, Oxnard
Transportation
Barbara Messina, Alhambra

Thank you for submitting the Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Santa Paula 2040 General Plan Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

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

SCAG staff has reviewed the Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Santa Paula 2040 General Plan Update (GPU) in Ventura County. The GPU will address the community's vision for development to the horizon year of 2040 and also includes a map of proposed urban boundaries and planned land uses.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Assistant Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

March 17, 2017
Ms. Minsk

SCAG No. IGR9157
Page 2

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE
SANTA PAULA 2040 GENERAL PLAN UPDATE [SCAG NO. IGR9157]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
*SCAG does not yet have an agreed-upon security performance measure.	

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

March 17, 2017
Ms. MinskSCAG No. IGR9157
Page 3

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Santa Paula Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	34,400	37,100	39,600
Households	6,458,000	7,325,000	7,412,300	9,900	10,800	11,500
Employment	8,414,000	9,441,000	9,871,500	9,900	11,200	11,700

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



Ventura County Cultural Heritage Board 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: April 13, 2017

TO: Janna Minsk, Santa Paula Planning Director

FROM: Nicole Doner, Cultural Heritage Board staff

SUBJECT: **Review of Notice of Preparation of a Supplemental EIR
Santa Paula 2040 General Plan Update Project No.14-CI-03
City of Santa Paula, RMA Project Ref. No. 17-007**

At City staff's request, the Notice of Preparation of the Supplemental EIR for the Santa Paula 2040 General Plan Update has been reviewed. Specifically, the Section E - Cultural Resources discussion found in Attachment B of the Initial Study:

Would the City of Santa Paula General Plan Update and its implementation cause a substantial adverse change in the significance of historic resources as defined in Section 15064.5?

Discussion: The historical resources presented in Section 4.9.1 of the prior EIR, which was derived from the General Plan Update Baseline Conditions Assessment (1994) and the technical report prepared by Wlodarski (1997), will be updated as necessary to reflect any historic surveys conducted within the Santa Paula planning area since 1997.

Cultural Heritage Board staff provides the following comments:

- Much of the Santa Paula planning area within the unincorporated county has not yet been surveyed so historic resources may exist that have not yet been documented. Greater population density and more transportation infrastructure could lead to direct and indirect impacts on historical, paleontological and cultural resources from greater public access to them. Historic sites can easily exist in open spaces and agricultural areas that have been previously disturbed by past activities.
- The County of Ventura completed two comprehensive surveys within the subject Santa Paula planning area. The Ventura County Cultural Heritage Survey Phase V: Western Santa Clara Valley prepared by San Buenaventura Research Associates (SBRA) dated July 1996 and Ventura County Cultural Heritage Survey Phase VI: Santa Clara Valley also prepared by SBRA dated August 1999. Since these surveys are over 20 years old, there is insufficient data for determining historical significance of the properties that were previously omitted because they did not meet the 50-year age threshold.

- On December 12, 2000, the Ventura County Board of Supervisors designated the previously mentioned surveyed sites given a National Register Status Code of 1 through 5 in existing and newly adopted County historic surveys as Sites of Merit as part of a larger County-initiated code amendment intended to protect historic resources. Properties of local significance such as Sites of Merit that have been designated under the County Cultural Heritage Ordinance 4225 are presumed to be historical resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.
- The City of Santa Paula should set forth goals, policies and programs within the Historical and Cultural Resources Section of the General Plan: a) to identify and preserve Santa Paula's unique historical and cultural resources for future generations; and b) for evaluating the historical significance of those sites that contain buildings, structures, and objects that are fifty years of age or older. Fifty years of age is a general estimate of the time needed to develop historical perspective and to evaluate significance. This is a standard used by the Federal and State governments.

Please contact Nicole Doner at 805-654-5042 or nicole.doner@ventura.org if you have any questions.

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division

Kimberly L. Prillhart
Director

April 13, 2017

Ms. Janna Minsk, Planning Director
City of Santa Paula, Planning Department
P.O. Box 569
Santa Paula, CA 93061

Subject: Notice of Preparation (NOP) for a Supplemental Impact Report for the Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

Dear Ms. Minsk,

Thank you for the opportunity to comment on the subject project. The following comments are intended to respond to the specific questions posed to the Ventura County Planning Division throughout the City of Santa Paula's (City) Initial Study (February 1, 2017).

1. Environmental Setting – Assumptions (Baseline date)

City Information Request: The Initial Study (IS) specifies that the Baseline date for the environmental setting is assumed to be the date of publication of the NOP, which is February 1, 2017 and requests that the Planning Division verify that the Baseline date is consistent with the Planning Division's "current expectations and planning programs."

Planning Division Response: It is not clear what "expectations" and "planning programs" the City is referring to; therefore, the Planning Division is unable to comment. However, it is the Planning Division's understanding that for some environmental issues identified in the IS (such as Aesthetics), the City intends to use the Baseline data that was analyzed for its 1998 Environmental Impact Report (EIR).

2. Project Buildout

City Information Request: The IS states that the City does not expect residential buildout to exceed the forecast of 11,500 households, as adopted by the Southern California Council of Governments in the 2040 RTP/SCS for the horizon year 2040. The City requests that the Planning Division verify that this buildout potential is consistent with the Planning Division's "current expectations and planning programs."

Planning Division Response: The Planning Division does not calculate buildout potential for cities within the County, nor does it develop its own "expectations" regarding residential buildout for cities. However, the Planning Division does integrate certain countywide household demographics into its Housing Element. The County's



most current Housing Element (2014-2021) has incorporated SCAG RTP/SCS forecasts through 2035, which show a household estimate of 11,100 households for Santa Paula. This data appears to be consistent with SCAG's current RTP/SCS forecast of 11,500 households through 2040.

3. Biological Resources

City Information Request: The City requests that the Planning Division provide information regarding any biological surveys the County has conducted within the Santa Paula Planning Area since 1997.

In addition, the IS concludes that issues related to wildlife corridors and potential conflicts with local policies and ordinances protecting biological resources (such as tree protection policies) have been "adequately addressed in the prior EIR."

Planning Division Response: Given the amount of new information related to biological resources that has been collected since 1998, the Planning Division does not agree that these issues have been adequately addressed. The Planning Division biologist has prepared separate comments that address the need to reevaluate potential impacts to biological resources (including wildlife corridors), and has provided information and resources to assist the City with that evaluation.

4. Cultural Resources

City Information Request: The City requests that the Planning Division identify contacts for archaeological, historical, and /or tribal resources.

Planning Division Response: The Planning Division contact for historical resources is Nicole Doner (Nicole.doner@ventura.org). Archaeological information is obtained from the South Central Coastal Archaeological Information Center at California State University, Fullerton. Tribal resource information is obtained through the State of California Native American Heritage Commission.

In addition, Ms. Doner has prepared separate comments regarding the need for additional historic resource surveys.

5. Land Use Planning

City Information Request: The City requests that the Planning Division confirm that the Guidelines for Orderly Development (Guidelines) adequately address land use and planning issues, as stated within the IS.

Planning Division Response: Although not directly related to the City's information request, the Planning Division would like to clarify that the overall purpose of the Guidelines is to locate urban development within incorporated cities to facilitate delivery of the full range of municipal services. It is not to "maintain consistent development patterns throughout the region," as stated in the IS (Supplemental EIR NOP, February 1, 2017, pg. B-18).

Furthermore, the Guidelines state that development is considered “urban” if it would result in the creation of residential lots less than two acres in area. However, based on the total acreage of the Adams Canyon and Fagan Canyon Expansion Areas and the total number of residential units allowed for in the City’s General Plan, the overall densities average approximately one unit per eight acres. Clearly, urban development at this density is not consistent with the density assumptions included in the Guidelines for Orderly Development.

6. Mineral Resources

City Information Request: The City requests that the Planning Division provide the most recent maps and regulations pertaining to the designation of mineral lands in the County and any permit/reclamation plans since 1998 within the Santa Paula Planning Area.

Planning Division Response: The most current maps and regulations can be obtained through the State Department of Conservation – Division of Mine Reclamation. There are no mines within the Santa Paula Planning Area.

7. Noise

City Information Request: The City is requesting that the Planning Division clarify whether the noise contours in the existing General Plan can be used by the City for its noise analysis, or whether the noise information will significantly change as part of the County’s General Plan Update.

Planning Division Response: The noise contour calculations that are currently included in the County’s General Plan have been modeled through 2020, which is the time horizon for the County’s existing General Plan. As the City notes, the County is also in the process of updating its General Plan, which will have a time horizon of 2040. As a result, the Planning Division expects the noise contour calculations to be updated.

The County recently completed its Public Review Draft of the Background Report for the General Plan Update. There is noise hazard information contained within Chapter 11 that may be helpful for the City’s analysis.

http://vc2040.org/wp-content/uploads/2017/03/VCGPU_11-BR-Hazards_Safety_PRD_March_2017.pdf)

8. Transportation

City Information Request: The City requests information regarding the “methodology” the County plans to use for its CEQA transportation analysis for its General Plan Update.

Planning Division Response: It is not clear what the City is referring to when it asks what “methodology” the County will use to conduct its CEQA transportation analysis.

The County will ensure that a thorough transportation and circulation analysis that complies fully with the requirements of CEQA is conducted for the County’s General Plan update.

Thank you again for the opportunity to comment.

Sincerely,



Shelley Sussman, Senior Planner
Ventura County Planning Division



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: April 14, 2017

TO: Janna Minsk, Santa Paula Planning Director

FROM: Whitney Wilkinson, Ventura County Planning Division

SUBJECT: Notice of Preparation of a Supplemental Environmental Impact Report for the Santa Paula 2040 General Plan Update (RMA 17-004)

I have reviewed the Notice of Preparation (NOP) and Initial Study for the Santa Paula 2040 General Plan Update (RMA 17-004), and have the following comments that the City of Santa Paula should consider with regard to the analysis of impacts to biological resources when preparing the Supplemental Environmental Impact Report (SEIR).

Requested Information from County of Ventura Planning Division:

The NOP requests that the County provide information regarding any biological surveys the County has conducted within the Santa Paula planning area since 1997. The Planning Division reviews the surveys and Initial Study Biological Assessments (ISBA) that accompany land use entitlement applications in the unincorporated areas near Santa Paula. These ISBAs summarize the results of surveys conducted and provide a literature and biological resource review to determine if any special status species, plant communities, water or wetland features, or wildlife movement corridors have the potential to occur. If having these reports would be useful to conduct the SEIR's biological impact analysis, please contact the Staff Biologist with the Ventura County Planning Division at (805) 654-2462 or at Whitney.Wilkinson@Ventura.org. The County's Watershed Protection District's Ecologist, Pam Lindsey, may also have conducted or authorized biological studies within the Santa Paula planning area. Pam can be reached at (805) 654-2036 or Pam.Lindsey@Ventura.org.

Impacts to Waters and Wetlands:

Subsection C of the biological resource section of the Initial Study addresses potential impacts to federally protected wetlands. In order to be in compliance with the federal Clean Water Act, both waters and wetlands should be considered when analyzing compliance with federal regulations within the SEIR. In addition, Subsection B considers potential impacts to riparian habitats and other sensitive natural communities protected by the State. Because the definitions and regulations pertaining to waters and wetlands are different among federal and state agencies, potential impacts to State Jurisdictional Waters and Wetlands in addition to those designated by federal agencies should be analyzed within the SEIR in order to comply with state environmental regulations.

Wildlife Movement and Habitat Connectivity:

The NOP provides a discussion of wildlife movement and mitigation measures that were developed for the 1998 EIR. The Initial Study concludes that updated impact analysis on wildlife movement is not necessary for the proposed General Plan Update. However, many additional studies have been completed that include the area around Santa Paula that have yielded additional data on wildlife movement in the area. These studies and data should be reviewed and analyzed in the SEIR in order to ensure impacts to wildlife movement and habitat connectivity associated with the increase in development that will result from the long-term build out of the City of Santa Paula are avoided and minimized adequately. These studies and data include, but are not limited to, the following:

The South Coast Missing Linkages Study (2008):

<http://www.scwildlands.org/reports/SCMLRegionalReport.pdf>

South Coast Missing Linkages: A Linkage Design for the Santa Monica to Sierra Madre Connection (2006):

http://www.scwildlands.org/reports/SCML_SantaMonica_SierraMadre.pdf

Roads and Biodiversity Project: Guidelines for Safe Wildlife Passage (2005)

http://vcrma.org/planning/pdf/bio/Guidelines_for_Safe_Wildlife_Passage.pdf

Wildlife corridor Study and Identification of Advanced Mitigation Measures along a Critical Linkage: SR-126 (Phase I) (National Park Service, 2016):

Please contact the Ventura County Planning Division's Staff Biologist for a copy.

A review of studies and data developed after the preparation of the original EIR would inform necessary updates to the mitigation measures provided in the EIR. For example, Mitigation Measure 29f listed in the NOP states that culverts must be designed such that light is visible at both ends. While this measure may be helpful, other considerations, such as culvert height and width, are also important in continuing to facilitate wildlife movement. Other mitigation measures to consider include preventing excessive light from illuminating habitat areas and utilizing wildlife permeable fencing, when feasible. Finally, the County considers Santa Paula Creek as part of the network of regional wildlife corridors that connect various core habitat areas throughout the County and beyond.

Thank you for the opportunity to comment on the Initial Study and Notice of Preparation. If you have questions regarding this submittal, please contact Whitney Wilkinson at 805-654-2462 or whitney.wilkinson@ventura.org.



Ventura County Transportation Commission

April 14, 2017

Ms. Janna Minsk, AICP, Planning Director
City of Santa Paula
PO Box 569
Santa Paula, CA 93061

Subject: Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report for the Santa Paula 2040 General Plan Update.

Dear Ms. Minsk:

The Ventura County Transportation Commission (VCTC) and in its role as the Ventura County Airport Land Use Commission (ALUC) appreciates this opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report for the Santa Paula 2040 General Plan Update. The comments below have been organized by VCTC's area of responsibility as either the ALUC or the VCTC.

ALUC

The Draft Supplemental EIR should consult the Ventura County Comprehensive Land Use Plan (CLUP) adopted in July of 2000 as it considers land uses surrounding Santa Paula Airport. Special consideration should be given to those areas that would be exposed to aircraft noise and/or are within the safety zones delineated in the CLUP. Compatibility with the CLUP should be contemplated within the Hazards, Noise and Land Use portions of the Draft SEIR. The adopted CLUP does not include airport operations and the Draft SEIR should consult with the Airport Director of Santa Paula Airport to obtain the latest information in terms of the number of flight operations and changes to the flight patterns.

VCTC

The Draft SEIR should consult the VCTC's 2009 Congestion Management Plan when considering impacts within the transportation section of the document. The Draft SEIR should address complete streets and consideration should be given to all modes of transportation including automobiles, trucks, transit, bicycles and pedestrian movements. The Draft SEIR should also consider a full range of Transportation Demand Management (TDM) policies to further reduce congestion, vehicle miles traveled and greenhouse gas emissions. VCTC agrees that until that the Governor's Office of Planning and Research (OPR) finalizes the methodology for implementing SB 743 the Draft SEIR should analyze transportation impacts under the current CEQA guidelines using Level of Service.

Notice of Preparation
Page 2

Again, The VCTC appreciates this opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report for the Santa Paula 2040 General Plan Update. If you have questions concerning any of the comments provided, please feel free to contact me at (805) 642-1591 x.103 or by email at sdegeorge@goventura.org.

Respectfully,

A handwritten signature in blue ink, appearing to read "Steve DeGeorge", with a stylized flourish at the end.

Steve DeGeorge,
VCTC Director of Planning

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division

Kimberly L. Prillhart
Director

April 17, 2017

City Santa Paula
Planning Department
Attn.: Janna Minsk, AICP
200 South Tenth Street
Santa Paula, CA 93060

E-mail: jminsk@spcity.org

Subject: Comments on the Notice of Preparation for the Santa Paula General Plan
Update (Project No. 14-CI-03)

Dear Ms. Minsk:

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 Clay Downing, 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 Clay Downing at (805) 650-4047.

Sincerely,



Denice Thomas, Manager
Planning Programs Section

Attachments

County RMA Reference Number 17-007



John Douglas

From: Janna Minsk <JMinsk@spcity.org>
Sent: Monday, July 17, 2017 9:20 PM
To: John Douglas
Subject: FW: Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

Hi John

See below and we can discuss further
The SP conservancy is recently formed historical conservancy.
Janna

From: SP Conservancy [conservancysp@gmail.com]
Sent: Monday, July 17, 2017 7:20 PM
To: Janna Minsk; Janna Minsk
Cc: Chris.Ganson@opr.ca.gov; Michael.McCormick@opr.ca.gov; Sahar.Shirazi@opr.ca.gov; John Cotti - LocalGovLaw; Jenny Crosswhite
Subject: Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

Re: Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

Dear Director Minsk:

The Planning Department's proposed utilization of an SEIR (Supplemental Environmental Impact Report) for Project No. 14-CI-03, Santa Paula 2040 General Plan Update, is neither adequate nor appropriate because it is inconsistent with the CEQA guidelines for projects that will have a significant environmental impact. Rather, it is a flawed approach that has the potential to cause at least 20 years of harm to development and land use planning in Santa Paula. Further, it is the opinion of the Santa Paula Conservancy that the scope of the Initial Study outlined in the Notice of Preparation, February 1, 2017, is incomplete and must be revised to include several important components that it does not include at this time.

Use of a Supplemental Environmental Impact Report is not adequate for Project No. 14-CI-03 because this approach is inconsistent with CEQA Guidelines 15162 and 15153.

CEQA 15162. Subsequent EIRs and Negative Declarations

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following...

In the case of Project No. 14-CI-03, **no EIR has been certified or negative declaration has been adopted for this project.** The EIR that was certified for the prior General Plan Update was certified for a different project, not for Project No. 14-CI-03. **For the EIR from any prior project to be adequate for Project No. 14-CI-03, that EIR must be found to be in accord with CEQA Guideline 15153.**

CEQA 15153. Use of an EIR from an Earlier Project

(a) The Lead Agency may employ a single EIR to describe more than one project, if such projects are essentially the same in terms of environmental impact. Further, the Lead Agency may use an earlier EIR prepared in connection with an earlier project to apply to a later project, if the circumstances of the projects are essentially the same.

The environmental impact of Project No. 14-CI-03 will differ necessarily and significantly from the environmental impacts that were addressed on March 4, 1998, when SCH# 970810084 was certified for the prior Santa Paula General Plan Update which, to reiterate, is a separate project from Project No. 14-CI-03. Some of the reasons the new Project will have a different environmental impact from the previous General Plan Update include:

-
- **Land Use Changes**
-
- **General Plan Map Revisions**
-
- **Expansion into Adams and Fagan Canyons**
-
- **The Scope of the Proposed SEIR is Incomplete**
-
- **Access to Scenic Resources not Addressed**
-
- **A Collection of Specific Plans Cannot Replace the General Plan**

LAND USE CHANGES

Several land use changes have been approved in Santa Paula subsequent to the certification of SCH# 970810084, and these changes need to be addressed by the proposed Project No. 14-CI-03. If an SEIR based on SCH# 970810084 is used for Project No. 14-CI-03, the General Plan Update may fail to adequately address the significant environmental impacts, if any, of these land use changes. The following examples illustrate some, but by no means all, of the potentially significant land use changes subsequent to March 4, 1998, that are by definition excluded from SCH# 970810084:

-
- **S.P. Ord. No. 1041** (4-2-01) Rezoning certain property located at the south east corner of Say Road and Cliff Drive from County A-E to RA-20 PD. Not assessed in SCH# 970810084.
-
- **S.P. Ord. No. 1131** (2-22-05) Rezoning approximately 16 acres of the 29-acre Santa Paula Memorial Hospital property located at the northern terminus of Tenth Street from IN to R2 with a PD overlay. Not assessed in SCH# 970810084.
-
- **S.P. Ord. No. 1143** (10-17-05) Implementing a prezone/zone change for approximately 48 acres, located south of Highway 126 near Todd Lane, west and southwest of the existing Wastewater Treatment Plant, as IN. Not assessed in SCH# 970810084.
-
- **S.P. Ord. No. 1149** (12-19-05) Prezoning portions of the Fagan Canyon Expansion Area as SP-2. Not assessed in SCH# 970810084.
-
- **S.P. Ord. No. 1155** (2-21-06) Prezoning approximately 22.5 acres, located south of Highway 126 near Todd Lane, west of the existing Wastewater Treatment Plant and north of the proposed water recycling facility and corporation yard, as A-1. Not assessed in SCH# 970810084.
-
- **S.P. Ord. No. 1190** (3-17-08) Prezoning portions of the East Area 1 Expansion Area as the East Area 1 Specific Plan (SP-3). Not assessed in SCH# 970810084.
-
- **S.P. Ord. No. 1220** (10-5-09) Prezoning approximately 27.59 acres located at the Northern terminus of Grant Line Street and East of Thelma Bedell Elementary School. Not assessed in SCH# 970810084.
-

S.P. Ord. No. 1228 (8-16-10) Rezoning approximately 40 acres located in the Santa Paula Creek Riverbed, east of the current city limit and north of the Union Pacific Railroad right-of-way as O. Not assessed in SCH# 970810084.

•

S.P. Ord. No. 1240 (11-7-11) Rezoning four parcels of land totaling approximately 43 acres A-1 and IN to I. Not assessed in SCH# 970810084.

•

S.P. Ord. No. 1248 (2-4-13) Rezoning portions of the East Area 2 Planning Area as the East Gateway Project and East Gateway Specific Plan (SP-4). Not assessed in SCH# 970810084.

•

S.P. Land Use Plan (2-13-14) Amended through **Ordinance No. 6351** on 10-16-06, revised through **City Council Resolution No. 6459** on 12-18-08, revised through **City Council Resolution No. 6700** on 9-20-10, revised through **City Council Resolution No. 6821** on 1-8-12, and revised through **City Council Resolution No. 6822** on 2-13-14. Not assessed in SCH# 970810084.

GENERAL PLAN MAP REVISIONS

In addition, several General Plan Map revisions have occurred since the last General Plan Update, meaning that the physical area for potentially significant environmental impacts has changed substantially since the certification of SCH# 970810084 in 1998. The Sphere of Influence for Project No. 14-CI-03 was adopted in 2007, nine years after the the last General Plan Update, and could not have been included in the last EIR. The current Santa Paula General Plan Map Land Use Plan and Expansions Areas for the Project was last revised on 2/13/14, sixteen years after the last Update was approved, and includes build-out of approximately 945 Dwellings in the unplanned areas of Adams Canyon and Fagan Canyon, a geographic area roughly double the size of the current city limits. An SEIR for Project No. 14-CI-03 that relies on SCH# 970810084 would effectively double the area within the Santa Paula Zoning Ordinance without any assessment of the environmental impacts of Planning in this Project area.

In addition, the Santa Paula Zoning Map was re-published in 2008 and in 2013.

EXPANSION INTO ADAMS AND FAGAN CANYONS

The following examples show why a new EIR is needed to adequately assess the potential Project impacts from expansion into Adams and Fagan Canyons, as well as the potential Project impacts that this expansion could produce in other existing portions of Santa Paula.

Potentially Significant Impact M(a) (Initial Study) - inducing substantial population growth in an area... is proposed to be addressed by updating the Growth Inducing Impacts through the extended time horizon of 2040. **The proposed solution, based on the prior EIR, will ignore impacts in grown areas outside the scope of the prior EIR, i.e. Adams and Fagan Canyons, the very Project areas where it is known that the substantial population growth will be induced.** An EIR is necessary to address the environmental impacts of the Project's population growth upon the known but as yet not fully documented historic resources identified in the City of Santa Paula General Plan Conservation and Open Space Element Appendix A, Cultural and Historical Resources:

Adams Canyon - ...*The historic resources presently known to exist within the Adams Canyon planning area should be regarded as only a representative sample. A significant number of additional resources representing historical themes related to early water development, homesteading and agriculture would probably be discovered in site-specific surveys. In addition, a number of other oil-related structures: sheds, derricks, tanks, worker residences and other structures may also remain.*

Fagan Canyon - ...*Agriculture has been the principal historic use of the canyon. A small number of residences, barns and sheds related to the historic agricultural uses of the canyon are known to exist, but*

could not be inventoried due to lack of access. Resources representing historical themes related to early water development, homesteading and agriculture would probably be discovered in site specific surveys.

THE SCOPE OF THE PROPOSED SEIR IS INCOMPLETE

Relative to the new Project, the scope and study area of the Proposed SEIR is limited and incomplete. The Initial Study for the Project has already identified Potentially Significant Impacts that obviously cannot be addressed by an SEIR based on the limited study area in SCH# 970810084. The following are a few examples of the Potentially Significant Impacts identified in the Initial Study that cannot be addressed by the proposed SEIR:

Potentially Significant Impact E(a) - a substantial adverse change in the significance of a historical resource... proposed to be addressed by updating the General Plan Update Baseline Conditions Assessment (1994) to reflect any historic surveys conducted within the Santa Paula planning area since 1997. **This response is inadequate because simply extending the General Plan Baseline Conditions Assessment for another 20 years will continue to exclude impacted areas in the new Project where no historic surveys have been conducted.** In Adams and Fagan Canyons a full EIR is required to fully document the existing historical and cultural resources so that potentially significant Project impacts can be mitigated or avoided.

In addition, both Adams and Fagan Canyons are also well known to provide habitat to native plant and animal species. Project impacts upon these resources will include traffic, noise, pollution, and loss of habitat. These impacts must be addressed in a new EIR, their significance assessed and, if necessary, mitigated.

Regarding new Project impacts on other existing portions of Santa Paula, potential pollution impacts to Adams and Fagan Barrancas have not been adequately studied within the context of the new Project. Habitat and wildlife in these waterways may be adversely affected by construction debris as well as increased concentrations of storm water runoff resulting from the Project.

Potentially Significant impact L(a) - exposure of persons to or generation of noise levels in excess of standards established in the local general plan... is proposed to be addressed by updating the Future Noise Contours through the extended time horizon of 2040. This is not adequate and **a full EIR is required to ensure that increased traffic volumes resulting from the Project in the historic central city do not exceed the acceptable standards regarding noise levels** (Figures N-1 & N-3, General Plan) adopted in the Santa Paula General Plan Noise Element.

Potentially Significant Impacts P(a) & (b) - pertaining to Santa Paula's Circulation element, **requires a new EIR since many of the proposed roads in Figure CI-3 (General Plan) connecting to the Fagan and Adams Canyon Expansion Areas are known now not to be viable, which will only increase traffic concentrations in other alternate routes through the historic city center. Potential adverse Project impacts within the Potential Historic Districts shown in Figure CO-4 (CO-17) have not been adequately studied to ensure that the Project does not result in LOS (minimum acceptable "C") that exceeds acceptable levels in these areas.**

ACCESS TO SCENIC RESOURCES NOT ADDRESSED

It also appears that Public Access to Santa Paula's natural and scenic resources was omitted from the Project Initial Study. Including this appropriate element will increase the environmental impact of the new Project relative to the prior General Plan Update.

The Inventory of Natural Scenic Resources in the Santa Paula General Plan Conservation and Open Space Element includes the Santa Clara River, Santa Paula Creek, Adams Canyon, Fagan Canyon, Santa Paula Canyon, Barrancas, Mountains to the north and south, Hillsides to the east, and Agricultural lands. A General

Plan update that fails to study and prioritize public access to these resources will continue to deprive the public of access to, and enjoyment of, the shared resources of which they are the rightful co-beneficiaries.

A COLLECTION OF SPECIFIC PLANS CANNOT REPLACE THE GENERAL PLAN

Expanding into Adams and Fagan Canyons via subsequent specific plans, as with East Area 1 & 2 and other areas, is not an adequate or appropriate Planning approach. By definition this fragments the planning process into separate areas and marginalizes them with respect to the overall General Plan, which is “the framework by which [all] the City’s physical and economic resources are to be managed and used in the future.” If the General Plan framework is intentionally left incomplete, leaving major areas of significance like Adams and Fagan Canyons to be “filled in” at a later date, the General Plan Update Project will have failed in its objective and the plan for Santa Paula will be inconsistently formulated and implemented. In particular, the lack of Project planning in the Canyons in the form of undesignated open spaces, unstudied and undocumented impacts to historic and cultural resources, and undefined public access to documented scenic resources creates a 20-year future scenario where development projects will have to interpret and reinterpret these General Plan elements on a case by case basis, without a clear, consistent, overarching framework to guide development. Development will take longer, be less clear, more expensive, and more vulnerable to litigation. Increasing the scope of the General Plan Update to properly plan for the expansion into Adams and Fagan Canyon will increase the environmental impact of the Project relative to the prior General Plan Update.

A succession of specific plans is not an adequate or appropriate substitute for a complete and thorough General Plan Update.

Inherently, such an approach engenders the kind of incremental, piecemeal, and fragmentary expansion that the General Plan is intended to prevent. The State of California general Plan Guidelines are clear:

Every city and county must adopt “a comprehensive, long term general plan” (§65300). The general plan must cover a local jurisdiction’s entire planning area and address the broad range of issues associated with a city’s or county’s development.

A complete General Plan land use plan cannot be replaced by a collection of Specific Plans

Several of Santa Paula’s unique and desirable features depend upon the comprehensiveness of the General Plan for their preservation and vitality. There furtherance, endorsed by the General Plan, cannot be ensured by a succession of separate Specific Plans. To wit, the Santa Paula General Plan Land Use Element “supports Santa Paula in preserving the urban form of a small town”, not only in parts of Santa Paula, but also in new areas, with the Goal, among others, that **“the small town atmosphere of Santa Paula and the quality of life in the community should be preserved and enhanced,”** through the Objectives, among others, that **“Continued use of the grid pattern in lieu of cul-de-sacs should be encouraged, where feasible, in all new development”**, that **“The City should encourage neighborhood designs whose appearance is not dominated by the automobile...”**, and that **“The City should protect and expand the urban forest.”** Two complimentary Santa Paula Policies, to “Provide for distinctive and compatible residential neighborhoods and commercial and industrial districts”, and to “Provide a diversity of areas characterized by different functional activity scales and intensity of uses through the land use plan and Specific Plans” require a complete and thoroughly updated land use plan in order to control and harmonize the Specific Plans that follow it.

In conclusion, there is abundant evidence that an SEIR derived from SCH# 97081084 is not adequate for Project No. 14-CI-03 because this approach does not comply with the relevant CEQA guidelines. Please do not proceed with the Project No. 14-CI-03 without a full, new, project-specific EIR as required by CEQA. This information is intended for the public benefit while opportunity remains to bring the Project into conformance with the CEQA guidelines. The Santa Paula Conservancy remains committed to vigilance and action in accord

with its mission “to advocate and educate in the public interest on behalf of Santa Paula’s local and regional historic architectural, landscape, and open space resources....”

Yours Sincerely,

Gabriel A. Zamora

The Santa Paula Conservancy
President



Revised Notice of Preparation

To: Public Agencies and Interested Parties

**From: Planning Department
City of Santa Paula
P.O. Box 569
Santa Paula, California 93061**

Date: November 8, 2017

Subject: Revised Notice of Preparation (NOP) of a Program Environmental Impact Report

Project Title: Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

The City of Santa Paula will be the Lead Agency and will prepare a Program Environmental Impact Report (PEIR) for the Santa Paula 2040 General Plan Update, which is summarized in more detail in Attachment A (Project Description) and Attachment B (Initial Study). As described in Section 15168 of the CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either:

- (1) Geographically,
- (2) A logical parts in the chain of contemplated actions,
- (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

A Program EIR is well-suited to a General Plan update since it facilitates the identification of policies in the General Plan that will avoid or reduce potential environmental impacts, and also provide a foundation for the environmental review of subsequent actions such as subdivision maps and conditional use permits for private projects, or public works projects such as street and utility improvements. When subsequent projects are proposed, they will be examined in light of the Program EIR to determine whether an additional environmental document must be prepared (CEQA Guidelines Sec. 15168[c]).

The City is seeking the views of affected agencies and other interested parties as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities. Your agency will need to use the PEIR prepared by the City of Santa Paula when considering your permit or other approval for the project. As you will note in the attached materials, the City is proactively soliciting input from public agencies and interested parties as to the scope and content of this PEIR. Note, where relevant, the City's request for input ("Comments Specifically Requested"), in the attached materials.

Attachment A presents the Project Description, including location, objectives, characteristics, and intended uses of the EIR. A copy of the Initial Study, presenting the City's preliminary analysis of potential environmental effects to be studied in the PEIR, is provided in Attachment B. These documents may also be viewed on the City website at: www.mysantapaula.com/documents.html

Please note that this NOP includes revisions to the City's original NOP, published February 1, 2017, reflecting 1) the City's decision to prepare a Program EIR rather than a Supplemental EIR; and 2) additional information from comments on the original NOP and the scoping meeting held

on March 2, 2017. There have been no substantive changes to the project description since publication of the original NOP; however, some new information regarding the scope of the EIR has been added. If your agency submitted comments on the original NOP, the City requests that you review the topical areas discussed in Attachment B that are within the purview of your agency, and submit any additional comments as appropriate.

Pursuant to the time limits mandated by State law, your response is requested at the earliest possible date but not later than **December 11, 2017**.

Please send your response to Ms. Janna Minsk, AICP, Santa Paula Planning Director at the address shown above. Please provide the name for the appropriate contact person in your agency.

A public Scoping Meeting regarding this project is scheduled for 6:00 p.m. on Tuesday, November 28, 2017 at Santa Paula City Hall in the City Council chambers, 970 Ventura Street, Santa Paula. All parties are invited to attend this meeting to provide comments and input on the contents of the Draft EIR.



Janna Minsk, AICP

City of Santa Paula Planning Director

Telephone: (805) 933-4214

Email: jminsk@spcity.org

Reference: California Code of Regulations, Title 14 (CEQA Guidelines), Sections 15082(a), 15103, 15375

ATTACHMENT A PROJECT DESCRIPTION

The General Plan addresses the community's vision for development to the horizon year of 2040. 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. All of the mandated General Plan Elements (Govt. Code Section 65302) are included in this comprehensive update with the exception of the Housing Element, which was adopted in 2013 pursuant to the schedule for housing element updates established in state law.

Section 15082 of the CEQA Guidelines specifies the minimum content requirements of a Notice of Preparation, intended to provide "sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response."

To meet this direction, and for the reader's convenience, the City of Santa Paula has structured the following Project Description for this Notice of Preparation, to generally correspond to the requirements of Section 15124 of the CEQA Guidelines:

1. Location and Boundaries

The City of Santa Paula is located approximately 65 miles northwest of Los Angeles and 14 miles east of Ventura. It is at the geographical center of Ventura County in the rich agricultural Santa Clara River Valley. The City is surrounded by rolling hills and rugged mountain peaks, in addition to orange, lemon, and avocado groves. **Figure 1** presents a Regional Location Map for the Santa Paula planning area.

Figure 2 presents a variety of currently adopted boundaries that influence planning within the Santa Paula Planning Area. Current as of January 1, 2017, these boundaries are:

- a. Santa Paula's "Area of Interest" which was established in 2009 by Ventura County LAFCo, Ventura County and all its incorporated cities. Santa Paula's Area of Interest encompasses approximately 74 square miles bounded on the south by the ridgeline of South Mountain and on the north by the ridge line of Sulphur Mountain between Santa Paula and the Upper Ojai area. On the west, the Area of Interest boundary is between Wheeler Canyon and Aliso Canyon. To the east, the Area of Interest boundary is Hall Road near the Sycamore Tree Monument.
- b. The Sphere of Interest, as adopted by Ventura County LAFCo, in accordance with Section 56425 of the California Government Code. The Sphere of Influence designates the probable ultimate urban boundaries for the City in the foreseeable future.
- c. The Santa Paula City Urban Restriction Boundary (CURB), as adopted by the voters.
- d. The current City Limits, as adopted by Ventura County LAFCo, in accordance with the California Government Code.

2. Statement of Objectives

Project Objectives will be presented in the PEIR, based in part on the responses received on this Notice of Preparation. As noted in Section 15124(b) of the CEQA Guidelines, "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project."

3. Project Characteristics

The proposed project is an update to the Santa Paula General Plan to reflect the City's preferred vision for development to the year 2040. The Plan provides the foundation for more detailed

ATTACHMENT A
PROJECT DESCRIPTION

development regulations and decisions by the City Council, Planning Commission, and City staff regarding public improvements and private developments.

The current General Plan includes six elements: Land Use, Circulation, Housing, Conservation and Open Space, Noise, and Safety. Each of these elements except for Housing will be included in this update, although it is anticipated that some of the elements may be reorganized or combined. Each element of the Plan will include a cohesive set of goals, objectives, policies and implementation measures to guide the city's physical and economic development. The update will address all of the requirements set forth in state General Plan law, including recent requirements and issues such as complete streets, environmental justice, and community sustainability and resilience.

4. Intended Uses of the EIR

The following information will be presented in the PEIR, based on the responses received on the Notice of Preparation:

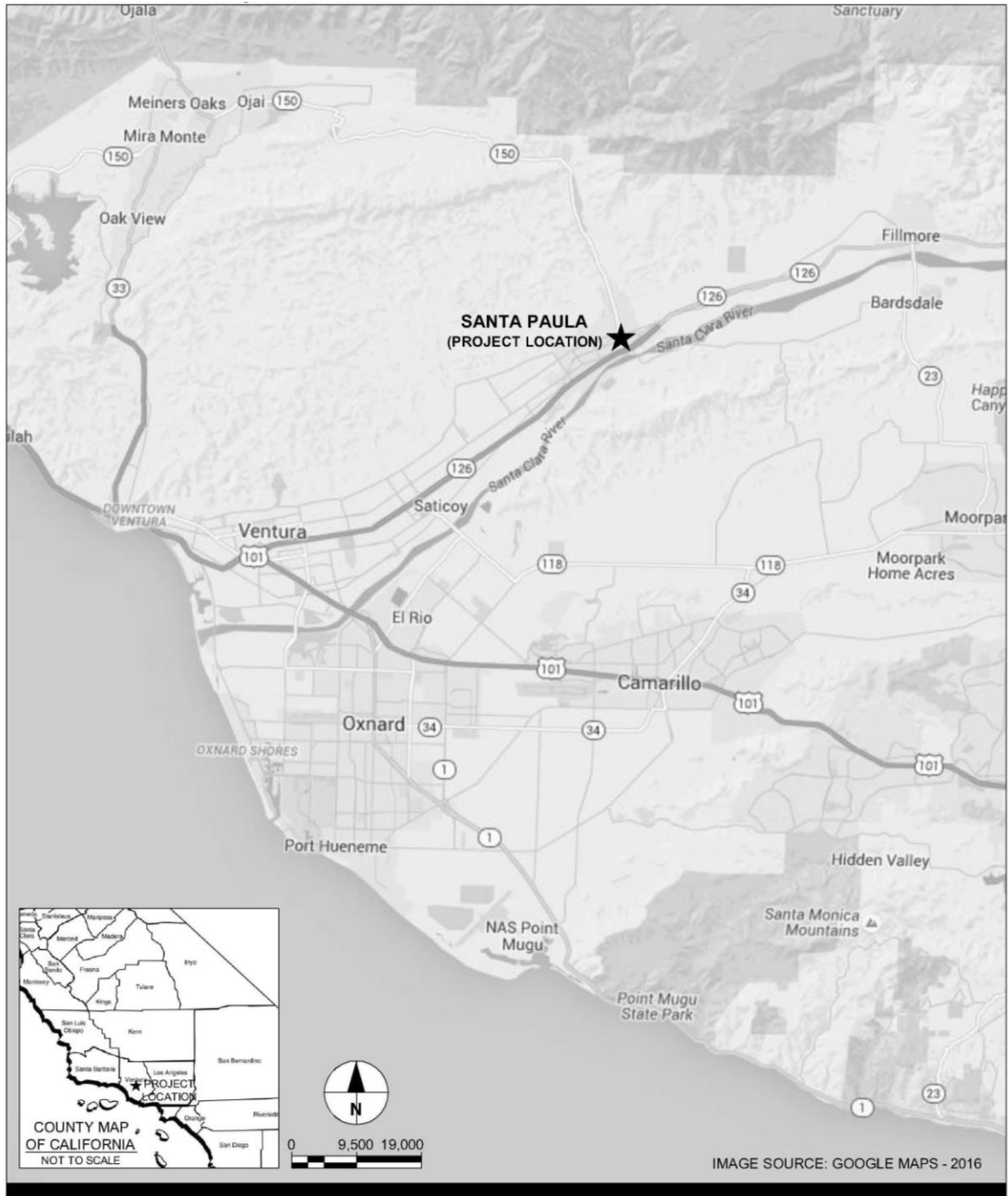
- a. List of agencies expected to use the PEIR in their decision-making
- b. Permits and other approvals required to implement the General Plan
- c. List of related environmental review and consultation requirements

Comments Specifically Requested:

All: The above information is a critical outcome of this Notice of Preparation process. Please be as specific as possible in identifying the "permits and other approvals" that your agency may use in implementing projects or activities undertaken within City's planning area.

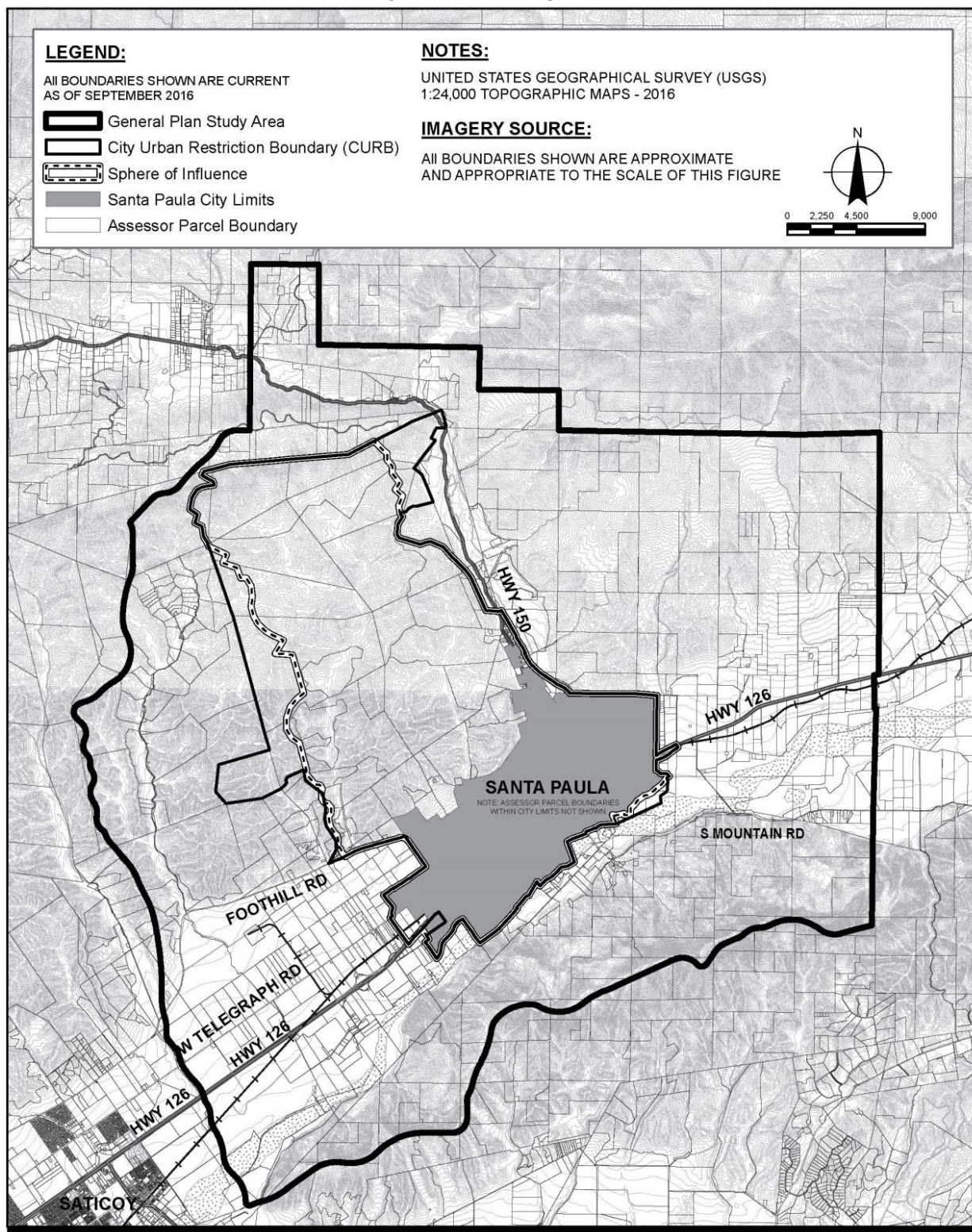
ATTACHMENT A
PROJECT DESCRIPTION

Figure 1: Regional Location map



ATTACHMENT A
PROJECT DESCRIPTION

Figure 2: Planning Areas



ATTACHMENT B
INITIAL STUDY

I. BACKGROUND/PURPOSE

The City of Santa Paula is proactively initiating the environmental review process at this time, for two primary reasons:

- To identify public agencies which may have valuable insight as to the development of the updated General Plan
- To allow interested parties, as well as public agencies, the early opportunity to identify issues which can guide development of the updated General Plan

This proactive outreach is endorsed by the Governor's Office of Planning and Research (OPR), as explained in the following excerpts from OPR's General Plan Guidelines:

- *"CEQA should be integrated into planning processes and guide development of the plan itself... Information developed as part of the CEQA process should influence the development of general plan policies."*
- *"The purpose of preparing an environmental analysis is not only to inform decision-makers and the public of a general plan's potential adverse environmental impacts, but also to allow environmental considerations to influence the design of the plan itself. To accomplish this purpose, the CEQA analysis should be prepared in coordination with the development of the general plan."*
- *"Careful coordination between the CEQA process and the general plan process can also minimize unnecessary duplication of work."*

In summary, the City is proactively soliciting input from all public agencies and interested parties as to the scope and content of this Program EIR (PEIR). Note, where relevant, the City's request for input on this approach from specific agencies ("Comments Specifically Requested").

II. ENVIRONMENTAL SETTING - ASSUMPTIONS

A. BASELINE

According to Section 15125 of the CEQA Guidelines, the publication date of the Notice of Preparation can serve as the baseline date for the environmental setting. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. For the purpose of the PEIR analysis, the baseline date shall be assumed to be the publication date of this NOP.

B. PROJECT BUILDOUT

The current General Plan assumes residential buildout potential of Santa Paula in the horizon year 2020 to be 10,493 dwelling units. While buildout potential for the updated General Plan has not been established yet, the City does not expect it to exceed the forecast of 11,500 households, as adopted by the Southern California Association of Governments in the 2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the horizon year 2040.

ATTACHMENT B
INITIAL STUDY

III. **ENVIRONMENTAL ISSUES TO BE STUDIED**

The following issues have been identified for study in the PEIR:

A. **AESTHETICS**

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	X			
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	X			
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X			

Discussion:

- Potentially Significant Impact.** Development under the General Plan update could introduce new development along sensitive viewing corridors; however, the Land Use and Conservation/Open Space Elements contain numerous policies and implementation measures that substantially reduce visual impacts. The PEIR will evaluate potential impacts in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact.** The current Conservation/Open Space Element states *"All of the Santa Clara River Valley may be considered a scenic resource. SR 126 and SR 150 are eligible state scenic highways."* Other scenic resources include Adams Canyon and Fagan Canyon. The current Conservation/Open Space Element includes goals, objectives and policies (p. CO-51) as well as Implementation Measures 41 through 46 (p. CO-60) that substantially reduce potential impacts to scenic resources. The PEIR will evaluate potential impacts in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact.** Development under the General Plan update would alter the visual character of Santa Paula, and the current Land Use Element contains policies and implementation measures to mitigate those impacts. The PEIR will evaluate potential impacts in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact.** Buildout under the current General Plan would introduce new sources of light and glare. Current Land Use Element policies and implementation measures reduce those impacts. The PEIR will evaluate potential impacts in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY

B. AGRICULTURE AND FOREST RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	X			
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	X			
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	X			
d) Result in the loss of forest land or conversion of forest land to non-forest use?	X			
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	X			

Discussion:

a/e. Potentially Significant Impact. The PEIR will evaluate potential impacts to important farmlands in light of revised development policies and implementation measures in the General Plan update and the "Save Open-space and Agricultural Resources (SOAR) Santa Paula City Urban Restriction Boundary."

b. Potentially Significant Impact. The PEIR will evaluate potential impacts to agricultural zoning and Land Conservation ("Williamson Act") contracts in light of revised development policies and implementation measures in the General Plan update.

c/d/e. Potentially Significant Impact. The PEIR will evaluate potential impacts to zoning for forest and timberland in light of revised development policies and implementation measures in the General Plan update.

Comments Specifically Requested:

1. **California Resources Agency/Farmland Mapping and Monitoring Program:** Please refer us to the most recent agricultural maps relating to the Santa Paula area.
2. **California Department of Fish and Wildlife/Timberland Conservation Program:** Please refer us to the most recent forest/timberland maps relating to the Santa Paula area.

ATTACHMENT B
INITIAL STUDY

C. AIR QUALITY

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	X			
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	X			
d) Expose sensitive receptors to substantial pollutant concentrations?	X			
e) Create objectionable odors affecting a substantial number of people?	X			

Discussion:

- a/b/c. Potentially Significant Impact. The Ventura County APCD's 2016 Air Quality Management Plan, will be used to analyze air quality impacts of the General Plan update.
- d. Potentially Significant Impact. The PEIR will evaluate potential impacts to sensitive receptors in light of revised development policies and implementation measures in the General Plan update.
- e. Potentially Significant Impact. The PEIR will evaluate potential impacts related to objectionable odors in light of revised development policies and implementation measures in the General Plan update.

Comments Specifically Requested:

1. Cal EPA/Air Resources Board: Please refer us to the most recent policy documents that apply to the City of Santa Paula's air quality.

ATTACHMENT B
INITIAL STUDY

D. BIOLOGICAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	X			
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	X			
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	X			
d) 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?	X			
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	X			
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Discussion:

a. Potentially Significant Impact. According to the State Department of Fish and Wildlife, the Second Edition of "A Manual of California Vegetation" (2009) provides a standardized, systematic classification and description of vegetation in the State. The PEIR will evaluate potential impacts to special status species in light of revised development policies and implementation measures in the General Plan update.

b. Potentially Significant Impact. According to the State Department of Fish and Wildlife, the Second Edition of "A Manual of California Vegetation" (2009) provides a standardized, systematic classification and description of vegetation in the State. The PEIR will evaluate potential impacts to riparian habitat and other sensitive natural communities in light of revised development policies and implementation measures in the General Plan update.

c. Potentially Significant Impact. The PEIR will evaluate potential impacts to federally protected wetlands in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY

d. Potentially Significant Impact. The PEIR will evaluate potential impacts to wildlife movement corridors in light of revised development policies and implementation measures in the General Plan update.

e. Potentially Significant Impact. The PEIR will evaluate potential impacts with respect to local policies to protect biological resources, including the Tree Preservation Ordinance (Municipal Code Sec. 156.580 et seq.) in light of revised development policies and implementation measures in the General Plan update.

f. No Impact. According to the California Department of Fish and Wildlife, (CALIFORNIA REGIONAL CONSERVATION PLANS August 2015), there are no Regional Conservation Plans (RCPs) located within Ventura County. This issue will not be addressed in the PEIR.

Comments Specifically Requested:

1. **California Department of Fish and Wildlife:** Please verify that there are no Regional Conservation Plans (RCPs) located within Ventura County.
2. **California Department of Fish and Wildlife:** Please provide information regarding the most recent biological surveys DFW has conducted within the Santa Paula planning area.

E. CULTURAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	X			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	X			
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X			
d) Disturb any human remains, including those interred outside of formal cemeteries?	X			

Discussion:

- a. Potentially Significant Impact. The PEIR will evaluate potential impacts to historical resources in light of revised development policies and implementation measures in the General Plan update.
- b. Potentially Significant Impact. The PEIR will evaluate potential impacts to archaeological resources in light of revised development policies and implementation measures in the General Plan update.
- c. Potentially Significant Impact. The PEIR will evaluate potential impacts to paleontological resources and geologic features in light of revised development policies and implementation measures in the General Plan update.
- d. Potentially Significant Impact. The PEIR will evaluate potential impacts with respect to the disturbance of human remains in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY

F. GEOLOGY AND SOILS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	X			
ii) Strong seismic ground shaking?	X			
iii) Seismic-related ground failure, including liquefaction?	X			
iv) Landslides?	X			
b) Result in substantial soil erosion or the loss of topsoil?	X			
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	X			
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	X			
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	

Discussion:

- a. Potentially Significant Impact. The current General Plan Safety Element includes an extensive list of policies and implementation measures to reduce geological impacts. The PEIR will evaluate potential impacts related to seismicity and landslides in light of revised development policies and implementation measures in the General Plan update.
- b/c/d. Potentially Significant Impact. The current General Plan Safety Element includes an extensive list of policies and implementation to reduce potential impacts related to soil conditions. In addition, Municipal Code Chapter 16.96-Grading Permits establishes regulations to enforce the policies and objectives set forth in the General Plan, including preparation of a Geotechnical Report and structural recommendations to mitigate soil conditions when determined necessary by the City Engineer. The PEIR will evaluate potential impacts related to soil conditions in light of revised development policies and implementation measures in the General Plan update.
- e. Less Than Significant Impact. A limited number of existing residences in the eastern portion of the city currently utilize private septic systems; however, all new developments are required to

ATTACHMENT B
INITIAL STUDY

connect to a wastewater treatment system. Therefore, potential impacts would be less than significant and this issue will not be addressed in the PEIR

Comments Specifically Requested:

1. **California Department of Conservation/California Geological Survey**: Please refer us to the most recent Alquist-Priolo Earthquake Fault Zoning Map for the Santa Paula area.
2. **California Department of Conservation**: Please refer us to the most recent policies and regulations dealing with soil erosion and stability.

G. GREENHOUSE GAS EMISSIONS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X			

Discussion:

- a. **Potentially Significant Impact**. The PEIR will evaluate potential impacts related to greenhouse gas emissions in light of revised development policies and implementation measures in the General Plan update, pursuant to Section 15064.4 of the CEQA Guidelines.
- b. **Potentially Significant Impact**. The PEIR will evaluate consistency with plans, policies and regulations for greenhouse gas emissions in light of revised development policies and implementation measures in the General Plan update. The City of Santa Paula proposes to rely upon relevant sections of the "2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS)", adopted by SCAG on April 7, 2016. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals.

Comments Specifically Requested:

1. **Cal EPA/Air Resources Board**: Please refer us to the most recent Scoping Plan that applies to the City of Santa Paula's air quality. Has the Scoping Plan update been completed?

ATTACHMENT B
INITIAL STUDY

H. HAZARDS AND HAZARDOUS MATERIALS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	X			
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	X			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X			
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	X			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	X			
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	X			
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X			
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	X			

Discussion:

- a/b. Potentially Significant Impact. Hazardous materials are regulated by state and county agencies and locally enforced by the Santa Paula Fire Department. The Safety Element includes policies and implementation measures that mitigate potential impacts from hazardous materials, such as requiring submittal of business plans by local businesses that use or store hazardous materials, as well as emergency response plans. The PEIR will evaluate potential impacts related to the use and transport of hazardous materials in light of revised development policies and implementation measures in the General Plan update.
- c. Potentially Significant Impact. Section 21151.4 of the Public Resources Code establishes requirements regarding the location of hazardous materials near schools. The PEIR will evaluate potential impacts related to hazardous materials near schools in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY

- d. Potentially Significant Impact. The PEIR will evaluate potential impacts related to hazardous materials sites in light of revised development policies and implementation measures in the General Plan update.
- e/f. Potentially Significant Impact. The “Airport Comprehensive Land Use Plan Update for Ventura County (2000)” will be consulted to evaluate potential conflicts and/or safety hazards related to airports in light of revised development policies and implementation measures in the General Plan update.
- g. Potentially Significant Impact. The current Safety Element includes policies and implementation measures (e.g., Implementation Measures 53 to 57) that mitigate potential impacts to emergency response. The PEIR will evaluate potential impacts related to emergency response in light of revised development policies and implementation measures in the General Plan update.
- h. Potentially Significant Impact. The PEIR will evaluate potential impacts related to wildland fire hazards in light of revised development policies and implementation measures in the General Plan update.

Comments Specifically Requested:

1. **Governor's Office of Planning and Research/State Clearinghouse:** Please refer us to the appropriate agencies for dealing with hazardous materials.
2. **County of Ventura Environmental Health Division:** Please refer us to the appropriate County contacts for dealing with hazardous materials.
3. **California Department of Forestry and Fire Protection:** Please refer us to the current Fire Hazard Zone map for the Santa Paula planning area, and identify any relevant state wildland fire protection policies.

I. HYDROLOGY AND WATER QUALITY

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	X			
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	X			
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	X			

ATTACHMENT B
INITIAL STUDY

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	X			
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	X			
f) Otherwise substantially degrade water quality?	X			
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	X			
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	X			
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	X			
j) Inundation by seiche, tsunami, or mudflow?	X			

Discussion:

- a. Potentially Significant Impact. The PEIR will evaluate potential impacts related to water quality standards and waste discharge requirements in light of revised development policies and implementation measures in the General Plan update.
- b. Potentially Significant Impact. The PEIR will evaluate potential impacts to groundwater in light of revised development policies and implementation measures in the General Plan update.
- c. Potentially Significant Impact. The PEIR will evaluate potential impacts related to erosion and/or siltation in light of revised development policies and implementation measures in the General Plan update.
- d. Potentially Significant Impact. The PEIR will evaluate potential impacts related to flooding due to altered drainage patterns in light of revised development policies and implementation measures in the General Plan update.
- e. Potentially Significant Impact. The PEIR will evaluate potential impacts related to the capacity of stormwater drainage systems and polluted runoff in light of revised development policies and implementation measures in the General Plan update.
- f. Potentially Significant Impact. The PEIR will evaluate potential impacts related to degradation of water quality in light of revised development policies and implementation measures in the General Plan update.
- g. Potentially Significant Impact. The PEIR will evaluate potential impacts related to housing within a 100-year flood hazard boundary in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY

- h. Potentially Significant Impact. The PEIR will evaluate potential impacts related to impedance and/or redirection of flood flows in light of revised development policies and implementation measures in the General Plan update.
- i. Potentially Significant Impact. The PEIR will evaluate potential impacts related to flooding as a result of the failure of a levee or dam in light of revised development policies and implementation measures in the General Plan update.
- j. Potentially Significant Impact. Potential impacts due to mudflow will be analyzed in the PEIR. There are no lakes, ponds or dams within the Planning Area of a size that could pose a substantial risk of inundation by a seiche; therefore, this issue will not be addressed in the PEIR. The Planning Area is approximately 14 miles inland from the Pacific Ocean and is approximately 250 to 300 feet above mean sea level (AMSL); therefore, potential impacts associated with tsunami are less than significant and this issue will not be addressed in the PEIR.

Comments Specifically Requested:

1. State Water Resources Control Board: Are there any recent changes in water quality standards and waste discharge requirements affecting the Santa Paula planning area that you believe should be analyzed in the PEIR for the updated General Plan?

J. LAND USE AND PLANNING

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	X			
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	X			
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	X			

Discussion:

- a. Potentially Significant Impact. Santa Paula's "Area of Interest" was established in 2009 by Ventura County LAFCo, Ventura County and all its incorporated cities, as part of the "Guidelines for Orderly Development." The purpose of these Guidelines is to locate urban development within incorporated cities to facilitate delivery of the full range of municipal services. The PEIR will evaluate potential impacts to established communities in light of revised development policies and implementation measures in the General Plan update.
- b. Potentially Significant Impact. The PEIR will evaluate potential conflicts between the General Plan update and relevant plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect.
- c. Potentially Significant Impact. According to the California Department of Fish and Wildlife, (CALIFORNIA REGIONAL CONSERVATION PLANS, July 2017), there are no Regional Conservation Plans (RCPs) located within Ventura County. However, in 2005 the Ventura County Watershed Protection District and the Los Angeles County Department of Public Works

ATTACHMENT B
INITIAL STUDY

sponsored the preparation of the *Santa Clara River Enhancement and Management Plan*.¹ The PEIR will evaluate potential conflicts between the General Plan update and the SCREMP.

K. MINERAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	X			
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	X			

Discussion:

a/b. Potentially Significant Impact. Mineral resources are described in Section II-G of the Conservation and Open Space Element of the present General Plan. According to the Ventura County RMA, there are no mines within the Santa Paula Planning Area.² The PEIR will evaluate potential impacts to mineral resources in light of revised development policies and implementation measures in the General Plan update.

Comments Specifically Requested:

1. **California Department of Conservation/State Mining and Geology Board:** please refer us to the most recent maps and regulations pertaining to the designation of mineral lands in the Ventura County area.

¹ http://www.ventura.org/wcvc/documents/PDF/SCRW/SCREMP_2005.pdf

² Letter from Shelly Sussman dated April 13, 2017.

ATTACHMENT B
INITIAL STUDY

L. NOISE

Would the City of Santa Paula General Plan Update and its implementation result in:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	X			
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	X			
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	X			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	X			
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	X			

Discussion:

a/b/c/d/e/f. Potentially Significant Impact. The PEIR will evaluate potential noise impacts in light of revised development policies and implementation measures in the General Plan update.

Comments Specifically Requested:

1. **Governor's Office of Planning and Research/State Clearinghouse:** What sources should we contact for the noise analysis, since the Office of Noise Control no longer exists?

ATTACHMENT B
INITIAL STUDY

M. POPULATION AND HOUSING

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	X			
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	X			
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	X			

Discussion:

- Potentially Significant Impact. The PEIR will evaluate potential impacts to population growth in light of revised development policies and implementation measures in the General Plan update. The Previous EIR assumed the Buildout Potential of the Santa Paula General Plan, in the horizon year of 2020, to be 10,493 dwelling units. The most recent regional growth forecast adopted by the Southern California Association of Governments in the 2016-2040 RTP/SCS anticipates a total of 11,500 households in the horizon year of 2040.
- Potentially Significant Impact. The PEIR will evaluate potential impacts due to displacement of existing housing in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact. The PEIR will evaluate potential impacts due to displacement of people in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY

N. PUBLIC SERVICES

Would the City of Santa Paula General Plan Update and its implementation result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Fire protection?	X			
b) Police protection?	X			
c) Schools?	X			
d) Parks?	X			
e) Other public facilities?	X			

Discussion:

- Potentially Significant Impact. The PEIR will evaluate potential impacts related to new or altered fire protection facilities in light of revised development policies and implementation measures in the General Plan update. The analysis will focus on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”
- Potentially Significant Impact. The PEIR will evaluate potential impacts related to new or altered police facilities in light of revised development policies and implementation measures in the General Plan update. The analysis will focus on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”
- Potentially Significant Impact. The PEIR will evaluate potential impacts related to new or altered school facilities in light of revised development policies and implementation measures in the General Plan update. The analysis will focus on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”
- Potentially Significant Impact. The PEIR will evaluate potential impacts related to new or altered park facilities in light of revised development policies and implementation measures in the General Plan update. The analysis will focus on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”
- Potentially Significant Impact. The PEIR will evaluate potential impacts related to other new or altered governmental facilities in light of revised development policies and implementation measures in the General Plan update. The analysis will focus on the “substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.”

Comments Specifically Requested:

- School districts: Please direct us to your current facilities master plan.

ATTACHMENT B
INITIAL STUDY

O. RECREATION

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	X			
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	X			

Discussion:

- a. Potentially Significant Impact. The PEIR will evaluate potential impacts related to increased use of park facilities in light of revised development policies and implementation measures in the General Plan update.
- b. Potentially Significant Impact. The PEIR will evaluate potential impacts related to development of new recreational facilities in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY**P. TRANSPORTATION**

Note: SB 743 (effective January 1, 2014) created a process to change the way transportation impacts are analyzed under CEQA. Specifically, the law requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." The alternative criteria would not become effective until the State Resources Agency amends the CEQA Guidelines to implement SB743. Once the Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA.

OPR's draft revisions to the CEQA Guidelines, published in January 2016, would provide a 2-year period after adoption during which use of the new methodology would be optional. At this time, OPR is still considering details of the revised methodology. Due to the uncertain timeframe for adoption of new methodology under SB 743, the City of Santa Paula is proposing to analyze transportation impacts of the General Plan Update using the current CEQA Guidelines.

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	X			
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	X			
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	X			
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X			
e) Result in inadequate emergency access?	X			
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	X			

ATTACHMENT B INITIAL STUDY

Discussion:

- a. Potentially Significant Impact. The PEIR will evaluate potential conflicts with applicable documents related to the effectiveness of the circulation system in light of revised development policies and implementation measures in the General Plan update.
- b. Potentially Significant Impact. The PEIR will evaluate potential conflicts with the most recent Congestion Management Program adopted by VCTC in light of revised development policies and implementation measures in the General Plan update.
- c. Potentially Significant Impact. The PEIR will evaluate potential impacts related to changes in air traffic patterns in light of revised development policies and implementation measures in the General Plan update.
- d. Potentially Significant Impact. The PEIR will evaluate potential impacts related to design features in light of revised development policies and implementation measures in the General Plan update.
- e. Potentially Significant Impact. The PEIR will evaluate potential impacts related to emergency access in light of revised development policies and implementation measures in the General Plan update.
- f. Potentially Significant Impact. The PEIR will evaluate potential impacts related to public transit, bicycle and pedestrian facilities in light of revised development policies and implementation measures in the General Plan update.

Q. TRIBAL CULTURAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	X			
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	X			

Discussion:

- a/b Potentially Significant Impact. The PEIR will evaluate potential impacts of revised development policies and implementation measures in the General Plan update on tribal cultural resources pursuant to state law.

ATTACHMENT B
INITIAL STUDY

R. UTILITIES AND SERVICE SYSTEMS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	X			
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X			
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X			
d) Have sufficient water supplies available to serve the buildout of the Santa Paula General Plan from existing entitlements and resources, or are new or expanded entitlements needed?	X			
e) Result in a determination by the wastewater treatment provider which serves or may serve the City of Santa Paula that it has adequate capacity to serve the General Plan's projected demand in addition to the provider's existing commitments?	X			
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	X			
g) Comply with federal, state, and local statutes and regulations related to solid waste?	X			

Discussion:

- Potentially Significant Impact.** Wastewater treatment requirements are established by the State Water Resources Board and Regional Water Quality Control Boards through NPDES permits for "point source" discharges. The PEIR will evaluate potential impacts related to wastewater discharges in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact.** The PEIR will evaluate potential impacts related to construction of new or expanded water or wastewater facilities in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact.** The PEIR will evaluate potential impacts related to construction of new or expanded stormwater drainage facilities in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact.** The PEIR will evaluate potential impacts related to water supply in light of revised development policies and implementation measures in the General Plan update.
- Potentially Significant Impact.** The PEIR will evaluate potential impacts related to wastewater treatment capacity in light of revised development policies and implementation measures in the General Plan update.

ATTACHMENT B
INITIAL STUDY

- f. Potentially Significant Impact. The PEIR will evaluate potential impacts related to landfill capacity in light of revised development policies and implementation measures in the General Plan update.
- g. Potentially Significant Impact. The PEIR will evaluate potential impacts related to solid waste regulations in light of revised development policies and implementation measures in the General Plan update.

Comments Specifically Requested:

- 1. **State Water Resources Control Board:** Are there any recent changes in the waste discharge requirements that would affect future development in the Santa Paula planning area?
- 2. **California Dept. of Resources Recycling and Recovery (CalRecycle):** Please refer us to the most recent information and any future plans related Ventura County you may have for landfill and solid waste facilities within the time horizon year 2040.

IV. LONG TERM IMPACTS

The PEIR will evaluate the following long-term issues in the context of the 2040 time horizon for the updated General Plan:

- A. Internal Policy Consistency
- B. Growth Inducing Effects
- C. Significant and Irreversible Environmental Effects
- D. Short-term Uses vs. Long-term Productivity

V. ALTERNATIVES

The PEIR will identify alternatives to the proposed General Plan update. Alternatives will “focus on alternatives to the project (i.e., the General Plan, as updated) or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (CEQA Guidelines Section 15126.6[b])

John Douglas

From: Tom Tarantino <ttarantino@spcity.org>
Sent: Monday, November 13, 2017 11:24 AM
To: John Douglas
Subject: FW: Response to Revised Notice of Preparation

Hi John – assuming Janna forwarded this to you as well, but just in case...

From: Janna Minsk
Sent: Monday, November 13, 2017 11:23 AM
To: Tom Tarantino <ttarantino@spcity.org>
Subject: Fwd: Response to Revised Notice of Preparation

Fyi

Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: "Scott, Amy@DOC" <Amy.Scott@conservation.ca.gov>
Date: 11/13/17 6:52 PM (GMT+00:00)
To: Janna Minsk <JMinsk@spcity.org>
Cc: "Schmidt, Jeffrey@DOC" <Jeffrey.Schmidt@conservation.ca.gov>
Subject: Response to Revised Notice of Preparation

Good morning,

The following two links will provide the mineral lands designation information for Ventura County, as requested in the Revised Notice of Preparation dated November 8, 2017.

[SMARA Designation Report No. 2 for Western Ventura County](#)

[CCR § 3550.2 Santa Clara River Valley Area of the Western Ventura County Region](#)

If you have any questions, please feel free to contact our office.

Regards,

Amy Scott

Executive Assistant
State Mining and Geology Board
(916) 322-1082

John Douglas

From: Janna Minsk <JMinsk@spcity.org>
Sent: Monday, November 20, 2017 8:48 AM
To: John Douglas; Tom Tarantino
Subject: FW: requested information - Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

From: Thornburg, Jennifer@DOC [<mailto:Jennifer.Thornburg@conservation.ca.gov>]
Sent: Wednesday, November 15, 2017 2:02 PM
To: Janna Minsk
Subject: requested information - Santa Paula 2040 General Plan Update (Project No. 14-CI-03)

Ms. Janna Minsk -

I am representing the California Geological Survey (part of the California Department of Conservation), and responding to your "Revised Notice of Preparation of a Program Environmental Impact Report" dated November 8, 2017. Specifically, I am responding to the request for information in your Section F - Geology and Soils.

- F. 1. - Please refer us to the most recent Alquist-Priolo Earthquake Fault Zoning Map for the Santa Paula area.
- F. 2. - Please refer us to the most recent policies and regulations dealing with soil erosion and stability.

Similar to Alquist-Priolo Earthquake Fault Zoning Act, we would note that there is also a Seismic Hazard Mapping Act in your area, where zones of required investigation for liquefaction and earthquake-induced landslides are defined.

All three types of zones can be found and downloaded for use in GIS systems through the map services:
https://spatialservices.conservation.ca.gov/arcgis/rest/services/CGS_Earthquake_Hazard_Zones
and can also be accessed through the Information Warehouse:
<http://maps.conservation.ca.gov/cgs/informationwarehouse/>

The Seismic Hazards Mapping Act (Section 2697(a)) requires cities and counties to submit a copy of each approved geologic/geotechnical report, prepared as a result of the presence of a Seismic Hazard Zone, to the State Geologist within 30 days of its approval.

Additional information about both of the two acts can be found at this web page:

<http://www.conservation.ca.gov/cgs/shzp/Pages/Index.aspx>

Please let me know if you need further information.

Regards,

- Jennifer

Jennifer Thornburg, PG, CEG

Senior Engineering Geologist
California Geological Survey
801 K Street, MS 12-31
Sacramento, CA 95814
916-445-5488

Jennifer.Thornburg@conservation.ca.gov<<mailto:Jennifer.Thornburg@conservation.ca.gov>>

[CGS_Logo_Pubs]

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws, including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-8391

FAX (213) 897-1337

TTY 711

www.dot.ca.gov



*Serious Drought.
Making Conservation
a California Way of Life.*

December 7, 2017

Ms. Janna Minsk
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061

RE: Santa Paula General Plan Update
Vic. VEN-150, VEN-126 Citywide
SCH # 2017111033
GTS # VEN-2017-00096-NOP-AL

Dear Ms. Minsk:

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. The State SB 743's goals include supporting infill land use, reducing greenhouse gas emissions, and supporting active transportation. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

While the State is in transition to VMT per capita for traffic analysis, we would like to provide the following suggested comment for your consideration in the interim.

- SB 743 (Steinberg, 2013) eliminates vehicular delay and Level of Service (LOS) as an impact under the California Environmental Quality Act (CEQA). The Governor's Office of Planning and Research (OPR) is tasked with developing alternate criteria for analysis. This affects transportation projects and local land use projects. OPR's current draft technical guidance indicates:

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

Ms. Janna Minsk
December 7, 2017
Page 2 of 3

- Vehicle miles traveled is the primary metric of transportation impacts across the state
 - Land use development near transit or in VMT-efficient areas should be presumed to cause a less than significant transportation impact on VMT
 - Transit, active transportation, and rehabilitation projects that do not add motor vehicle capacity should also be presumed to cause less than a significant impact
-
- Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this General Plan should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as sidewalk for pedestrians, bicycling, and public transit can allow streets to transport more people in a fixed amount of right-of-way.
 - Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.
 - We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.
 - We suggest that a General Plan to include a VMT-based transportation analysis that assesses impacts and mitigates with transportation demand management (TDM), multimodal, and operational efficiency projects. For analysis purposes the recommended land use project thresholds offered by the Governor's Office of Planning and Research can be used if an agency has not established its own VMT thresholds.
 - As a rule of thumb, in accordance with most local jurisdiction land use development permit requirements, Caltrans should be notified of all proposals that will entail construction or facilities on parcels with boundaries that occur within 300 feet of state right of way.

Ms. Janna Minsk
December 7, 2017
Page 3 of 3

- Some local land use projects may enjoy CEQA streamlining and/or may not complete a transportation analysis. However, potential safety concerns are not exempt from analysis under CEQA. We recommend the City to include a traffic conflict analysis for potential significant impact locations at the freeway weaving areas, on/off-ramps, and intersections on the State facilities on SR-126 and SR-150. We recommend the City to consider traffic mitigation fee program for this General Plan update.
- For future projects, Lead Agency should consult with Caltrans on whether a safety analysis is needed for a local land use project; we would appreciate it if the general plan clarifies this point under CEQA.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # VEN-2017-00096-NOP-AL.

Sincerely,



MIYA EDMONSON
IGR/CEQA Acting Branch Chief

cc: Scott Morgan, State Clearinghouse

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division

Kimberly L. Prillhart
Director

December 7, 2017

City of Santa Paula- Planning Department
Attn.: Janna Minsk, AICP
P.O. Box 569
Santa Paula, CA 93061

E-mail:

Subject: Comments on the Notice of Scoping and Initiation of Studies for the Rock Slope
Restoration Project

Dear Ms. Minsk:

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.

Sincerely,



Denice Thomas, Manager
Planning Programs Section

Attachments

County RMA Reference Number 17-007-1





Ventura County Watershed Protection District Groundwater Resources

MEMORANDUM

DATE: December 6, 2017

TO: Ms. Janna Minsk, AICP, Planning Director

FROM: Alma Quezada, Watershed Protection District, Groundwater Section

SUBJECT: RMA Ref. # 17-007-1, Notice of Preparation of a Program Environmental Impact Report

The Ventura County Watershed Protection District (VCWPD) – Groundwater Resources Section has reviewed the Revised Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) dated November 8, 2017 and provides the following comments.

PROJECT LOCATION

The City of Santa Paula is geographically located at the center of Ventura County, approximately 14 miles east of the City of Ventura and 65 miles northwest of the City of Los Angeles. The General Plan Study Area boundaries are depicted in Attachment A, Figure 2, page A-4 of the NOP.

PROJECT DESCRIPTION

The City of Santa Paula is updating their General Plan and soliciting comments from responsible agencies to guide the preparation of a PEIR. The approved PEIR will be used by responsible agencies when considering permits or other project approvals for projects located within the General Plan Study Area boundaries. Santa Paula's updated General Plan addresses the community's vision for development to the year 2040 and includes proposed urban boundaries and planned land uses. The current General Plan assumes residential buildout potential of approximately 10,500 dwelling units by the year 2020.

ENVIRONMENTAL IMPACT ANALYSIS

Groundwater Quality

As population grows, land use designations and/or zoning may change and create physical buildout potential requiring the installation of septic systems in unincorporated areas outside of the City of Santa Paula. Septic systems collect wastewater effluent from dwelling units and percolate the effluent into the subsurface. Standard septic tanks have a maximum denitrification rate of 15%. Additional denitrification can occur in some soil types, with a maximum of 25% removal occurring in clay soils. This means the maximum denitrification rate for a septic system is 40%. The nitrate that remains in the effluent percolates to groundwater.

The City of Santa Paula and surrounding areas are dependent on groundwater resources for all domestic, municipal and agricultural supply. Increased reliance on septic systems can have a potentially significant impact on groundwater quality by increasing nitrate levels. Groundwater quality impacts associated with septic systems can be mitigated to “less than significant” if new dwellings connect to a sewer line.

Water Supply

Increased buildout will increase population size and lead to an increased water demand. The increased water demand may have the potential to cause conditions of overdraft in the Santa Clara River Basin, Santa Paula subbasin (CA Bulletin 118 Basin No. 4-4.04). The increase in water demand merits evaluation and discussion in the PEIR to determine if the increase is sustainable on a long-term basis. Mitigation alternatives should also be identified.



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

M E M O R A N D U M

DATE: December 7, 2017

TO: Anthony Cifetelli, RMA Case Planner

FROM: Sergio Vargas, Deputy Director

SUBJECT: RMA17-007, NOP Santa Paula 2040 General Plan Update
Revised Notice of Preparation (NOP) of Initial Study, of a Program
Environmental Impact Report (PEIR), Zone 2
Watershed Protection District Project Number: WC2017-0012

Thank you for the opportunity to comment. Pursuant to your request dated November 8, 2017, the Ventura County Watershed Protection District (District) has reviewed the Revised NOP and Initial Study for preparation of a SEIR for the Santa Paula 2040 General Plan Update, and offers the following comments which we would appreciate being addressed in the PEIR and the Santa Paula 2040 General Plan Update.

WATERSHED PROTECTION DISTRICT COMMENTS:

Comments from Advanced Planning Section:

1. Ventura County Watershed Protection District Redline Channels and Facilities

There are several watercourses situated within the General Plan Study Area Map of the PEIR: Planning Areas) that are under the jurisdictional authority of the Ventura County Watershed Protection District (District). These jurisdictional redline channels include Santa Clara River, Todd Barranca, Cummings Road Drain, Briggs Road Drain, Haines Barranca, Adams Barranca, Saltmarsh Canyon, Sisar Creek, Camp Bartlett Creek, Peck Road Drain, Fagan Canyon, Santa Paula Creek, Magnolia Drive Creek, Mud Creek Canyon, Anlauf Canyon, Orcutt Canyon, Timber Canyon, O'Leary Creek, and Balcom Canyon Wash.

Please include an Exhibit in the final SEIR and in the General Plan Update (Safety Element & the Conservation and Open Space Element) that identifies the District's jurisdictional redline channels and specifies the District's jurisdictional authority as follows:

"In accordance with Ventura County Watershed Protection District Ordinance WP-2 enacted October 13, 2013, it is the District's standard that a Project can not impair, divert, impede or alter the characteristics of the flow of water running in any jurisdictional redline channel or facility. To the extent that development

impacts District channels and facilities, compliance with District criteria is required. In such cases engineering studies should verify compliance with District hydrology data and flood studies. In addressing peak attenuation, stormwater runoff after development must not exceed the peak flow under existing conditions for any frequency of event; any additional flow (peak, volume) must be contained on the development site.

Furthermore, any development activity including drainage connections and site grading that is proposed in, on, under, or across any jurisdictional redline channel or facility including the bed, banks, and overflow areas will require a permit from the Ventura County Watershed Protection District.”

Please revise the General Plan to reference the District as the “Ventura County Watershed Protection District” instead of the “Ventura County Flood Control District” to reflect our official name change that occurred on January 1, 2003.

2. PEIR Attachment B – Initial Study (I. Hydrology and Water Quality)

The District concurs that items (c, d, e, g, h and i) could result in Potentially Significant environmental impacts and should be analyzed in the SEIR.

3. Recent Flooding Issues in the Santa Paula Planning Area

The District and the City of Santa Paula are currently working with project proponents and the Federal Emergency Management Agency (FEMA) on new/updated flood risk mapping studies in the Santa Paula Planning Area. These studies should be reviewed and addressed as part of the General Plan Update:

- Santa Clara River Watershed Flood Insurance Study
- Orcutt Canyon Flood Insurance Study

Please refer to FEMA's Flood Map Service Center website for technical background including, new best available data, modeling and mapping. In addition, the City of Santa Paula Engineering Department and the District are currently undertaking technical reviews of the following Conditional Letters of Map Revisions submitted by project proponents. The District requests that these flood hazard studies also be taken into consideration as part of the SEIR and General Plan Update.

- Clearwater/Pierce Development CLOMR (APNs: 107-0-011-21; -22)
- Santa Maria Street Industrial Park LOMR (APN: 104-0-140-415)
- Santa Paula Creek Flood Control Project LOMR

4. Flood Hazards Analysis Considerations

The District requests that the Santa Paula 2040 General Plan Update and associated SEIR address the issue of flood hazard analysis standards and

appropriate use of current supporting data. CEQA impact analyses often rely primarily or solely upon FEMA's Flood Insurance Rate Maps (FIRMs) for analyzing flood hazard issues. However, many of the currently effective FIRMs are now outdated, having been generated during the 1980's using technologies and hydrologic and topographic data available from that time. They represent a historical snap shot in time condition that may not accurately reflect current land use development conditions. Land use planning and CEQA require the projects to evaluate not only present but future land use changes to address cumulative impacts and provide appropriate flood protection measures. Thus, major development projects should consider the most recent available information regarding flood hazards. This means that in addition to the currently effective FIRMs, flood hazard analyses should consider recent floodplain analyses, hydrology and hydraulic modeling reports, and flood risk studies applicable to the project area that have been prepared by the District as part of its long range planning efforts. Of particular consideration is the preservation of existing natural resources, flood storage, existing water recharge and improve recreational opportunities within the reline jurisdictional channels. It is recommended that the General Plan identifies guidelines and regulations that will maximize the preservation of floodplains and significantly limit the use of levees as flood protection option to address potential flood hazards and improve community resiliency along District's jurisdictional channels. As an example, West Area 2 as identified in the February 13, 2014 General Plan Map proposes to encroach into the floodway of the Santa Clara River with potentially significant impacts to flood hazards. Preserving the existing floodplain in the exiting agricultural use state or reserving it as open space would meet preservation and community resiliency objectives.

5. Master Drainage Plan Update

Comments related to the Conservation and Open Space Element, Page CO-26 states "The City of Santa Paula does not have a master plan of storm drains. Instead, a number of regional studies have been done to develop solutions to known problems": As part of the Santa Paula 2040 General Plan Update, the District requests that the City of Santa Paula consider updating their Master Drainage Plan and update on as needed basis to reflect any updates, or changes to the General Plan. The purpose of a Master Drainage Plan is to address the current and future drainage needs of a community and it should be regularly updated to reflect current conditions and needs. A Master Drainage Plan should identify and discuss a variety of infrastructure options, including channels, storm drains, levees, basins, dams, wetlands or other conveyances capable of economically relieving flooding problems within the community. District staff are available to coordinate with the City of Santa Paula on a Master Drainage Plan update to help identify areas of concern and assess options for relieving potential flooding problems. The plan update should include cost estimates and economic analyses, as well as exploring potential funding options for implementing drainage

infrastructure improvements. Financial mechanisms, such as area drainage plans that impose fees on new development based on total impervious acreage created, should be considered to prevent existing taxpayers from having to shoulder the cost burden of cumulative land development impacts on community drainage infrastructure.

END OF TEXT

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Janna Minsk, AICP, City of Santa Paula Planning Director

DATE: December 8, 2017

FROM: Alicia Stratton

SUBJECT: Request for Review of Notice of Preparation for a Revised Notice of Preparation of a Program Environmental Impact Report (PEIR) for the Santa Paula 2040 General Plan Update, Project No. 14-CI-03, City of Santa Paula (Reference No. 17-007-1)

Air Pollution Control District staff has reviewed the revised notice of preparation (RNOP) for an environmental impact report (EIR), which is a which is a general plan addressing Santa Paula's vision for development to the horizon year of 2040. The City of Santa Paula has decided to prepare a Program EIR rather than a Supplemental EIR as previously released, and this review includes additional information from comments received on the original NOP for the Supplemental EIR. No substantive changes to the project description have been made since the publication of the original NOP; however some new information regarding the scope of the EIR has been added. The general plan includes a map of proposed urban boundaries and planned land uses including physical buildout potential and proposed policies/implementation measures. It also contains goals, objectives and policies that will govern the growth of the city and management of its resources.

Section C of the revised NOP addresses air quality. This discussion indicates that air quality impacts from the proposed General Plan Update would be potentially significant and will be studied in the PEIR. We recommend that the PEIR would be updated using the 2016 Air Quality Management Plan (AQMP) and guidance from the Ventura County Air Quality Assessment Guidelines to evaluate all potential air quality impacts that may result from the project. Specifically, the air quality assessment should consider reactive organic compound, nitrogen oxide emissions and particulate matter from all project-related motor vehicles and construction equipment that may result from potential buildout, as appropriate to future development policies and implementation measures.

Thank you for the opportunity to review this project. If you have any questions, please call me at (805) 645-1426 or email alicia@vcapcd.org.

December 11, 2017

Ms. Janna Minsk, AICP, Planning Director
City of Santa Paula
P.O. Box 569
Santa Paula, CA 93061
jminsk@spcity.org

Subject: Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Santa Paula 2040 General Plan Update (Project No. 14-CI-03) SCH # 2017111033, Ventura County

Dear Ms. Minsk:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) submitted by the City of Santa Paula (Lead Agency) for the Santa Paula 2040 General Plan Update (General Plan) Program Environmental Impact Report (PEIR). A PEIR, selected by the Lead Agency to address a series of actions characterized as one large Project, and are related either:

- Geographically;
- A logical parts in the chain of contemplated actions;
- In connection with issuance of rules, regulations, plans, or other criteria to govern the conduct of a continuing program; or,
- As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar, environmental effects which can be mitigated in similar ways.

The General Plan update has been designed to address and affirm the Lead Agency's:

- Location and Boundaries;
- Statement of Objectives;
- Project Characteristics; and,
- Intended Uses of the EIR.

The following comments and recommendations have been prepared pursuant to CDFW's authority as a Responsible Agency under California Environmental Quality Act (CEQA), Guidelines section 15381, over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*); and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority, as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) to assist the Lead Agency in avoiding, minimizing, and mitigating potential project-related impacts on biological resources.

Specific Comments

CDFW recommends that the Lead Agency General Plan consider the many various programs in Ventura County that are making efforts to research, conserve, and preserve wildlife and natural resources around the County. CDFW has included references below to some of these programs that should be considered for any Projects completed by the Lead Agency under the new General Plan update.

- 1) Santa Clara River Watershed Conservancy: <https://scrwconservancy.org/>
- 2) The Southern California Coastal Water Research Project (SCCWRP): <http://www.sccwrp.org>
- 3) Groundwater Sustainable Management Plans: <http://www.fcgma.org/public-documents/plans/20-public-documents/plans/97-groundwater-sustainability-plan>
- 4) Save Open Space and Agricultural Resources Ordinance (SOAR): vcrma.org/pdf/brochures/SOAR.pdf

General Comments

CDFW offers the following comments and recommendations for the DPEIR to assist the City in adequately identifying and/or mitigating the Project's potentially significant direct and indirect impacts to fish and wildlife (biological) resources. Absent the following information, substantial evidence may not exist to support the Lead Agencies findings.

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the PEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to project component location and design features to ensure that alternatives to the proposed project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
 - i. CDFW recommends any projects proposed under the General Plan update consider nesting birds and adequate habitat remain available as important resources for birds, such as cover from predators, and nesting materials, are essential for healthy populations of many special status species that are known to occur in the Santa Paula area. In addition, this native and essential scrub plant provides a natural biological barrier to prevent human access into the open space areas throughout the Lead Agency's purview. CDFW recommends impacts or reduction of water near riparian areas of the Santa Paula Creek and Santa Clara River would need to be fully analyzed in the PEIR

- ii. CDFW recommends that all lighting proposed with any diversion installation, and other areas where project-plans have indicated artificial illumination is necessary, to be cast downward, directional, with no off-cast to allow nocturnal wildlife to behave naturally.
- 2) Lake and Streambed Alteration Agreements (LSA). CDFW has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will substantially divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the Project applicant must provide written notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, CDFW then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. CDFW's issuance of an LSA Agreement is a project subject to CEQA. To facilitate issuance of a LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. Again, the failure to include this analysis in the Project's environmental document could preclude CDFW from relying on the Lead Agency's analysis to issue a LSA Agreement without CDFW first conducting its own, separate Lead Agency subsequent or supplemental analysis for the Project. Information on submitting a Notification for a LSA Agreement, the current fee schedule, and timelines required in obtaining an Agreement and found using the following URL: <https://www.wildlife.ca.gov/Conservation/LSA>.
 - a) The Lead Agency's General Plan area supports aquatic, riparian, and wetland habitats; therefore, a preliminary delineation of the streams and their associated riparian habitats should be included in the PEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the CDFW (Cowardin, et al. 1970). Some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
 - b) In General Plan areas which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
 - c) Any General Plan Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
- 3) Wetlands Resources. CDFW, as described in Fish & Game Code section 703(a), is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (<http://www.fgc.ca.gov/policy/p4misc.aspx#WETLANDS>) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a

reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values".

- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the PEIR and these measures should compensate for the loss of function and value.
- b) The Fish and Game Commission's Water policy guides CDFW to ensure the quantity and quality of the waters of this state should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state, and prevent the degradation thereof caused by pollution and contamination; and endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible.
- 4) California Endangered Species Act (CESA). CDFW considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, candidate species, or state-listed rare plant species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting

program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

- 5) **Biological Baseline Assessment.** To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. **Absent this information, there may not be substantial evidence in the record to support the findings.** CDFW recommends the PEIR include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);
 - b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see Native Plants and Natural Communities; <https://www.wildlife.ca.gov/Conservation/Plants>);
 - c) Floristic, alliance-and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008²). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
 - d) A complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species Special Concern (CSSC), and California Fully Protected Species (Fish and Game Code § 3511), such as American peregrine falcon (*Falco peregrinus anatum*) and white-tailed kite (*Elanus leucurus*). Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service.
 - e) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted period, or in phases.
- 6) **Biological Direct, Indirect, and Cumulative Impacts.** To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the PEIR:

- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address project-related changes on drainage patterns and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;
 - b) A discussion regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the PEIR;
 - c) The impacts of zoning of areas for development projects or other uses nearby or adjacent to natural areas, which may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document; and,
 - d) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
- 7) Avoidance, Minimization, and Mitigation for Sensitive Plants. Timely appropriately focused wildlife and botanical surveys should be conducted to capture current conditions at the project site. CDFW Recommends the Lead Agency conduct a recent floristic, alliance-and/or association- based mapping and vegetation impact assessment at the Project site, and within the neighboring vicinity. Evans (2009) *Identification and mapping of rare plant communities* is recommended for mapping an isolated area for unique and rare plants. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite, such as from hillside slippage caused from vibration. Habitat mapping at the alliance level will help establish baseline vegetation conditions. In addition, the CDFW website, with regard to Natural Communities, can provide guidance for surveying and mapping sensitive and rare plant communities:
<https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities/List>.
- a) The PEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts. CDFW considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDb and are included in *The Manual of California Vegetation* (Sawyer et al. 2008).
- 8) Compensatory Mitigation. The PEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should

emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

- 9) Long-Term Management of Mitigation Lands. For proposed preservation and/or restoration, the PEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
- 10) Nesting Birds. The environmental document must include adequate protection measures to protect impacts to nesting birds during construction. Nesting birds may be affected within sparse tree and shrub habitat on/adjacent to the Project site, directly or indirectly, by noise, dust, or vibration. Nests missed during pre-project surveys could lead to nest abandonment during Project implementation.
 - a) CDFW recommends avoiding the nesting bird season, which generally runs from February 1st through September 1st (as early as January 1st for some raptors), for all Project-related activities to avoid take of birds or their eggs. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory non-game birds (as listed under the Federal MBTA).
 - b) If avoidance of the avian breeding season is not feasible, CDFW recommends submittal of a nesting bird management plan to CDFW for review. Additionally, surveys by an ornithologist with experience in conducting breeding bird surveys should be completed to detect bird nests within suitable nesting habitat that is to be disturbed and within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 11) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals, and their habitats.

- 12) Moving out of Harm's Way. The proposed project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, CDFW recommends a qualified biological monitor approved by CDFW be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.

- 13) Wildlife Movement and Connectivity. The project area supports significant biological resources and is located adjacent to a regional wildlife movement corridor. The project area contains habitat connections and supports movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Onsite features, which contribute to habitat connectivity, should be evaluated and maintained. Aspects of the project could create physical barriers to wildlife movement from direct or indirect project-related activities. Indirect impacts from lighting, noise, dust, and increased human activity may displace wildlife in the general area.

- 14) Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

- 15) Wildlife and Plant Surveys: CDFW generally does not consider wildlife surveys greater than one year old and botanical surveys greater than two years old as representative of current conditions for the purposes of impact assessment, avoidance and mitigation measures. Timely appropriately focused wildlife and botanical surveys should be conducted to capture current conditions at the project site. CDFW Recommends the Lead Agency conduct a recent floristic, alliance-and/or association-based mapping and vegetation impact assessment at the Project site, and within the neighboring vicinity. Evans (2009) Identification and mapping of rare plant communities is recommended for mapping an isolated area for unique and rare plants. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite, such as from hillside slippage caused from vibration. Habitat mapping at the alliance level will help establish baseline vegetation conditions. In addition, the CDFW website, with regard to Natural Communities, can provide guidance for surveying and mapping sensitive and rare plant communities: <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities/List>.
 - a) CDFW recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be

initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

- b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include, for example, retention of woody material, logs, snags, rocks and brush piles (see Mayer and Laudenslayer, 1988 for a more detailed discussion of special habitat elements).

CDFW appreciates the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Ms. Jamie Jackson, Senior Environmental Scientist (Specialist) at (805) 382-6906 or jamie.jackson@wildlife.ca.gov

Sincerely,



Betty J. Courtney
Environmental Program Manager I
South Coast Region

cc: Christine Found-Jackson, CDFW
Sarah Rains, CDFW
Office of Planning and Research, State Clearinghouse, Sacramento
Steve Henry, USFWS Ventura, steve_henry@fws.gov
Valerie Carrillo-Zara, RWQCB, valerie.carrillozarra@waterboards.ca.gov
Jacqueline Phelps, CCC, jacqueline.phelps@coastal.ca.gov

References

- California Department of Fish and Wildlife. (2016). Native plants and natural communities. Retrieved from <https://www.wildlife.ca.gov/Conservation/Plants>.
- Evens, M. J. (Jan, 2009). Identification and mapping of rare plant communities. *Proceedings of the CNPS Conservation Conference*. (pp. 49-55).
- Mayer, K. E. and W. F. Laudenslayer, Jr. (1988). *A guide to the wildlife habitats of California*. California Department of Forestry and Fire Protection, Sacramento.



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS

818 West 7th Street, 12th Floor
Los Angeles, CA 90017

(213) 236-1800

(213) 236-1825

www.scag.ca.gov

December 11, 2017

Ms. Janna Minsk, AICP, Planning Director
City of Santa Paula
P.O. Box 569
Santa Paula, California 93061
Phone: (805) 933-4214
E-mail: jminsk@spcity.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Santa Paula 2040 General Plan Update [SCAG NO. IGR9157]

Dear Ms. Minsk,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Santa Paula 2040 General Plan Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Santa Paula 2040 General Plan Update. The proposed project includes a General Plan Update (GPU) for the City and will address the community's vision for development to the horizon year of 2040 and also includes proposed urban boundaries and planned land uses.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,


Ping Chang

Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

December 11, 2017
Ms. Minsk

SCAG No. IGR9157
Page 2

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
SANTA PAULA 2040 GENERAL PLAN UPDATE [SCAG NO. IGR9157]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
*SCAG does not yet have an agreed-upon security performance measure.	

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

December 11, 2017
Ms. MinskSCAG No. IGR9157
Page 3

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why;</i> <i>Not-Consistent: Statement as to why;</i> <i>Or</i> <i>Not Applicable: Statement as to why;</i> <i>DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why;</i> <i>Not-Consistent: Statement as to why;</i> <i>Or</i> <i>Not Applicable: Statement as to why;</i> <i>DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Santa Paula Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	34,000	37,100	39,600
Households	6,458,000	7,325,000	7,412,300	9,900	10,800	11,500
Employment	8,414,000	9,441,000	9,871,500	9,900	11,200	11,700

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



County of Ventura
PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division
MEMORANDUM

DATE: 12/13/2017

TO: RMA Planning Division
Attention: Anthony Ciuffetelli

FROM: Anitha Balan, Engineering Manager II 

SUBJECT: **REVIEW OF DOCUMENT 17-007-1 PEIR**
Project: **Santa Paula 2040 General Plan Update**
Lead Agency: **City of Santa Paula**
Notice of Preparation of a Program Environmental Impact Report

Pursuant to your request, the Public Works Agency - Transportation Department has reviewed the PEIR for the Santa Paula 2040 General Plan Update.

The City of Santa Paula will be the Lead Agency and will prepare a Program Environmental Impact Report (PEIR) for the Santa Paula 2040 General Plan Update. The General Plan addresses the community's vision for development to the horizon year of 2040. 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. All of the mandated General Plan Elements (Govt. Code Section 65302) are included in this comprehensive update with the exception of the Housing Element, which was adopted in 2013 pursuant to the schedule for housing element updates established in state law. The update will address all of the requirements set forth in state General Plan law, including recent requirements and issues such as complete streets, environmental justice, and community sustainability and resilience.

We offer the following comment(s):

1. The City's General Plan update may have site-specific impacts on the County's Regional Road Network. The Draft PEIR should show if traffic generated by this update/project would have a significant impact on the County's transportation system and roadway network and intersections in the unincorporated area. If this project will have a significant impact on the County's Regional Road Network, the General Plan Update should include measures to mitigate the impacts to less than significant levels.

2. When future developments are proposed, the projects may have site specific and/or cumulative impact on County roadways. The subsequent environmental document for these projects should include any site-specific or cumulative impact to the County Road Network and local roads. The project proponent will then be required to mitigate any adverse impacts this project may have on the County Road Network. To address the cumulative adverse impacts of traffic on the Regional Road Network, Traffic Impact Mitigation Fees should be assessed on development projects in accordance with the terms of the Agreement between the City of Santa Paula and the County.
3. The PEIR and the GP should include provisions and conditions concerning possible annexations to the City, to avoid creation of “islands” within the boundaries of the GP. In accordance with the Ventura LAFCO Commissioner’s Handbook, section 3.2.1, cities shall annex entire roadway sections adjacent to territory proposed to be annexed and shall include complete intersections.
4. Please provide us a copy of the Final GP Update for the City of Santa Paula for our review and comments, when it becomes available.

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