Draft Environmental Impact Report

Santa Paula Unified School District
201 S. Steckel
Santa Paula, CA 93060

Isbell Middle School Modernization Project

Meridian Consultants
860 Hampshire Road, Suite P
Westlake Village, CA 91361
www.meridianconsultantsllc.com

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Draft

ENVIRONMENTAL IMPACT REPORT

ISBELL MIDDLE SCHOOL MODERNIZATION PROJECT

SANTA PAULA UNIFIED SCHOOL DISTRICT

State Clearinghouse No. 2023010299

PREPARED FOR:

Santa Paula Unified School District
201 South Steckel Drive
Santa Paula, California 93060

PREPARED BY:

Meridian Consultants
860 Hampshire Road, Suite P
Westlake Village, California 91361

www.meridianconsultantsllc.com

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EXECUTIVE SUMMARY

This section provides information on the background of the Project, as described in **Section 2.0: Project Description**, assessed in this Draft EIR, and a summary of the information in this Draft EIR identifying the potential environmental impacts of the Project, the measures identified to mitigate these impacts, and the alternatives evaluated to provide additional information on ways to avoid or lessen the significant impacts identified for the Project.

A. BACKGROUND

This Draft environmental impact report (EIR) has been prepared by the Santa Paula Unified School District (District) as lead agency pursuant to the California Environmental Quality Act (CEQA) (Section 15367) and the CEQA. The CEQA requires public agencies, before taking action on projects over which they have discretionary approval authority, to consider the environmental consequences of such projects. An EIR is a document designed to provide to the public and to local and state governmental agency decision makers an analysis of potential environmental consequences of a project to support informed decision making.

This EIR has been prepared to evaluate the environmental impacts associated with implementation of the proposed Isbell Middle School Modernization Project (Project). This EIR is an informational document intended for use by the District, other public agencies, and members of the public in evaluating the potential environmental effects of the Project. This EIR was prepared pursuant to CEQA, codified as California Public Resources Code Section 21000 et seq., and the CEQA Guidelines in the California Code of Regulations, Title 14, Section 15000 et seq.

This summary provides a brief overview of the Project a proposed, results of the environmental analysis contained within this EIR, alternatives to the Project that were considered, and major areas of controversy and issues to be resolved by decision-makers. This summary does not contain the extensive background and analysis found throughout the individual sections within the EIR. For this reason, the reader should review the entire document to fully understand the Project and its potential environmental effects.

B. OVERVIEW OF PROPOSED PROJECT

The Santa Paula Unified School District (SPUSD) is located in the City of Santa Paula, Ventura County, and serves approximately 4,600 students. The SPUSD was formed in 2013 through the merger of the Santa Paula Elementary School District and the Santa Paula Union High School District. The district includes six elementary schools, one middle school (Isbell Middle School), one high school, and a continuation high school.

Isbell Middle School currently serves approximately 700 students in grades 7-8. The school is situated on a 14-acre site at 221 South 4th Street in Santa Paula, with frontages on S. 4th Street and Harvard

Boulevard. The District proposes to modernize Isbell Middle School to meet current educational need and improve safety for students, staff and visitors while preserving historic character of the school. The Project would involve replacing some existing buildings, including the main building, multi-purpose/cafeteria building, portable classrooms, and other structures, with new, safer, and more efficient buildings. The modernized campus would include a new administrative building, multi-purpose room (MPR), and seven new classroom buildings. The Project would also include parking and circulation improvements including expanding the parking lot along Harvard Boulevard and establishing a student loading zone.

The school's student capacity will increase from 700 to 750, with no planned increase in staff. The school will continue to operate at normal hours, with adult education classes in the evening.

The Project would be completed in phases, starting with the construction of interim housing facilities comprised of 19 portable units on the northern portion of the Project Site. The existing main building, manual arts/woodshop building, western storage room, and restroom building would then be demolished, with these functions operating out of the interim housing facilities, while the new administrative and MPR building is built. Once construction of the new administrative and MPR building is complete, the existing multi-purpose/cafeteria building would be demolished to allow for the expansion of the southern parking lot and campus circulation improvements. The final phase would include the removal of the existing portable classroom buildings to facilitate the construction of the seven (7) new permanent classroom buildings, followed by removal of the interim housing facilities from the campus.

C. PROJECT OBJECTIVES

The CEQA Guidelines require an EIR to include a statement of the objectives of the Project that identify the underlying purpose of a proposed project.

The main building at Isbell Middle School was built in the 1920s and is experiencing aging issues related to the structural integrity of the building, and design issues such as crowded hallways with poor lighting; difficulty supervising hallways; congested stairwells; small classrooms; small administration area; lack of air conditioning; lack of power and data outlets; and a small literacy center.

The District has transitioned Isbell School from housing a 6th–8th grade educational program to a 7th–8th grade educational program. In response to input from the community, the SPUSD has identified the following objectives for the Isbell School Modernization Project:

- Ensure all buildings meet applicable seismic safety standards.
- Provide additional facilities to accommodate SPUSD's current educational program for 7th and 8th Grades.
- Modernize the Isbell School Campus to improve student and staff well-being.
- Preserve the historic character of the campus.

D. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Topics evaluated in this Draft EIR have been identified based on the responses to the NOP and the preliminary review of the project by the District. The District determined impacts related to the following environmental topics are potentially significant and further assessment in this Draft EIR was needed:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise

Other environmental topics are not reviewed in detail in this Draft EIR because impacts were determined to be less than significant. Discussion of these topics is provided in **Section 5.0: Effects Found Not to be Significant**.

A summary of the potential environmental impacts of the Project and the measures identified to mitigate these impacts is provided in **Table ES-1: Summary of Project Impacts. Table ES-1** contains four columns: the identified impact for each EIR topic; the level of significance prior to implementation of mitigation; mitigation measures that would avoid or reduce the level of impacts; and the level of significance after implementation of mitigation measures, if applicable.

A summary of the alternatives to the Project as defined and evaluated in this EIR to provide additional information on ways to avoid or lessen the significant impacts identified for the Project is provided after **Table ES-1**.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
Aesthetics			
Threshold (a): Would the Project have a substantial adverse effect on a scenic vista? The only views of natural or man-made scenic resources from the Project Site are views of the mountains to the north and south of Santa Paula; however, views of these scenic resources are partially blocked by the surrounding one- to three-story-tall development and existing vegetation. Project construction activities could temporarily degrade the existing visual character of the Project Site and its immediate surroundings. This impact would be short term in nature and construction equipment would be removed following construction activities. Once construction has been completed, existing views across the site would be modified. The proposed Project would replace the main building, portable buildings, and storage buildings with single-story buildings in generally the same locations as the existing buildings, with the exception of the temporary placement of new interim relocatable classroom buildings that will be built north of the existing portable classroom buildings. Therefore, the proposed Project would have less than significant impacts regarding scenic vistas during operation.	Less than significant.	No mitigation measures are required.	Less than significant.
Threshold (b): Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? The proposed Project would replace the Main School Building, Manual Arts building, and Cafeteria, which are considered contributors to the historic landmark designation of the Isbell School campus, with single-story buildings in generally the same locations as the existing buildings. The existing buildings have been substantially altered over time to accommodate seismic retrofitting requirements and do not embody the distinctive characteristics and methods of construction relevant to the period of historic significance (1924 to 1974) of the Isbell School campus. Replacement of these buildings with the proposed new buildings would not result in a significant impact on the overall	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
aesthetic character of the campus as visible from Harvard Blvd. and S. 4th Street. Furthermore, there are no official state scenic highways within the vicinity of the Project Site and the Project Site does not contain scenic resources, including trees, rock outcroppings, or other locally recognized scenic natural features.			
Threshold (c): In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? The Project is located in an urbanized area, surrounded by development near the City's downtown area, and would not conflict with any zoning and other regulations governing scenic quality. While SPUSD is not legally subject to City's land use authority, the proposed Project would be designed to be consistent with the goals, policies, and programs addressing visual and scenic resources. The proposed Project would maintain the spatial relationships and visual character of the Isbell School campus, and impacts to the visual character of the Project Site and its surroundings would be less than significant.	Less than significant.	No mitigation measures are required.	Less than significant.
Threshold (d): Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views of the area? Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. Additionally, the exterior of the new buildings would be constructed of nonreflective building materials so vehicle headlights would not reflect glare for drivers. Substantial glare as a result of field lighting is not expected. The proposed Project would not introduce lights at substantially greater intensities than existing lights on and near the site and would not cause shadows to extend off-site in such a manner as to significantly impact nearby sensitive residential uses. Therefore, implementation of the proposed Project would	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
not create a new source of substantial light or glare that would adversely affect day or nighttime views in the project area.			
Air Quality			
Threshold (a): Would the Project conflict with or obstruct implementation of the applicable air quality plan? While the Project would marginally increase the capacity of Isbell Middle School from 700 to 750 students, the Project does not include residential uses and would not contribute to an increase in population in the region. The proposed Project is consistent with the growth assumptions in the regional air plan, would not contribute to air quality violations in the Air Basin, and would be consistent with the Air Quality Management Plan (AQMP). The proposed Project would also be consistent with the transportation control measures included in the AQMP as the Project is located near existing residential uses and is served by the nearby existing transit services as well as school bus service. The Project would comply with the applicable Ventura County Air Pollution Control District (VCAPCD) rules with the intention of limiting VOC and NOx emissions and would not exceed regional construction or operational thresholds. Project impacts with respect to AQMP consistency would be less than significant.	Less than significant.	No mitigation measures are required.	Less than significant.
Threshold (b): Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard? The emissions of criteria air pollutants from construction and operation of the Project would not generate levels of emissions that would exceed the VCAPCD regional thresholds for these pollutants. Construction of the Project would result in maximum daily emissions of approximately 9.9 pounds/day of VOC, 14.7 pounds/day of NOX, 11.7 pounds/day of CO, 0.1 pounds/day of SO2, 4.2 pounds/day of PM10, and 1.9 pounds/day of PM2.5, which do not exceed VCAPCD regional thresholds for criteria pollutants. Operational emissions would lower for the proposed Project when compared to existing conditions as there would be an	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
increase in capacity of 50 students, and the new buildings would be required to meet all current energy conservation standards and would operate more efficiently than the existing buildings. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant. Operation of the Project would result in maximum unmitigated daily emissions of approximately 7.7 pounds/day of VOC, 4.0 pounds/day of NOX, 36.4 pounds/day of CO, 0.1 pounds/day of SO2, 8.9 pounds/day of PM10, and 2.3 pounds/day of PM2.5, which do not exceed VCAPCD-established operational significance thresholds for criteria pollutants			
Threshold (c): Would the Project expose sensitive receptors to substantial pollutant concentrations? Project construction would result in short-term emissions of diesel particulate matter, which is a toxic air contaminant (TAC). Single-family residential uses, multi-family residential uses, and school uses are located adjacent to the site, and sensitive receptors include single-family residences along S. 7th Street, single-family residences along S. 4th Street, and the existing Isbell School. Given that the greatest potential for diesel particulate emissions would only occur during excavation/grading activities and other construction activities would result in reduced use of heavy-duty diesel construction equipment in comparison to excavation/grading activities, the Project would not result in a long-term source of TAC emissions. The Project would comply with the California Air Resources Board (CARB) Air Toxics Control Measure that limits diesel-powered equipment and vehicle idling to no more than five minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these regulations would minimize emissions of TACs during construction. Project operations would result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed uses within the Project Site.	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the criteria used to determine the significance of a potential health risk impact.			
Threshold (d): Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? As previously discussed, construction of the Project would result in emissions below significance thresholds. Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement, however the construction process is short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor-producing materials. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project site and therefore would not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor-producing materials being utilized, no significant impact related to odors would occur during construction of the proposed Project. The Project Site does not currently emit objectionable odors and no change in use is proposed. Therefore, objectionable odors would not be emitted by continued operation of the existing school. The Project would also comply with VCAPCD Rule 74.2 which would limit the number of VOCs in architectural coatings and solvents. Any unforeseen odors generated by the Project will be controlled in accordance with VCAPCD Rule 51 and Rule 55.	Less than significant.	No mitigation measures are required.	Less than significant.
Cultural Resources			
Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? A Historic Resources Report prepared as part of this Draft EIR evaluates the potential for implementation of the Project to	Significant	**MM CUL-1:** In consultation with a qualified historic preservation professional, all historically significant buildings and structures and features to be modified or removed shall be documented in	Unavoidable Significant Impact.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
substantially change the significance of an identified historical resource. Isbell School was listed as Ventura County Landmark No. 143 and City of Santa Paula Historic Landmark No. 14 in February, 1992 and is a historic resource for the purposes of CEQA, per CEQA Guidelines § 15064.5 (a)(2). The period of significance for Isbell School is 1924 to 1974. Five buildings constructed during this period are considered contributors to the landmark's historic designation, including the Main School Building (1924), Manual Arts Building (1929), Cafetorium (1956), Locker and Shower Building (1969), and a small quonset building. The removal of all of the contributing buildings would result in a loss of historic integrity that would result in the school no longer qualifying as a historic landmark, which would result in a significant impact. Mitigation measures have been identified that would reduce the impacts to the extent feasible but would not mitigate the impacts to a point where clearly no significant impact on the environment would occur.		accordance with HABS/ HAER standards. This documentation shall include archival quality photographs of exterior features, elevations and significant interior features. Scaled, "as built" site plan and floor plans should also be produced where existing plans or records will not suffice for this purpose. The documentation package will be archived at an appropriate location to be determined by the District. **MM CUL-2:** In consultation with a qualified historic preservation professional, produce an onsite interpretive plan for the property focused on the history of Isbell School to be permanently displayed in a publicly accessible location. **MM CUL-3:** All modifications to historic features on the property shall be undertaken in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties in accordance with plans prepared in consultation with a qualified historic preservation professional. The objective shall be to preserve interior and exterior historic building character defining features to the greatest extent feasible.	
Greenhouse Gases			
Threshold (a): Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Total GHG emissions from the construction activities are estimated to be 936 MTCO2e. When these construction emissions are amortized over a 30-year project lifetime, the annual contribution would be 31 MTCO2e per year. The estimated GHG emissions for the Project including the	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
amortized construction emissions would be 1,320 MTCO2e per year. This is less than the 1,372 MTCO2e Isbell School currently generates per year due to the decrease in mobile emissions that would result from the increasing efficiency of cars in the future and the proposed new buildings being more energy efficient. The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases and impacts would be less than significant.			
Threshold (b): Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? The analysis of the Project GHG emissions consists of a quantitative analysis of the GHG emissions generated by the Project and a qualitative analysis of the Project's consistency with adopted GHG-related legislation, plans, and policies. The Project adheres to regulatory compliance measures, including current building efficiency standards, that would reduce the Project's GHG emissions profile. Additionally, the Project would not conflict with applicable plans including SCAG's 2024-2050 RTP/SCS. Further, the Project Site's proximity to alternative transit options would further reduce what emissions are produced through the above regulations and applicable air quality plans. As such, the Project would have a less than significant direct or indirect GHG impact on the environment and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less than significant.	No mitigation measures are required.	Less than significant.
Hazards and Hazardous Materials			
Threshold (a): Would the Project create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials? The Project is an educational facility which would not involve routine transport, use, or disposal of hazardous materials during operation. All hazardous materials would be contained, stored,	Less than significant.	No mitigation measures required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
and used according to manufacturers' instructions and handled in compliance with applicable standards and regulations. An Asbestos and Lead Survey Report was conducted as part of this Draft EIR which identified lead-based paint coatings and Asbestos Containing Materials (ACM) at the site which require abatement or special handling during construction. The proposed Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding hazardous waste, including the regulations set forth in SCAQMD Rule 1403. Compliance with existing standards and regulations would minimize associated risks to a less-than-significant level and would not result in significant impacts to the public or the environment.			
Threshold (b): Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment? As discussed above, lead-based paint coatings and Asbestos Containing Materials (ACM) have been identified at the site which require abatement or special handling during construction. The proposed Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding hazardous waste. During the operation of the proposed Project, hazardous waste use would be minimal and in small quantities. The hazardous waste material will be properly used and stored according to the manufacturers' instructions and in compliance with applicable standards and regulations. The Project would comply with existing federal, State, and local standards and regulations regarding hazardous waste. Hazardous release impacts during construction and operation of the proposed Project would be less than significant	Less than significant.	No mitigation measures required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
Threshold (c): Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? The nearest school to Isbell Middle School is Santa Paula High School, approximately 1,600 feet north of the Project Site. The Project Site is a school as well and impacts will incur if hazardous waste materials were to be released on campus. As discussed above, the Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding hazardous waste during construction. During operation, the Project is expected to continue its current functions with minimal uses of hazardous materials on site. The Project would comply with all applicable local, State, and federal regulations governing such activities, decreasing the impact of handling the hazardous waste materials to less than significant.	Less than significant.	No mitigation measures required.	Less than significant.
Threshold (d): Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? Based on a review of the databases compiled in accordance with Section 65962.5 by the DSTC and SWRCB,[1,2] the Project Site is not included on a list of hazardous materials sites. There are seven (7) Leaking Underground Storage Tank (LUST) Cleanup Sites, all located within 0.25 miles of the Project Site, that have been remediated and no further regulatory oversight activities are required. Additionally, there is one (1) Cleanup Program Site located within 0.25 miles of the Project Site that has been	Less than significant.	No mitigation measures required.	Less than significant.

1 State of California. Department of Toxic Substances Control. "EnviroStor." Accessed October 2024. https://www.envirostor.dtsc.ca.gov/public/.

2 State of California. State Water Resources Control Board. "GeoTracker." Accessed October 2024. https://geotracker.waterboards.ca.gov.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
remediated and no further oversight activities are required. Therefore, the Project will not create a significant hazard to the public or the environment.			
Threshold (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 or excessive noise for people residing or working in the project area? The Project Site is located approximately 0.1 miles from the Santa Paula Airport. According to the City's General Plan, the Project Site is not located within the Runway Protection Zone, the Outer Safety Zone, or the Traffic Pattern Zone of the Santa Paula Airport. However, the southeastern portion of the Project Site is located within Height Restriction Zone. The proposed Project would comply with the regulations outlined in the Airport Comprehensive Land Use Plan for Ventura County regarding development in Height Restriction Zones. The function and operation of the Project Site would remain unchanged; therefore, no additional safety hazards or excessive noise impacts are anticipated due to the proximity of an airport. Impacts would be less than significant.	Less than significant.	No mitigation measures required.	Less than significant.
Threshold (f): Would the Project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? During demolition and construction activities, the Project would conduct improvements along sidewalks and street lanes adjacent to the site that could potentially cause traffic hazards. Delivery truck trips and construction equipment could contribute additional traffic within the Project area, and partial lane closures may be needed along Harvard Boulevard and 4th Street, which could potentially impact emergency vehicle access to the Project Site. To ensure that there would be less than significant impacts to emergency access during the construction phase, the Project would implement a construction management plan.	Less than significant.	No mitigation measures required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
Development of the Project would not expand the school campus outside of its existing boundaries, which do not currently create hazards due to a geometric design or incompatible uses. The project would not alter or impact roads or sight lines. Existing entrance/exit points to the project site would remain largely unaltered except for modifications to the parking lot along Harvard Boulevard. Therefore, the operation of the proposed Project is not expected to interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.			
Threshold (g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? The Project Site is not within a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). Given the nature and location of the Project, no exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	No Impact.	No mitigation measures required.	No Impact.
Noise			
Threshold (a): Would the Project generation substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? The nearest sensitive receptors include the one- and two-story single-family and multi-family residences located adjacent to the Project Site to east along S. 7th Street and to the west along S. 4th Street. Average noise levels during construction would exceed the threshold of 85 dBA by a maximum of 5.9 dBA at the single-family residential uses located adjacent to the Project Site to the west on South 4th Street. With implementation of **MM-NOI-1,** construction noise levels resulting in an increase of 5.9 dBA (Leq 1-hour) above the significance threshold would be reduced by a minimum of 26.5 dBA (Leq 1-hour). Additionally, the Project would be consistent with the City's Noise Ordinance	Less than significant with Mitigation.	**MM NOI-1:** The District shall require that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels below the established thresholds: • Construction equipment shall be equipped with exhaust muffler systems consistent with FHWA guidance. • All equipment shall be properly maintained in accordance with manufacturers' specifications to assure that no additional noise due to worn or improperly maintained parts	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
by ensuring construction activities would not occur outside of the hours of 8:00 AM to 6:00 PM Monday through Friday. Compliance with the above practices would ensure construction noise levels would be below the significance threshold. The increases in trips during construction would not represent a doubling of traffic during any phase of construction, and construction of the proposed Project would not result in a perceptible increase in roadway noise. All stationary sources would have shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels and HVAC-equipment would be screened so as not to generate noise levels that would impact nearby noise-sensitive receptors. There would not be a perceptible increase in operational roadway noise.		is generated consistent with FHWA guidance. • Construction equipment shall have features that dampen metal surfaces and minimize metal-to-metal contact consistent with FHWA guidance. • When construction operations occur adjacent to off-site occupied residential areas, construction equipment staging areas and stationary noise sources shall be located as far from those nearby receptors as possible, prohibit idling equipment, notify adjacent residences in advance of construction work, and install temporary acoustic barriers or noise blankets achieving a minimum reduction of 5 dBA around stationary construction noise sources. These barriers shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise barrier and must be installed in a location that completely blocks line-of-sight between the construction noise source and adjacent sensitive receptors. • Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
		during all phases of project construction. • Use electric air compressors and similar power tools rather than diesel equipment, where feasible. • Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes. • Construction hours, allowable workdays, and the phone number of the job superintendent must be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent must investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications must be included in the proposed Project construction documents, which must be reviewed by the City prior to issuance of grading permits.	
Threshold (b): Would the Project generate excessive groundborne vibration or groundborne noise levels? The Caltrans Transportation and Construction Vibration Guidance Manual is used as a screening tool to assess the potential for adverse vibration effects related to structural damage. The forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold at the nearby sensitive receptors for vibratory rollers, loaded trucks, jackhammers, and small	Less than significant.	No mitigation measures required.	Less than significant.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS			
Project Impacts	**Impact Without Mitigation**	**Mitigation Measures**	**Impact With Mitigation**
bulldozers. As such, construction vibration impacts would be less than significant. Similar to existing conditions, the primary sources of vibration associated with operation would include passenger-vehicle circulation within the Project area and stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. The majority of the Project operation-related vibration sources, such as mechanical equipment, would incorporate vibration attenuation mounts as required by the particular equipment specifications. Therefore, operation would not substantially increase existing vibration levels in the immediate vicinity of the Project Site.			
Threshold (c): For a project located within the vicinity of a private airstrip or 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? The Project Site is located approximately 0.1 miles north of Santa Paula Airport. Santa Paula Airport is a privately owned, public use airport that exclusively serves privately operated general aviation aircraft and has no commercial airline operations. Further, the Project Site is located outside of the airport's CNEL 60 noise contours. For this reason, the Project would not expose people residing or working in the project area to excessive noise levels and there would be no impact.	No Impact.	No mitigation measures required.	No Impact.

E. SUMMARY OF ALTERNATIVES

This Draft EIR considers a range of Alternatives to the Project in accordance with CEQA Guidelines Section 15126.6. This section of the Guidelines requires an EIR to describe and evaluate a range of reasonable alternatives to a project to promote informed decision-making by providing additional information on ways to avoid or substantially lessen the significant impacts identified for a proposed project. The identification and analysis of alternatives to a proposed project is a fundamental aspect of the environmental review process under CEQA.

CEQA Guidelines Section 15126.6(b) emphasizes the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts attributable to a proposed 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(f) further directs that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. As such, the focus of the evaluation is on those environmental resources for which the proposed Project may have potential impacts.

The Alternatives to the Project evaluated in this Draft EIR include:

- Alternative 1 - No Project/No Development
- Alternative 2 – Renovate Existing Main Building

Alternative 1 – No Project/No Development

Consideration of the No Project/No Development Alternative is required by Section 15126(2)(4) of the *CEQA Guidelines*. As required by the *CEQA Guidelines*, the analysis must examine the impacts which could occur if the site is left in its present condition, as well as what may reasonably be expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project/No Development Alternative, the Project Site would not be developed with the new administrative and classroom buildings and expanded parking and would remain as currently developed.

A potential future outcome of Alternative 1 may involve some degree of alteration to the historic buildings as required to bring them up to current seismic codes and to meet ADA requirements, and other interior and exterior treatments as may be determined necessary to improve functional conditions on the campus. However, it is likely these improvements could be made in a manner that is consistent with

the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, which would result in impacts from these improvements being less than significant. While this alternative would avoid the significant impact of the Project on historic resources, it would not feasibly meet the stated objectives to modernize the campus and provide additional facilities to accommodate SPUSD's current educational program for 7th and 8th Grades.

Alternative 2 – Renovate Existing Main Building

Alternative 2 would involve retaining and modifying the main building, including retrofitting the building to meet current seismic safety building standards. Additionally, this alternative, like the proposed Project would include demolishing the existing cafeteria, all portable classroom buildings, the manual arts/woodshop building, the western storage room, three basketball courts, and restroom building to develop two single-story classroom buildings, a courtyard, four new basketball courts, and an expanded southern parking lot.

Alternative 2 would preserve the western portion of the main building facing S. 4th Street and convert the eastern portion of the building containing five existing classrooms into a new Literacy Center on the second floor, and a new Community/Parent Room on the first floor. This alternative would also include the addition of new food service components and a multi-purpose room in the northeast corner of the building centrally located on campus. The proposed modifications would reduce the student occupant load on the hallways between classes and create new openings along the hallway for view through the Literacy Center to the courtyard. On the western façade of the building, the existing windows would be replaced with windows matching the original design of the building and a new freestanding canopy would be added to the sidewalk immediately in front of the building. In addition, the southeast corner of the main building will have a small addition creating a new main entry for the administrative offices.

The modifications to the existing building would be designed to be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, which would result in the impact from these modifications to the existing building being less than significant.

This alternative would also replace the manual arts/woodshop building and cafeteria, which are considered contributors to the landmark designation of the Isbell School campus, with single-story buildings in generally the same locations as the existing buildings. However, these buildings have been significantly altered to accommodate seismic retrofitting requirements and do not embody the distinctive characteristics and methods of construction relevant to the period of significance (1924 to 1974) of the Isbell School campus, and the impact from their demolition and replacement to the existing character of the campus would be less than significant.

Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR. Of the alternatives considered, Alternative 1-No Project/No Development would avoid the significant and unavoidable impacts to historic resources identified for the proposed Project.

While Alternative 1 would avoid the significant impact on historic resources that would result from the Project, this alternative would not address the aging issues related to the structural integrity of the main building, and design issues such as crowded hallways with poor lighting; difficulty supervising hallways; congested stairwells; small classrooms; small administration area; lack of air conditioning; lack of power and data outlets; and a small literacy center.

Alternative 2—Renovate Main Building would also avoid the significant impact to historic resources that would result from the Project and would feasibly meet the objectives of the Project. Alternative 2 would feasibly address the aging issues affecting the main building and ensure all buildings meet applicable seismic safety standards; provide additional facilities to accommodate SPUSD's current educational program for 7th and 8th Grades; modernize the Isbell School Campus to improve student and staff well-being; and preserve the historic character of the campus. For these reasons, Alternative 2 is the environmentally superior alternative.

F. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

In compliance with Section 15201 of the State CEQA Guidelines, the District has taken steps to provide opportunities for public participation in the environmental process. A Notice of Preparation (NOP) was distributed on January 13, 2023, to public agencies and interested parties for a 30-day public review period to solicit comments and to inform agencies and the public of the Project. The Ventura County Cultural Heritage Board commented on the potential damage to, or removal of, historical resources on the Project Site. Specifically, the subject property is Ventura County Landmark #143, designated February 1992. The school is named after Olive Mann Isbell, who opened the first public school in California in 1846. Isbell was a Santa Paula resident at the time of her death. Additionally, the school was built in 1926 and designed by Santa Paula architect, Roy C. Wilson. Roy C. Wilson was a master architect known as an individual whose work is distinguishable from others by its characteristic style and quality and is known to have contributed to creating the built environment in Ventura County.

To address these concerns, a Historic Resources Report (**Appendix B**) was prepared for the proposed Project. As described therein, CEQA Guidelines Section 15064.5 (b)(2)(B) states that a Project materially impairs the significance of a historic resource when it demolishes or materially alters in an adverse manner the physical characteristics of a resource that account for its inclusion in a local register of historical resources. The removal of all of the contributing buildings on the eligible property would result in a loss of its eligibility as a landmark, which is a significant impact under this standard.

As described in **Section 3.3: Cultural Resources**, mitigation measures have been identified to reduce the impact of the proposed Project on the historic resources present on the Project Site. CEQA Guidelines state that in some circumstances, documentation of a resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the impacts of demolition of the resource will not mitigate the impacts to a point where clearly no significant impact on the environment would occur. The Project would result in a significant impact because it would remove all of the contributing buildings on the eligible property resulting in the loss of its eligibility as a landmark. The resource documentation required by the mitigation measures therefore would mitigate this impact to the extent feasible but would not mitigate the impacts to a point where clearly no significant impact on the environment would occur. As discussed above, Alternative 2 – Renovate Existing Main Building, is identified as the environmentally superior alternative as it would avoid the significant impact to historic resources that would result from the Project.

1.0 INTRODUCTION

This section provides information on the background of the Project, as described in **Section 3.0: Project Description**, information on the environmental review process being conducted by the Santa Paula Unified School District ("SPUSD" or "District") for this Project, as well as the organization and content of this Draft EIR.

1.1. ENVIRONMENTAL REVIEW PROCESS

1.1.1 Proposed Project

SPUSD is proposing the Isbell Middle School Modernization Project (Project) is proposing to renew and update the facilities at Isbell Middle School in the City of Santa Paula to achieve the project objectives, which include providing facilities to meet the District's current 7th and 8th grade educational program needs; modernizing the Isbell School Campus to meet safety, community, and SPUSD goals and guidelines; and preserving the school's historic character. The Project would include replacing several existing buildings within the existing Isbell Middle School campus (Project Site) with new administrative and classroom buildings, an expansion of the southern parking lot, and changing the student drop off location from the western parking lot to the southern parking lot.

1.1.2 Purpose of an EIR

In accordance with PRC Section 21080, the Project is subject to environmental review under CEQA. The California Environmental Quality Act (CEQA) states the purpose of an environmental impact report (EIR) is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code [PRC], Section 21002.1). This Draft EIR evaluates the potential environmental effects resulting from implementation of the proposed Project.

In accordance with Section 15121(a) of the State CEQA Guidelines, this EIR is an "informational document that will: (1) inform public agency decision makers and the public of the significant environmental effects of the Project; (2) identify possible ways to minimize the significant effects; and (3) describe reasonable alternatives to the Project."

This Draft EIR has been prepared in conformance with CEQA and the State CEQA Guidelines. Section 15151 of the State CEQA Guidelines defines the standards for EIR adequacy as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of*

> *disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

This Draft EIR is intended to serve as a Project EIR under CEQA. Section 15161 of the State CEQA Guidelines. A Project EIR focuses on changes in the environment that would result from the development of a project and examine all phases of a project, including planning, construction, and operation. This Project EIR is intended to provide the environmental information necessary for the District to consider prior to making a final decision on the Project. This Draft EIR is also intended to support necessary approvals by other public agencies.

1.1.3 Notice of Preparation

In compliance with Section 15201 of the State CEQA Guidelines, the District has taken steps to provide opportunities for public participation in the environmental process. A Notice of Preparation (NOP) was distributed on January 13, 2023, to public agencies and interested parties for a 30-day public review period to solicit comments and to inform agencies and the public of the Project. **Table 1.0-1: Comments Received on NOP** includes a list of agencies and individuals who provided comments on the NOP. A copy of the NOP and responses received are included in **Appendix A: Notice of Preparation (NOP) and Comment Letters** of this Draft EIR.

TABLE 1.0-1: COMMENTS ON NOTICE OF PREPARATION

County of Ventura	Mr. Anthony Ciuffetelli, Planning Programs Manager	February 9, 2023
Native American Heritage Commission	Cody Campagne, Cultural Resources Analysis	January 18, 2023

Additionally, the District held a community meeting and public scoping meeting on April 26th, 2023, at the Isbell Middle School in the City of Santa Paula. Notices on the scoping meeting were to all residents within a 500-foot radius of the campus as well as local agencies (see Distribution List in **Appendix A**).

Topics evaluated in this Draft EIR were identified based a preliminary review of the Project as defined in Section 15060 of the CEQA Guidelines and the responses to the NOP. The District determined that impacts related to the following environmental topics are potentially significant and further assessment was required in this Draft EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise

Other environmental topics not evaluated in detail in this Draft EIR because potential impacts were determined to be less than significant include:

- Agriculture and Forestry Resources
- Biological Resources
- Energy
- Geology and Soil
- Hydrology and Water Quality
- Land Use and Planning

- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

In accordance with Section 15128 of the CEQA Guidelines, a brief discussion of the reasons the potential effects of the Project related to these topics were determined not to be significant is provided in Section 6.0: Effects Found Not to be Significant.

1.1.4 Lead Agency Contact Persons

This Draft EIR was prepared under the direction and supervision of the SPUSD Facilities and Construction Department. The Draft EIR is being circulated for a 45-day public review period from Wednesday, December 18, 2024 to Monday, February 3, 2025.

Written comments on the Draft EIR may be submitted to:

Santa Paula Unified School District
Facilities and Construction Department
201 S. Steckel Drive
Santa Paula, CA 93060
Attention: Douglas Henning, Facilities and Construction Manager

Comments may also be sent by facsimile to (805) 933-8901 or by e-mail to dhenning@santapaulausd.org and include "**Isbell Middle School Modernization Project EIR**" in the subject line.

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

After the public review and comment period, written responses to all written comments received will be included in the Final EIR. As required by CEQA, responses to comments submitted by responsible public agencies will be distributed to those agencies for review 10 days prior to consideration of certification of the Final EIR by the SPUSD Governing Board. Upon completion of the Final EIR and other required documentation, the appropriate decision- making

1.2. ORGANIZATION OF THIS ENVIRONMENTAL IMPACT REPORT

As stated previously, a principal objective of CEQA is to ensure that the environmental review process is a public process. In meeting this objective, an EIR informs members of the public, reviewing agencies, and decision makers of the physical impacts associated with a project. To meet this objective, , this Draft EIR is organized to present the required technical information in an understandable.. This Draft EIR is organized as follows:

Section 1.0: Introduction provides information on the background of the Project, the environmental review process, and organization of the Draft EIR.

Section 2.0: Project Description presents a description of the Project which addresses the location of the Project Site, the objectives of the Project, the characteristics of the Project, and identification of all discretionary actions requiring approval to allow the implementation of the Project.

Section 3.0: Environmental Impact Analysis contains information and analysis of the potential for the Project to result in significant environmental effects for each of the topics evaluated in this Draft EIR.

Section 4.0: Alternatives details project alternatives that would provide a majority or all of the project objectives, and compares environmental impacts of the alternative to the impacts of the proposed Project.

Section 5.0: Effects Not Found to be Significant discusses the potential impacts of the Project that were determined not to be significant and were therefore not discussed in detail in this Draft EIR.

Section 6.0: Other Environmental Impacts addresses the potential for the project to induce growth that could result in environmental impacts and the potential for the Project to result in the significant irreversible and irretrievable commitment of resources associated with the implementation of the Project.

Section 7.0: References lists the principal documents, reports, maps, and other information sources referenced in this Draft EIR.

Section 8.0: List of Preparers / Organizations Consulted lists persons involved in the preparation of this Draft EIR or who contributed information incorporated into this Draft EIR.

Appendices to this EIR include technical information and other materials used in the preparation of this Draft EIR.

2.0 PROJECT DESCRIPTION

2.1 INTRODUCTION

This section describes the location, objectives, and characteristics of the proposed Isbell Middle School Modernization Project (Project) in the City of Santa Paula (City), California along with the intended uses of this Draft EIR, as required by the California Environmental Quality Act (CEQA) Guidelines.[1]

2.2 PROJECT LOCATION

The Santa Paula Unified School District is located in the City of Santa Paula in Ventura County. The City is home to approximately 30,000 residents within a 4.6-square-mile radius and is located approximately 14 miles east of Ventura and 65 miles northwest of Los Angeles and. The Santa Paula Unified School District was established in 2013, with the merger of the Santa Paula Elementary School District and the Santa Paula Union High School District.

Santa Paula Unified School District offers an early childhood education program, along with six elementary schools (K-6), one middle school (7-8), one comprehensive high school, and one continuation high school. The district serves approximately 4,600 students with a staff of approximately 535 employees. Isbell Middle School (Isbell School) serves grades seven and eight and accommodates approximately 700 students and 85 staff members.

The approximately 14-acre school site is located at 221 South 4th Street (Assessor Parcel Number [APN] 103-0-220-535] in the City of Santa Paula, Ventura County. As shown in **Figure 2.0-1: Regional Location**, regional access to the Project Site is provided by California State Route 126 to the southeast and State Route 150 to the northeast.

As shown in **Figure 2.0-2: Project Location Map,** the Project Site is bounded by East Main Street to the north, South 7th Street to the east, Harvard Boulevard to the south, and South 4th Street to the west.

2.3 EXISTING CAMPUS

As shown in **Figure 2.0-3: Current Campus Plan**, Isbell School includes the main building, multi-purpose building (cafeteria), gymnasium building, a STEM flex classroom building, manual arts/woodshop building, storage buildings, 18 modern portable classroom buildings, restroom building, two large grass fields, three basketball courts, a western parking lot and drop-off area, and southern parking lot. Access to the school is provided via South 4th Street and Harvard Boulevard.

Isbell School serves grades seven and eight and accommodates approximately 700 students and 85 staff members. The main building, built in 1926, was added to the Ventura County list of Historic Landmarks

1 California Code of Regulations. Title 14. Section 15000 et seq.

in 1992 as Landmark No. 143. Isbell School is named for Olive Mann Isbell, who opened the first public school in California in 1846 and is recognized as the first "American school- teacher" in California. At the time this main building at Isbell School was built, it was the largest school building in Santa Paula. Its two-story compact plan was the latest in school design and noted for its administrative efficiency.

The campus has grown over the years with the addition of new buildings. The manual arts/woodshop building was constructed in 1929, and the multi-purpose cafeteria building was constructed in 1956. The remainder of buildings on the campus include modern portable classroom buildings, storage buildings, a gymnasium building, a locker room building (now converted into a STEM flex classroom), and a restroom building.

Isbell School experienced two severe flooding events, which led to the development of low concrete walls, berms, and wooden gates around the school. After the 1933 Long Beach earthquake and the passage of the Field Act, two-story schools were no longer constructed in California. In 1939, Isbell was seismically strengthened and substantially altered to meet the Field Act requirements using Public Works Administration funds under the New Deal administration. The Santa Paula Unified School District (SPUSD) retained structural engineers in 2019 to determine the structural integrity of the main building. This review determined that the main building does not comply with the latest applicable building safety standards.

In 2022–2023, the SPUSD hosted community meetings, and conducted polling and surveys to solicit input from the community on the current conditions at Isbell School and future improvements. Comments indicated the community is interested in preserving the historic architecture of the school, upgrading and modernizing the school, and improving safety and student well-being. Issues with the current campus identified in comments include crowded hallways with poor lighting; difficulty supervising hallways; congested stairwells; small classrooms; small administration area; lack of air conditioning; lack of power and data outlets; and a small literacy center.

2.4 PROJECT OBJECTIVES

The CEQA Guidelines require an EIR to include a statement of the objectives of the Project that identify the underlying purpose of a proposed project.

The main building at Isbell Middle School was built in the 1920s and is experiencing aging issues related to the structural integrity of the building, and design issues such as crowded hallways with poor lighting; difficulty supervising hallways; congested stairwells; small classrooms; small administration area; lack of air conditioning; lack of power and data outlets; and a small literacy center.

Additionally, the District has transitioned Isbell School from housing a 6th–8th grade educational program to a 7th–8th grade educational program. In response to input from the community, the SPUSD has identified the following objectives for the Isbell School Modernization Project:

- Ensure all buildings meet applicable seismic safety standards.

- Provide additional facilities to accommodate SPUSD's current educational program for 7th and 8th Grades.
- Modernize the Isbell School Campus to improve student and staff well-being.
- Preserve the historic character of the campus.

2.5 PROJECT CHARACTERISTICS

The Project is intended to renew and update the facilities at Isbell School to achieve the project objectives, which include providing facilities to meet the District's current 7th and 8th grade educational program needs; modernizing the Isbell School Campus to meet safety, community, and SPUSD goals and guidelines; and preserving the school's historic character. The proposed Project would include the demolition and replacement of aging buildings on campus with new buildings to provide structurally safe buildings, improve operational efficiency the visual character of the school.

The development of the proposed Project would increase the student capacity from the existing 700 students to 750 students. No increases in the number of faculty increases are proposed.

The school would continue to operate at normal hours with the school day beginning at 7:05 AM and ending at either 12:40 PM or 2:35 PM. Adult education classes are held at the school Mondays through Thursdays between 4:00 PM and 8:00 PM.

2.5.1 Proposed Improvements

The Project design would renew the campus by demolishing the existing main building, cafeteria, all 18 portable classroom buildings, manual arts/woodshop building, the western storage room, and restroom building to develop a new single-story administrative and multi-purpose room (MPR) building, seven single-story classroom buildings, and expand the southern parking lot along Harvard Boulevard. Refer to **Figure 2.0-4: Site Plan**, which depicts the layout of the project components, which are further described below.

The Project would be developed in several phases. A relocatable classroom campus could be initially constructed north of the existing portable classrooms to provide temporary classroom space to replace the classrooms in the existing main building. The existing main building would then be demolished to allow construction of the new Administrative and Multi-Purpose Room Building. The new classroom buildings would be developed in a subsequent phase after removal of the portable classroom buildings.

Relocatable Classroom Campus

The plan for this relocatable classroom campus is shown in **Figure 2.0-5: Temporary Relocatable Classroom Plan**. This relocatable classroom campus of one-story portable buildings would include 18,240 square feet of space providing 16 classrooms in three building clusters and an Administrative/Classroom/Restroom space in a fourth building cluster. Development of this campus would include the import of approximately 6,000 cubic yards of soil to raise this site by approximately 2 feet from the existing elevation to raise this portion of the campus above the flood zone.

New Administrative and Multi-Purpose Room Building

The new single-story administrative and MPR building would comply with the Field Act. The new administrative and MPR building components and square footage can be seen below in **Table 2.0-1: Administrative and MPR Building Components**.

TABLE 2.0-1: ADMINISTRATIVE AND MULTI-PURPOSE ROOM (MPR) BUILDING COMPONENTS

Components	Number of Components	Square Foot of Each Component	Total Square Foot (SF)
Administration			
Lobby	1	678	678
Clerical Staff	1	493	493
Records/Locked Storage	1	203	203
Conference Room - Large	1	387	387
Conference Room - Small	1	174	174
Principal's Office	1	240	240
Assistant Principal Office	1	120	120
Principal/Assistant Principal Clerical	1	120	120
Counselor Office	3	100	300
SRO Office	1	100	100
Flex Office	2	100	200
Administrative Assistance	1	300	300
Public Restrooms	1	480	480
Staff Restrooms	1	460	460
Staff Work Room	1	364	364
Mail Room / Receiving	1	188	188
Staff Lounge	1	804	804
Storage	1	177	177
Student Resources			
Resource Specialist Program (RSP)	1	660	660
Speech	2	167	334
Mindfulness Room	1	100	100
Health Waiting	1	335	335
Health Office	1	120	120
Staff Toilet	2	60	120
Psych Office	1	172	172
Health Exam	1	120	120
Lactation Room	1	50	50
Health Cot Area	1	226	226
Circulation and Support			
MDF	1	97	97
Custodial	1	39	39
Mechanical	1	313	313

TABLE 2.0-1: ADMINISTRATIVE AND MULTI-PURPOSE ROOM (MPR) BUILDING COMPONENTS			
Components	**Number of Components**	**Square Foot of Each Component**	**Total Square Foot (SF)**
Electrical/Special Systems	1	192	192
MPR and Literacy Center			
MPR	1	3,400	3,400
Kitchen	1	1,529	1,529
Servery	1	1,519	1,519
Storage	1	707	707
Staff Toilets	2	60	120
Public Restrooms	1	558	558
Mechanical	1	1,587	1,587
Electrical/Special Systems	1	271	271
Data	1	140	140
Library / Media Center	1	3,008	3,008
Help Desk	1	100	100
Work Room	1	161	161
Textbook Storage	1	90	90
		Total Square Feet	**21,856**

Source: HMC Architects, 2024.

New Classroom Buildings

The existing manual arts/woodshop building would be demolished and all of the portable classroom buildings would be removed and replaced with seven single-story classroom buildings around a centralized courtyard. The three proposed northwest buildings (Buildings 1-3) would be designated as 7th grade classrooms, and the four proposed northeast buildings (Buildings 4-7) would be designated as 8th grade classrooms. Development of these new buildings would include the import of approximately 7,000 cubic yards of soil to raise this site by approximately 2 feet from the existing elevation to raise this portion of the campus above the flood zone. Details of each classroom component and square footage can be seen below in **Table 2.0-2: Classroom Building Components**.

TABLE 2.0-2: INSTRUCTIONAL SPACES			
Components	**Number of Components**	**Square Foot of Each Component**	**Square Foot (SF)**
General Classrooms			
Classrooms - General	22	1020	22440
Classrooms - Special Education	4	1020	4080
Classrooms - Science	4	1224	4896
Resource Classroom	1	477	477
Classroom Storage	26	70	1820

TABLE 2.0-2: INSTRUCTIONAL SPACES			
Components	**Number of Components**	**Square Foot of Each Component**	**Square Foot (SF)**
Science Storage	2	360	720
Student Restrooms	2	616	1232
Collaboration/Breakout Space	7	810	5670
Teacher Workroom	2	150	300
Teacher Storage	2	50	100
General Storage	6	100	600
Circulation and Services			
Electrical/Special Systems	1	100	100
Data	1	100	100
Mechanical	2	340	680
		Total Square Footage	**43,215**

Source: HMC Architects, 2024.

Circulation and Parking

Parking Lots

The Project Site has public access from two streets, 4th Street and Harvard Boulevard. Another vehicular access point is available from Ventura Street west of 7th Street, but this is limited to use by maintenance staff of the School District. The main school building is oriented towards 4th Street. A semi-circular 27-space parking lot adjoins that entry and has one inbound driveway and one outbound driveway. Three spaces are designated for specific school staff and one is designated for police. The remaining parking spaces (two handicapped and 21 standard spaces) are unassigned. The lawn within the loop is used for overflow parking for approximately ten cars. Access is also available from the southern side of the school, through gates next to a 67-space parking lot on Harvard Boulevard. The eastern driveway of this lot serves inbound traffic and the western driveway serves outbound traffic. The parking spaces in this lot (63 standard spaces and 4 handicapped spaces) are unassigned. A perimeter fence surrounds the entire school campus and, during student loading periods, one or two school staff are present at the entries on 4th Street and on Harvard Boulevard. A bus stop used by school buses and public transit buses (Valley Express) is located immediately west of the western driveway on Harvard Boulevard.

Students who arrive or depart by car are dropped off and picked up in both parking lots and also curbside on the surrounding streets. As part of the proposed Project, a formal student loading zone would be constructed in the Harvard Boulevard parking lot. The existing building housing the cafeteria and adult education office would be demolished to accommodate an enlarged parking lot, whose capacity would increase from 67 to 110 spaces, and the western driveway would be relocated approximately 100 feet westward. The other three existing driveways and the staff-only access on Ventura Street would be retained. The 4th Street parking lot would be restriped but would not be enlarged.

Streets and Sidewalks

Harvard Boulevard is an east-west oriented arterial roadway which provides four travel lanes, two in each direction with left-turn lanes at intersections and a continuous two-way left turn lane along mid-block segments. Parking is generally allowed on both sides of Harvard Boulevard but is not permitted adjacent to the existing Harvard Boulevard parking lot. The posted speed limit is 35 mph. Sidewalks are present on both sides of the street. A striped school crossing is located adjacent to the school with push-button activated rapid repeating flashing beacon (RRFB) and two crossing refuge islands which extend to the edges of the travel way and reduce exposure of pedestrians crossing the street. In August 2024, the City of Santa Paula completed a two-year project which rebuilt and repaved a 1.7-mile segment of Harvard Boulevard, including the segment adjacent to Isbell Middle School. The only change proposed on Harvard Boulevard is relocation of the west driveway with expansion of the Harvard Street Parking Lot.

4th Street is a north-south oriented local street with one travel lane in each direction and no marked center line. Parking is allowed on each side of the street except during street sweeping hours. Except for the school, this area of 4th Street is exclusively residential. School crosswalks are located where 4th Street intersects Harvard Boulevard, Ventura Street and Main Street. Before and after school hours a crossing guard is present at 4th Street & Main Street. No changes to the existing driveways on 4th Street are proposed

2.5.2 Construction Schedule

Construction of the proposed Project would occur in five (5) phases and is anticipated to begin in the Fall of 2025 and conclude in the Fall of 2030, as outlined below in **Table 2.0-3: Construction Schedule**.

Phase 1 involves the construction of interim housing facilities comprised of 19 portable units on the northern portion of the Project Site.

Phase 2 involves the demolition of the existing main building, manual arts/woodshop building (Summer 2027), western storage room, and restroom building. Subsequently, these functions of the campus would operate out of the interim housing facilities during construction of the new Administrative and MPR building.

Once construction of the new Administrative and MPR building is complete, Phase 3 would begin which involves demolition of the existing MPR/cafeteria building (2028/2029 school year), expanding the southern parking lot, and campus circulation improvements.

Phase 4 involves construction of the seven (7) new classroom buildings and the subsequent removal of the 18 existing portable classrooms.

Phase 5 involves removal of the interim housing facilities.

TABLE 2.0-3: CONSTRUCTION SCHEDULE		
Phase Number	**Description**	**Schedule**
1	Construction of Interim Housing	Fall 2025 to Summer 2026
2	Demolition of Main Building Demolition of Manual Arts Building Construction of new Administrative and MPR building	Summer 2026 to Summer 2028
3	MPR Demo Parking and Circulation Improvements	Fall 2028 to Summer 2029
4	Construction of Seven New Classroom Buildings Removal of Existing Portable Classrooms	Summer 2029 to Summer 2031
5	Removal of Interim Housing	Summer 2031 to Fall 2031

Source: HMC Architects, 2024.

The Project Site is generally level. New buildings or additions to existing buildings will require over-excavations, likely between 5' to 10' deep. Once the soils removed during over-excavation are re-used, there will be shrinkage due to compaction efforts and some import will be required to finish grading the Project Site. For purposes of analysis, it is assumed, based on the current conceptual design, 6,000 cubic yards of soil will be imported to raise the temporary Relocatable Classroom Campus above the current flood level and an additional 7,000 cubic yards will be imported to raise the new 7th and 8th Grade Classroom Buildings above the current flood elevation.

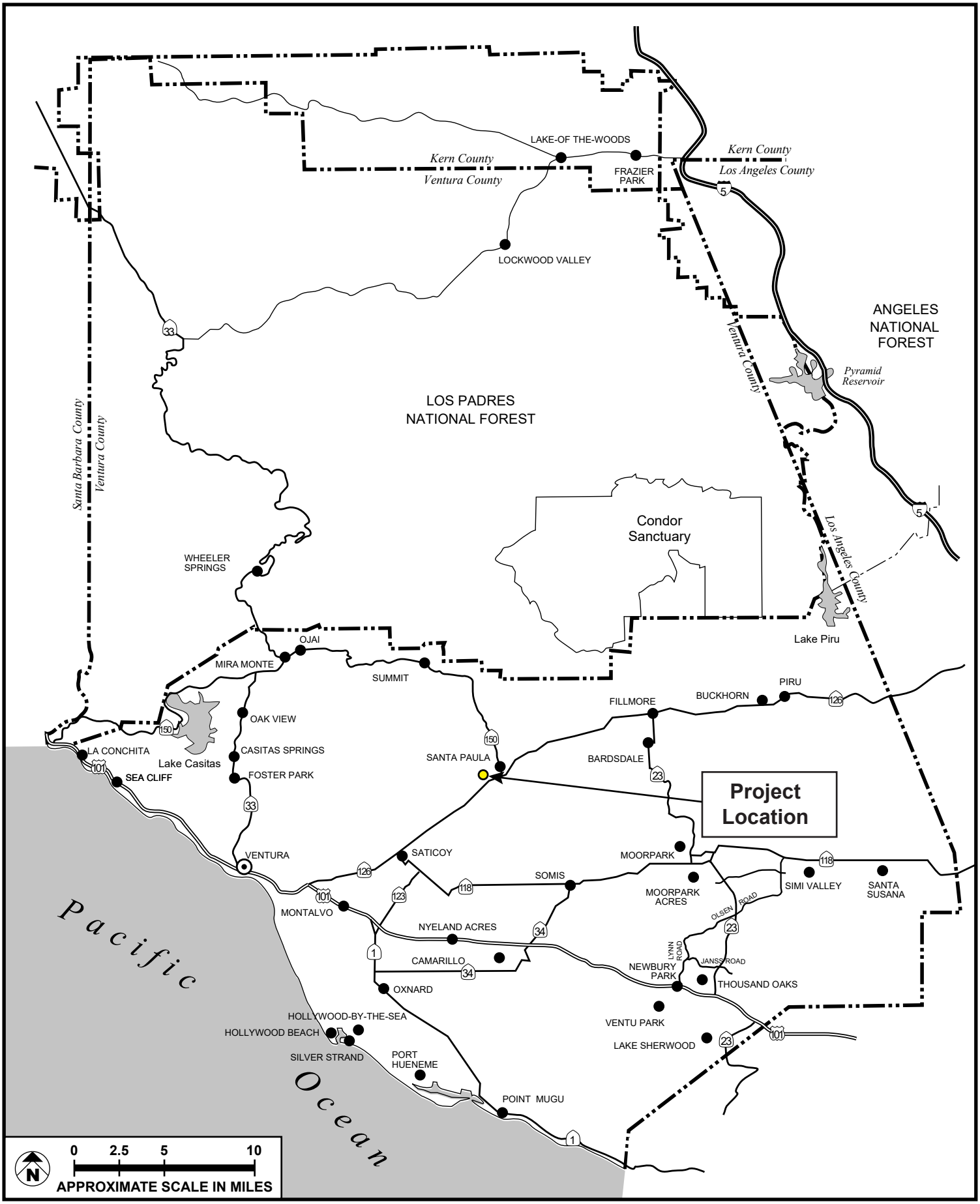
Construction equipment would be staged on the Project Site. Identification of a construction equipment staging area will be selected upon selection of a contractor as part of the construction contract.

2.6 INTENDED USES OF THIS EIR

This EIR evaluates the environmental effects that would result from the proposed Project, thereby enabling SPUSD, responsible and reviewing agencies, and interested parties to make informed decisions.

The District requests approval of the following discretionary actions, see **Table 2.0-4** below:

TABLE 2.0-4: DISCRETIONARY ACTIONS	
Lead Agency	**Action**
SPUSD Board of Education	Certify FEIR
Reviewing Agencies	**Action**
California Department of Education	Review School Design and Program
Division of the State Architect	Review Building and Construction Plans



SOURCE: Meridian Consultants, LLC - 2022

FIGURE **2.0-1**

Meridian Consultants

Regional Location Map

324-001-21

SOURCE: Google Earth - 2022

FIGURE **2.0-2**

Meridian Consultants

Project Location Map

087-001-15

SOURCE: Meridian Consultants, LLC - 2022

FIGURE **2.0-3**

Meridian Consultants

Current Campus Plan

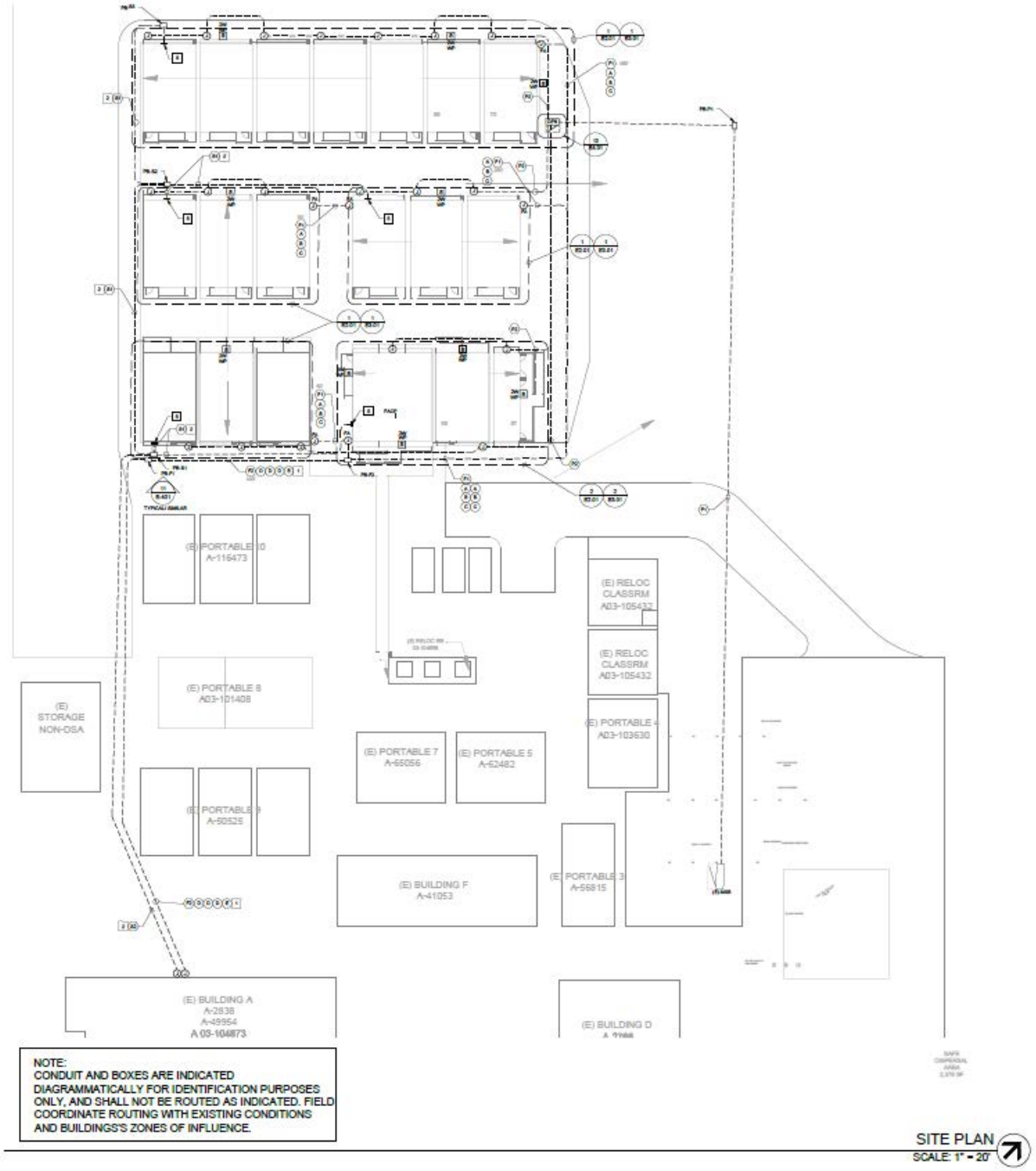
324-001-21

SOURCE: HMC Architects - 2023

FIGURE **2.0-4**

Meridian Consultants

Site Plan



SOURCE: HMC Architects - 2024

FIGURE **2.0-5**

Meridian Consultants

Temporary Relocatable Classroom Plan

3.0 ENVIRONMENTAL ANALYSIS

In accordance with Section 15126 of the State CEQA Guidelines, Chapter 3 provides an analysis of the direct and indirect environmental effects, as well as project and cumulative environmental effects, of the Project. The determination of whether an impact is significant has been made based on the physical conditions established at the time the NOP was published (CEQA Guidelines, Section 15125[a]) (refer to **Appendix A**).

The following environmental resources are assessed in this chapter in accordance with the County of Los Angeles Environmental Checklist Form, which is based in part on Appendix G of the CEQA Guidelines.

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise

Sections 3.1 through **3.6** of this Draft EIR contain discussions of the environmental setting, regulatory framework, and potential impacts related to construction and operation of the Project. The environmental evaluation includes a project analysis and a cumulative analysis. If potential significant impacts are identified, feasible mitigation measures are recommended. The analysis also includes a level of impact after the implementation of mitigation measures.

3.1 AESTHETICS

This section describes the existing aesthetic characteristics of the Project Site and the surrounding area and analyzes the potential aesthetic impacts of the proposed Project. The analysis considers visual character and quality, scenic resources, and sources of light and glare.

3.1.1 EXISTING CONDITIONS

Santa Paula has developed in a traditional style, with a grid-pattern street system, prominent buildings of architectural interest, especially in the Downtown, and tightly knit surrounding residential neighborhoods. Santa Paula's neighborhoods and commercial areas have a more compact development pattern than many suburban cities. Most buildings are 1 or 2 stories tall with a few 3-story buildings. Higher densities are allowed in certain areas, and a mix of uses is encouraged. This development pattern helps to preserve agricultural lands surrounding the city. Many mature oak trees have been preserved, especially in the northeastern part of town, and native oaks, sycamores, and other trees of historic or cultural significance are protected by ordinance.

3.1.1.1 Scenic Vistas

According to the City's General Plan, natural scenic resources in Santa Paula include various rivers, creeks, canyons, agricultural lands, mountains to the north and south, and hillsides to the east. Man-made scenic resources in Santa Paula include eligible State Scenic Highways SR-126 and SR-150, scenic routes including Foothill Road and 12th Street, historic districts, city parks, and views of the town from the surrounding hillsides.

The only views of natural or man-made scenic resources from the Project Site are views of the mountains to the north and south of Santa Paula; however, views of these scenic resources are partially blocked by the surrounding one- to three-story-tall development and existing vegetation.

3.1.1.2 Scenic Resources

Isbell School was listed as Ventura County Landmark No. 143 and City of Santa Paula Historic Landmark No. 14 in February 1992. Consequently, the property is a historic resource for the purposes of CEQA, per CEQA Guidelines § 15064.5 (a)(2). The landmark designations for the school did not establish a period of significance for the property. The period 1924 to 1974 covers the construction of the extant buildings on the property and its active use as a school and is considered the period of significance for purposes of historic resource evaluation as described in **Appendix B: Historic Resources Report**. This period includes the main school building, manual arts building, and multi-purpose/cafeteria buildings, constructed in 1924, 1929, and 1956 respectively.

Main School Building

The two-story school building was designed in a modified u-plan with a long rectangular western elevation of the building facing onto S. 4th Street with short hipped roof wings attached at each end on the west side of the building. The medium hip roof is covered with clay tiles. Decorative carved brackets are located under the overhanging eaves. Long hipped wings are located on the east side of the building forming the u-shape. At the end of the southern wing is a one-story section with a flat roof. The northern wing is one story with a flat roof. Approximately eight chimneys punctuate the roofline.

The front of the building is divided into four bays with a band of five symmetrically placed windows on both first and second floors. The two-story recessed front entrance is centered with two sets of double wood and glass doors. Above the doors rise multi-paned glass and steel windows that rise to the second floor level below the roofline. Windows are divided into three parts with wood casings and between each band of windows are either single or pairs of narrow windows. Some of these windows have been boarded up. The rear elevation contains a small two-story tower with a hipped tile roof and clock added in 1988. The building is covered with shot-on concrete.

When the building was constructed in 1925 it was designed in the Italian Renaissance style with ornate art stone columns, a balcony, art stone block finish, and decorative details at the front, side, and rear entries. The red brick was laid in a Flemish bond pattern. Windows were multi-paned double hung wood with a transom in the upper portion that pivoted inward.

Following the Long Beach earthquake in 1933 and the adoption of the Field Act, schools constructed of brick, especially two-story schools, were required to be seismically retrofitted. In 1939 architects Roy C. Wilson and Geoffry H. Lawford designed plans for major alterations to the school building to bring it up to code. All of the ornamental openings, columns, arches, and art stone (cast stone) were removed. The hipped roof over the main entrance was removed. The brick was either removed and/or covered over with concrete. Concrete chimneys replaced brick chimneys. In 1989-90 the original multi-paned wood windows were replaced with current tinted three-paned aluminum sash windows within the original window openings.

Manual Arts (Shop) Building

The one-story manual arts building is square in plan with a flat roof and raised parapet. The front (western elevation) of the building features a single door entrance above a concrete stoop with metal railings. On either side of the centered entry are two small boarded-up windows and a band of three windows on the upper half of the building. Windows are multi-paned steel. Horizontal vents are found below the parapet on all sides of the building. The same bands of multi-paned windows are located on the remaining elevations. The northern and eastern elevations each contain a single entrance. The building is constructed of brick masonry that has been covered with gunite on the exterior. The interior features a wood truss ceiling and wood floors.

The Manual Arts building was designed as a smaller, simplified version of the main school building when it was constructed in 1929. Its major decorative features were wrought iron grills above the entrance and over the adjacent small windows. The front door on the west elevation was a double door each with four panels surrounded by plaster quoins. Several steps with a buttress on each side lead up to the front door. The exterior finish was brick with a concrete belt course running across all elevations above the windows just below the parapet. Changes to the building included the gunite over the exterior brick and the removal of the wrought iron grills over the entry and small windows as a part of the 1939 seismic retrofit project for the campus.

Multi-Purpose Cafeteria Building

This rectangular-plan building features projecting wings on the southern elevation creating a modified t-plan. The building is a combination one- and two-story building with a main low gable roof with overhanging eaves. The one-story roof sections are flat and hip roofed. The eastern and western elevations feature a band of multi-paned steel windows on the upper portion of the building under the eaves. Two attached flat roofed entrances are found on the eastern elevation. The northern elevation features a flat roofed section with a band of multi-paned steel windows on the first floor. The building is covered with stucco.

A two-story music room addition was made to the southern elevation in 1966, matching the roofline and materials of the original 1956 building. Another small concrete block addition was made to the northwestern corner of the building at an unknown date after 1966.

3.1.1.3 Visual Quality/Scenic Character

Visual quality is a measure of the overall impression or appeal of an area as determined by the particular landscape's characteristics and scenic resources. It is possible for new structures to be compatible with the existing setting if they replicate existing forms, lines, colors, and textures of the surrounding environment and if the new structures do not appreciably change the balance of natural elements.

As shown below in **Figure 3.1-1: Aerial Campus Photo**, Isbell School is located in the block bordered by S. 4th Street on the west, E. Main Street on the north, S. 7th Street on the east, and Harvard Boulevard on the south. The Project Site is surrounded by one- to three-story commercial and residential buildings to the north; one- to two-story residential buildings to the east; one- to two-story commercial and residential buildings to the south; and one- to two-story residential buildings to the west.

As shown previously in **Figure 2.0-3: Current Campus Plan**, Isbell School includes the main building, multi-purpose/cafeteria building, gymnasium building, a locker room building (now converted into a STEM flex classroom), manual arts/woodshop building, storage buildings, 18 modern portable classroom buildings, restroom building, two large grass fields, three basketball courts, a western parking lot and drop-off area, and southern parking lot. Access to the school is provided via S. 4th Street and Harvard Boulevard.

Isbell School has two street frontages in the southwestern portion of the campus, on S. 4th Street and Harvard Boulevard. Visible from S. 4th Street is the front entrance of the main school building, about 180 feet from the street behind a semi-circular parking lot with a landscaped center island.

Visible from Harvard Boulevard is the cafeteria building in the southwestern corner of the Project Site and an adjacent parking lot, setback from the street behind narrow landscaped buffers. The northern and eastern portions of the campus are currently occupied by three (3) maintenance buildings and open playfields. This grass-covered open space provides an approximately 350-foot buffer between the existing portable classroom buildings and businesses to the north of the Project Site, and an approximately 200-foot buffer between the existing gymnasium building and the residences to the east of the Project Site.

The center island of the S. 4th Street parking lot, the front lawn of the main school building, the central courtyard between the existing campus buildings, and landscaped buffers along Harvard Boulevard contain a variety of mature trees.

Figures 3.1-2 through **3.1-6,** below, provide photographs of the existing street frontages of the campus and adjacent buildings.

Surrounding Uses

Land uses surrounding the Project Site include single and multifamily residential and commercial uses. Parcels to the north and south of the Project Site are zoned C-G: Commercial-General, and parcels to the east and west are zoned R-3: Residential-Medium-High Density.

North

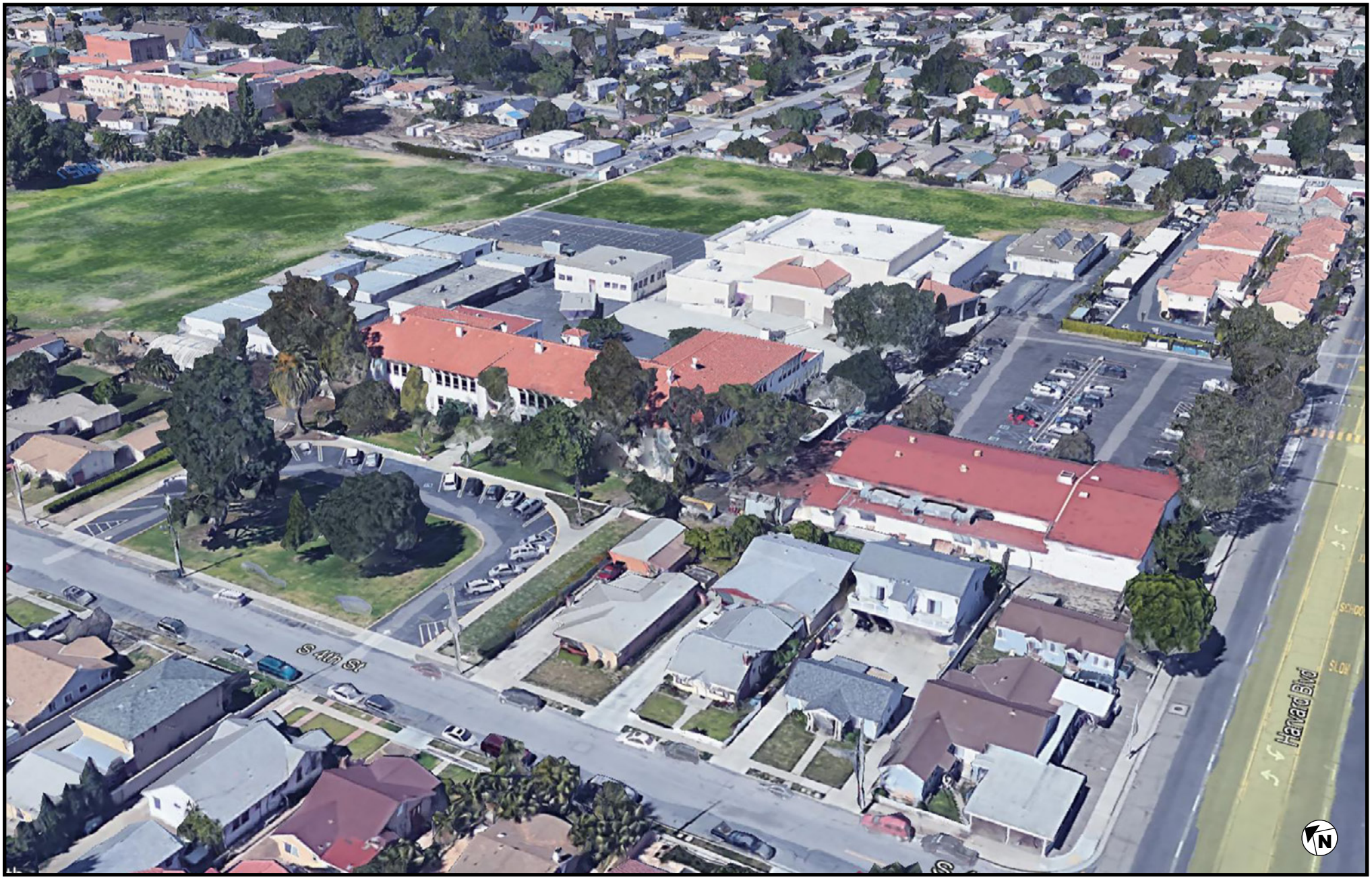
The Isbell School campus does not have a frontage on E. Main Street to the north. The campus is separated from the street commercial and residential buildings including a single-story medical clinic, commercial office, laundromat, bank, and associated surface parking, as well as single-story single-family homes and two- and three-story multifamily residences.

South

The campus is separated from the northeast corner of the intersection of Harvard Boulevard and S. 4th Street by one- and two-story single-family and multi-family residences. Commercial buildings located across from the school's frontage on Harvard Boulevard include a motel, retail store, and associated surface parking. The campus is set back from the northwest corner of the intersection of Harvard Boulevard and S. 7th Street by two-story multi-family residences and a small retail store.

East

The campus is separated from S. 7th Street to the east by one- and two-story single-family and multi-family residences. E. Ventura Street bisects the block running east-west and is lined with single-family



SOURCE: Google Earth - 2022

FIGURE **3.1-1**

Meridian Consultants

Aerial Campus Photo

087-001-15

View of adjacent residences from intersection of S. 4th Street and Harvard Boulevard, looking northeast.

View of cafeteria building from Harvard Boulevard, looking north.

FIGURE **3.1-2**

Meridian Consultants

Viewpoint 1

View of southern parking lot and campus frontage on Harvard Boulevard, looking northwest.

View of southern parking lot and campus frontage on Harvard Boulevard, looking northeast.

FIGURE **3.1-3**

Meridian Consultants

Viewpoint 2

View of adjacent residences to the east of campus frontage on Harvard Boulevard, looking northeast.

View of adjacent residences and commercial building from intersection of S. 7th Street and Harvard Boulevard, looking northwest.

FIGURE **3.1-4**

Meridian Consultants

Viewpoint 3

View of main building and western parking lot from S. 4th Street, looking east.

View of residences adjacent to campus frontage on S. 4th Street, looking northeast.

FIGURE **3.1-5**

Meridian Consultants

Viewpoint 4

View of residences adjacent to campus frontage on S. 4th Street, looking southeast.

FIGURE **3.1-6**

Meridian Consultants

Viewpoint 5

homes from its intersection at S. 7th Street until its termination at a service entrance to the school's campus.

West

The campus is separated from S. 4th Street to the west by one- and two-story single-family and multi-family residences. Residential buildings located across from the school frontage on S. 4th Street include one- and two-story single-family and multi-family residences.

3.1.1.4 Light and Glare

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the vicinity of the Project Site are limited to the residences adjacent to the southern and western site boundaries.

The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb. Existing lighting on the Project Site includes security and parking lot lights, exterior building lights, and lighting for evening athletic events. Surrounding land uses also generate light from street lights, vehicle lights, parking lot lights, and exterior building security lights. Existing structures on the Project Site generate little glare because there are few reflective glass or brightly painted surfaces.

3.1.2 RELEVANT PLANS, POLICIES, ORDINANCES

3.1.2.1 Federal Regulations

There are no existing federal regulations pertaining to aesthetics that are applicable to the proposed Project.

3.1.2.2 State Regulations

California Department of Transportation (Caltrans) Scenic Highway Program

The California Scenic Highway Program was created in 1963, to preserve and protect scenic highway corridors from change that would reduce the aesthetic value of lands adjacent to highways. Caltrans defines a scenic highway as any freeway, highway, road, or other public ROW, that traverses an area of exceptional scenic quality. Suitability for designation as a State Scenic Highway is based on vividness, intactness, and unity. As discussed above, there are no State Designated Scenic Highways within the vicinity of the Project Site.

3.1.2.3 Local Regulations

City of Santa Paula General Plan

While the Santa Paula Unified School District is not legally subject to City's land use authority, the City's General Plan includes the following goals, policies, and programs in the Land Use and Open Space and Scenic Resources sections regarding visual and scenic resources.

Land Use Element

Goal LU1: Santa Paula's small-town character, cultural and historic resources, and traditional Downtown should be preserved and enhanced.

Goal LU2: Development should be carefully planned to protect agricultural lands and other natural and scenic resources.

Policy LU 1.1: Preserve and enhance the character and integrity of residential neighborhoods and noteworthy historic structures in Downtown Santa Paula.

Policy LU 1.3: Ensure that new development and infrastructure are designed in a manner that protects natural features such as barrancas, tree rows, wetlands, ridgelines, and wildlife movement corridors.

Policy LU 1.5: Ensure that new development and infrastructure are designed in a manner that protects the character of existing neighborhoods.

Policy LU 1.9: Ensure that development in hillside areas occurs in a manner that protects the natural character, environmental resources, aesthetic qualities, and public safety, and discourage grading and development on land with a slope greater than 30%.

Policy LU 1.13: Land uses should be located, designed and managed in a way that minimizes impacts from air pollution, noise, light and glare.

Open Space and Conservation Element

Policy 6.1: The Santa Clara River, Santa Paula Creek and the ridgelines, mountains and canyons surrounding the city should be treated as important assets to be conserved, and new development must be designed in a manner sensitive to the natural features of the site and the surrounding character. All new residential, commercial, and industrial developments shall provide open space amenities, and development south of the Santa Clara River should be limited to low-intensity uses requiring few public services or infrastructure.

Policy 6.2: Acquisition of additional public open space shall be prioritized based upon the following factors: good visual qualities, significant natural resources, significant physical constraints and/or good passive recreational opportunities.

Program 6.a: Use Open Space land use designations to preserve scenic, environmentally constrained and recreational properties, and establish appropriate standards for

the type and intensity of development in or adjacent to the river, creeks and barrancas. Continue to provide an Institutional/Civic or Open Space designation, as appropriate, for all public buildings and lands.

Program 6.d: Establish scenic highway designations for State Routes 126 and 150 and work with Caltrans and the Federal Highway Administration to obtain funding to enhance the scenic quality along those routes. Develop standards for new development along scenic routes, including regulation of land uses and intensities, requiring detailed site planning, limiting outdoor advertising, limiting grading, landscaping requirements, architectural control and equipment/storage screening. Designate a scenic route through Santa Paula's Downtown and historic neighborhoods with signage and brochures.

Program 6.e: As part of the development review process, assist applicants in demonstrating that the project is designed in a manner sensitive to the natural features of the site and that open space amenities will be provided. Development in canyon areas shall preserve scenic viewing opportunities.

3.1.3 THRESHOLDS OF SIGNIFICANCE

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

(a) Have a substantial adverse effect on a scenic vista?

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

(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?

3.1.4 IMPACT ANALYSIS

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

Less than Significant Impact.

Construction. Construction within the Project Site would involve views associated with construction activities, including construction staging areas, grading, excavation, construction equipment, material storage areas, construction debris, exposed trenches, etc. Project construction activities could temporarily degrade the existing visual character of the Project Site and its immediate surroundings. This impact would be short term in nature and construction equipment would be removed following construction activities. Given the temporary nature of construction, visual impacts during construction would be less than significant.

Operation. The only views of natural or man-made scenic resources from the Project Site are views of the mountains to the north and south of Santa Paula; however, views of these scenic resources are partially blocked by the surrounding one- to three-story-tall development and existing vegetation. The Isbell Campus currently contains single-story buildings, except for the main building, which is two stories. The proposed Project would replace the main building, portable buildings, and storage buildings with single-story buildings in generally the same locations as the existing buildings, with the exception of the new interim relocatable classroom buildings that will be built north of the existing portable classroom buildings. The approximately 350-foot buffer between the existing portable classroom buildings and businesses to the north of the Project Site would be reduced to an approximately 170-foot buffer as a result of the proposed Project. The placement of interim relocatable classroom buildings on the Project Site would be temporary as previously described in **Section 2.5.2: Construction Schedule**, and these buildings would be removed after construction of the proposed Project concludes. Therefore, the proposed Project would have less than significant impacts regarding scenic vistas during operation.

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

Less than Significant Impact.

The Project Site is fully developed, exhibits limited topographic variation, and contains no natural slopes, rock outcrops, or other geological formations. The proposed Project would replace the main school building, manual arts building, and multi-purpose/cafeteria building, which are considered contributors to the landmark designation of the Isbell School campus, with single-story buildings in generally the same locations as the existing buildings. However, these buildings have been significantly altered to accommodate seismic retrofitting requirements and do not embody the distinctive characteristics and methods of construction relevant to the period of significance (1924 to 1974) of the Isbell School campus. Replacement of these buildings with the proposed new buildings would not result in a significant impact on the overall aesthetic character of the campus as visible from Harvard Blvd. and S. 4th Street.

As discussed previously in **Section 3.1.1.1: Scenic Vistas**, there are no official state scenic highways within the vicinity of the Project Site. State Route 126, approximately 330 feet south of the Project Site, is not designated a state scenic highway, but it is considered an eligible scenic highway. Due to the surrounding one- to three-story-tall buildings and vegetation currently blocking views of Project Site from SR-126, the construction of single-story buildings associated with the proposed Project would not be visible from SR-126. Project development would not result in impacts to scenic resources within a designated State scenic highway and no impact would occur.

Threshold (c): In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact.

The proposed Project is located in an urbanized area, surrounded by development near the City's downtown area, and would not conflict with any zoning and other regulations governing scenic quality. The proposed Project would replace existing buildings with new buildings in generally the same locations, and the spatial relationships between the buildings will remain similar to existing conditions. These new buildings would be limited to single-story structures and would complement the scale and character of the surrounding buildings. While the Santa Paula Unified School District is not legally subject to City's land use authority, the proposed Project would be designed to be consistent with the goals, policies, and programs addressing visual and scenic resources as described previously in **Section 3.1.2.3: Local Regulations**.

Construction of a new single-story administrative and multi-purpose room building would replace the existing two-story main school building currently visible from S. 4th Street. However, the new building would be set back from S. 4th Street at the same distance as the existing building and the existing western parking lot and circle drive would remain.

Views of the campus from Harvard Boulevard currently include the existing multi-purpose/cafeteria building and southern parking lot. The proposed Project would result in demolition of the multi-purpose/cafeteria building and the expansion of the southern parking lot into its footprint, therefore the overall visual character of the view from Harvard Boulevard would not change substantially.

Changes to the existing views of the campus from the north and east would change with the placement of new interim relocatable classroom buildings that will be built north of the existing portable classroom buildings. These would be one-story portable buildings similar to the existing portable classroom buildings, and their placement on the campus would be temporary. This change in the visual character of the campus would not be substantial upon Project completion, as the interim relocatable classroom buildings would be removed, and the existing portable classroom buildings would be replaced with single-story permanent classroom buildings.

The proposed Project would maintain the spatial relationships and visual character of the Isbell School campus, and impacts to the visual character of the Project Site and its surroundings would be less than significant.

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

Less than Significant Impact.

The Project Site is in an urban setting and is fully developed. The current uses generate nighttime light from security and parking lot lights, exterior building lights, and lighting for evening athletic events. Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and exterior building security lights. Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. Additionally, the exterior of the new buildings would be constructed of nonreflective building materials

so vehicle headlights would not reflect glare for drivers. Substantial glare as a result of field lighting is not expected. The proposed Project would not introduce lights at substantially greater intensities than existing lights on and near the site, and the proposed Project would have no impact on nighttime views. Therefore, implementation of the proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the project area.

Because the proposed Project would be limited to single-story buildings, it would not cause shadows to extend off-site in such a manner as to significantly impact nearby sensitive residential uses. No significant impacts from shadows would occur as a result of the project.

3.1.5 MITIGATION MEASURES

No mitigation measures are required with regards to aesthetics as all impacts would be less than significant.

3.2 AIR QUALITY

This section of the EIR described the existing air quality on the Project Site and evaluates the potential air quality impacts of the proposed Project including whether impacts associated with the Project may potentially affect regional and local air quality. Various federal, State, regional, and local programs and regulations related to anticipated air quality impacts are also discussed in this section. Emission calculations and air quality modeling completed for the Project are contained in **Appendix C: Air Quality and Greenhouse Gas Emissions Outputs** of this EIR.

3.2.1 EXISTING CONDITIONS

The Project is located within the South Central Coast Air Basin (Air Basin). The Air Basin includes all of Ventura, Santa Barbara, and San Luis Obispo Counties. The South Central Coast Basinwide Air Pollution Control Council is made up of three air pollution control districts. The Ventura County Air Pollution Control District (VCAPCD) shares responsibility with the California Air Resources Board (CARB) or ensuring that all state and federal air quality standards are achieved and maintained within Ventura County.

3.2.1.1 Criteria Air Pollutants and Health Effects

Criteria air pollutants are defined as the six principal pollutants for which NAAQS and CAAQS criteria and standards have been promulgated. These criteria air pollutants are most relevant to current air quality planning and regulation in the Air Basin are ozone (O_3) carbon monoxide (CO), nitrogen dioxide (NO_2), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). In addition, volatile organic compounds (VOC) and toxics air contaminants (TACs) are a concern in the Air Basin but are not classified under AAQS.

The State and federal AAQS and their attainment status in the Basin for each of the criteria pollutants are summarized below in **Table 3.2-1: Ambient Air Quality Standards and Attainment Status.** The Air Basin is currently designated as being in nonattainment at the federal level for O_3 and at the State level for O_3, and PM_{10}.

TABLE 3.2-1: AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	**1-hour**	**0.09 ppm (180 µg/m³)**	**Nonattainment**	**—**	**Nonattainment**
	8-hour	**0.070 ppm (137 µg/m³)**		**0.070 ppm (137 µg/m³)**	
Nitrogen Dioxide (NO_2)	**Annual Arithmetic mean**	**0.03 ppm (57 µg/m³)**	**Attainment**	**0.053 ppm (100 µg/m³)**	**Unclassified/ Attainment**
	1-hour	**0.18 ppm**		**0.100 ppm**	

TABLE 3.2-1: AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Carbon Monoxide (CO)	**8 hours**	**(339 µg/m^3)** **9.0 ppm (10 mg/m^3)**	**Attainment**	**(188 µg/m^3)** **9 ppm (10 mg/m^3)**	**Unclassified/ Attainment**
	1 hour	**20 ppm (23 mg/m^3)**		**35 ppm (40 mg/m^3)**	
Sulfur Dioxide (SO_2)	**1 hour**	**0.25 ppm**	**Attainment**	**0.075 ppm**	**Attainment**
	24 hours	**0.04 ppm**		**—**	
Lead (Pb)	**30-day average**	**1.5 µg/m^3**	**Attainment**	**—**	**Attainment**
	Rolling 3-month average	**—**		**0.15 µg/m^3**	
Respirable Particulate Matter (PM_{10})	**24 hours**	**50 µg/m^3**	**Nonattainment**	**150 µg/m^3**	**Unclassified**
	Annual arithmetic mean	**20 µg/m^3**		**—**	
Fine Particulate Matter ($PM_{2.5}$)	**24 hours**	**—**	**Attainment**	**35 µg/m^3**	**Unclassified/ Attainment**
	Annual arithmetic mean	12 µg/m^3		9 µg/m^3	

Source: California Air Resources Board (CARB), Area Designations Maps/State and National, http://www.arb.ca.gov/desig/adm/adm.htm. Accessed August 2023.
Note: ppm = parts per million; µg = micrometer; m3 = cubic meter; mg = milligram.

Elevated concentrations of certain air pollutants in the atmosphere have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants. In the United States, such pollutants have been identified and are regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the USEPA and are subject to emissions control requirements adopted by federal, State, and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted pertaining to them.

The EPA established the National Ambient Air Quality Standards (NAAQS) to "provide public health protection, including protecting the health of 'sensitive' populations such as asthmatics, children, and the elderly," allowing "an adequate margin of safety." California Ambient Air Quality Standards (CAAQS) were "established to protect the health of the most sensitive groups in our communities" and "defines

the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment."[1]

Existing Ambient Air Quality

The VCAPCD maintains a network of air quality monitoring stations throughout Ventura County. The nearest air monitoring station VCAPCD operates is located El Rio-Rio Mesa School #2 located at 545 Central Avenue, approximately 8.0 miles southwest of the Project site. This station monitors O_3, NO_2, PM_{10} and $PM_{2.5}$. **Table 3.2-2: Air Quality Monitoring Summary** summarizes published monitoring data from 2021 through 2023, the most recent 3-year period available. The data shows that during the past few years, the region has exceeded the PM_{10} standards.

TABLE 3.2-2: AIR QUALITY MONITORING SUMMARY

Air Pollutant	Average Time (Units)	2021	2022	2023
Ozone (O_3)	State Max 1 hour (ppm)	0.073	0.077	0.071
	Days > CAAQS threshold (0.09 ppm)	0	0	0
	National Max 8 hour (ppm)	0.059	0.063	0.058
	Days > NAAQS threshold (0.075 ppm)	0	0	0
	State Max 8 hour (ppm)	0.067	0.063	0.059
	Days > CAAQS threshold (0.07 ppm)	0	0	0
Nitrogen dioxide (NO_2)	National Max 1 hour (ppm)	0	0	0
	Days > NAAQS threshold (0.100 ppm)	0.033	0.032	0.027
	State Max 1 hour (ppm)	0	0	0
	Days > CAAQS threshold (0.18 ppm)	377.8	57.9	102.8
Respirable particulate matter (PM_{10})	National Max (µg/m3)	26.4	22.7	20.3
	National Annual Average (µg/m3)	1	0	0
	Days > NAAQS threshold (150 µg/m3)	125.0	57.5	103.0
	State Max (µg/m3)	23.7	23.1	20.4
	State Annual Average (µg/m3)	31.7	18.5	23.5
	Days > CAAQS threshold (50 µg/m3)	6.8	6.4	6.1
Fine particulate matter ($PM_{2.5}$)	National Max (µg/m3)	0	0	0
	National Annual Average (µg/m3)	31.7	18.5	23.5
	Days > NAAQS threshold (35 µg/m3)	—	—	—
	State Max (µg/m3)	31.7	18.5	23.5
	State Annual Average (µg/m3)	0.073	0.077	0.071

Note: (—) = Data not available.

1 California Air Resources Board (CARB). "California Ambient Air Quality Standards." Accessed November 2024. https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards.

TABLE 3.2-2: AIR QUALITY MONITORING SUMMARY				
Air Pollutant	Average Time (Units)	2021	2022	2023

Source: CARB, iADAM: Air Quality Data Statistics.

Existing Emissions

As mentioned previously, the existing Isbell School includes the main building, multi-purpose/cafeteria building, gymnasium building, a STEM flex classroom building, manual arts/woodshop building, storage buildings, 18 modern portable classroom buildings, restroom building, two large grass fields, three basketball courts, a western parking lot and drop-off area, and southern parking lot. Isbell School serves grades six, seven, and eight and accommodates approximately 700 students and 85 staff members. The current site usage generates existing vehicle trips and air quality emissions from operations related to these uses. The existing emissions were estimated using the most recent version of the California Emissions Estimator Model (CalEEMod). **Table 3.2-3: Existing Operational Daily Emissions** identifies the emissions from the existing school uses.

TABLE 3.2-3: EXISTING OPERATIONAL DAILY EMISSIONS						
Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Mobile	6.8	5.5	43.5	0.1	8.3	2.2
Area	2.5	<0.1	3.6	<0.1	<0.1	<0.1
Energy	<0.1	0.5	0.4	<0.1	<0.1	<0.1
Total	**9.3**	**6.0**	**47.2**	**0.1**	**8.4**	**2.0**
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; Sox = sulfur oxides; VOC = volatile organic compounds.
Source: Refer to Appendix C: Air Quality and Greenhouse Gas Emissions Outputs.

3.2.2 RELEVANT PLANS, POLICIES, ORDINANCES

The Project Site lies within the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD), and compliance with VCAPCD rules and guidelines is required. VCAPCD is responsible for regulating emissions primarily from stationary sources. VCAPCD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the Air Basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as "nonattainment" of the national and/or California AAQS. The term "nonattainment area" is used to refer to an air basin in which one or more AAQS are exceeded.

The VCAPCD adopted the Final 2022 Ventura County AQMP on December 13, 2022.[2] The 2022 AQMP includes transportation control measures developed by SCAG from the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as the integrated strategies and measures needed to meet the NAAQS. The 2022 AQMP includes strategies to meet the 8-hour ozone NAAQS as well as the latest 24-hour and annual $PM_{2.5}$ standards.

Under the Federal CAA, VCAPCD has adopted federal attainment plans for O_3.The VCAPCD reviews projects to ensure that they would not (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay the timely attainment of any air quality standard or any required interim emission reductions or other milestones of any federal attainment plan.

The VCAPCD is responsible for limiting the number of emissions that can be generated throughout the Ventura County portion of the Air Basin by various stationery, area, and mobile sources. Specific rules and regulations have been adopted by the VCAPCD Governing Board. These rules and regulations limit the emissions that can be generated by various uses or activities and identify specific pollution reduction measures, which must be implemented in association with various uses and activities. These rules not only regulate the emissions of the federal and State criteria pollutants, but also toxic air contaminants and acutely hazardous materials. The rules are also subject to ongoing refinement by VCAPCD.

Among the VCAPCD rules applicable to the Project are Rule 50 (Opacity), Rule 51 (Nuisance), Rule 55 (Fugitive Dust), Rule 55.1 (Paved Road and Public Unpaved Roads), Rule 55.2 (Street Sweeping Equipment), Rule 62.7 (Asbestos – Demolition and Removal), and Rule 73.2 (Architectural Coating). Rule 50 sets opacity standards on discharge from sources of air contaminants. Rule 51 prohibits any person from discharging air contaminants or any other material from a source that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endangers the comfort, health, safety, or repose to any considerable number of persons or the public. Rule 55 requires fugitive dust generators, including construction and demolition projects, to implement control measures limiting the amount of dust from vehicle track-out, earth moving, bulk material handling, and truck hauling activities. Rule 55.1 requires fugitive dust generators to begin the removal of visible roadway accumulation within 72 hours of any written notification from the VCAPCD. The use of blowers is expressly prohibited under any circumstances. This rule also requires controls to limit the amount of dust from any construction activity or any earthmoving activity on a public unpaved road. Rule 55.2 requires the use of PM10-efficient street sweepers for routine street sweeping and for removing vehicle track-out pursuant to Rule 55. Rule 62.7 sets notification and emission control requirements to reduce airborne emissions during construction activities. Rule 73.2 sets limits on the volatile organic compound (VOC) content of architectural coatings.

2 Ventura County Air Pollution Control District (VCAPCD). *2022 Air Quality Management Plan*. Accessed November 2024. http://www.vcapcd.org/pubs/Planning/AQMP/2022/Final-2022-AQMP-without-appendices.pdf.

In 2003, the VCAPCD prepared its Air Quality Assessment Guidelines (Guidelines) to assist local government agencies and consultants in preparing environmental documents for projects subject to CEQA.[3] The Guidelines describe the criteria that VCAPCD uses when reviewing and commenting on the adequacy of environmental documents. The Guidelines provide the most up-to-date recommended thresholds of significance in order to determine if a project will have a significant adverse environmental impact. VCAPCD provides information in the Guidelines including methodologies for estimating project emissions and mitigation measures that can be implemented to avoid or reduce air quality impacts.[4] As discussed previously, air quality in the Air Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, State, and local levels. Air quality levels continue to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.

The Southern California Association of governments (SCAG) is the metropolitan planning organization (MPO) for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),[5] SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to air quality planning, SCAG has most recently prepared and adopted the 2024–2050 RTP/SCS,[6] which includes a SCS that addresses regional development and growth forecasts. The SCAG 2024–2050 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving a 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an air quality plan, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

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3 VCAPCD. *Ventura County Air Quality Assessment Guidelines*. October 2003. Accessed October 2024. http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf.

4 VCAPCD. *Ventura County Air Quality Assessment Guidelines*. October 2003.

5 California Health and Safety Code. Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b). Accessed October 2024. https://law.justia.com/codes/california/2014/code-hsc/division-26/part-3/chapter-5.5.

6 Southern California Association of Governments (SCAG). *Final Connect SoCal: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategies*. Adopted April 4, 2024. Accessed October 2024. https://scag.ca.gov/connect-socal.

3.2.3 THRESHOLDS OF SIGNIFICANCE

The CEQA Guidelines include thresholds to determine the significance of Air Quality emissions impacts (Appendix G of the CEQA Guidelines), which are being used by the District for this analysis. Appendix G provides that a project would have a significant environmental impact if it would:

(a) Conflict with or obstruct implementation of the applicable air quality plan?
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?
(c) Expose sensitive receptors to substantial pollutant concentrations?
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

3.2.4 IMPACT ANALYSIS

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

Less than Significant Impact.

A significant impact would occur if the proposed Project is deemed inconsistent with air quality plans such as if it would result in population and/or employment growth that exceeds growth estimates in the Air Quality Management Plan (AQMP).

The VCAPCD CEQA Air Quality Assessment Guidelines describes the significance criteria to be used when determining a project's consistency with the VCAPCD AQMP. Firstly, the Air Quality Assessment Guidelines provide daily thresholds for Volatile Organic Compounds (VOCs) and Nitrogen Oxides (NOx). Projects that may cause an exceedance of these emissions thresholds have been determined to individually and cumulatively jeopardize attainment of the federal one-hour ozone standard, and thus have a significant adverse impact on air quality in Ventura County. Additionally, a demonstration of consistency with the population forecasts used in the most recently adopted AQMP should be used for assessing project consistency with the AQMP. The Air Quality Guidelines also state that the air quality impact assessment should also address project consistency with emission reduction strategies included in the AQMP. Consistency with the AQMP does not mean that a project will not have a significant project-specific adverse air quality impact. However, inconsistency with the AQMP is considered a significant cumulative adverse air quality impact.

The Air Basin is currently designated as is currently designated as being in nonattainment at the federal level for $O_{3\ 5}$ and at the State level for O_3 and PM_{10}. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Air Basin. As discussed further in **Table 3.2-5**: **Maximum Construction Emissions**, temporary emissions associated with construction of the Project would not exceed regional construction thresholds. Additionally, as discussed further in **Table 3.2-6**: **Maximum Operational Emissions**, long-term emissions associated with operation would not exceed regional operational thresholds. As such, the Project is consistent with the growth

assumptions in the regional air plan, would not contribute to air quality violations in the Air Basin and would be consistent with the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2024–2050 RTP/SCS regarding population, housing, and growth trends. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The proposed Project is intended to renew and update the school's facilities by demolishing the existing main building, multi-purpose/cafeteria building, all 18 portable classroom buildings, manual arts/woodshop building, the western storage room, and restroom building to develop a new single-story admin and multi-purpose room (MPR) building, seven single-story classroom buildings, and expanding the southern parking lot. While the Project would increase the School's capacity from 700 to 750 students, the Project does not include residential uses and would not contribute to an increase in population in the region. The proposed Project would not cause the City to exceed population estimates.

Emission reduction strategies included in the AQMP include stationary and transportation source control measures to reduce air pollutant emissions. Stationary control measures included in the AQMP include rules previously adopted by VCAPCD. The proposed Project would comply with the applicable VCAPCD rules with the intention of limiting VOC and NOx emissions, including Rule 73.2. Additionally, as discussed further below, the proposed Project would not exceed regional construction or operational thresholds.

The proposed Project would also be consistent with the transportation control measures included in the AQMP as the Project is located near existing residential uses and is served by the nearby existing transit services, specifically Ventura County Transportation Commission, which has stops for multiple bus routes within 0.5 miles of the Project Site including Route 60, Route 61, and Route 62. The Project Site is also accessible via bike lanes, with Class I bike lanes located along East Main Street and Class II bike lanes located along South Palm Avenue. The location of the Project encourages the use of a variety of transportation options, including walking, biking and using public transit. For these reasons, the Project is consistent with AQMP transportation control measures.

Based on the discussion above, Project impacts with respect to AQMP consistency would be less than significant.

Threshold (b):	**Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?**

Less than Significant Impact.

According to VCAPCD, individual development projects that generate construction or operational emissions that exceed VCAPCD recommended daily regional or localized thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which

the Basin is in nonattainment. As shown in **Table 3.2-1**, the Basin is currently designated as being in nonattainment at the federal level for O_3 and at the State level for O_3, and PM_{10}.

Construction

The VCAPCD has not recommended a specific numerical significance threshold for construction, as emissions are considered to be temporary. However, construction-related emissions should be mitigated if estimates of ROC and NOx emissions from the heavy-duty construction equipment exceeds 25 pounds per day. Individual construction projects that exceed the VCAPCD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from grading activities, which would be reduced through compliance with VCAPCD Rules 55, 55.1, and 55.2. NO_X emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. However, such releases would be regulated in compliance with VCAPCD Rule 73.2. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction emissions were estimated in the most recent California Emissions Estimator Model (CalEEMod version 2022.1.1.26). This model is the CARB–approved computer program model recommended by VCAPCD for use in the quantification of air quality emissions and takes into account the latest Title 24 building and energy standards.

Construction would occur over five (5) phases as described in **Section 2.0: Project Description**. Construction is projected to begin in the Fall of 2025 and conclude in the Fall of 2031 as shown in **Table 2.0-3: Construction Schedule**. Phase 1 involves the construction of interim housing facilities comprised of 19 portable units on the northern portion of the Project Site. Phase 2 involves the demolition of the existing main building, manual arts/woodshop building (Summer 2027), western storage room, and restroom building. Subsequently, these functions of the campus would operate out of the interim housing facilities during construction of the new Administrative and MPR building. Once construction of the new Administrative and MPR building is complete, Phase 3 would begin which involves demolition of the existing multi-purpose/cafeteria building (2028/2029 school year), expanding the southern parking lot, and campus circulation improvements. Phase 4 involves removal of the 18 existing portable classrooms and construction of the seven (7) new classroom buildings. Phase 5 involves removal of the interim housing facilities.

Table 3.2-4: Project Construction Diesel Equipment Inventory displays the construction equipment required for each activity in each phase. Due to limited construction information available during the preparation of this analysis, default equipment inventory assumptions were utilized. CalEEMod will

populate the default equipment list provided below based on proposed land uses. CalEEMod generates defaults for the fuel type, engine tier, number of equipment operating per day, daily operational hours per equipment, and the equipment horsepower and load factor. Under regulatory compliance measures in CalEEMod, construction would be required to adhere to VCAPCD Rule 55 (Fugitive Dust) and Rule 73.2 (Architectural Coatings).

TABLE 3.2-4: PROJECT CONSTRUCTION DIESEL EQUIPMENT INVENTORY

Phase	Off-Road Equipment Type	Amount	Daily Hours	Horsepower [HP] (Load Factor)
Phase 1				
Grading	Graders	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
	Rubber Tired Dozers	1	6	367 (0.40)
Building Construction	Forklifts	2	6	82 (0.20)
	Cranes	1	4	367 (0.29)
	Tractors/Loaders/Backhoes	2	8	84 (0.37)
Paving	Cement and Mortar Mixers	4	6	10 (0.56)
	Pavers	1	7	81 (.42)
	Rollers	1	7	36 (0.38)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
Architectural Coating	Air Compressors	1	6	37 (0.48)
Phase 2				
Demolition	Rubber Tired Dozers	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	2	6	84 (0.37)
	Concrete/Industrial Saws	1	8	84 (0.37)
Grading	Graders	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
	Rubber Tired Dozers	1	6	367 (0.40)
Building Construction	Forklifts	2	6	82 (0.20)
	Cranes	1	4	367 (0.29)
	Tractors/Loaders/Backhoes	2	8	84(0.37)
Paving	Cement and Mortar Mixers	4	6	10 (0.56)
	Pavers	1	7	81 (.42)
	Rollers	1	7	36 (0.38)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
Architectural Coating	Air Compressors	1	6	84 (0.37)
Phase 3				
Demolition	Rubber Tired Dozers	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	2	6	84 (0.37)
	Concrete/Industrial Saws	1	8	84 (0.37)
Grading	Graders	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)

TABLE 3.2-4: PROJECT CONSTRUCTION DIESEL EQUIPMENT INVENTORY				
Phase	**Off-Road Equipment Type**	**Amount**	**Daily Hours**	**Horsepower [HP] (Load Factor)**
	Rubber Tired Dozers	1	6	367 (0.40)
Paving	Cement and Mortar Mixers	4	6	10 (0.56)
	Pavers	1	7	81 (.42)
	Rollers	1	7	36 (0.38)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
Architectural Coating	Air Compressors	1	6	84 (0.37)
	Phase 4			
Demolition	Rubber Tired Dozers	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	2	6	84 (0.37)
	Concrete/Industrial Saws	1	8	84 (0.37)
Grading	Graders	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
	Rubber Tired Dozers	1	6	367 (0.40)
Building Construction	Forklifts	2	6	82 (0.20)
	Cranes	1	4	367 (0.29)
	Tractors/Loaders/Backhoes	2	8	84 (0.37)
Paving	Cement and Mortar Mixers	4	6	10 (0.56)
	Pavers	1	7	81 (.42)
	Rollers	1	7	36 (0.38)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
Architectural Coating	Air Compressors	1	6	84 (0.37)
	Phase 5			
Demolition	Rubber Tired Dozers	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	2	6	84 (0.37)
	Concrete/Industrial Saws	1	8	84 (0.37)
Grading	Graders	1	6	148 (0.41)
	Tractors/Loaders/Backhoes	1	7	84 (0.37)
	Rubber Tired Dozers	1	6	367 (0.40)

Source: Refer to **Appendix C: Air Quality and Greenhouse Gas Emissions Outputs**.

Each phase would result in varying lengths of demolition, grading, building construction, paving, and (5) architectural coating and would result in varying levels of intensity and a number of construction personnel. The construction workforce across all phases would consist of maximum of approximately 10 worker trips per day and 21 hauling trips per day during demolition, 8 worker trips and 88 hauling trips per day during grading,18 worker trips per day and 7 vendor trips per day during building construction, 18 worker trips per day during paving, and 4 worker trips per day during architectural coating. **Table 3.2-5: Maximum Construction Emissions** identifies maximum daily emissions that are estimated for peak construction days for each construction year. As shown, construction emissions associated with the

Project would not exceed VCAPCD regional thresholds. As such, impacts related construction would be less than significant.

TABLE 3.2-5: MAXIMUM CONSTRUCTION EMISSIONS

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Phase 1						
2025	1.2	13.7	11.4	<0.1	2.9	1.7
2026	8.9	5.0	7.4	<0.1	0.2	0.2
Phase 2						
2026	5.8	9.2	10.1	<0.1	2.6	1.4
2027	0.5	3.7	7.4	<0.1	0.3	0.2
2028	0.5	3.5	7.4	<0.1	0.3	0.2
Phase 3						
2028	1.0	10.9	10.6	<0.1	3.1	1.5
2029	1.7	3.8	7.2	<0.1	0.4	0.2
Phase 4						
2029	1.1	13.7	11.7	0.1	3.2	1.9
2030	0.5	3.3	7.8	<0.1	0.4	0.2
2031	9.9	3.1	7.6	<0.1	0.4	0.2
Phase 5						
2031	0.9	73	9.8	<0.1	2.5	1.3
Maximum	**9.9**	**13.7**	**11.7**	**0.1**	**3.2**	**1.9**
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; Sox = sulfur oxides; VOC = volatile organic compounds.
Source: Refer to **Appendix C: Air Quality and Greenhouse Gas Emissions Outputs**.

Operation

Operational activities associated with the Project would result in long-term emissions from area, energy, and mobile sources. Area-source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product (including paint) usage rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the California Energy Commission (CEC)'s California Commercial End Use Survey data set, which provides energy demand by building type and climate zone. Mobile source emissions are derived primarily from vehicle trips generated by the Project, such as student drop-off/pickup and staff vehicles to and from the Project Site. Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

The emission estimates for travel on paved roads were calculated using the CalEEMod model. The results presented in **Table 3.2-6: Maximum Operational Emissions** are compared to the VCAPCD-established operational significance thresholds. As shown, the operational emissions would not exceed VCAPCD's regional thresholds and would be less than the existing operational emissions as shown above in **Table 3.2-3**. Emissions would lower for the proposed Project as compared to existing Isbell School as there would only be an increase in capacity of 50 students, and the new buildings would be required to meet all current energy conservation standards and would operate more efficiently than the existing buildings. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant. As such, operational impacts would be less than significant.

TABLE 3.2-6: MAXIMUM OPERATIONAL EMISSIONS

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Mobile	5.1	3.5	32.2	0.1	8.9	2.3
Area	2.6	<0.1	3.8	<0.1	<0.1	<0.1
Energy	<0.1	0.5	0.4	<0.1	<0.1	<0.1
Total	**7.7**	**3.0**	**36.4**	**0.1**	**8.9**	**2.3**
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Existing Operational Emissions	**9.3**	**6.0**	**47.2**	**0.1**	**8.4**	**2.0**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; Sox = sulfur oxides; VOC = volatile organic compounds.

Source: Refer to Appendix C: Air Quality and Greenhouse Gas Emissions Outputs.

Threshold (c): Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact.

VCAPCD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Locations evaluated for exposure to air pollution include but are not limited to residences, schools, hospitals, and convalescent facilities.

Uses surrounding the Project Site include single-family residential uses adjacent to the east along South 7th Street and to the west along South 4th Street. The nearest sensitive receptors to the Project Site include:

- Single family residential uses along South 7th Street
- Single family residential uses along South 4th Street
- Existing Isbell School

Project construction would result in short-term emissions of diesel particulate matter, which is a toxic air contaminant (TAC). Emissions from combustion of gasoline produce much of the PM2.5 emissions found in outdoor air.[7] Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period, as diesel emissions are strongly correlated with PM2.5 emissions. As mentioned previously, single-family residential uses, multi-family residential uses, and school uses are located adjacent to the site. Given that the greatest potential for diesel particulate emissions would only occur during excavation/grading activities (approximately 72 days across all phases) and other construction activities (occurring over 5 years) would result in reduced use of heavy-duty diesel construction equipment in comparison to excavation/grading activities, the Project would not result in a long-term (i.e., 70 year) source of TAC emissions. No residual TAC emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (60 out of 840 months of a 70-year lifetime), diesel particulate emissions would be minimal. The Project would comply with the CARB Air Toxics Control Measure that limits diesel-powered equipment and vehicle idling to no more than five minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of VCAPCD *Rule 62.7* if asbestos is found during renovation and construction activities.

In addition, Project operations would only result in minimal emissions of TACs from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the criteria used to determine the significance of a potential health risk impact.

Threshold (d): Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact.

VCAPCD has not recommended a specific numerical criterion or procedure for odors. The qualitative threshold is described in the VCAPCD Air Quality Assessment Guidelines:

> *"A qualitative assessment indicating that a project may reasonably be expected to generate odorous emissions in such quantities as to cause detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or*

7 California Air Resources Board (CARB). "Inhalable Particulate Matter and Health (PM2.5 and PM10)." Accessed October 2024. https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health#:~:text=Emissions%20from%20combustion%20of%20gasoline,a%20significant%20proportion%20of%20PM1.

property (see California Health and Safety Code, Division 26, §41700) will have a significant adverse air quality impact."

The Air Quality Assessment Guidelines provide a definition of significant odor impact in terms of the numbers of complaints received – but this is of no predictive value in assessing new projects. There is a tabulation of "screening distances" in the Air Quality Assessment Guidelines (Table 6-3) for various odorous land uses that may cause an odor impact at receptor locations. The distances are all one or two miles, and they are associated with a wide variety of industrial, agricultural, and waste management facilities.

As shown in **Table 3.2-5**, the construction of the Project would result in emissions below the significance thresholds. Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor-producing materials. Due to the short-term nature and limited amounts of odor-producing materials being utilized, no significant impact related to odors would occur during construction of the proposed Project. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore would not reach an objectionable level at the nearest sensitive receptors.

According to VCAPCD, while almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation. Land uses more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. The Project does not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. Therefore, objectionable odors would not be emitted by the proposed uses. The Project would also comply with VCAPCD Rule 73.2 which would limit the number of VOCs in architectural coatings and solvents. Any unforeseen odors generated by the Project will be controlled in accordance with VCAPCD Rule 51 and Rule 55. As previously noted, Rule 51 prohibits the discharge of air contaminants that harm, endanger, or annoy individuals or the public; endanger the comfort, health or safety of individuals or the public; or cause injury or damage to business or property. Failure to comply with Rule 51 could subject the offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan.

Based on the analysis above, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

3.2.5 MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required with regards to air quality, and all impacts would be less than significant.

3.3 CULTURAL RESOURCES

This section addresses potential impacts to cultural and historical resources. Historical resources include sites, structures, objects, or places that are at least 50 years old and are significant for their engineering, architecture, and cultural importance. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. The analysis of potential impacts to cultural resources is based in part on the Historic Resources Report prepared by San Buenaventura Research Associates, dated October 9, 2024 (see **Appendix B**).

3.3.1 REGULATORY FRAMEWORK

3.3.1.1 Federal Regulations

National Historic Preservation Act

The 1966 NHPA authorized formation of the National Register of Historic Places (National Register) and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources.[1] Buildings, districts, sites, and structures may be eligible for listing in the National Register if they possess significance at the national, State, or local level in American history, culture, architecture, or archaeology and, in general, are more than 50 years old.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation (ACHP), an independent federal agency, administers the review process, with assistance from the State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process.

National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 Code of Federal Regulations [CFR] 60.2). The NRHP recognizes properties that are significant at the national, State, and local levels. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance. To be eligible for listing in the NRHP, a resource must be significant in American history,

1 *National Historic Preservation Act of 1966* amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575).

architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of State and local importance that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:

- **Criterion A (Events)**: It is associated with events that have made a significant contribution to the broad patterns of our history.
- **Criterion B (Persons)**: It is associated with the lives of persons who are significant in our past.
- **Criterion C (Design/Construction)**: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.
- **Criterion D (Information Potential)**: It has yielded, or may be likely to yield, information important in prehistory or history.[2]

Although there are exceptions, certain kinds of resources are not usually considered for listing in the National Register. These include religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Secretary's Standards) were published in 1995 and codified as 36 CFR 68.3,3. Neither technical nor prescriptive, these standards are intended to promote responsible preservation practices that help protect irreplaceable cultural resources. The Secretary's Standards for Rehabilitation consist of 10 basic principles created to help preserve the distinctive character of a historic building and its site while allowing for reasonable changes to meet new needs. The preamble to the Secretary's Standards states that they "are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility." The standards for rehabilitation of a historic resource are as follows:

1. Standard 1: A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. Standard 2: The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Standard 3: Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

2 Code of Federal Regulations. Title 36, Chapter 1, Part 60, Section 60.3.

4. Standard 4: Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Standard 5: Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Standard 6: Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Standard 7: Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Standard 8: Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. Standard 9: New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. Standard 10: New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act (ARPA) of 1979[3] is to ensure the preservation and protection of archaeological resources on public and Indian lands. ARPA places a primary emphasis on a federal permitting process to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the ARPA.

3.3.1.2 State Regulations

California State Office of Historic Preservation

The mission of the California State Office of Historic Preservation (OHP) and the State Historical Resources Commission (SHRC), in partnership with the people of California and governmental agencies, is to preserve and enhance California's irreplaceable historic heritage as a matter of public interest so that its vital legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations.

3 United States Code. Tit. 16, sec. 470aa–470mm, Archaeological Resources Protection Act of 1979, Public Law 96-95, as amended.

The OHP is responsible for administering federally and State-mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable archaeological and historical resources under the direction of the OHP and the SHRC. OHP reviews and comments on several thousand federally sponsored projects, State programs, and State projects annually pursuant to Section 106 of the National Historic Preservation Act.

California Register of Historical Resources

The California Register of Historical Resources is an authoritative guide to California's significant historical and archeological resources intended to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State; and determining which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.

The rights and responsibilities of owners of historic properties are the same as those of owners of non-historic properties. Listing does not prevent the use, sale, or transfer of the property. Because land use authority in California generally belongs to the local government, listing does not give either the State or the federal government any additional authority over the property. Consent from the property owner is not required, but a resource cannot be listed over an owner's objections. The State Historic Resources Commission can, however, formally determine a property eligible for the California Register even if the resource owner objects.

Resources eligible for listing include buildings, sites, structures, objects, or historic districts that retain historic integrity and are historically significant at the local, State, or national level under one or more of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
4. It has yield or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions.

California Health and Safety Code

If human remains are encountered unexpectedly during implementation of a project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98.23.

California Public Resources Code Sections 5020-5029.5 – Historical Resources

The State Historic Preservation Office (SHPO) maintains the California Register of Historic Resources (CRHR). Properties listed, or formally designated as eligible for listing, on the NRHP are automatically listed on the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

State law seeks to protect cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15063.5(a)(3) of the CEQA Guidelines. These criteria, which are nearly identical to those for the NRHP, are listed below.

a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
b. Is associated with lives of persons important in our past.
c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
d. Has yielded, or may be likely to yield, information important in prehistory or history.

As stated earlier, CEQA Section 15063.5(a)(4) also affords the lead agency the ability to determine whether a resource may be an historical resource without it being listed in the CRHR. Resources eligible for listing in the California Register must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Buildings, structures, or objects that have been moved or reconstructed, and resources that have achieved significance within the past 50 years, may also be considered for listing in the California Register under specific circumstances.

California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have Statewide historical significance by meeting at least one of the criteria listed in the following paragraph. The resource also must be approved for designation by the County Board of Supervisors or the City/Town Council in whose jurisdiction it is located, must be recommended by the SHRC, and must be officially designated by the Director of California State Parks.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the SHRC are also listed in the California Register. No

historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired.

California Environmental Quality Act

CEQA and the CEQA Guidelines have specific provisions relating to the evaluation of a project's impact on historical and unique archaeological resources. PRC Section 21083.1 and Section 15063.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA.

CEQA Guidelines Section 15063.5(a), in Title 14 of the California Code of Regulations, defines a "historical resource" as follows:

1. A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5023.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.
4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5023.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5023.1.

First, a resource is considered a historical resource for purposes of CEQA if it is listed or "deemed eligible for listing" in the California Register by the State Historical Resources Commission (SHRC).[4] Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1.4, or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC Section 5023.1.5. If a resource meets either of these criteria, the lead agency must treat the resource as historically significant unless the

4 Public Resources Code (PRC). Sections 21083.1 and 15063.5 20.

"preponderance of the evidence" indicates that the resource is not historically significant. Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the California Register, listed in a local register, or identified in a local survey.[5] Any such determination must be based on substantial evidence in light of the whole record.

CEQA also provides further guidance with respect to historical resources of an archeological nature and unique archaeological resources. A unique archeological resource is defined in PRC Section 21083.2(g) as:

> *"[A]n archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, (2) has a special and particular quality such as being the oldest of its type or best available example of its type, and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person."*

According to the CEQA Guidelines Section 15063.5(b): "A project with an effect 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." This section of the guidelines defines historical resources as including both the built environment and archaeological resources.

A substantial adverse change is defined in the CEQA Guidelines Section 15063.5(4)(b)(1), as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The significance of an historical resource is materially impaired, according to the CEQA Guidelines Section 15063.5(4)(b)(2), when a project:

a. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5023.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or

c. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

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5 PRC. Sections 21083.1; sec. 15063.5(a)(3)(4).

Archaeological resources are defined in CEQA Section 21083.2, which states that a "unique" archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Unique archaeological resources, as defined in Section 21083.2, may require reasonable efforts to preserve resources in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. Additionally, the State CEQA Guidelines state that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (State CEQA Guidelines Section 15063.5(c)(4)).

3.3.1.3 Local Regulations

Ventura County

Although the Santa Paula Unified School District is not subject to the County's land use authority, the following are relevant goals and policies regarding historic and cultural resources.

COS-4*:* To identify, inventory, preserve and protect cultural, historical, paleontological, and archaeological resources in Ventura County, including Native American resources, for their scientific, educational, and cultural value.

COS-3.1: The County shall maintain an inventory of tribal, cultural, historical, paleontological, and archaeological resources in Ventura County based on project studies and secondary resources, including record studies and reports filed with natural history programs, the California Historical Resources Information System and the Native American Heritage Commission.

COS-3.2: (a) The County shall cooperate with cities, special districts, appropriate organizations and private landowners to identify known cultural, archaeological, historical, and paleontological resources to preserve identified resources within the county.

(b) For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.

COS-3.3: The County shall require all structures and sites that are designated, or eligible for designation, as County Historical Landmarks to be preserved as a condition of discretionary development, in accordance with the Secretary of the Interior Standards, unless a structure is unsafe or deteriorated beyond repair. The

property owner shall place an appropriate marker on the site to describe the historical significance of the structure, site or event.

COS-3.4: The County shall require that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of mitigation and/or extraction of maximum recoverable data. Priority shall be given to measures that avoid resources.

COS-3.5: The County shall require, in all feasible circumstances, discretionary development to adaptively reuse architecturally or historically significant buildings if the original use of the structure is no longer feasible and the new use is allowed by the underlying land use designation and zoning district.

COS-3.6: The County shall require discretionary development to incorporate architectural designs and features that reflect the historical and cultural traditions characteristic to the area or community.

COS-3.7: Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with the Cultural Heritage Board to identify sites of potential archaeological, historical, tribal cultural and paleontological significance, to ensure that all known resources have been properly identified. Should a site of archaeological, tribal, architectural, or historical significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). If it is determined during the review that a site has potential archaeological, tribal, architectural, or historical significance, information shall be provided to the County Cultural Heritage Board for evaluation. Recommendations identified by the Cultural Heritage Board shall be provided to the appropriate decision-making body.

COS-3.8: The Building and Safety Division shall utilize the State Historic Building Code for preserving historic sites in the County.

Ventura County's Cultural Heritage Board (CHB) works to preserve and protect historic, cultural, and natural resources of Ventura County. The CHB has jurisdiction over all buildings, sites, structures, and districts that are designated or potentially eligible as a Ventura County Landmark, a Site of Merit, a Point of Interest, or Historic District. The CHB reviews work proposed at these properties to ensure that significant architectural and historical features are maintained. The CHB's mission is enforced through a review process for project applications related to the maintenance, alteration, restoration, rehabilitation, remodeling, addition, change of use, demolition, relocation, or subdivision of a designated Cultural Heritage Site or potential site.

Ordinance No. 4604, enacted by the Ventura County Board of Supervisors, establishes the framework for the preservation of historic resources in the county. This ordinance provides legal protection for designated cultural resources, setting out procedures for their identification, evaluation, and protection.

It allows for the creation of historic districts and landmarks, and it outlines the process for reviewing and approving alterations to properties deemed to have historical value.

City of Santa Paula

Although the Santa Paula Unified School District is not subject to the City's land use authority, the following are relevant policies and programs regarding historic and cultural resources.

ECR 3.1*:* Future land use decisions affecting the community's heritage must recognize the irreplaceable nature of cultural resources. The value of these resources is to be given equal weight with other factors in the decision-making process. Historic preservation is a valuable tool to retain the city's heritage, and activities and development that could damage cultural, archaeological, paleontological, historical or architectural resources should be avoided.

ECR 3.2*:* Encourage the designation of historic districts such as the Downtown.

ECR 3.a*:* As part of the development review process, evaluate potential impacts to cultural and historic resources, including tribal cultural resources, and require appropriate mitigation as necessary to avoid significant impacts in conformance with Federal and State law. For proposed discretionary developments that would involve grading or excavation in previously undisturbed areas, require the applicant to provide a cultural resources assessment by a qualified archaeologist identifying potential archaeological and paleontological impacts and establishing appropriate mitigation measures.

ECR 3.b*:* Complete a comprehensive historic preservation study for Santa Paula.

ECR 3.c*:* Adopt and implement standards and guidelines for new development and alterations to existing structures within historic districts. Such guidelines shall be developed by a qualified historian, and shall address architecture, landscaping, streets, and hardscape elements within these districts. Standards should address the particular character of individual districts.

Continue to implement the Historic Overlay District for portions of the Downtown and surrounding historic neighborhoods. Formally recognize the following historic districts: Downtown Commercial District, Downtown Residential District, South 7th Street, McKevett Heights, Park Street, The Oaks, and Richmond Tract. Pursue Federal designations for all eligible historic districts under the National Trust for Historic Preservation.

Chapter 16.33 of the City of Santa Paula Municipal Code established the City's Historic Landmark Overlay Zoning District to facilitate the protection and recognition of historic buildings and neighborhoods with historic merit. Chapter 16.33 provides for the identification and designation of historic places, buildings, works of art, neighborhoods, and other objects of historic or cultural interest within the city and established the City's Historic Preservation Commission.

The Historic Preservation Commission considers applications to designate a historic landmark or district to determine how or why the proposed historic landmark or district represents and exemplifies an important aspect of the cultural or architectural history of the City of Santa Paula or Ventura County and

makes recommendations to the City Council. At a public hearing, the City Council reviews the Commission's recommendation and determines whether to approve a historic landmark or district.

3.3.2 EXISTING CONDITIONS

3.3.2.1 Historic Context

The boom of the 1920s brought tremendous growth to Santa Paula, and along with it, the problem of schools becoming too small and outdated to accommodate the increased population. In March 1925 contracts were submitted to construct two new schools in Santa Paula, a grade school near Ojai Road called Canyon School, later renamed Barbara Webster School, and a new large Junior High school on Harvard Boulevard and S. Fourth Street. The Junior High school was proposed to be constructed within the new Lee Ireland and Taussig Subdivision on S. Fourth Street, which had opened in 1922.

Within a year, half of the lots on S. Fourth Street featured new houses. The placement of the new school within this newly developing area of Santa Paula was no doubt due to the availability of a large parcel of land adjacent to the subdivision to the east. Santa Paula architect Roy C. Wilson produced the school building design, assisted by his father-in-law Edwin Thorne, with associate Peter Ficker of Los Angeles. General contractor Thomas H. Reed of Los Angeles won the construction bid. With the new school in its planning stages in the spring of 1925, a name first considered was Harvard School, after the adjacent thoroughfare. Instead, the school board accepted a proposal submitted by members of the Pioneer Section of the Ebell Club to name it after Olive Mann Isbell.[6]

Then known as the “first American schoolteacher in California,” Isbell took up teaching at Mission Santa Clara upon her arrival in pre-statehood California in 1846 with her husband Isaac, a physician who served briefly as the Surgeon of the California Battalion in the same year. After their retirement, the couple moved to Santa Paula during the 1870s and became well known in the small town. Olive Isbell died at the age of 74 on March 26, 1899, after a brief illness and was buried in the Santa Paula Cemetery. Attesting to the high regard citizens of Santa Paula held for Olive Isbell, it was said “to be the most largely attended funeral ever held in Ventura County up to that time.”

The main school building was completed in the fall of 1925 and dedicated in February 1926 with much fanfare and distinguished speakers. The Ebell Club presented a plaque to the school in memory of Olive Mann Isbell, and the Native Sons placed a plaque declaring that the “building is dedicated to truth-liberty-tolerance.”[7]

At the time the Isbell Junior High School was constructed, it was the largest school building in Santa Paula. Its two-story compact plan was the latest in school design and noted for its administrative

6 *Santa Paula Chronicle*. 3-16-1925, 5-18-1925.

7 *Santa Paula Chronicle*. 2-15-1926, 2-27-1926.

efficiency. Following the school's completion, an article published in the Santa Paula Chronicle described the many special features of the new building.

The school weathered two major disasters throughout its history. The flood waters of the 1928 St. Francis Dam break apparently reached the first-floor windows of the school and filled the basement with mud. After the 1933 Long Beach earthquake and the passage of the Field Act, two-story schools were no longer constructed in California. In 1939 the main school and manual arts building were seismically strengthened and substantially altered to meet Field Act requirements using PWA (Public Works Administration) funds under the New Deal program. Architects Roy C. Wilson and Geoffry N. Lawford designed the alterations.[8]

In between these events, a second flood occurred in 1938, during one of California's most severe storm seasons. As a result, low concrete walls, berms and wooden gates were proposed to be constructed around the school as part of the seismic retrofitting project. Initially the flood wall project proved too costly to construct, but it remained an urgent consideration and funding was later found to complete it. Nearly six-hundred Isbell students were taught in double sessions at other schools in Santa Paula while the work, which took most of the year to complete, was underway. They returned to their transformed school in December.[9]

The 14-acre campus has grown since with the addition of new buildings. Architects Roy C. Wilson and Robert S. Raymond designed the manual arts building, constructed in 1929. Santa Paula architect Robert S. Raymond designed the multi-purpose cafeteria building in 1954, though not constructed until 1956. Not yet fifty years of age when the school and manual arts building were designated as historic landmarks, this building was not included in the landmark nominations. However, it is now over fifty years of age. The remainder of buildings on the campus include modern portable classroom buildings behind the main school building and near Ventura Street, storage buildings, a gymnasium building, a locker room building (now converted into a STEM flex classroom), and a restroom building.

Isbell School was listed as Ventura County Landmark No. 143 and City of Santa Paula Historic Landmark No. 14 in February 1992. Consequently, the property is a historic resource for the purposes of CEQA, per CEQA Guidelines § 15063.5 (a)(2).

3.3.2.2 Period of Significance

The purpose of establishing a period of significance for a historic property is to provide a means for establishing the physical features created during its period of significance and that convey its significance to a viewer. The character defining features of a historic building depend on the type of building, and can include its function, materials, details, method of construction, or architectural style, and other elements that contribute to its sense of time and place. The landmark designations for the school did not establish a period of significance for the property.

8 *Santa Paula Chronicle*. 12-9-1938.

9 *Santa Paula Chronicle*. 3-22-1939, 4-12-1939, 4-13-1939, 9-23-1939, 12-16-1939.

The period 1924 to 1974 (fifty years ago) covers the construction of the extant buildings on the property and its active use as a school and is considered the period of significance for purposes of historic resource evaluation. This period includes the main school building, manual arts building, and multi-purpose/cafeteria building, constructed in 1924, 1929, and 1956 respectively. These buildings and alterations, to the extent they are known, are described in the Historic Resources Report (**Appendix B**).

Other buildings on the campus constructed during this period include the a locker room building (1969) located at the southeastern corner of the campus adjacent to the athletic fields, and a small storage building (undated) to the north of the main school building. Alterations to the campus buildings made after 1974 should generally be regarded as non-character defining features that do not contribute to the significance and eligibility of the property. These would include the numerous portable buildings on the campus and the gymnasium building constructed circa 2003.

The Ventura County and City of Santa Paula landmark designations for the Olive Mann Isbell School from 1992 do not specify the buildings on the property determined to contribute to its eligibility at that time. In general buildings constructed during the period of significance for the property or altered during this period of significance are typically considered as contributors, including some that might have been excluded in 1992 as not then being fifty years of age.

3.3.3 RELEVANT PLANS, POLICIES, ORDINANCES

According to the Public Resources Code, "a project that may cause a substantial change in the significance of an historical resource is a project that may have a significant effect on the environment." The Public Resources Code broadly defines a threshold for determining if the impacts of a project on an historic property will be significant and adverse. By definition, a substantial adverse change means, "demolition, destruction, relocation, or alterations," such that the significance of an historical resource would be impaired. For purposes of NRHP eligibility, reductions in a property's integrity (the ability of the property to convey its significance) should be regarded as potentially adverse impacts. (PRC §21083.1, §5020.1(6))

Further, according to the CEQA Guidelines, "an historical resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources [or] that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5023.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant."

The lead agency is responsible for the identification of "potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource." The specified methodology for determining if impacts are mitigated to less than significant levels are the Secretary of the Interior's

Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings and the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), publications of the National Park Service. (CCR §15063.5(b)(3))

3.3.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, the proposed Project could have a potentially significant impact with respect to cultural resources if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15063.5.

3.3.5 IMPACTS ANALYSIS

Threshold (a):	**Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15063.5?**

Significant and Unavoidable Impact.

A Historic Resources Report has been prepared as part of this Draft EIR that evaluates the potential for implementation of the Project to substantially change the significance of an identified historical resource (see **Appendix B**). As discussed therein, Isbell School was listed as Ventura County Landmark No. 143 and City of Santa Paula Historic Landmark No. 14 in February 1992. Consequently, the property is a historic resource for the purposes of CEQA, per CEQA Guidelines § 15063.5 (a)(2). The Ventura County and City of Santa Paula landmark designations for the Olive Mann Isbell School from 1992 do not specify the buildings on the property found to be contributing to its eligibility at that time. In general buildings constructed during the period of significance for the property or altered during this period of significance should be considered as contributors, including some that might have been excluded in 1992 as not then being fifty years of age.

As discussed above, the period of significance for Isbell School is considered to be 1924 to 1974. Five buildings were constructed during this period and can be considered contributors to the landmark's historic designation, including the main school building (1924), manual arts building (1929), multi-purpose/cafeteria (1956), a locker room building (1969), and a small storage building.

The proposed Project includes the demolition of the existing main school building, manual arts building, multi-purpose/cafeteria, the storage building, all 18 portable classroom buildings, and a restroom building and their replacement with a new single-story administrative and multi-purpose room (MPR) building, seven single-story classroom buildings, and expanding the southern parking lot, including providing a new location for students to be dropped off and picked up. CEQA Guidelines Section 15063.5 (b)(2)(B) states that a Project materially impairs the significance of a historic resource when it demolishes or materially alters in an adverse manner the physical characteristics of a resource that account for its inclusion in a local register of historical resources.

The removal of all of the contributing buildings on the eligible property would result in a loss of its eligibility as a landmark, which is a significant impact under this standard.

3.3.6 MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

The CEQA Guidelines require a project which will have potentially adverse impacts on historic resources to conform to the Secretary of the Interior's Standards, in order for the impacts to be mitigated to below significant and adverse levels. However, CEQA also mandates the adoption of feasible mitigation measures which will reduce adverse impacts, even if the residual impacts after mitigation remain significant. Means other than the application of the Standards would necessarily be required to achieve this level of mitigation. In determining what type of additional mitigation measures would reduce impacts to the greatest extent feasible, best professional practice dictates considering the level of eligibility of the property, as well as by what means it derives its significance.

Mitigation programs for impacts on historic resources tend to fall into three broad categories: documentation, design and interpretation. Documentation techniques involve the recordation of the site according to accepted professional standards, such that the data will be available to future researchers, or for future restoration efforts. Design measures can potentially include direct or indirect architectural references to a lost historic property, e.g., the incorporation of historic artifacts into the new development, or the relocation of the historic property to another suitable site. Interpretative measures could include commemorating a significant historic event or the property's connection to historically significant themes. The following mitigation measures have been identified to reduce the impact of the proposed Project on the historic resources present on the Project Site:

MM-CUL-1. In consultation with a qualified historic preservation professional, all historically significant buildings and structures and features to be modified or removed shall be documented in accordance with HABS/ HAER standards. This documentation shall include archival quality photographs of exterior features, elevations and significant interior features. Scaled, "as built" site plan and floor plans should also be produced where existing plans or records will not suffice for this purpose. The documentation package will be archived at an appropriate location to be determined by the District.

MM-CUL-2. In consultation with a qualified historic preservation professional, produce an onsite interpretive plan for the property focused on the history of Isbell School to be permanently displayed in a publicly accessible location.

MM-CUL-3. All modifications to historic features on the property shall be undertaken in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties in accordance with plans prepared in consultation with a qualified historic preservation professional. The objective shall be to preserve interior and exterior historic building character defining features to the greatest extent feasible.

As discussed above, the CEQA Guidelines state that in some circumstances, documentation of a resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the impacts of demolition of the resource will not mitigate the impacts to a point where clearly no significant impact on the environment would occur. The proposed Project would result in a significant impact because it would remove all of the contributing buildings on the eligible property resulting in the loss of its eligibility as a landmark. The resource documentation required by the mitigation measures described above therefore would mitigate this impact to the extent feasible but would not mitigate the impacts to a point where clearly no significant impact on the environment would occur.

3.4 GREENHOUSE GAS EMISSIONS

This section provides a discussion of global climate change, existing regulations pertaining to climate change, an inventory of the greenhouse gas (GHG) emissions that would result from the proposed Project, and an analysis of the potential impact of those GHGs. Emission calculations completed for the Project are contained in **Appendix C: Air Quality and Greenhouse Gas Emissions Outputs** of this EIR.

3.4.1 EXISTING CONDITIONS

3.4.1.1 Global Context

GHGs are global pollutants that have long atmospheric lifetimes (1 year to several thousand years).[1] GHGs persist in the atmosphere for a long enough time to be dispersed around the globe.[2] Although the exact lifetime of any particular GHG molecule depends on multiple variables and cannot be pinpointed, more CO_2 is currently emitted into the atmosphere than is avoided or sequestered.[3] CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through photosynthesis and dissolution, respectively. The is estimated to absorb approximately 31% of the CO_2 emissions released into the atmosphere.[4]

Similarly, the effects of GHGs are borne globally (sea-level rise, hurricanes, droughts, etc.), as opposed to the localized air quality effects of criteria air pollutants and toxic air contaminants (TACs). The quantity of GHGs that it takes to ultimately result in climate change is not precisely known, but that quantity is enormous. No single project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or microclimates. However, it is the combined GHG contributions per project that create an impact.

3.4.1.2 Greenhouse Gas Effects

GHGs play a critical role in determining the Earth's surface temperature because these gases absorb solar radiation. Solar radiation enters the Earth's atmosphere from space. A portion of the radiation is absorbed by the Earth's surface, and a smaller portion of this radiation is reflected back into space. The radiation absorbed by the Earth is reradiated as lower-frequency infrared radiation, which is then selectively absorbed by GHGs in the Earth's atmosphere. As a result, the greater the amount of GHGs in the atmosphere, the greater the amount of infrared radiation trapped, resulting in a warming of the atmosphere. This phenomenon is commonly referred to as the "greenhouse effect." Scientists have speculated that increased GHG emissions from human activity (anthropogenic) could lead to a less

1 United States Environmental Protection Agency (USEPA). "Overview of Greenhouse Gases." Accessed November 2024. https://www.epa.gov/ghgemissions/overview-greenhouse-gases.

2 USEPA. "Overview of Greenhouse Gases." Accessed November 2024.

3 USEPA. "Overview of Greenhouse Gases." Accessed November 2024.

4 National Centers for Environmental Information. "Quantifying the Ocean Carbon Sink." Accessed November 2024. https://www.ncei.noaa.gov/news/quantifying-ocean-carbon-sink#:~:text=Changing%20Ocean%20Chemistry,and%20international%20partners%20in%20Science.

habitable climate. Anthropogenic GHG emissions leading to atmospheric levels in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of warming of the Earth's atmosphere and oceans, with corresponding effects on global air and water circulation patterns and climate. CO_2 emissions associated with fossil fuel combustion are the primary contributors to human-induced emissions.

Climate Change Effects for California

Climate change could affect environmental conditions in California in a variety of ways. One effect of climate change is rising sea levels. Sea levels along the California coast rose approximately 7 inches during the last century, and they are predicted to rise an additional 7 to 22 inches by 2100, depending on the future levels of GHG emissions. The effects of a rise in sea level could include increased coastal flooding, saltwater intrusion (especially a concern in the low-lying Sacramento–San Joaquin Delta, where pumps delivering potable water to Southern California could be threatened), and disruption of wetlands.

As the State's climate changes over time, the range of various plant and wildlife species could shift or be reduced, depending on the favored temperature and moisture regimes of each species. In the worst cases, some species would become extinct or be extirpated from the State if suitable conditions are no longer available. Additional concerns associated with climate change include a reduction in the snowpack, leading to less overall water storage in the mountains (the largest "reservoir" in the State), and increased risk of wildfires caused by changes in rainfall patterns and plant communities. Changes in the climate can also impact California's weather patterns and rainfall, causing droughts in certain areas and flooding in others.

Sources of Greenhouse Gas Emissions

GHGs are the result of both natural and anthropogenic activities. With respect to anthropogenic activities, motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfire are the primary sources of GHG emissions. Additionally, land use decisions and future development projects pursuant to implementation of a general plan can affect the generation of GHG emissions from multiple sectors, resulting in direct or indirect GHG emissions. For example, electricity consumed in the lighting and heating of buildings is an indirect source of GHG emissions because it requires electricity from power plants, which emit GHGs directly into the atmosphere. Conversely, tailpipe emissions from the use of vehicles generate direct GHG emissions.

GHGs are a group of emissions that include CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, and nitrogen trifluoride (NF_3). Carbon dioxide is the most abundant GHG. As stated above, other GHGs are less abundant, but have higher global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2; denoted as CO_2e. A general description of GHGs discussed is provided in **Table 3.4-1: Description of Identified Greenhouse Gases**.

TABLE 3.4-1: DESCRIPTION OF IDENTIFIED GREENHOUSE GASES

GHG	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG that has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and is the main component of natural gas. When one molecule of CH4 is burned in the presence of oxygen, one molecule of CO2 and two molecules of water are released. A natural source of CH4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH4 or ethane (C2H6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorinated Chemicals (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conduction manufacturing.
Sulfur Hexafluoride (SF6)	An inorganic, odorless, colorless, nontoxic, and nonflammable gas. SF6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF3)	An inorganic, nontoxic, odorless, nonflammable gas. NF3 is used in the manufacture of semiconductors, as an oxidizer of high energy fuels, for the preparation of tetrafluoro hydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] *GHGs identified in this table are ones identified in the Kyoto protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*

State Emissions

California is the second largest contributor of GHGs in the United States and the 16th largest in the world.[5] In 2019, California produced 418.2 million metric tons of carbon dioxide equivalents ($MMTCO_2e$),

5 California Energy Commission (CEC). *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report*. December 2006. Accessed November 2024. https://ww2.arb.ca.gov/ghg-1990-to-2004.

including imported electricity and excluding combustion of international fuels and carbon sinks or storage. The major source of GHGs in California is transportation, contributing to 40 percent of the State's total GHG emissions. The Statewide inventory of GHGs by sector is shown in **Table 3.4-2: California GHG Inventory 2013¦ 2021**.

TABLE 3.4-2: CALIFORNIA GHG INVENTORY 2013–2021

Main Sector	Emissions ($MMTCO_2e$)								
	2013	2014	2015	2016	2017	2018	2019	2020	2021
Transportation[a]	156.9	157.6	161.2	165.0	166.4	165.2	162.3	135.6	145.6
Electric Power	93.0	90.3	86.3	70.8	63.4	65.0	60.2	59.5	62.4
Industrial[b]	82.7	85.0	82.7	81.2	81.4	82.0	80.8	73.3	73.9
Commercial and Residential	39.0	35.5	37.2	37.7	38.3	37.5	40.6	38.9	38.8
Agriculture	33.7	33.7	32.6	32.1	31.6	32.1	31.3	31.5	30.9
High GWP[c,d]	17.0	17.9	18.8	19.4	20.1	20.5	20.7	21.3	21.3
Recycled and waste	8.3	8.1	8.1	7.9	8.2	8.3	8.4	8.6	8.4
Total Emissions	**431.6**	**428.2**	**426.9**	**413.2**	**410.4**	**410.7**	**403.4**	**368.7**	**381.3**

Note: MMTCO2e - million metric tons of carbon dioxide equivalent emissions.

[a] *Includes equipment used in construction, mining, oil drilling, industrial and airport ground operations.*

[b] *Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions.*

[c] *These categories are listed in the Industrial sector of CARB's GHG Emission Inventory sectors.*

[d] *This category is listed in the Electric Power sector of CARB's GHG Emission Inventory sectors.*

Source: CARB, "GHG Emissions Inventory (GHG EI) 2000-2021," https://ww2.arb.ca.gov/ghg-inventory-data. Accessed November 2024.

City of Santa Paula Emissions

In 2015, Ventura County GHG emission by sector were published by the Ventura County Regional energy Alliance (VCEA) and reported emissions for 2010, 2011, and 2012.[6] Emissions for Santa Paula were estimated to be approximately 113,069 $MTco_2e$ in 2012, as shown below in **Table 3.4-3: Santa Paula GHG Inventory 2010-2012**.

6 City of Santa Paula. *Santa Paula 2040 General Plan Update, Revised Draft Program Environmental Impact Report*. March 4, 2020. Accessed November 2024. https://www.spcity.org/DocumentCenter/View/1703/City-of-Santa-Paula-2040-General-Plan---Volume-II-DEIR-Revised-Final-Tracked-2020-03-03.

TABLE 3.4-3: SANTA PAULA GHG INVENTORY 2010-2012			
Main Sector	Emissions ($MMTCO_2e$)		
	2010	2011	2012
On-road transportation (city/county roads and state highways)	26,426	25,914	25,401
Non-residential electricity use	17,548	18,062	18,276
Other emissions	21,527	21,860	23,048
Residential natural gas use	17,388	16,753	15,963
Residential electricity use	13,247	13,320	13,386
Off-road vehicle use	13,177	13,356	12,644
Non-residential natural gas use	4,470	4,834	4,351
Total Emissions	**113,783**	**114,099**	**113,069**

Note: MTCO2e - metric tons of carbon dioxide equivalent emissions.

Source: City of Santa Paula, Revised Draft Program Environmental Impact Report, https://www.spcity.org/DocumentCenter/View/1703/City-of-Santa-Paula-2040-General-Plan---Volume-II-DEIR-Revised-Final-Tracked-2020-03-03. Accessed October 2024

Existing Emissions

As mentioned previously, the existing Isbell School includes the main building, multi-purpose/cafeteria building, gymnasium building, a STEM flex classroom building, manual arts/woodshop building, storage buildings, 18 modern portable classroom buildings, restroom building, two large grass fields, three basketball courts, a western parking lot and drop-off area, and southern parking lot. The existing greenhouse gas emissions were estimated using the most recent version of the California Emissions Estimator Model (CalEEMod). **Table 3.4-4: Existing Greenhouse Gas Emissions** identifies the emissions from the existing high school uses.

TABLE 3.4-4: EXISTING OPERATIONAL GHG EMISSIONS	
Source	MTCO2e per year
Mobile	1,108
Energy	218
Area	1
Water	5
Waste	40
Total	**1,372**

Notes: $MTCO_2e$ = metric tons of carbon dioxide emissions.
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
*Source: Refer to **Appendix C: Air Quality and Greenhouse Gas Emissions Outputs**.*

3.4.2 RELEVANT PLANS, POLICIES, ORDINANCES

While the Santa Paula Unified School District is not legally subject to City of Santa Paula's (City) land use authority, the City's standards were considered in establishing thresholds of significance to assist in determining environmental impacts. The City is a member agency of the Southern California Association of Governments (SCAG). SCAG is the metropolitan planning organization (MPO) for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),[7] SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to GHG emissions, SCAG prepared and adopted the 2024–2050 RTP/SCS,[8] also known as Connect SoCal which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. The SCAG 2024–2050 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving a 19 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2035 on a per capita basis compared to 2005 level on a per capita basis, and 21 percent reduction by 2040 on a per capita basis compared to the 2005 level on a per capita basis.[9]

3.4.3 THRESHOLDS OF SIGNIFICANCE

To assist in determining whether the Project would have a significant effect on the environment, the District finds the Project may be deemed to have a significant impact related to greenhouse gas emissions if it would:

(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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7 California Health and Safety Code. Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b). https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC. Accessed October 2023.

8 Southern California Association of Governments (SCAG). *Connect SoCal: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategies*. Adopted April 4, 2024. Accessed October 2024. https://scag.ca.gov/connect-socal.

9 SCAG. *Connect SoCal: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategies*. Adopted April 4, 2024.

Pursuant to CEQA Guidelines Section 15063.4, the methods suitable for analysis of GHG emissions are:

- Use a model or methodology to quantify greenhouse gas emissions resulting from a project. The Lead Agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The Lead Agency should explain the limitation of the particular model or methodology selected for use.
- Rely on a qualitative analysis or performance-based standards.

No applicable thresholds for assessing GHG emissions apply to the Project. VCAPCD, State of California, Office of Planning and Research (OPR), CARB, CAPCOA, nor any other state or regional agency have adopted a numerical significance threshold that is applicable to the Project.

The OPR released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[10] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."[11]

Assessing the significance of a project's contribution to cumulative global climate change involves: (1) developing pertinent inventories of GHG emissions, and (2) considering project consistency with applicable emission reduction strategies and goals.

3.4.3.1 Consistency Analysis

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions adopted by the City. As discussed previously, the City has not established goals and actions to reduce the generation and emission of GHGs.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The City does not have a programmatic mitigation plan to tier from, such as a Greenhouse Gas Emissions Reduction Plan, as recommended in the relevant amendments to the CEQA Guidelines. However, CARB's Climate Change Scoping Plan includes a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, market-based mechanisms, and an AB 32 implementation regulation. Thus, if the Project is designed in accordance with these policies and regulations, the Project

10 State of California. Office of Planning and Research, State Clearinghouse. *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. 2008.

11 State of California. Office of Planning and Research, State Clearinghouse. *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. 2008.

would result in a less-than-significant impact, because it would be consistent with the overarching State regulations on GHG reduction (AB 32).

A consistency analysis is provided below and describes the Project's compliance with, or exceedance of performance-based standards included in the regulations outlined in the applicable portions of SCAG's 2024-2050 RTP/SCS.

3.4.4 IMPACT ANALYSIS

Threshold (a): Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact.

The analysis of the Project's GHG emissions consists of a quantitative analysis of the GHG emissions generated by the construction and operation activities and a qualitative analysis of the proposed Project's consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA Guidelines Section 15063.4(a), which affirms the discretion of a lead agency to determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project's impacts.

Construction

Construction of the proposed Project is broken down into 5 phases as shown in **Table 2.0-3** and would not overlap with each other. Construction would begin in the Fall of 2025 and conclude in the Fall of 2031. Phase 1 involves the construction of interim housing facilities comprised of 19 portable units on the northern portion of the Project Site. Phase 2 involves the demolition of the existing main building, manual arts/woodshop building (Summer 2027), western storage room, and restroom building. Subsequently, these functions of the campus would operate out of the interim housing facilities during construction of the new administrative and MPR building. Once construction of the new administrative and MPR building is complete, Phase 3 would begin which involves demolition of the existing multi-purpose/cafeteria building (2028/2029 school year), expanding the southern parking lot, and campus circulation improvements. Phase 4 involves removal of the 18 existing portable classrooms and construction of the seven (7) new classroom buildings. Phase 5 involves removal of the interim housing facilities.

The total GHG emissions from the Project were quantified to determine the level of the Project's estimated annual GHG emissions. As with the calculations provided in **Section 3.2: Air Quality**, construction emissions were estimated using CalEEMod by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile-source emissions factors. In addition, GHG emissions-reduction measures for construction equipment are relatively limited as construction activity impacts are relatively short in duration, so they contribute a relatively small portion of the total lifetime GHG emissions of a project. Therefore,

construction emissions are amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.

CalEEMod was also used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, fireplaces, and landscaping equipment. CalEEMod calculates energy use from systems covered by Title 24[12] (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. Mobile-source emissions were estimated based on the CARB EMFAC model.

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Energy demand rates were estimated based on square footage as well as predicted water supply needs for this use. Energy demand (off-site electricity generation and on-site natural gas consumption) for the Project was calculated within CalEEMod using the California Energy Commission's (CEC) California Commercial End-Use Survey (CEUS) data set,[13] which provides energy demand by building type and climate zone.

Emissions of GHGs from solid waste disposal were also calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the waste diversion rate, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for methane, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery), which are Statewide averages, were used in this assessment.

Emissions of GHGs from water and wastewater result from the required energy to supply and distribute the water and treat the wastewater. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod and are based on the water usage rate for the restaurant use; the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment; the GHG emission factors for the electricity utility provider; and the emission factors for the wastewater treatment process.

Total construction emissions would be 936 metric tons of carbon dioxide equivalent ($MTCO_2e$). One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame because this is a typical interval before a new building requires its first major renovation.[14] As shown in **3.4-5: Operational**

12 CEC. Energy Code, Title 24, Part 6. Building Energy Efficiency Standards.

13 CEC. *2022 Commercial End-Use Survey (CEUS): Final Report*. Updated February 28, 2024. Accessed October 2024. https://www.energy.ca.gov/publications/2023/2022-california-commercial-end-use-survey-ceus-final-report.

14 International Energy Agency (IEA). *Energy Efficiency Requirements in Building Codes, Energy Efficiency Policies for New Buildings, IEA Information Paper*. 2008.

GHG Emissions, when amortized over an average 30-year Project lifetime, average annual construction emissions from the Project would be 31 $MTCO_2e$ per year.

Operation

Operation of the Project has the potential to generate GHG emissions through vehicle trips traveling to and from the Project Site. Operational Project emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are shown in **Table 3.4-5.** As shown in **Table 3.4-5**, average annual operational emissions from the proposed Project would be 1,320 $MTCO_2e$ per year. This is less than the 1,372 $MTCO_2e$ that the existing Isbell School generates per year due to the decrease in mobile emissions that would result from the increasing efficiency of cars in the future as estimated by CalEEMod.

TABLE 3.4-5: OPERATIONAL GHG EMISSIONS

Source	Proposed Project Unmitigated $MTCO_2e$ per year	Existing Unmitigated $MTCO_2e$ per year	Difference
Construction (amortized)	31	—	31
Mobile	1,006	1,108	(102)
Area	1	1	0
Energy	233	218	15
Water	6	5	1
Waste	43	40	3
Refrigerants	<1	<1	0
Total	**1,320**	**1,372**	**(52)**

Notes: $MTCO_2e$ = metric tons of carbon dioxide emissions.
() – represent a negative number

Source: Refer to ***Appendix C: Air Quality and Greenhouse Gas Emissions Outputs.***

No applicable thresholds for assessing GHG emissions apply to the Project. VCAPCD, OPR, CARB, CAPCOA, nor any other state or regional agency have adopted a numerical significance threshold that is applicable to the Project. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) developing pertinent inventories of GHG emissions, and (2) considering project consistency with applicable emission reduction strategies and goals. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. As discussed below, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As such, impacts would be less than significant.

Threshold (b): Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact.

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG reduction plans and strategies. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the regulations and policies outlined in SCAG's 2024-2050 RTP/SCS. Key regulations incorporated into this analysis include the California Code of Regulations, Title 20 and Title 23.

A discussion of the Project's consistency with the policies applicable to individual development projects in the 2024-2050 RTP/SCS is presented in **Table 3.4-6: Project Consistency with SCAG 2024-2050 RTP/SCS**, below. As shown in **Table 3.4-6**, the Project would not conflict with the 2024-2050 RTP/SCS.

TABLE 3.4-6: PROJECT CONSISTENCY WITH SCAG 2024–2050 RTP/SCS GOALS AND POLICIES

Goals and Policies	Consistency Analysis
Mobility: Build and maintain an integrated multimodal transportation network	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**Consistent**. While not necessarily applicable on a project-specific basis, the Project would support this goal, the Project would support this goal complying with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards.
Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**Consistent**. While not necessarily applicable on a project-specific basis, the Project is served by school bus service and the nearby existing transit services, including Ventura County Transportation Commission, within 0.5 miles of the Project Site including Route 60, Route 61, and Route 62. The Project Site is also accessible via bike lanes, with Class I bike lanes located along East Main Street and Class II bike lanes located along South Palm Avenue. The location of the Project encourages use of a variety of transportation options, including walking, biking and using public transit.
Support planning for people of all ages, abilities, and backgrounds.	**Consistent**. The proposed Project would renew and update the facilities at Isbell School to achieve the project objectives, which include providing facilities to meet the District's current 7th and 8th grade educational program needs; modernizing the Isbell School Campus to meet safety, community, and SPUSD goals and guidelines; and preserving the school's historic character. The proposed Project would include the demolition and replacement of aging buildings on campus with new buildings to provide structurally safe buildings, improve operational efficiency the visual character of the school. This would support planning for the students and faculty of the campus.
Communities: Develop, connect and sustain livable and thriving communities	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**Consistent**. As mentioned previously, the Project is served by school bus service and the nearby existing transit services, including Ventura County Transportation Commission, within 0.5 miles of the Project Site including Route 60, Route 61, and Route 62. The Project Site is also accessible via bike lanes, with Class I bike lanes located along East Main Street and Class II bike lanes located along South Palm Avenue. This would encourage use of a variety of transit options, including walking, biking, and use of public transit, which would increase mobility and reduce travel distance.

TABLE 3.4-6: PROJECT CONSISTENCY WITH SCAG 2024–2050 RTP/SCS GOALS AND POLICIES

Goals and Policies	Consistency Analysis
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	**Consistent**. The Project would include improvements to the existing Isbell School campus and would not involve the removal of any existing housing.
Environment: Create a healthy region for the people of tomorrow	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent**. This strategy is directed towards SCAG and is not specifically applicable to the Project. The Project include the demolition and replacements of aging buildings on campus with new buildings to provide structurally safe buildings, improve operational efficiency the visual character of the school, The Project would also raise portions of the campus above the flood zone.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	**Consistent**. While not necessarily applicable on a project-specific basis, the Project would be served by school bus service and the nearby existing transit services, including Ventura County Transportation Commission, within 0.5 miles of the Project Site including Route 60, Route 61, and Route 62. The Project Site is also accessible via bike lanes, with Class I bike lanes located along East Main Street and Class II bike lanes located along South Palm Avenue. The Project would also comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CAL Green standards.
Conserve the region's resources.	**Consistent**. While not necessarily applicable on a project-specific basis, the Project would comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CAL Green standards.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region	
Improve access to jobs and educational resources.	**Consistent**. While not necessarily applicable on a project-specific basis, the Project is served by school bus service and the Ventura County Transportation Commission with bus stops along multiple bus routes surrounding the Project Site and existing bicycle paths. The location of the Project in encourages use of a variety of transportation options, including walking, biking, and using public transit which would improve access to surrounding resources.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Consistent**. This goal is directed toward SCAG and is not specifically applicable to the Project. Nonetheless, the Project is served by school bus service and the Project Site's location near existing transit services and bicycle infrastructure would promote a variety of transportation options to minimize environmental health impacts while fostering continued economic growth.

Source: SCAG. *2024–2050 RTP/SCS*. April 4, 2023.

As discussed above, the analysis of the Project's GHG emissions consists of a quantitative analysis of the GHG emissions generated by the Project and a qualitative analysis of the Project's consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA

Guidelines Section 15063.4(a), which affirms the discretion of a lead agency to determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project's impacts. As discussed above, the Project adheres to regulatory compliance measures, including current building efficiency standards, that would reduce the Project's GHG emissions profile. Additionally, the Project would not conflict with applicable plans including SCAG's 2024-2050 RTP/SCS. Further, the Project Site's proximity to alternative transit options would further reduce what emissions are produced through the above regulations and applicable air quality plans. As such, the Project would have a less than significant direct or indirect GHG impact on the environment and would not be subject to or contribute to potential secondary effects of climate change and would be considered less than significant.

3.4.5 MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with local, State, and federal plans, policies, and programs would ensure impacts related to greenhouse gas emissions would be less than significant. No mitigation measures are required.

3.5 HAZARDS AND HAZARDOUS MATERIALS

This section of the EIR addresses and identifies the potential impacts of the proposed impacts of the proposed Project related to hazardous materials. More specifically, this section evaluates impacts associated with the Project that may potentially affect public health and safety or degrade the environment. Various federal, State of California (State), regional, and local programs and regulations related to use, storage and transportation of hazardous materials are also discussed in this section.

3.5.1 REGULATORY FRAMEWORK

3.5.1.1 Federal

Resource Conservation and Recovery Act

At the federal level, the principal agency regulating the generation, transport, and disposal of hazardous substances is the United States Environmental Protection Agency (USEPA), under the authority of the Resource Conservation and Recovery Act (RCRA). RCRA established an all-encompassing federal regulatory program for hazardous substances that is administered by USEPA. Under RCRA, USEPA regulated the generation, transportation, treatment, storage and disposal of hazardous substances.

Hazardous Materials Transport Regulations

The United States Department of Transportation (USDOT) regulates transportation of hazardous materials between states. The USDOT Federal Railroad Administration (FRA) enforces the hazardous materials regulations, which are promulgated by the Pipeline and Hazardous Materials Safety Administration for rail transportation. These regulations include requirements that railroads and other transporters of hazardous materials, as well as shippers, have and adhere to security plans and also train employees involved in offering, accepting, or transporting hazardous materials on both safety and security matters. Additionally, the Federal Hazardous Materials Transportation Law is enforced by the USDOT's Federal Highway Administration (FHWA) with the purpose of protecting risks to life, property and the environment as a result of the transportation of hazardous materials.

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress in 1980 to protect the water, air, and soil resources from the risks created from past chemical disposal practices. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites and established a trust fund to provide for cleanup when not responsible party could be identified.

Emergency Planning and Community Right-To-Know Act

The Emergency Planning and Community Right-To-Know Act (EPCRA) is an authorized program under the Superfund Amendments and Reauthorization Act (SARA). The purpose of EPCRA is to help protect communities from chemical hazards by implementing local emergency planning and notification programs. Under EPCRA, local governments are required to prepare chemical emergency response plans as a strategy to prepare for hazardous emergencies.

Superfund Amendments and Reauthorization Act

Superfund Amendment and the Reauthorization Act amended CERCLA and made important revisions to the Superfund program. Emergency Planning and Community Right-To-Know (also known as SARA Title III) requires the creation of a plan for chemical emergencies at the State and local levels and improves public access to information regarding chemical hazards. In addition, with respect to emergency planning, the Federal Emergency Management Agency (FEMA) is responsible for ensuring the establishment and development of policies and programs for emergency management at the federal, State and local levels. This includes the development of a national capability to mitigate, prepare for, respond to, and recover from a full range of emergencies.

National Pollutant Elimination System

In 1972, the National Pollution Discharge Elimination System (NPDES) was established under Section 402 of the Clean Water Act to control the discharge of pollutants to waters of the US. It does so by establishing a variety of measures designed to reduce pollutant discharges through a permitting program. The permit contains limits on allowable discharge, monitoring and reporting requirements, and other provisions to ensure that the discharge does not pollute water quality or cause harm relative to public health. Under the Clean Water Act, the NPDES program is managed nationally by the EPA, who authorizes the NPDES permit program to State, tribal, and territorial governments, enabling them to perform many of the permitting, administrative, and enforcement aspects of the NPDES program.

In the State of California, the State Water Resources Control Board (SWRCB) and nine California Regional Water Quality Control Boards (RWQCBs) administer the regulation, protection and administration of water quality. The Project Site, and the City of Rancho Mirage, are located within the Colorado River Region (Region 7), which administers the permit program for regulating storm water from construction activities for projects greater than one acre in size in the project areas under the State's General permit approach, since urban development and construction-related activities have the potential to impact the quality and quantity of runoff to proximate receiving waters. These potential construction-related impacts are mitigated by implementing a Stormwater Pollution Prevention Plan (SWPPP), in compliance with the Construction General Permit (State Water Resources Control Board Order No. 2009-0009-DWQ, as amended by Order No. 2012-006-DWQ, NPDES No. CAS000002) under the NPDES. The SWPPP requires construction sites to develop and implement best management practices (BMPs) in order to mitigate potential runoff contamination from construction activities. Some BMPs include implementing storm

drain inlet protection, concrete washout bins, secondary containment, and proper material storage at construction sites.

To address post-construction runoff impacts, projects in the Coachella Valley are regulated under the Municipal Separate Storm Sewer System (MS4) within the Whitewater River Watershed, otherwise known as the MS4 Permit (Order No. R7-2013-0011 and NPDES No. CAS617002).

3.5.1.2 State

California Environmental Protection Agency (CalEPA)

The CalEPA has broad jurisdiction over hazardous materials management in the State. Within CalEPA, the Department of Toxic Substances Control (DTSC) has primary regulatory responsibility for hazardous waste management and cleanup to protect California and Californians from exposures to hazardous wastes by regulating hazardous waste and looking for ways to reduce the hazardous waste produced in California. Enforcement of regulations has been delegated to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials.

The DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA of 1976, and the California Health and Safety Code. The Hazardous Waste Control Law (HWCL) is the primary hazardous waste statute in the State of California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the State of California. The HWCL specifies that generators have the primary duty to determine whether their waste is hazardous and to ensure their proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning, and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of waste and waste management activities that are not covered by federal law with RCRA.

Along with the DTSC, the Regional Water Quality Control Board (RWQCB) is responsible for implementing regulations pertaining to management of soil and groundwater investigation and cleanup. RWQCB regulations are contained in Title 27 of the California Code of Regulations (CCR). Additional State regulations applicable to hazardous materials are contained in Title 22 of the CCR. Title 26 of the CCR is a compilation of those hazardous materials, waste, and toxic-related regulations contained in CCR Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 that are applicable to hazardous materials.

Tanner Act

Although there are numerous State policies dealing with hazardous waste materials, the most comprehensive is the Tanner Act (AB 2948) that was adopted in 1986. The Tanner Act governs the preparation of hazardous waste management plans and the siting of hazardous waste facilities in the State of California. The act also mandates that each county adopt a Hazardous Waste Management Plan. To be in compliance with the Tanner Act, local or regional hazardous waste management plans need to

include provisions that define (1) the planning process for waste management, (2) the permit process for new and expanded facilities, and (3) the appeal process to State available for certain local decisions.

Hazardous Materials Management Plans

In January 1996, Cal/EPA adopted regulations implementing a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The six program elements of the Unified Program are hazardous waste generators and hazardous waste on-site treatment, underground storage tanks, above-ground storage tanks, hazardous material release response plans and inventories, risk management and prevention program, and Uniform Fire Code hazardous materials management plans and inventories. The program is implemented at the local level by a local agency, the Certified Unified Program Agency (CUPA). The CUPA is responsible for consolidating the administration of the six program elements within its jurisdiction.

State and federal laws require detailed planning to ensure that hazardous materials are property handled, used, stored and disposed of, and, in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment.

Hazardous Materials Disclosure Program

The Hazardous Materials Disclosure Program is found within the provisions of the California Health and Safety Code, Division 20, Chapter 6.95, Article 1. CUPAs are required to implement this Program by reporting and disclosing the storage, use, or handling of hazardous materials on a site as a strategic measure to minimize loss to life and property. In addition, Hazardous Materials Business Plans are required to be submitted by all businesses that handle more than a threshold quantity of hazardous materials.

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP) is found within the provisions of the California Health and Safety Code, Division 2, Chapter 3.5. CalARP is implemented at the local level by CUPAs as a strategy to minimize the accidental releases of stationary substances that can cause harm to the general public and environment. Businesses are required to develop Risk Management Plans (RMPs) if more than a threshold quantity of regulated substances is handled.

California Hazardous Materials Release Response Plans and Inventory Law

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires hazardous materials business plans to be prepared and inventories of hazardous materials to be disclosed. A business plan includes an inventory of the hazardous materials handled, facility floor plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee safety and emergency response training.

Government Code Section 65962.5 (Cortese List)

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List. The Cortese List is a planning document used by the State and local agencies to provide information about hazardous materials release sites. Government Code Section 65962.5 requires Cal/EPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Response to hazardous materials incidents is one part of this plan. The plan is managed by the California Governor's Office of Emergency Services, which coordinates the responses of other agencies, including Cal/EPA, California Highway Patrol (CHP), RWQCB, and the Riverside County Emergency Management Department.

Cal/OSHA

The Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA, protects workers from health and safety hazards on the job in almost every workplace in California through its research and standards, enforcement, and consultation programs. Cal/OSHA oversees certain demolition and construction efforts, and issues construction activity permits for:

- Construction of trenches or excavations which are five feet or deeper and into which a person is required to descend;
- Construction of any building, structure, scaffolding or falsework more than three stories high or the equivalent height (36 feet);
- Demolition of any building or structure, or dismantling of scaffolding or falsework more than three stories high or the equivalent height (36 feet); and
- Erection or dismantling of vertical shoring systems more than three stories high, or equivalent height (36 feet).

3.5.1.3 Local

Local agencies responsible for implementing hazardous materials regulations and protocols in Ventura County include the Ventura County Air Pollution Control District (VCAPCD), the Ventura County Certified Unified Program Agency (CUPA), the Ventura County Fire Department (VCFD) and the Ventura County Integrated Waste Management Department (VCIWMD).

The VCAPCD regulates the demolition of buildings and structures that may contain asbestos. The Ventura County CUPA is the Certified Unified Program Agency for most of the cities and the unincorporated areas of Ventura County, and has been certified by CalEPA to implement the following State environmental programs:

- Hazardous Waste

- Hazardous Materials Business Plan (HMBP)
- California Accidental Release Prevention Program (CalARP)
- Underground Hazardous Materials Storage Tanks (UST)
- Aboveground Petroleum Storage Act (APSA)/Spill Prevention, Control, and Countermeasure Plan
- Onsite Hazardous Waste Treatment/Tiered Permit

Ventura County Environmental Health Division regulates the construction, operation, repair, and removal of underground storage tanks within Ventura County, with the exception of the cities of Oxnard and Ventura. The Environmental Health Division also administers the Medical Waste Program and the Body Art Program and has emergency on-call staff available to respond to hazardous and medical waste incidents or releases.

VCIWMD administers the Household Hazardous Waste (HHW) collection program and the operation of the Pollution Prevention Center, a permanent HHW collection facility that specifically serves residents of the unincorporated area and the cities of Ojai, Santa Paula, and Fillmore.

VCFD provides a range of emergency response services including hazardous materials spills.

Information on hazardous materials and contaminated properties is maintained by both the State and the County of Ventura. The California Environmental Protection Agency (CalEPA) maintains the California Hazardous Waste and Substances List (also known as the "Cortese List"). As of April 2017, approximately 220 regulated facilities in Santa Paula were on the County's CUPA list, as well as five facilities that collect and/or transfer hazardous wastes.

Although the Santa Paula Unified School District is not subject to the City's land use authority, the following are relevant policies and programs regarding hazardous materials.

HPS 3.1*:* All use, storage, transportation and disposal of hazardous materials in Santa Paula, including the management of underground and above-ground storage tanks, shall conform to Federal, State, and County regulations. Projects that would reasonably be anticipated to emit hazardous air emissions or handle extremely hazardous substances within one quarter mile of a school shall not be approved.

HPS 3.2*:* Petroleum production, storage, and pipeline facilities and operations, including abandonment, shall comply with all applicable regulations to minimize risks to public safety. Wells, storage tanks and pipelines should be located away from sensitive uses such as residences, hospitals, and schools.

HPS 3.3*:* City land use decisions shall seek to limit public exposure to electromagnetic fields (EMF) based on the best available scientific evidence.

HPS 3.a*:* Review City regulations, procedures and sources of information regarding the use, storage, transportation and disposal of hazardous materials, and the location and operation of petroleum facilities, on an annual basis and revise as necessary to ensure that they reflect current Federal, State, and County regulations.

HPS 3.b: Cooperate with the Ventura County Environmental Health Division in preparing and updating the County Hazardous Waste Management Plan (CHWMP).

HPS 3.c: As part of the development review process for new developments that handle hazardous materials or petroleum products, consult with DEHS and require applicants to demonstrate conformance with all applicable hazardous materials regulations and identify appropriate mitigation measures. When development is proposed in an area of previous or current oil operations, the City shall consult with the California Division of Oil, Gas, and Geothermal Resources (DOGGR) and require the project to comply with DOGGR recommendations to protect public health and safety.

HPS 3.d: Work cooperatively with County DEHS to ensure that existing facilities that use, store, transport or dispose of hazardous materials comply with existing regulations.

HPS 3.e: As part of the development review process for proposed developments near electrical transmission lines, require that new residential properties, childcare facilities, active parks and recreational facilities comply with the setbacks established in *California Code of Regulations*, Title 5, §14010.c, or subsequent standards.

3.5.2 EXISTING CONDITIONS

California Government Code Section 65962.5 requires State agencies, including but not limited to the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile a list of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection. Based on a review of the databases compiled in accordance with Section 65962.5 by the DSTC and SWRCB,[1,2] the Project Site is not located on a hazardous waste site. According to the EnviroStor database on DTSC's website, the nearest cleanup site is 0.4 miles away from the proposed Project Site, north of the intersection of the Harvard Boulevard and Vernon Way. The cleanup was voluntary and no further oversight activities are required. There are seven (7) Leaking Underground Storage Tank (LUST) Cleanup Sites, all located within 0.25 miles of the Project Site that have been remediated and no further regulatory oversight activities are required. Further, there is one (1) Cleanup Program Site located within 0.25 miles of the Project Site that has been remediated and no further oversight activities are required.

A hazardous materials survey was conducted at the Project Site on May 17, 2021, which included asbestos bulk sampling and lead-based paint testing of interior and exterior building materials. A visual inspection of representative building materials was conducted to identify suspect asbestos and lead paint materials. Bulk samples were collected from representative suspect materials for submittal to a qualified laboratory for asbestos analysis. All samples were analyzed by polarized light microscopy (PLM), to determine

1 State of California. Department of Toxic Substances Control. "EnviroStor." Accessed October 2024. https://www.envirostor.dtsc.ca.gov/public/.

2 State of California. State Water Resources Control Board. "GeoTracker." Accessed October 2024. https://geotracker.waterboards.ca.gov.

asbestos fiber concentrations in bulk building material samples. PLM is applicable for the analysis of building survey submissions and other bulk materials. Screening for lead-based paint was conducted using an X-Ray Fluorescence (XRF) paint analyzer to screen representative surfaces and materials suspected of being coated with lead-based paint.

The findings of this hazardous materials survey were compiled into an Asbestos and Lead Survey Report (**Appendix D**), which identified lead-based paint coatings and Asbestos Containing Materials (ACM) in the existing buildings on the Project Site. 77 bulk samples from suspect asbestos containing materials at the Project Site were collected for analysis. Materials found to contain greater than 1% asbestos and are regulated under current federal, state and local regulations as an ACM included sprayed-on textured ceiling plaster and roofing mastics. Materials presumed to be asbestos containing but not sampled due to the potential for damaging the integrity of the materials or inaccessibility included fire doors, chalkboard mastic, and acoustic wall panel mastic. Materials tested and found to contain less than 1% asbestos included cove base mastic (dark brown), brown wall tile mastic, and exterior window putty. Presumed ACM and Trace ACM materials must be treated as asbestos containing materials unless further analysis by more quantitative methods such as "Point Count" or transmission electron microscopy (TEM) are utilized to quantify the actual concentration of asbestos.

A visual inspection was conducted to identify areas of suspect lead-based paint or coatings at the Project Site. Screening for lead was conducted in the field using XRF methodology in accordance with current state and federal regulations. All field work was conducted by a Certified Lead Inspector/Assessor or Lead Sampling Technician. Per EPA and California regulations, paint or coatings are considered to be lead-based at concentrations at or above 1.0 milligram per square centimeter (mg/cm2) using XRF technology. Materials and surfaces with concentrations greater than 1.0 milligrams per square centimeter using XRF equipment, and are therefore considered positive for lead-based paint (LBP) per current state and federal regulations included tan wood door trim and window frames, blue wood display cases, window frames, and door frames, beige wood door trim, brown wood window frames, trim, sills, and door frames, white plaster walls, and white wood eaves and rafter tails. Materials and surfaces that tested positive for lead in the glazing compounds about 1.0 milligrams per square centimeter included white ceramic wall tiles, blue accent tiles, a white porcelain sink, green chalkboards, and green and blue ceramic decorative wall tiles. Although not covered by the EPA's RRP rule, disturbance of these components may create a lead hazard which is regulated under current OSHA and state regulations and may require special handling as part of site renovation work.

3.5.3 RELEVANT PLANS, POLICIES, ORDINANCES

The local enforcement agency for asbestos removal projects in this area is the Ventura County Air Pollution Control District (APCD). They require notification for removal of friable, regulated asbestos containing materials in quantities which exceed 100 square feet. Regardless of the quantities found, the survey report should be submitted for their review along with any required documentation or notifications for their review and approval. They also require notification for all demolition projects,

including projects where a load-bearing wall is removed. Additional permit requirements may apply from the local Building Department.

Several regulations apply to the disturbance and possible exposure to lead from paints and other coatings. Title 17 of the California Code of Regulations (CCR) applies to residences and buildings accessible to the public that were constructed prior to 1979, and schools constructed before 1993 where lead paint may exist. Cal-OSHA regulations found within Title 8 of the CCR apply to worker exposure as stated in the Lead-in-Construction Standard (8-CCR-1532.1). The EPA recently issued a final rule to address lead-based paint hazards created by renovation, repair and painting activities that disturb lead-based paint in target housing and child-occupied facilities.

The EPA's Lead Renovation, Repair and Painting (RRP) Program was passed into regulation requiring compliance with training and certification requirements per Title 40 of the Code of Federal Regulations (40 CFR Part 745). The RRP rule states that firms and individuals conducting renovations of target housing constructed before 1978 must assume that lead is present in all painted surfaces or coatings unless a written determination has been made by a Certified Inspector that the components affected by the renovation are free of paint or other surface coatings that contain lead equal to or in excess of 1.0 milligrams per square centimeter (mg/cm2) or 0.5% by weight.

Hazardous materials are also regulated by the United States Environmental Protection Agency (US EPA), Department of Toxic Substances Control (DTSC), Occupational Safety & Health Administration (OSHA), and South Coast Air Quality Management District (SCAQMD).

The Airport Comprehensive Land Use Plan (CLUP) for Ventura County, adopted by the Ventura County Transportation Commission in 2000, is intended to protect and promote the safety and welfare of residents near military and public use airports in the county, as well as airport users, while promoting the continued operation of those airports. The plan seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that structures and activities do not encroach upon or adversely affect the use of navigable airspace.

3.5.4 THRESHOLDS OF SIGNIFICANCE

The proposed Project would result in a significant impact if any of the following would occur:

(a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
(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 or excessive noise for people residing or working in the project area.
(f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.5.5 IMPACT ANALYSIS

Threshold (a):	**Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?**

Less than Significant Impact.

As discussed above in **Section 3.5.1**, an Asbestos and Lead Survey Report was conducted as part of this Draft EIR which identified lead-based paint coatings and Asbestos Containing Materials (ACM) at the site which require abatement or special handling during construction.

Construction of the proposed Project could result in significant impacts with regard to the routine transport, storage, production, use, or disposal of hazardous materials from demolition of asbestos or lead containing building materials. Any demolition activities that include asbestos removal shall be completed in compliance with all regulations set forth in SCAQMD Rule 1403. These include surveying, notifications, ACM removal procedures and time schedules, as well as the handling, clean-up, storage, disposal, and landfilling of ACM. Rule 1403 also requires all operators to maintain records including waste shipment records, appropriate warning labels, signs, and markings.[3]

The Asbestos and Lead Survey Report outlines additional recommendations for the disturbance and removal of asbestos and lead containing materials and specifies that all lead and asbestos containing materials that will be disturbed as part of future site work must be handled in accordance with applicable federal, state and local regulations. Specifically, this report recommends that disturbance activities should be performed only by properly trained and licensed abatement contractors and proper containment and transportation of contaminated waste materials for off-site disposal at a properly permitted facility.

The proposed Project is an educational facility which would not involve routine transport, use, or disposal of hazardous materials during operation. Required maintenance supplies such as pesticides, cleansers, lubricants, and paints would be used and stored on site. Proper maintenance of storage areas and

3 Air Quality Management District. Rule 1403. Asbestos Emissions from Demolition/Renovation Activities. October 5, 2007. https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

appropriate storage of hazardous materials on campuses would be required. All hazardous materials would be contained, stored, and used according to manufacturers' instructions and handled in compliance with applicable standards and regulations.

The proposed Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding hazardous waste. Compliance with existing standards and regulations would minimize associated risks to a less than significant level and would not pose a significant impact to the public or the environment. Impacts would be less than significant.

Threshold (b): Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

Less than Significant Impact.

Construction of the proposed Project may require the transportation, use, and disposal of hazardous waste materials. As referred to within Threshold (a), the Asbestos and Lead Survey Report (**Appendix D**) identified a number of lead-based paint coatings and Asbestos Containing Materials (ACM) at the site which will require abatement or special handling as part of future site work. According to the EnviroStor database on DTSC's website, the nearest cleanup site is 0.4 miles away from the proposed Project Site, north of the intersection of the Harvard Boulevard and Vernon Way. The cleanup was voluntary and no further oversight activities are required. The proposed Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding hazardous waste.

During the operation of the proposed Project, hazardous waste use would be minimal and in small quantities. The hazardous waste material will be properly used and stored according to the manufacturers' instructions and in compliance with applicable standards and regulations.

The proposed Project would comply with existing federal, State, and local standards and regulations regarding hazardous waste. Hazardous release impacts during construction and operation of the proposed Project would be less than significant.

Threshold (c): Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact.

The proposed Project is located in a mixed-use neighborhood with both commercial and residential development. The nearest school to Isbell Middle School is Santa Paula High School, approximately 1,600 feet north of the Project Site. The proposed Project Site is a school as well and impacts will incur if hazardous waste materials were to be released on campus.

As discussed in Thresholds (a) and (b), the proposed Project will involve the disturbance of lead and asbestos containing materials during demolition activities. The proposed Project will require routine transport, use, and disposal of materials with the potential to contain hazardous chemicals. The proposed Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding hazardous waste.

During operation, the proposed Project is expected to continue its current functions with minimal uses of hazardous materials on site. Any hazardous chemicals used would be properly handled and stored according to manufacturer's instructions and in compliance with applicable standards and regulations. In addition, the proposed Project would comply with all applicable local, State, and federal regulations governing such activities, decreasing the impact of handling the hazardous waste materials to less than significant.

Threshold (d): Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact.

California Government Code Section 65962.5 requires State agencies, including but not limited to the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile a list of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection. Based on a review of the databases compiled in accordance with Section 65962.5 by the DSTC and SWRCB,[4,5] the Project Site is not located on a hazardous waste site. There are seven (7) Leaking Underground Storage Tank (LUST) Cleanup Sites, all located within 0.25 miles of the Project Site that have been remediated and no further regulatory oversight activities are required. Further, there is one (1) Cleanup Program Site located within 0.25 miles of the Project Site that has been remediated and no further oversight activities are required. Therefore, the proposed Project will not create a significant hazard to the public or the environment. Impacts would be less than significant.

Threshold (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 or excessive noise for people residing or working in the project area?

Less than Significant Impact.

The Project Site is located approximately 0.1 miles from the Santa Paula Airport, which encompasses a total of about 38 acres and provides a single asphalt runway approximately 2,650 feet long by 40 feet wide. According to the City's General Plan, the Project Site is not located within the Runway Protection

4 State of California. Department of Toxic Substances Control. "EnviroStor."

5 State of California. State Water Resources Control Board. "GeoTracker."

Zone, the Outer Safety Zone, or the Traffic Pattern Zone of the Santa Paula Airport. However, the southeastern portion of the Project Site is located within Height Restriction Zone.[6] As discussed above in **Section 3.5.2**, air safety zones applicable to Santa Paula Airport are designated in the Airport Comprehensive Land Use Plan (CLUP) for Ventura County. The proposed Project would comply with the regulations outlined in Chapter 6.3, Airspace Protection, of the CLUP regarding development in Height Restriction Zones.[7] The function and operation of the Project Site would remain unchanged; therefore, no additional safety hazards or excessive noise impacts are anticipated due to the proximity of an airport. Impacts would be less than significant.

Threshold (f): Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact.

Construction. During demolition and construction activities, the Project would conduct improvements along sidewalks and street lanes adjacent to the site that could potentially cause traffic hazards and have construction equipment that would be incompatible with the school. Additionally, delivery truck trips and construction equipment could contribute additional traffic within the Project area, which could in turn impact emergency access to the Project Site. Partial lane closures may be needed along Harvard Boulevard and 4th Street, which could potentially impact emergency vehicle access to the Project Site. Construction trip generation intensities would vary based on the construction phase, truck hauling patterns, and construction employment intensities. To ensure that there would be less than significant impacts to emergency access during the construction phase, the Project would implement a construction management plan. Therefore, construction impacts would be less than significant.

Operation. Development of the proposed Project would not expand the school campus outside of its existing boundaries, which do not currently create hazards due to a geometric design or incompatible uses. The Project would be developed to adhere to applicable City regulations to ensure that there would be no significant hazard within the proposed buildings. The project would not alter or impact roads or sight lines. Existing entrance/exit points to the Project Site would remain largely unaltered except for modifications to the parking lot along Harvard Boulevard. Therefore, the operation of the proposed Project is not expected to interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Threshold (g): Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact.

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6 City of Santa Paula. *2040 General Plan*. "5-24 Hazards and Public Safety, F. Aviation Safety." Accessed October 2024. https://www.spcity.org/DocumentCenter/View/1700/City-of-Santa-Paula-2040-General-Plan---Final-Adopted-2020-03-04.

7 Ventura County Airport Land Use Commission. *Final Airport Comprehensive Land Use Plan Update for Ventura County*. Adopted July 7, 2000. Accessed October 2024. https://www.goventura.org/wp-content/uploads/2018/03/2000-airport-land-use-for-ventura-county.pdf.

The proposed Project is not within the areas identified as Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). Under Government Code 51175-89, CAL FIRE is directed to identify areas of VHFHSZ based on fuels, terrain, weather, and other relevant factors. The information is used to determine mitigation measures to reduce the risk associated with wildfires.[8] Given the nature and location of the proposed Project, no exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impacts would occur.

3.5.6 MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required with regards to hazards and hazardous materials, and all impacts would be less than significant.

8 State of California. Department of Forestry and Fire Protection. "Fire Hazard Severity Zones." Accessed October 2024. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.

3.6 NOISE

This section evaluates the potential for the proposed Project to result in noise and vibration impacts within the Project Site and surrounding area. This evaluation uses procedures and methodologies as specified by the California Department of Transportation (Caltrans), the Federal Transit Administration (FTA), and the Federal Highway Administration (FHWA). Construction noise and vibration modeling datasheets are included in **Appendix E: Construction Noise Worksheets** and **Appendix F: Construction Vibration Worksheets** of this report.

3.6.1 EXISTING CONDITIONS

The main sources of noise within the City include roads, commercial, industrial and agricultural operations, railroads, aircraft overflight, construction and nuisance noise. The highest noise levels are located adjacent to roadways including State Route (SR) 126, SR 150, Harvard Boulevard, Hallock Drive, Palm Avenue, Santa Paula Street, and Telegraph Road.

3.6.1.1 Overview of Noise and Vibration

Noise levels are measured using a variety of scientific metrics. As a result of extensive research into the characteristics of noise and human response, standard noise descriptors have been developed for noise exposure analyses. All noise levels provided in this analysis are for outdoor conditions, unless otherwise stated specifically to be interior noise levels.

A-Weighted Sound Pressure Level (dBA): The decibel (dB) is a unit used to describe sound pressure level. When expressed in dBA, the sound has been filtered to reduce the effect of very low and very high frequency sounds, much as the human ear filters sound frequencies. Without this filtering, calculated and measured sound levels would include events that the human ear cannot hear (e.g., dog whistles and low-frequency sounds, such as the groaning sounds emanating from large buildings with changes in temperature and wind). With A-weighting, calculations and sound-monitoring equipment approximate the sensitivity of the human ear to sounds of different frequencies.

Maximum Noise Level (Lmax): Lmax is the maximum or peak sound level during a noise event. The metric accounts only for the instantaneous peak intensity of the sound, and not for the duration of the event. As a vehicle passes by an observer, the sound level increases to a maximum level and then decreases. Some sound level meters measure and record the maximum or Lmax level.

Sound Exposure Level (SEL): SEL, expressed in dBA, is a time-integrated measure, expressed in decibels, of the sound energy of a single noise event at a reference duration of 1 second. The sound level is integrated over the period that the level exceeds a threshold. Therefore, SEL accounts for both the maximum sound level and the duration of the sound. The standardization of discrete noise events into a 1-second duration allows calculation of the cumulative noise exposure of a series of noise events that occur over a period of time.

Equivalent Continuous Noise Level (Leq): Leq is the sound level, expressed in dBA, of a steady sound that has the same A-weighted sound energy as the time-varying sound over the averaging period. Unlike SEL, Leq is the average sound level for a specified time period (e.g., 24 hours, 8 hours, 1 hour). Leq is calculated by integrating the sound energy from all noise events over a given time period and applying a factor for the number of events. Leq can be expressed for any time interval; for example, the Leq representing an averaged level over an 8-hour period would be expressed as Leq(8).

Community Noise Equivalent Level (CNEL): CNEL, expressed in dBA, is the standard metric used in California to represent cumulative noise exposure. The metric provides a single-number description of the sound energy to which a person or community is exposed over a period of 24 hours similar to day-night average sound level (DNL). CNEL includes penalties applied to noise events occurring after 7:00 PM and before 7:00 AM, when noise is considered more intrusive. The penalized time period is further subdivided into an evening period (7:00 PM through 10:00 PM) with an addition of 5 dBA to measured noise levels and a nighttime period (10:00 PM to 7:00 AM) with an addition of 10 dB to measured noise levels. The evening weighting is the only difference between CNEL and DNL.

3.6.1.2 Groundborne Noise

Groundborne noise refers to noise generated by groundborne vibration. More specifically, groundborne noise is the low-frequency rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.[1] The relationship between groundborne vibration (discussed directly below) and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise levels that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 dB lower than the velocity level. For groundborne vibration that causes high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the groundborne noise level will be approximately 20 dB lower than the velocity level.[2]Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

1 Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment Manual*. p. 112. September 2018. Accessed December 2024. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

2 United States Department of Transportation (USDOT). *FHWA Roadway Construction Noise Model Final Report*. January 2006. Accessed December 2024. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

3.6.1.3 Groundborne Vibration

Groundborne vibration is the perceptible movement of building floors, rattling windows, and doors, shaking of items on shelves or walls, and rumbling sounds. The root mean square (RMS) amplitude of a motion over a 1-second period is commonly used to predict human response to vibration. The motion due to groundborne vibration is described in vibration velocity levels, measured in decibels referenced to 1 microinch per second, and expressed as vibration decibels (VdB). Groundborne vibration is not a common environmental problem, unlike roadway noise or transit noise. The vibration source levels for various types of construction equipment would be based on data provided in Table 7-4 of the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

3.6.1.4 Effects of Noise on Humans

Human response to sound is highly individualized. Annoyance is the most common issue associated with community noise levels. Many factors influence the response to noise including the character of the noise, the variability of the sound level, duration, and the time of day of the occurrence.[3] Additionally, non-acoustical factors, such as individual opinion of the noise source, the ability to adapt to the noise, the attitude towards the source and those associated with it, and the predictability of the noise, all influence the response to noise.[4] These factors result in the reaction to noise being highly subjective, with the perceived effect of a particular noise varying widely among individuals in a community. The effects of noise can be grouped into three general categories, subjective effects, such as annoyance and nuisance; interference with activities such as conversation and sleep; and physiological effects, for example, stress or hearing loss.[5]

Noise-induced hearing loss usually takes years to develop.[6] Hearing loss is one of the most obvious and easily quantifiable effects of excessive exposure to noise. While the loss can be gradual and occur over time, it can also be traumatic and occur due to sudden exposure to high noise levels.[7] When combined with hearing loss associated with aging, the amount of hearing loss directly due to the environment is

3 State of California. Department of Transportation. *Technical Noise Supplement*. September 2013. Accessed December 2024. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf.

4 State of California. Department of Transportation. *Technical Noise Supplement*. September 2013.

5 State of California. Department of Transportation. *Technical Noise Supplement*. September 2013.

6 State of California. Department of Transportation. *Technical Noise Supplement*. September 2013.

7 State of California. Department of Transportation. *Technical Noise Supplement*. September 2013.

difficult to quantify. Although the major cause of noise induced hearing loss is occupational, nonoccupational sources may also be a factor.[8]

Noise can mask important sounds and disrupt communication between individuals in a variety of settings. This process can cause anything from a slight irritation to a serious safety hazard, depending on the circumstance. Noise can disrupt face-to-face communication and telephone communication, and the enjoyment of music and television in the home. Interference with communication has proved to be one of the most important components of noise-related annoyance.[9]

Noise-induced sleep interference is one of the critical components of community annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern or level of sleep. It can produce short-term effects, with the possibility of more serious effects on health if it continues over long periods.

Annoyance can be defined as the expression of negative feelings resulting from interference with activities, as well as the disruption of one's peace of mind or the enjoyment of one's environment. The consequences of noise-induced annoyance are privately held dissatisfaction, publicly expressed complaints to authorities, and potential adverse health effects, as discussed previously.

Some common sounds on the dBA scale, relative to ordinary conversation, are provided in **Table 3.6-1: Common Sounds on the A-Weighted Decibel Scale**. As shown, the relative perceived loudness of sound doubles for each increase of 10 dBA, although a 10 dBA change corresponds to a factor of 10 in relative sound energy. Generally, sounds with differences of 3 dBA or less are not perceived to be noticeably different by most listeners.

TABLE 3.6-1: COMMON SOUNDS ON THE A-WEIGHTED DECIBEL SCALE

Sound	Sound Level (dBA)	Subjective Evaluations
Near Jet Engine	140	Deafening
Threshold of Pain	130	
Rock music, with amplifier	120	
Thunder, snowmobile (operator)	110	Very Loud
Boiler shop, power mower	100	
Orchestral crescendo at 25 feet, noisy kitchen	90	
Busy street	80	Loud
Interior of department store	70	
Ordinary conversation, 3 feet away	60	Moderate

8 State of California. Department of Transportation. *Technical Noise Supplement*. September 2013.

9 FTA. *Transit Noise and Vibration Impact Assessment Manual*. September 2018.

TABLE 3.6-1: COMMON SOUNDS ON THE A-WEIGHTED DECIBEL SCALE		
Sound	**Sound Level (dBA)**	**Subjective Evaluations**
Quiet automobiles at low speed	50	
Average office	40	Faint
City residence	30	
Quiet country residence	20	
Rustle of leaves	10	Very Faint
Threshold of hearing	0	

Notes:

[1] Continuous exposure above 85 dB is likely to degrade the hearing of most people (hearing protection recommended).

[2] Range of Speech: 50 – 70 dB

Source: U.S. Department of Housing and Urban Development. Aircraft Noise Impact – Planning Guidelines for Local Agencies. 1972.

3.6.1.5 Surrounding Uses

Land uses surrounding the Project Site include single and multifamily residential and commercial uses. Parcels to the north and south of the Project Site are zoned C-G: Commercial-General, and parcels to the east and west are zoned R-3: Residential-Medium-High Density. The nearest sensitive receptors include the single-family residential uses located adjacent to the Project Site to east along S. 7th Street and to the west along S. 4th Street.

North

The Isbell School campus does not have a frontage on E Main Street to the north. The campus is located behind a variety of commercial and residential buildings including a single-story medical clinic, commercial office, laundromat, bank, and associated surface parking, as well as single-story single-family homes and two- and three-story multifamily residences.

South

The campus is set back from the northeast corner of the intersection of Harvard Boulevard and S. 4th Street by one- and two-story single-family and multi-family residences. Commercial buildings located across from the school's frontage on Harvard Boulevard include a motel, retail store, and associated surface parking. The campus is set back from the northwest corner of the intersection of Harvard Boulevard and S. 7th Street by two-story multi-family residences and a small retail store.

East

The campus is separated from S. 7th Street to the east by one- and two-story single-family and multi-family residences. East Ventura Street bisects the block running east-west and is lined with single-family

homes from its intersection at S. 7th Street until its termination at a service entrance to the school's campus.

West

The campus is separated from S. 4th Street to the west by one- and two-story single-family and multi-family residences. Residential buildings located across from the school's frontage on S. 4th Street include also include one- and two-story single-family and multi-family residences.

3.6.2 RELEVANT PLANS, POLICIES, ORDINANCES

While the Santa Paula Unified School District is not legally subject to City of Santa Paula's (City) land use authority, the City's standards are considered when establishing thresholds of significance to assist in determining environmental impacts. The City's Noise Ordinance (Title IX, Chapter 93 of the Santa Paula Municipal Code) regulates against loud or unnecessary noise and defines sources of such noise. The ordinance also establishes that it is unlawful for a source of sound to exceed the noise levels provided below in **Table 3.6-2: City of Santa Paula Sound Level Limits**. The ordinance also specifies noise sources that are normally exempt from these standards, including motor vehicle noise and construction activities between 8:00 AM and 6:00 PM Monday through Friday, and emergency work.

TABLE 3.6-2: CITY OF SANTA PAULA SOUND LEVEL LIMITS

Land Use (Receptor Property)	Time Period	Maximum Exterior Noise Level (dB)
Residential	10:00 PM to 7:00 AM 7:00 AM to 10:00 PM	60 dbA 65 dbA
Neighborhood Commercial	Anytime	65 dbA
Commercial & Office	Anytime	70 dbA
Industrial	Anytime	75 dbA
Schools, Libraries, Hospitals, community Care facility, and Assembly Halls	Anytime	65 dbA

Source: City of Santa Paula Municipal Code, Section 93.21

Policy Hazards and Public Safety (HPS) 6.4 of the City's General Plan states that exposure of citizens to excessive noise and ground-borne vibration, including nuisance noise, should be reduced to the greatest extent feasible.[10] To evaluate whether the Project will generate a substantial periodic increase in short-term noise levels at off-site sensitive receiver locations, a construction-related noise level threshold is adopted from the Criteria for Recommended Standard: Occupational Noise Exposure prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the US Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the

10 City of Santa Paula. *2040 General Plan*. March 4, 2020. Accessed December 2024. https://www.spcity.org/DocumentCenter/View/1700/City-of-Santa-Paula-2040-General-Plan---Final-Adopted-2020-03-03.

source. The construction-related noise level threshold starts at 85 dBA for more than eight hours per day, and for every 3 dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, more conservative construction noise level threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at the nearby sensitive receiver locations. Since this construction-related noise level threshold represents the energy average of the noise source over a given time period, they are expressed as Leq noise levels. Therefore, the noise level threshold of 85 dBA Leq over a period of eight hours or more is used to evaluate the potential Project-related construction noise level impacts at the nearby sensitive receiver locations.

With regards to vibration standards, there are no existing federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects such as the Project. However, the FTA has adopted vibration criteria for use in evaluating impacts from construction activities.[11] While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration. The construction vibration criteria include consideration of the building condition. The vibration damage criteria is shown in **Table 3.6-3: Construction Vibration Damage Criteria**.

TABLE 3.6-3: CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration (FTA). Transit Noise and Vibration Impact Assessment Manual. p. 112. September 2018. Accessed October 2023. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

3.6.3 THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, a project would have a potentially significant impact related to noise and groundborne vibration if it would result in:

(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

11 FTA. *Transit Noise and Vibration Impact Assessment Manual*. p. 112. September 2018. Accessed December 2024. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

Based on local noise criteria established by the City and NIOSH, the following would be considered significant:

- Construction activities occur outside the hours of 8:00 AM and 6:00 PM Monday through Friday,
- Construction activities that exceed the noise level threshold of 85 dBA Leq over a period of eight hours or more.

(b) Generation of excessive groundborne vibration or groundborne noise levels?

Based on vibration criteria established by the Federal Transit Administration, the following would be considered significant:

- Construction equipment would provide ground-borne vibration levels to exceed 0.2 ips PPV at the nearest off-site residential buildings.

(c) For a project located within the vicinity of a private airstrip or 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?

3.6.4 IMPACT ANALYSIS

Threshold (a):	**Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less than Significant Impact with Mitigation.

A significant impact would occur if exposure of persons to or generation of noise levels are in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction

Construction activities that would occur during the construction the five construction phases (demolition, grading, building construction, architectural coating, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project site.

Noise from construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Construction activities that would occur during the construction phases would generate both steady-state and episodic noise that would be heard both on and off the Project site. Each construction phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be required.

An inventory of construction equipment, including the number and types of equipment, which would be operating simultaneously within the Project site was identified for each phase/component of construction as shown in **Table 3.6-4: Construction Equipment by Phase**. It is highly unlikely that all pieces of construction equipment identified in **Table 3.6-4** would operate simultaneously in any specific location during construction because equipment is generally operated only when needed and space constraints limit the equipment that can be used at any one time in a specific location. Therefore, this modeling is considered a conservative approach to calculate the maximum noise levels that would be generated.

TABLE 3.6-4: CONSTRUCTION EQUIPMENT BY PHASE

Construction Phase	Equipment Type	Quantity	Usage Hours (per day)	Noise Level at 25 feet (dBA Leq-1hour)	Calculated Average Noise Level (dBA Leq 1-hour)
		Phase 1			
Grading	Graders	1	6	87.0	90.5
	Tractors/Loaders/Backhoes	1	7	86.0	
	Rubber Tired Dozers	1	6	83.7	
Building Construction	Forklifts	2	6	83.2	90.6
	Cranes	1	4	78.6	
	Tractors/Loaders/Backhoes	2	8	89.1	
Paving	Cement and Mortar Mixers	4	6	89.0	92.5
	Pavers	1	7	80.2	
	Rollers	1	7	79.0	
	Tractors/Loaders/Backhoes	1	7	86.0	
Architectural Coating	Air Compressors	1	6	79.7	79.7
		Phase 2			
Demolition	Rubber Tired Dozers	1	6	83.7	92.5
	Tractors/Loaders/Backhoes	2	6	89.1	
	Concrete/Industrial Saws	1	8	88.6	
Grading	Graders	1	6	87.0	90.5
	Tractors/Loaders/Backhoes	1	7	86.0	
	Rubber Tired Dozers	1	6	83.7	
Building Construction	Forklifts	2	6	83.2	90.6
	Cranes	1	4	78.6	
	Tractors/Loaders/Backhoes	2	8	89.1	
Paving	Cement and Mortar Mixers	4	6	89.0	92.5
	Pavers	1	7	80.2	
	Rollers	1	7	79.0	
	Tractors/Loaders/Backhoes	1	7	86.0	
	Air Compressors	1	6	79.7	
Architectural Coating	Rubber Tired Dozers	1	1	87.0	79.7
		Phase 3			
Demolition	Rubber Tired Dozers	1	6	83.7	92.5

TABLE 3.6-4: CONSTRUCTION EQUIPMENT BY PHASE

Construction Phase	Equipment Type	Quantity	Usage Hours (per day)	Noise Level at 25 feet (dBA Leq-1hour)	Calculated Average Noise Level (dBA Leq 1-hour)
	Tractors/Loaders/Backhoes	2	6	89.1	
	Concrete/Industrial Saws	1	8	88.6	
Grading	Graders	1	6	87.0	90.5
	Tractors/Loaders/Backhoes	1	7	86.0	
	Rubber Tired Dozers	1	6	83.7	
Paving	Cement and Mortar Mixers	4	6	89.0	92.5
	Pavers	1	7	80.2	
	Rollers	1	7	79.0	
	Tractors/Loaders/Backhoes	1	7	86.0	
Architectural Coating	Air Compressors	1	6	79.7	79.7
Phase 4					
Demolition	Rubber Tired Dozers	1	6	83.7	92.5
	Tractors/Loaders/Backhoes	2	6	89.1	
	Concrete/Industrial Saws	1	8	88.6	
Grading	Graders	1	6	87.0	90.5
	Tractors/Loaders/Backhoes	1	7	86.0	
	Rubber Tired Dozers	1	6	83.7	
Building Construction	Forklifts	2	6	83.2	90.6
	Cranes	1	4	78.6	
	Tractors/Loaders/Backhoes	2	8	89.1	
Paving	Cement and Mortar Mixers	4	6	89.0	92.5
	Pavers	1	7	80.2	
	Rollers	1	7	79.0	
	Tractors/Loaders/Backhoes	1	7	86.0	
Architectural Coating	Air Compressors	1	6	79.7	79.7
Phase 5					
Demolition	Rubber Tired Dozers	1	6	83.7	92.5
	Tractors/Loaders/Backhoes	2	6	89.1	
	Concrete/Industrial Saws	1	8	88.6	
Grading	Graders	1	6	87.0	90.5
	Tractors/Loaders/Backhoes	1	7	86.0	
	Rubber Tired Dozers	1	6	83.7	

Source: FHWA Roadway Construction Noise Model (RCNM) version 1.1.
Refer to **Appendix E** for Construction Noise Worksheets.

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on-site would operate simultaneously.

As described above, land uses surrounding the Project Site include single and multifamily residential and commercial uses. Parcels to the north and south of the Project Site are zoned C-G: Commercial-General, and parcels to the east and west are zoned R-3: Residential-Medium-High Density. The campus is separated from E Main Street to the north and Harvard Boulevard to the south by a variety of commercial and residential buildings and associated surface parking. The nearest sensitive receptors include the one- and two-story single-family and multi-family residences located adjacent to the Project Site to east along S. 7th Street and to the west along S. 4th Street.

The estimated construction noise levels were calculated for each of the analyzed receptors during each of the construction phases. Given the physical size of the Project site and logistical limitations, and with the noise equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. This is considered a worst-case evaluation because construction of the Project would typically use fewer pieces of equipment simultaneously at any given time as well as operating throughout the construction site (i.e., most of the time construction equipment would be operating at distances further away from the off-site receptors than that assumed in the forecasting of Project construction noise levels). As such, Project construction would often generate lower noise levels than reported herein.

Table 3.6-5: Construction Maximum Noise Estimates presents the maximum noise impacts that are forecasted to occur at each of the nearby sensitive receptors during any of the construction phases. As shown, average noise levels during construction would exceed the threshold of 85 dBA by a maximum of 5.9 dBA at the adjacent single-family residential uses located adjacent to the Project Site to the west on South 4th Street.

TABLE 3.6-5 : CONSTRUCTION MAXIMUM NOISE ESTIMATES

Nearest Off-Site Building Structures	Calculated Noise Level (Leq-1hour) by Construction Phase					Significance Threshold	Increase above Significance Threshold
	Demolition	Grading	Building Construction	Paving	Architectural Coating		
Single family homes to the east along South 7Th Street	73.8	71.9	72.7	71.9	61.0	85.0	+0.0
Single family homes to the west along South 4Th Street	90.9	89.0	89.8	89.0	78.1	85.0	+5.9

Source: FHWA, RCNM, version. 1.1.
Refer to **Appendix E** for Construction Noise Worksheets.

In devising construction noise control strategies, important options include controlling the noise at the source. Source control requirements include added benefits in promoting technological advances in the development of quieter equipment. Source control techniques can include: (1) muffler requirements, (2)

maintenance and operational requirements, and (3) equipment emission level requirements. Most noise originates from equipment powered by either gasoline or diesel engines. A large part of the noise emitted is due to the intake and exhaust portions of the engine cycle. A remedy for controlling much of the engine noise is by adhering to **Mitigation Measure MM-NOI-1** which requires the use of optimal muffler systems. **MM-NOI-1** would lead to replacement of worn mufflers and to retrofitting where mufflers are not in use. Based on FHWA data, using optimal muffler systems on all equipment would reduce construction noise levels by 10 dBA or more.[12]

Other effective methods of diminishing the noise impacts associated with individual pieces of construction equipment is to employ less noisy machinery. This is accomplished by specifying the quietest available equipment. Modifications such as dampening of metal surfaces or a redesign of a particular piece of equipment is effective in reduction noise due to vibration. These modifications are typically conducted by the manufacturer or with factory assistance. The reduction is controlled by the imposed limits on the technical capabilities of the manufacturer or the equipment user. According to FHWA analysis, noise reductions of up to 5 dBA can be achieved using dampening materials.[13] Sound aprons are typically designed from absorptive mats and are draped on the frames attached to the equipment.[14] This material can be constructed from polyvinyl chloride (PVC) layers, lead-filled fabric, or rubber. These aprons are most useful when equipment only needs partial shielding or has to be regularly moved.[15]

Additionally, limiting the number of noise-generating, heavy-duty construction equipment to two (2) pieces operating simultaneously would reduce construction noise levels by approximately 1.5 dBA, as having multiple sources operating at the same time increases the intensity of the sound.

With implementation of **MM-NOI-1,** construction noise levels resulting in an increase of 5.9 dBA (Leq 1-hour) above the significance threshold would be reduced by a minimum of 26.5 dBA (Leq 1-hour). Additionally, the Project would be consistent with the City's Noise Ordinance by ensuring construction activities would not occur outside of the hours of 8:00 AM to 6:00 PM Monday through Friday. Compliance with the above practices would ensure construction noise levels would be below the significance threshold; thus, construction noise levels would not be significant.

Off-Site Construction Traffic

Construction of the Project would require worker, haul, and vendor truck trips to and from the site to work on the site, export soil, and delivery supplies to the site. These trips would be minimal relative to existing uses and would be temporary in nature and would cease to occur after the construction of the Project is complete.

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12 Federal Highway Administration (FHWA). *Special Report—Measurement, Prediction, and Mitigation*. Updated June 2017. Accessed December 2024. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn03.cfm.

13 FHWA. *Special Report—Measurement, Prediction, and Mitigation*. Updated June 2017.

14 FHWA. *Special Report—Measurement, Prediction, and Mitigation*. Updated June 2017.

15 FHWA. *Special Report—Measurement, Prediction, and Mitigation*. Updated June 2017.

Noise associated with construction truck trips were estimated using the Caltrans FHWA Traffic Noise Model based on the maximum number of worker and truck trips in a day. Project haul truck trips which includes medium- and heavy-duty trucks would generate noise levels of approximately 58.2 to 63.0 dBA, respectively, measured at a distance of 25 feet from the adjacent sensitive receptor.

According to the Federal Transit Administration, a doubling of identical sound sources can result in a 3 dB increase in sound.[16] The maximum number of trips would occur during the building construction of Phase 4, totaling approximately 96 trips, including 8 worker trips and 88 hauling trips. Daily trips from the existing uses were estimated to be 1,491.[17] The increases in trips during construction would not represent a doubling of traffic during any phase of construction, thus roadway noise from the construction of the proposed Project would not result in a perceptible increase. For this reason, impacts would be less than significant.

Operation

Stationary Noise (operations)

Stationary sources of noise that could be introduced in the area could include mechanical equipment, loading docks, and expansion of the existing parking lot. All stationary sources would have shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to distance, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. Impacts would be less than significant.

HVAC Systems

The Project would introduce various stationary noise sources, including HVAC systems, which would be located either on the roof, the side of a structure or on the ground. Off-site and on-site sensitive receptors could be potentially affected by the introduction of such equipment. Should the school district choose to consider the City's standards when establishing thresholds of significance to assist in determining environmental impacts, this equipment would be screened and integrated into the architectural design of the building and this **3.**equipment would not generate noise levels that would substantially elevate the ambient noise environment and would not generate substantial noise and impacts to nearby noise-sensitive receptors. Impacts would be less than significant.

Roadway Noise

Changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. An increase of greater than 5 dBA is readily noticeable, while the human ear perceives a 10 dBA increase in sound level to be a doubling of sound volume. A doubling of sound energy results in a 3 dBA increase in sound, which means that a doubling of sound wave energy (e.g., doubling the volume of

16 FTA. *Transit Noise and Vibration Impact Assessment*. May 2006. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf. December 2024.

17 **Appendix C.1**: Existing Air Quality and Greenhouse Gas Emissions.

traffic on a roadway) would result in a barely perceptible change in sound level. As discussed above, Daily trips from the existing uses were estimated to be 1,491.[18] The increase in student capacity from 700 students to 750 students would result in 1,598 daily trips.[19] There would not be a doubling of trips and for this reason, there would not be a doubling of sound. There would not be a perceptible increase in roadway noise. Impacts would less than significant.

Threshold (b): Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

Impacts due to construction activities were evaluated by identifying vibration sources (i.e., construction equipment), measuring the distance between vibration sources and surrounding structure locations, and making a significance determination.

The Caltrans *Transportation and Construction Vibration Guidance Manual*[20] is used as a screening tool to assess the potential for adverse vibration effects related to structural damage. Project construction activities would result in potentially significant impacts if ground-borne vibration levels were to exceed 0.2 ips PPV at the nearest off-site residential buildings. **Table 3.6-6: Construction Vibration Levels Estimates—Building Damage** presents construction vibration impacts associated with on-site construction in terms of building damage, as well as typical vibration levels that could be expected from construction equipment at a distance of 25 feet. It is important to note pile driving would not be required during construction. As shown in **Table 3.6-6**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold at the nearby sensitive receptors for vibratory rollers, loaded trucks, jackhammers, and small bulldozers. As such, construction vibration impacts would be less than significant.

TABLE 3.6-6: CONSTRUCTION VIBRATION LEVEL ESTIMATES—BUILDING DAMAGE

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment				Significance Threshold (PPV ips)
	Vibratory Roller	Loaded Trucks	Jackhammer	Small bulldozer	
Single family homes to the east along South 7Th Street	0.008	0.003	0.001	0.000	0.2

18 **Appendix C.1**: Existing Air Quality and Greenhouse Gas Emissions.

19 **Appendix C.7**: Proposed Project Operational Air Quality and Greenhouse Gas Emissions.

20 State of California. Department of Transportation (Caltrans). *Transportation and Construction Vibration Guidance Manual*. September 2013. Accessed December 2024. https://cityofdavis.org/home/showdocument?id=4521.

TABLE 3.6-6: CONSTRUCTION VIBRATION LEVEL ESTIMATES—BUILDING DAMAGE

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment				Significance Threshold (PPV ips)
	Vibratory Roller	Loaded Trucks	Jackhammer	Small bulldozer	
(215 feet)					
Single family homes to the east along South 4Th Street (30 feet)	0.160	0.058	0.035	0.002	0.2

Source: US Department of Transportation, Federal Transportation Authority, *Transit Noise and Vibration Impact Assessment*.
Note: Refer to **Appendix F** for Construction Vibration Worksheets.

Operation. Similar to existing conditions, the primary sources of vibration associated with operation would include passenger-vehicle circulation within the Project area and the stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the Project's operation-related vibration sources, such as mechanical equipment, would incorporate vibration attenuation mounts as required by the particular equipment specifications. Therefore, operation would not substantially increase existing vibration levels in the immediate vicinity of the Project Site. Therefore, vibration impacts associated with operation would be less than significant.

Threshold (c): For a project located within the vicinity of a private airstrip or 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?

No Impact.

The Project Site is located approximately 0.1 miles north of Santa Paula Airport. Santa Paula Airport is a privately owned, public use airport that exclusively serves privately operated general aviation aircraft and has no commercial airline operations. Further, the Project Site is located outside of the airport's CNEL 60 noise contours.[21] For this reason, the Project would not expose people residing or working in the project area to excessive noise levels and there would be no impact.

3.6.5 MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of **MM NOI-1** would reduce noise related to construction equipment both on and off site. Impacts would be less than significant with mitigation.

21 City of Santa Paula. *Santa Paula 2040 General Plan Update Revised Draft Program Environmental Impact Report*. Volume II. March 4, 2020. Accessed December 2024. https://www.spcity.org/DocumentCenter/View/1703/City-of-Santa-Paula-2040-General-Plan---Volume-II-DEIR-Revised-Final-Tracked-2020-03-03.

MM NOI-1: The project applicant shall require that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels below the established thresholds:

- Construction equipment shall be equipped with exhaust muffler systems consistent with FHWA guidance.
- All equipment shall be properly maintained in accordance with manufacturers' specifications to assure that no additional noise due to worn or improperly maintained parts is generated consistent with FHWA guidance.
- Construction equipment shall have features that dampen metal surfaces and minimize metal-to-metal contact consistent with FHWA guidance.
- When construction operations occur adjacent to off-site occupied residential areas, construction equipment staging areas and stationary noise sources shall be located as far from those nearby receptors as possible, prohibit idling equipment, notify adjacent residences in advance of construction work, and install temporary acoustic barriers or noise blankets achieving a minimum reduction of 5 dBA around stationary construction noise sources. These barriers shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise barrier and must be installed in a location that completely blocks line-of-sight between the construction noise source and adjacent sensitive receptors.
- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses whenever physically possible during all phases of project construction.
- Use electric air compressors and similar power tools rather than diesel equipment shall be used, whenever such equipment is available.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.
- Construction hours, allowable workdays, and the phone number of the job superintendent must be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent must investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications must be included in the proposed Project construction documents, which must be reviewed by the City prior to issuance of grading permits.

4.0 ALTERNATIVES

4.1. INTRODUCTION

This section of the EIR provides a comparative analysis of the merits of alternatives to the Project pursuant to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines, as amended. The purpose of the alternatives analysis is to provide information on potentially feasible ways to avoid or minimize any significant effects of a proposed Project.

The identification and analysis of alternatives to a proposed project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code Section 21002 states, in part: "it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." In addition, Public Resources Code Section 21002.1(a) states: "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

CEQA Guidelines Section 15126.6(a) provides the following guidance regarding an EIR's discussion of alternatives:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.*

CEQA Guidelines Section 15126.6(b) emphasizes the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts attributable to a proposed 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(f) further directs that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.*

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f)(2) requires the evaluation of alternative location(s) for a proposed project, if feasible. Based on the alternatives analysis, CEQA Guidelines Section 15126.6(e)(2) requires an EIR to designate an environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, then the EIR must identify an environmentally superior alternative among the other alternatives. CEQA Guidelines Section 15126.6(d) states:

> *The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project… If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.*

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. As such, the focus of the evaluation is on those environmental resources for which the proposed Project may have potential impacts.

According to the *CEQA Guidelines*, an EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the Project. The objectives for the Isbell Middle School Project (Project) are as follows:

- Ensure all buildings meet applicable seismic safety standards.
- Provide additional facilities to accommodate SPUSD's current educational program for 7th and 8th Grades.
- Modernize the Isbell School Campus to improve student and staff well-being.
- Preserve the historic character of the campus.

4.2. SIGNIFICANT IMPACTS OF THE ISBELL MIDDLE SCHOOL PROJECT

In accordance with Section 15126.6(b) of the State CEQA Guidelines, the alternatives in this section have been selected to evaluate means for avoiding or substantially reducing significant impacts of the proposed Isbell Middle School Project (proposed Project) identified in **Section 3.0: Environmental Impact Analysis** of this Draft EIR.

Table 4.0-1: Environmental Impact Summary presents a summary of findings for each topic analyzed in this EIR for the proposed Project.

TABLE 4.0-1: ENVIRONMENTAL IMPACT SUMMARY			
Topic	**Potentially Significant Impact?**	**Mitigated to Less than Significant?**	**Unavoidable Significant Impact?**
Aesthetics	No	N/A	N/A
Air Quality	No	N/A	N/A
Cultural Resources	**Yes**	No	**Yes**
Greenhouse Gas Emissions	No	N/A	N/A
Hazards and Hazardous Materials	No	N/A	N/A
Noise	**Yes**	**Yes**	No

4.3. SELECTION OF ALTERNATIVES FOR ANALYSIS

According to the *CEQA Guidelines*, the discussion of alternatives should focus on alternatives to a project or its location that can feasibly avoid or substantially lessen the significant effects of the Project. The *CEQA Guidelines* indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice. The alternative discussion should provide decision makers with an understanding of the merits and disadvantages of these alternatives.

The analysis in **Section 3.0: Environmental Impact Analysis** of this EIR does not identify any significant impacts that would result from construction or operation and uses of the proposed Project related to the topics evaluated including Aesthetics, Air Quality, Greenhouse Gases, and Hazards and Hazardous Materials. Potentially significant impacts were identified that could result from construction of the proposed Project related to the topic of Noise, however these impacts could be mitigated to less than significant. Significant and unavoidable impacts were identified that could result from uses of the proposed Project related to the topic of Cultural Resources. CEQA mandates the adoption of feasible mitigation measures which will reduce adverse impacts, even if the residual impacts after mitigation remain significant, and mitigation measures are recommended to reduce the impact of the proposed Project on cultural resources.

Because the proposed Project would result in significant and unavoidable impacts to historic resources, the Santa Paula Unified School District (SPUSD) reviewed and identified alternatives for analysis to comply with the requirements of Section 15126.6 of the CEQA Guidelines.

4.4. ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN DETAIL

Section 15126.6(c) of the *CEQA Guidelines* states that an EIR should briefly describe the rationale for selecting the alternatives to be discussed and the reasons for eliminating alternatives from detailed consideration in an EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic Project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. One alternative to the proposed

Project was initially considered but determined to be infeasible for the reasons discussed below and is not evaluated in detail.

4.5. ALTERNATIVE SITE

An alternative site would involve the development of the Project at a different location. Given that SPUSD does not own or control any other property in the vicinity of the Project Site, the ability of SPUSD to find and purchase an alternative site on which to develop the Project is considered speculative. In addition, the development of an alternative site may not be able to meet the Project objectives and would be inconsistent with the Project objective to preserve the existing Isbell School campus. Lastly, the development of the same uses at a different location could result in long term and cumulative impacts related to incompatible land uses. Thus, the selection of an alternative site would necessarily avoid any of the significant impacts identified for the Project. As indicated in CEQA 15126.6(c), "*among factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts*." The relocation of the Project to an alternative site would not be feasible because the ability of SPUSD to obtain an alternative site of the size necessary to accommodate the project is both difficult and speculative and because development on an alternative site would not necessarily avoid or substantially lessen any of the significant effects of the Project. For these reasons, this alternative is not evaluated in detail.

4.6. ALTERNATIVES EVALUATED IN DETAIL

As discussed above, SPUSD identified several alternatives for analysis in this EIR to determine if these alternatives could avoid or substantially lessen the significant impacts of the Project and meet the basic Project objectives. The following objectives for the Project are identified in **Section 2.0: Project Description**:

- Ensure all buildings meet applicable seismic safety standards.
- Provide additional facilities to accommodate SPUSD's current educational program for 7th and 8th Grades.
- Modernize the Isbell School Campus to improve student and staff well-being.
- Preserve the historic character of the campus.

Because the proposed Project would result in significant and unavoidable historic resource impacts, the following alternatives were identified for purposes of comparative analysis to provide additional information on ways the effects of the Project on the environment could be lessened or avoided:

- Alternative 1 – No Project/No Development
- Alternative 2 – Renovate Existing Main Building

This section of the EIR provides a comparative analysis of the merits of alternatives to the Project pursuant to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines, as amended. The purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize significant effects of the Project. According to the State CEQA Guidelines, the EIR need only examine in

detail those alternatives that could feasibly meet most of the basic objectives of the Project. When addressing feasibility, the State CEQA Guidelines Section 15126.6 states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites." The State CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative and need not be presented in the same level of detail as the assessment of the Project.

Therefore, based on the State CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives. These factors would be unique for each project.

4.6.1. Alternative 1—No Project / No Development

Consideration of the No Project/No Development Alternative is required by Section 15126(2)(4) of the *CEQA Guidelines*. As required by the *CEQA Guidelines*, the analysis must examine the impacts which could occur if the site is left in its present condition, as well as what may reasonably be expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project/No Development Alternative, the Project Site would not be developed with the new administrative and classroom buildings and expanded parking and would remain as currently developed. The Project Site is comprised of the existing Isbell School campus.

4.6.1.1 Aesthetics

As there would be no new development or changes to the existing Isbell School campus with the No Project Alternative, there would be no changes to existing scenic vistas, public views, or the existing visual characteristics of the site. As the proposed Project would not result in any significant aesthetic impacts, the No Project Alternative would not avoid or substantially lessen any significant aesthetic impacts.

4.6.1.2 Air Quality

With the No Project Alternative, no emissions from construction activities would occur. As the proposed new administrative and classroom buildings would not be developed, no emissions would be generated from operation of these new facilities. As the proposed Project would not result in any significant air quality impacts, the No Project Alternative may lessen new construction and operations related emissions but would not avoid or substantially lessen any significant air quality impacts.

4.6.1.3 Cultural Resources

There would be no changes to the existing Isbell School campus with the No Project Alternative. Isbell School was listed as Ventura County Landmark No. 143 and City of Santa Paula Historic Landmark No. 14 in 1992, and buildings contributing to the landmark designation are considered the Main School Building, Manual Arts, and Cafetorium. As the proposed Project involves the demolition of these buildings, significant impacts to historic resources were identified that would result from the proposed Project and mitigation measures are identified to reduce the impact of the proposed Project on cultural resources. These mitigation measures would not, however, reduce these impacts to less than significant.

The No Project Alternative would avoid this potential impact, but as Isbell School campus functions as the District's only middle school, and based on the District's ongoing needs, some impacts from pursuing the No Project alternative can be reasonably foreseen. One potential future outcome may involve some degree of alteration to the historic buildings as required to bring them up to current seismic codes and to meet ADA requirements, and other interior and exterior treatments as may be determined necessary to improve functional conditions on the campus. Assuming any modifications to these buildings are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, the No Project Alternative would substantially lessen and likely avoid the significant impacts the would result from approval and implementation of the Project as proposed.

4.6.1.4 Greenhouse Gas Emissions

No change in greenhouse gas emissions (GHG) would occur with the No Project Alternative as construction of the new administrative and classroom buildings would not occur and there would be no changes to the existing uses of the Isbell School campus. The GHG emissions associated with construction and operation of the proposed Project would be less than significant and, for this reason, the No Project Alternative would not avoid or substantially lessen any significant GHG impacts.

4.6.1.5 Hazards and Hazardous Materials

No changes to the existing buildings and site characteristics would occur with the No Project Alternative. An Asbestos and Lead Survey Report (**Appendix D**) identified a number of lead-based paint coatings and Asbestos Containing Materials (ACM) at the Project Site. However, the proposed Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding the handling of hazardous waste, therefore impacts would be less than significant. For this reason, the No Project Alternative would not avoid or substantially lessen any significant impacts related to hazards and hazardous materials.

4.6.1.6 Noise

No new construction would occur on the Project Site with the No Project Alternative and the existing buildings and uses would remain. No temporary noise or groundborne vibration impacts from construction would occur. The Project, as proposed, would result in potentially significant impacts due to an increase

in short-term construction related noise levels. However, these construction noise impacts could be mitigated to less than significant, and operational noise impacts would be less than significant. The No Project Alternative would not, therefore, avoid or substantially lessen any significant noise impacts that would result from the proposed Project.

4.6.2. Alternative 2—Renovate Existing Main Building

Alternative 2 would involve modifying the main building, including retrofitting the building to meet current seismic safety building standards. Additionally, this alternative, like the proposed Project, would include demolishing the existing cafeteria, all portable classroom buildings, the manual arts/woodshop building, the western storage room, three basketball courts, and restroom building to develop two single-story classroom buildings, an administrative and health office, a courtyard, four new basketball courts, and an expanded southern parking lot as shown **Figure 4.0-1: Alternative 2 Campus Plan, and Figure 4.0-2 Alternative 2 Facilities Plan**.

Alternative 2 would preserve the western portion of the main building facing S. 4th Street and remove the eastern portion of the building containing five existing classrooms as shown in **Figure 4.0-3: Alternative 2 Main Building Modifications Cross Sections.** As shown in **Figure 4.0-4: Alternative 2 Main Building Modifications Floorplans,** removing the five classrooms would allow the addition of a multi-purpose room and literacy center to the rear of the building. The proposed modifications would allow additional daylight for the upstairs hallway. On the western façade of the building, the existing windows would be replaced with windows matching the original design of the building and a new freestanding canopy would be added to the sidewalk immediately in front of the building.

The main building components and square footage are presented below in **Table 4.0-2: Main Building Components**.

TABLE 4.0-2: MAIN BUILDING COMPONENTS

Components	Number of Components	Square Foot of Each Component	Square Foot (SF)
New Construction			
Multi-Purpose Room (MPR)	1	3,532	3,532
Renovation			
Existing Classrooms	8	920	7,360
Collaboration/Breakout Space - existing	5	560	2,800
Library / Media Center	1	3,431	3,431
Meeting Room	1	920	920
Help Desk	1	100	100
Work Room	1	625	625
Textbook Storage	1	116	116
Staff Lounge	1	900	900
Staff Toilets	2	80	160

TABLE 4.0-2: MAIN BUILDING COMPONENTS			
Components	Number of Components	Square Foot of Each Component	Square Foot (SF)
Kitchen	1	1,135	1,135
Servery	1	1,488	1,488
Storage	1	707	707
Restrooms	1	528	528
Mechanical	1	1,587	1,587
Student Toilets - existing	4	490	1,960
Electrical/Special Systems	2	271	542
Data	2	140	280
Miscellaneous			
Corridors/Hallways	N/A	5,229	5,229
		Total Building Square Feet	**33,400**

Source: HMC Architects, 2024.

4.6.3. New Administration and Health Office

The existing administrative offices are located in the central portion of the first floor. This alternative would include construction of a new administration and health office in the southern portion of the gym building and renovate portions of the gym. The main building components and square footage can be seen below in **Table 4.0-3: Administration Office Components**.

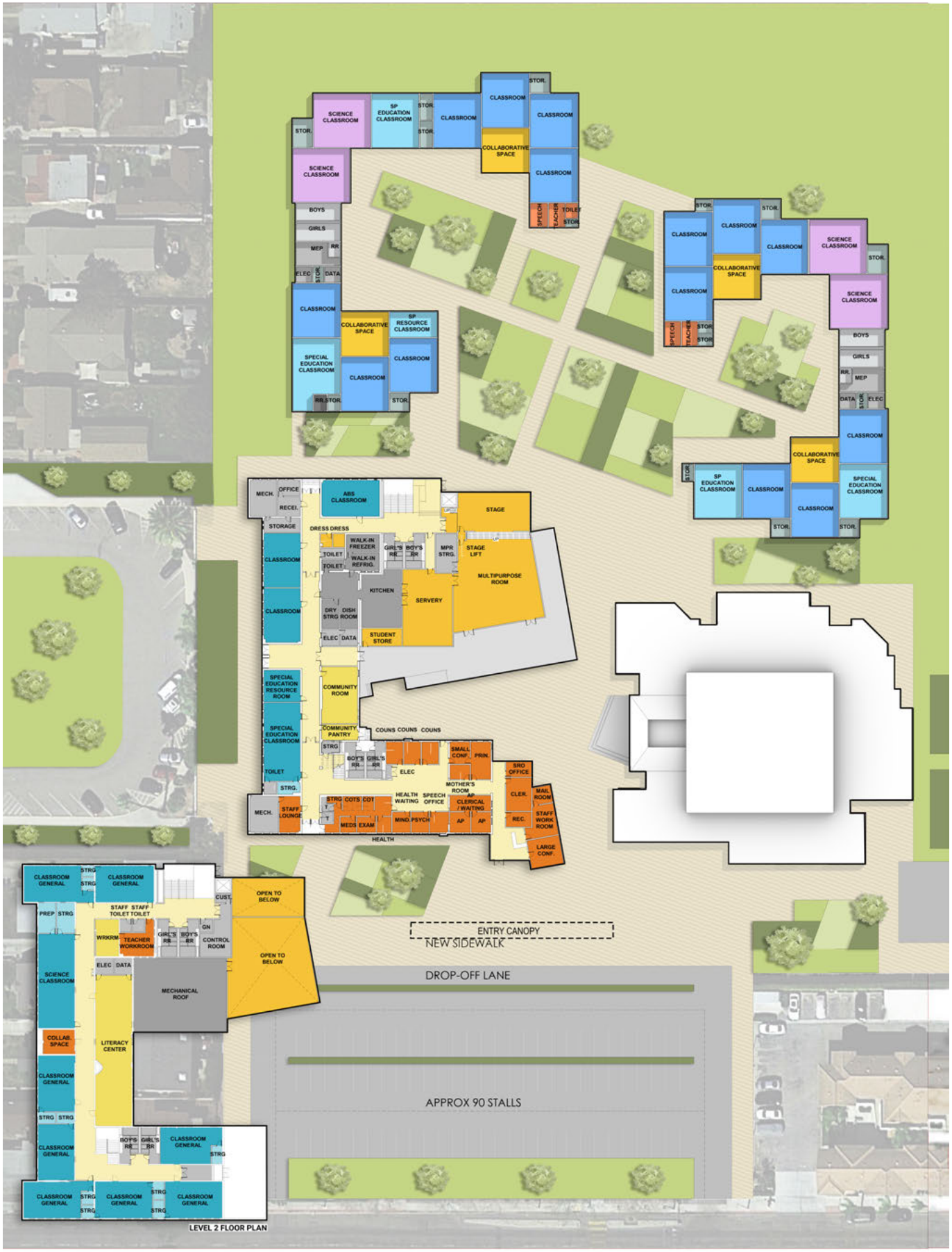
TABLE 4.0-3: ADMINISTRATION OFFICE COMPONENTS			
Components	Number of Components	Square Foot of Each Component	Square Foot (SF)
New Construction			
Lobby	1	678	678
Clerical Staff	1	496	496
Records/Locked Storage	1	197	197
Conference Room - Large	1	314	314
Conference Room - Small	1	143	143
Principal's office	1	268	268
Assistant Principal Office	2	120	240
Principal/Assistant Principal Clerical	1	496	496
Counselor Office	3	100	300
SRO Office	1	100	100
Flex Office	1	92	92
Admin Assist	1	210	210

SOURCE: HMC Architects - 2024

FIGURE **4.0-1**

Meridian Consultants

Alternative 2 Campus Plan

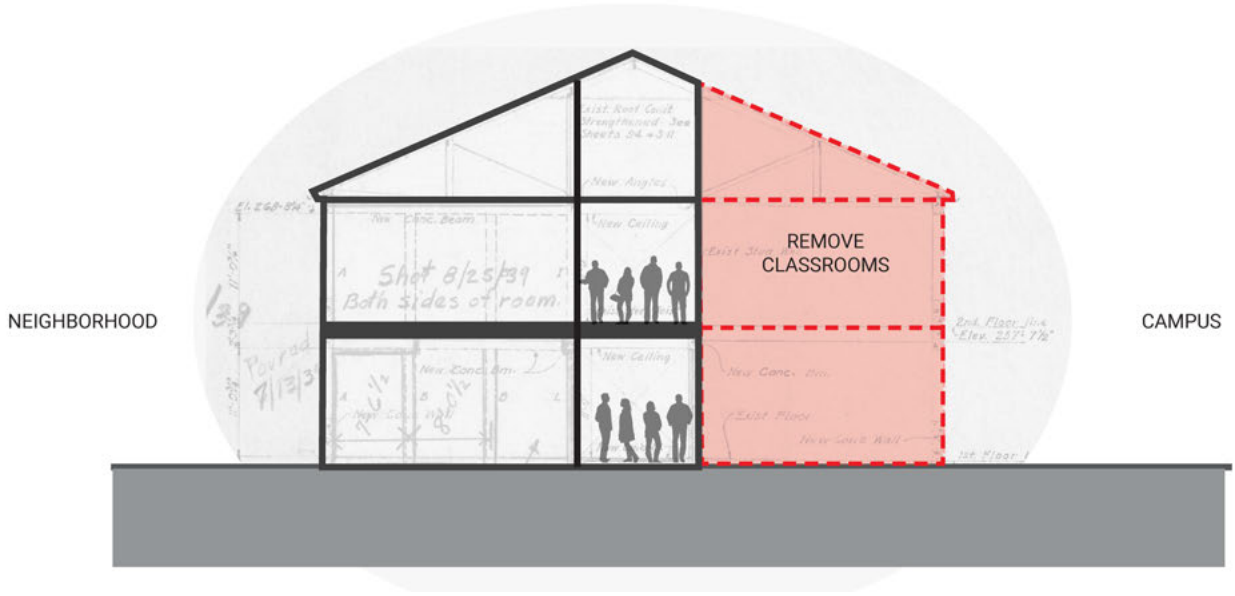


SOURCE: HMC Architects - 2024

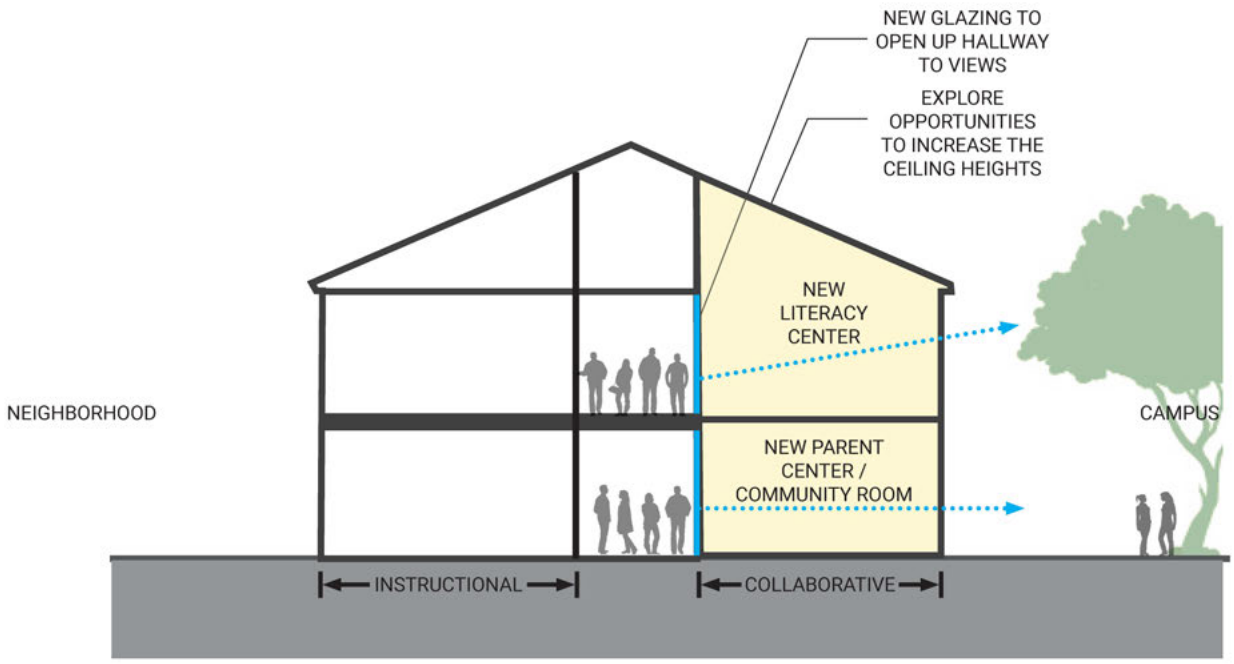
FIGURE **4.0-2**

Meridian Consultants

Alternative 2 Facilities Plan



Cross Section of Existing Building



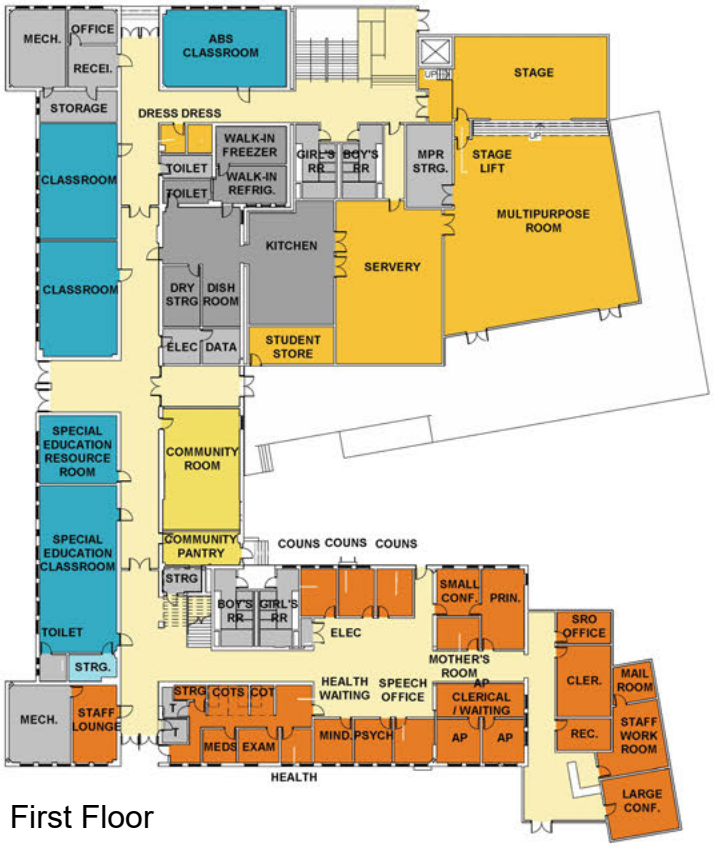
Cross Section Showing Modifications to Building

SOURCE: HMC Architects - 2024

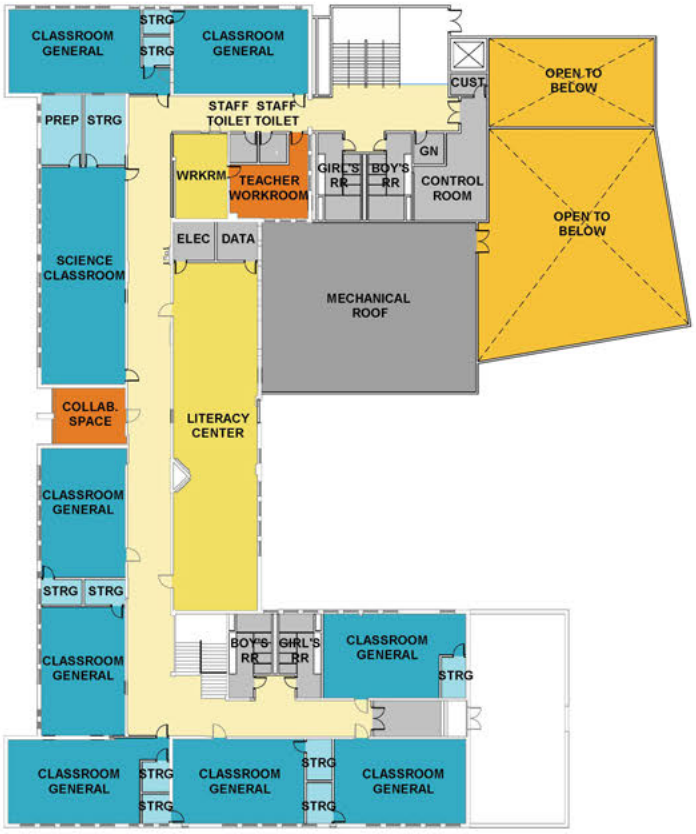
FIGURE **4.0-3**

Meridian Consultants

Alternative 2 Main Building Modifications Cross Sections



First Floor



Second Floor

SOURCE: HMC Architects - 2024

FIGURE **4.0-4**

Meridian Consultants

Alternative 2 Main Building Modifications Floorplans

TABLE 4.0-3: ADMINISTRATION OFFICE COMPONENTS (CONTINUED)			
Components	**Number of Components**	**Square Foot of Each Component**	**Square Foot (SF)**
New Construction (Continued)			
Staff Restrooms	1	462	462
Staff Work Room	1	368	368
Mail Room / Receiving	1	174	174
Mindfulness Room	1	102	102
Health Waiting	1	175	175
Health Office	1	120	120
Psych Office	1	154	154
Health Exam	1	110	110
Health Cot Area	1	199	199
Custodial	1	50	50
Renovation			
MDF	1	100	100
Building Storage	1	527	527
Mechanical	1	225	225
Electrical/Special Systems	1	150	150
Miscellaneous			
Corridors/Hallways	N/A	1,905	1,905
Total Building Square Feet			**8,355**

Source: HMC Architects, 2024.

4.6.4. New Classroom Buildings

The existing manual arts/woodshop building, all 18 portable classroom buildings, and three basketball courts would be demolished and replaced with two single-story classroom buildings with a centralized courtyard between them. Classroom Building #1, in the northeast portion of campus, would house 8th grade students, and Classroom Building #2, in the northwest portion of campus, would house 7th grade students. The new classroom buildings components and square footage can be seen below in **Table 4.0-4: Classroom Buildings Components**.

TABLE 4.0-4: CLASSROOM BUILDINGS COMPONENTS			
Components	**Number of Components**	**Square Foot of Each Component**	**Square Foot (SF)**
Classroom Building #1 (Northeast)			
Classrooms - General	7	1020	7,140
Classrooms - Special Education	2	1020	2,040
Classrooms - Science	2	1224	2,448
Classroom Storage	4	70	280
Collaboration/Breakout Space	2	840	1,680

TABLE 4.0-4: CLASSROOM BUILDINGS COMPONENTS			
Components	Number of Components	Square Foot of Each Component	Square Foot (SF)
Teacher Workroom	1	150	150
Student Restrooms	2	690	1,380
Teacher Toilet	1	72	72
Speech	1	160	160
Mechanical	1	340	340
Electrical/Special Systems	1	100	100
Data	1	100	100
Miscellaneous	N/A	675	675
Total Classroom #1 Building Square Feet			**16,565**
Classroom Building #2 (Northwest)			
Classrooms - General	6	1020	6,120
Classrooms - Special Education	2	1020	2,040
Classrooms - Science	2	1224	2,448
Resource Classroom	1	480	480
Classroom Storage	3	70	210
Collaboration/Breakout Space	2	840	1,680
Teacher Workroom	1	150	150
Student Restrooms	2	690	1,380
Teacher Storage	1	50	50
Teacher Toilet	1	72	72
Resource Specialist Program (RSP)	1	660	660
Speech	1	160	160
Mechanical	1	340	340
Electrical/Special Systems	1	100	100
Data	1	100	100
Miscellaneous	6	1020	575
Total Classroom #2 Building Square Feet			**16,565**

Source: HMC Architects, 2024.

4.6.5. Basketball Courts

As described above, the three existing basketball courts would be demolished with this alternative to develop the proposed classrooms. This alternative would include construction of four new basketball courts on the grass field in the eastern portion of the campus.

4.6.6. Circulation and Parking

4.6.6.1 Parking Lots

The campus currently has two parking lots – the southern parking lot along Harvard Boulevard that has 67 public parking spaces, and the western parking lot along South 4th Street that has 27 staff parking spaces and a student drop-off zone. The southern parking lot does not contain adequate parking for school events. With this alternative, the existing cafeteria building abutting the western side of the southern parking lot would be demolished to expand the parking lot from 67 to 110 spaces in order to provide adequate parking for school events. The student drop-off zone would be moved from the western parking lot to the southern parking lot. This alternative would also include minor renovations to the western parking lot including re-striping and adding benches to make the green center island useful to students.

4.6.6.2 Aesthetics

Alternative 2 would change the existing visual character of the campus to a lesser degree than the proposed Project would as the existing western façade of the Main School Building would be maintained, with some minor modifications, such as replacing the existing windows with windows matching the original design of the building and adding a new freestanding canopy in front of the building. In addition, the building would be retrofitted to meet current seismic safety building standards.

The proposed Project would replace existing buildings with new buildings in generally the same locations, and the spatial relationships between the buildings on campus will remain similar to existing conditions. The proposed Project would replace buildings which are considered contributors to the landmark designation of the Isbell School campus; however, these buildings have been significantly altered to accommodate seismic retrofitting requirements and do not embody the distinctive characteristics and methods of construction relevant to the period of significance (1924 to 1974) of the Isbell School campus. The proposed buildings will not have a substantial adverse effect on any publicly available scenic vistas or adversely affect the visual character of the site and the surrounding area. The Project would not result in any significant aesthetics impacts and, for this reason, Alternative 2 would not avoid or lessen significant aesthetic impacts in comparison to the proposed Project.

4.6.6.3 Air Quality

The scope and duration of construction activities for Alternative 2 would be similar to those of the proposed Project with the exception that the Main School Building would be retained and modified as opposed to demolished and replaced. Modification of the Main School Building would result in incrementally less construction impacts when compared to demolition of the building. As with the proposed Project, the emissions resulting from Alternative 2 would not exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD). The scope and duration of construction in this alternative would not increase vehicle miles traveled (VMT) or daily operational emissions when compared to the Project but would remain under SCAQMD significant thresholds. The

Project would not result in any significant air quality impacts and Alternative 2 would not avoid or lessen significant air quality impacts in comparison to the proposed Project for this reason.

4.6.6.4 Cultural Resources

Construction of Alternative 2 would involve demolition, grading and excavation, and building construction activities similar to the proposed Project. This alternative preserves the principal western, northern and southern elevations of the Main School Building and restores an important historic feature of these elevations lost in prior alterations, the schoolroom windows. The previously altered non-street facing secondary elevations on the eastern side of the building would be entirely removed and new building space attached. The remaining interior spaces would be reorganized as needed to address current educational and administrative requirements.

The alteration of one building and the removal of other buildings contributing to the landmark designation of the Isbell School would result in a significant loss of the landmark's integrity of design and would result in a significant impact on the resource. This could potentially be mitigated to a less than significant level through conformance to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Further, impacts to historic buildings may be reduced if they are treated as "qualified historical buildings" for purposes of the California State Historical Building Code (SHBC), which can be utilized as a means of minimizing the need to alter character defining features of the buildings and assist in the objective of conforming the project to the Secretary of the Interior's Standards. The Isbell School campus should be considered eligible for the SHBC, and it can be assumed that if this approach is taken, adverse impacts resulting from implementation of this alternative will be avoided to the greatest extent feasible. As such, Alternative 2 would avoid the significant impact to historic resources that would result from the proposed Project.

4.6.6.5 Greenhouse Gas Emissions

Although the Santa Paula Unified School District is not legally subject to City's land use authority, neither the School District nor the City have adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have SCAQMD, OPR, CARB, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. CEQA Guidelines Section 15064.4 states that using a model or methodology to quantify greenhouse gas emissions and/or relying on a qualitative analysis or performance-based standards is suitable for analyzing GHG emissions. The scope and duration of construction activities for Alternative 2 would be similar to those of the proposed Project with the exception that the Main School Building would be retained and modified as opposed to demolished and replaced. Modification of the Main School Building would result in incrementally less construction impacts when compared to demolition of the building. Construction activity impacts are relatively short in duration, so they contribute a relatively small portion of the total lifetime GHG emissions of a project. This alternative would generate a similar amount of GHG emissions during construction and operation as the proposed Project. The Project would not result

in any significant GHG emissions impacts and Alternative 2 would not avoid or lessen significant GHG emissions impacts in comparison to the proposed Project for this reason.

4.6.6.6 Hazards and Hazardous Materials

Development of both this alternative and the proposed Project would require the disturbance of lead-based paint coatings and Asbestos Containing Materials (ACM) in the main building, as described in the Asbestos and Lead Survey Report (**Appendix D**). While this alternative does not involve the demolition of the main building, renovation of the main building would also require the disturbance of these materials. Both this alternative and the proposed Project would implement the recommendations of the Asbestos and Lead Survey Report and comply with existing federal, State, and local standards and regulations regarding the handling of hazardous waste, therefore impacts would be less than significant. Neither the proposed Project nor this alternative would result in any significant impacts related to hazards and hazardous materials.

4.6.6.7 Noise

Development activities associated with the Project and this alternative during construction, such as earthmoving and construction would involve the use of heavy equipment, such as backhoe, dozer, loaders, concrete mixers, forklifts, and cranes that would generate temporary noise during construction that would represent significant noise impacts. These impacts could be reduced with either development scenario through the implementation of the mitigation measures recommended for the Project. As a result, construction of the Project under both scenarios would result in less than significant noise impacts. Operational noise generated by the proposed Project would not increase compared to existing conditions, and impacts would be less than significant. Therefore, this alternative would not avoid nor substantially lessen a significant noise impact.

4.7. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR.

Of the alternatives considered in this section, Alternative 1-No Project/No Development would avoid the significant and unavoidable impacts to Historic Resources identified for the proposed Project. As previously discussed, a potential future outcome of Alternative 1 may involve some degree of alteration to the historic buildings as required to bring them up to current seismic codes and to meet ADA requirements, and other interior and exterior treatments as may be determined necessary to improve functional conditions on the campus. However, it is likely these improvements could be made in a manner that is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, which would result in impacts from these improvements being less than significant. While this alternative would avoid the significant impact of the Project on historic resources, it would not feasibly meet the stated objectives to modernize the campus and provide additional facilities to accommodate SPUSD's current

educational program for 7th and 8th Grades. Alternative 1 does not address the aging issues related to the structural integrity of the main building, and design issues such as crowded hallways with poor lighting; difficulty supervising hallways; congested stairwells; small classrooms; small administration area; lack of air conditioning; lack of power and data outlets; and a small literacy center.

Alternative 2—Renovate Main Building would also avoid the significant impact to historic resources that would result from the proposed Project and would feasibly meet the objectives of the Project. Alternative 2 would feasibly address the aging issues affecting the main building and ensure all buildings meet applicable seismic safety standards; provide additional facilities to accommodate SPUSD's current educational program for 7th and 8th Grades; modernize the Isbell School Campus to improve student and staff well-being; and preserve the historic character of the campus. For these reasons, Alternative 2 is the environmentally superior alternative.

5.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires a brief description of the possible significant effects of a project determined to be not significant and not analyzed in detail in an EIR. This Section presents the analysis of the effects related to agriculture and forestry resources, biological resources, energy, geology and soil, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems not found to be significant. Topics not addressed in this section are addressed in **Section 3.0, Environmental Impact Analysis**, of this Draft EIR.

5.1. AGRICULTURE AND FORESTRY RESOURCES

Threshold: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The Project Site, currently developed as the Isbell Middle School Campus, is located within an urban and developed portion of the City. According to the California Department of Conservation Farmland Mapping and Monitoring Program (DOC FMMP), the Project Site is classified as Urban and Built-Up Land.[1] The Project Site does not contain any farmland or agricultural land that would be impacted by implementation of the proposed Project. Therefore, the proposed Project would not cause the conversion of farmland to non-agricultural use. No impacts from the Project would occur for these reasons.

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

The Project Site is zoned Institutional-Civic (IN).[2] The Williamson Act was established with the basic intent of encouraging the preservation of the state's agricultural lands in view of increasing trends toward their "premature and unnecessary" urbanization. The Project Site is not zoned for agricultural use and is not subject to a Williamson Act contract. No impacts from the Project would occur for these reasons.

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

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

1 California Department of Conservation (DOC). "California Important Farmland Finder." Database. 2022. Accessed on February 5, 2024. https://maps.conservation.ca.gov/dlrp/ciff/.

2 City of Santa Paula. "Zoning Map." Map. 2022. Accessed on February 5, 2024. https://www.spcity.org/DocumentCenter/View/2739/COSP-Zoning-Map-072022-24x36.

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

"Timberland production zone" (TPZ) is defined as an area that has been zoned pursuant to Government Code Section 51112 or Section 51113[3] and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in Government Code Section 51104(h). With respect to the general plans of cities and counties, "timberland preserve zone" means "timberland production zone."

The Project Site, Isbell Middle School, is fully developed, and not zoned as forestland or timberland, or for timberland production. No impacts from the Project would occur for these reasons.

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

As described previously, the Project Site is developed with Isbell Middle School and does not any forestland. No impacts from the Project would occur for these reasons.

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

As described previously, the Project Site does not contain farmland or forestland and is not adjacent or near to any farmland or forest land. No impacts from the Project would occur for these reasons.

5.2. BIOLOGICAL RESOURCES

Threshold: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

The Project Site is located in an urbanized portion of the City of Santa Paula that supports largely non-native plant communities and species. Therefore, only a limited number of plant species that flourish in urban environments, none of which are considered rare or endangered, can be found on or near the Project Site. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist on the Project Site nor within the surrounding area. No impacts from the Project would occur for these reasons.

3 Government Code. Title 5. Div 1. Ch. 6.7, Timberland. Article 2. Sections 51112 and 51113.

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

A riparian habitat refers to the area of land adjacent to a body of water, such as a river, stream, creek, or lake. The Project Site does not contain any bodies of water and is not near to any bodies of water. The City of Santa Paula General Plan Environmental and Cultural Resources Element shows the general locations where sensitive biological resources have been recorded within the City[4], and the Project Site and surrounding area are not within those areas. Therefore, no impact would occur regarding riparian or sensitive habitats.

Threshold: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Project Site and surrounding area are fully developed. Additionally, the Project Site is not located in a wetland area as identified by the U.S. Fish and Wildlife Service.[5] No impacts from the Project would occur for these reasons.

Threshold: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The area surrounding the Project Site is urban and developed with existing residential and commercial uses. The Project Site and the surrounding area are almost entirely paved or otherwise developed, and do not contain native residents, migratory species, or native nursery sites. As the Project Site is located in an urban area, the proposed Project would not interfere substantially with the movement of any native resident, migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, nor impede the use of native wildlife nursery sites. In addition, there are no wildlife migration corridors in the vicinity of the Project Site. No impacts from the Project would occur for these reasons.

Threshold: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

While the Santa Paula Unified School District is not legally subject to City of Santa Paula's (City) land use authority, the City's standards were considered to identify thresholds of significance to assist in determining environmental impacts. Should the school district choose to consider the City's standards regarding tree preservation, the City's Municipal Code details tree protection regulations in Section 155.580: Preservation, Cutting and Removal of Trees on Public Property.[6] Design of the proposed Project

4 City of Santa Paula. *2040 General Plan*. March 4, 2020. p. 4-10. Accessed on February 13, 2024. https://www.spcity.org/DocumentCenter/View/1700/City-of-Santa-Paula-2040-General-Plan---Final-Adopted-2020-03-04.

5 U.S. Fish and Wildlife Services (UFWS). "National Wetlands Inventory." Map. 2024. Accessed on February 13, 2024. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

6 City of Santa Paula. Municipal Code. Ch. 156. Section 155.580 to 155.589. Accessed on February 13, 2024. https://codelibrary.amlegal.com/codes/santapaula/latest/santapaula_ca/0-0-0-58873.

is at a conceptual level and landscape plans have not yet been developed to the point of determining what trees would be impacted; a qualified landscape architect will be responsible for developing landscape plans for the Project. The Project Site contains several mature trees, and construction of the proposed Project may require tree removal, however the Project would also include the planting of new trees on the Project Site. Less than significant impacts would occur.

Threshold: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project Site and the surrounding area have been previously developed and disturbed. No adopted Habitat Conservation Plan or Natural Conservation Plan exists for the Project Site or immediate vicinity.[7] Consequently, implementation of the proposed Project would not conflict with the provisions of any adopted conservation plan. No impacts from the Project would occur for these reasons.

5.3. CULTURAL RESOURCES

Threshold: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, or resources that constitute unique archaeological resources. The Santa Paula General Plan does not identify any known archaeological or paleontological resources within the City.[8] Soil on the Project Site has been previously disturbed by construction of the existing Campus. If subsurface archaeological resources are discovered during construction activities, the proposed Project would comply with the provisions of Public Resources Code Section 21083.2(i) regarding archaeological sites accidentally discovered during construction. Therefore, impacts to archaeological resources would be less than significant.

Threshold: Disturb any human remains, including those interred outside of formal cemeteries?

During previous construction of the existing Campus, extensive earthwork (excavation and grading) occurred and no human remains were encountered. For this reason, human remains are not anticipated to be encountered during construction activities to implement the Project. In the unlikely event that human remains are uncovered during Project demolition, grading, or excavation, Government Code Sections 27460 et seq. mandate that there will be no further excavation or soil disturbance until the Ventura County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the

7 California Department of Fish and Wildlife (CDFW). "BiosViewer." Map. 2024. Accessed February 13, 2024. https://apps.wildlife.ca.gov/bios6/.

8 City of Santa Paula. "Cultural and Historical Resources." *2040 General Plan*. March 4, 2020.

excavation, or to his or her authorized representative, in the manner provided in Public Resources Code Section 5097.98.

Pursuant to California Health and Safety Code Section 7050.5, the coroner will make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she will contact the Native American Heritage Commission within 24 hours. Compliance with existing regulations would ensure that impacts to human remains would be less than significant.

5.4. ENERGY

Threshold:	**Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**
Threshold:	**Conflict with or obstruct a state or local plan for renewable energy efficiency?**

According to the CEQA Guidelines, "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of Project implementation that cannot be avoided.

Both construction and operation of the proposed Project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The new development would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the Project Site.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the Project Site.

Operation

Student enrollment and faculty and staff employment would remain similar to existing conditions, and the type and frequency of events at the school campus would not change. During Project operation, energy would be consumed for multiple purposes, including but not limited to lighting, electronics, electricity usage, water usage, solid waste disposal, and vehicle trips.

Built in 1926, the school has an outdated and inefficient energy infrastructure compared to the current energy efficiency standards. Development of the proposed Project would use more energy-efficient building materials and design, which would help minimize energy consumption. It is anticipated that the proposed Project would utilize energy-efficient lighting and HVAC systems, which would result in an overall reduction of energy usage compared to existing conditions. The proposed Project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation. Therefore, the proposed Project would have a less than significant impact regarding conflict with or obstruction of a state or local plan for renewable energy or energy efficiency.

The consumption of resources would represent a long-term commitment of these resources. The commitment of resources required for the construction and operation of the proposed Project would limit the availability of such resources for future generations or for other uses during the life of the Project. However, continued use of such resources is consistent with the anticipated program change of the middle school campus and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Therefore, the energy demand requirements associated with the proposed Project would be less than significant.

5.5. GEOLOGY AND SOILS

Threshold:	**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 known fault?

An Alquist-Priolo Earthquake Fault Zone is a seismic hazard area that is approximately 0.25-mile around active faults and has ruptured in the last 11,000 years (Holocene era). The Project Site is not located within or adjacent to an established Alquist-Priolo Earthquake Fault Zone. The nearest active fault is the Santa Paula Peak fault zone located approximately 1.5-mile northeast of the Project Site.[9] However, given the seismic activity of the Southern California, the California Building Code (CBC) requires that structures be constructed to address the seismic nature of the region-based seismic stability factors established within the Code. The CBC provides minimum standards to protect property and the public

9 California Geologic Survey (CGS). "Zones of Required Investigation." Map. 2022. Accessed on February 5, 2024. https://maps.conservation.ca.gov/cgs/eqzapp/app/.

welfare by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions.

The current main building of the school is not seismically compliant with the latest building safety regulations. The Division of the State Architect (DSA) regulates school modernization projects in California through architectural review to ensure compliance with state building codes and accessibility standards, which is essential for safeguarding the safety and well-being of students and staff. The DSA also ensures that all modernization projects meet the California Building Code and the Americans with Disabilities Act (ADA), assessing structural integrity and ensuring accessibility for individuals with disabilities. Design of the proposed Project would be subject to review by the DSA which would ensure that the risk of loss, injury, or death associated with surface rupture of a known earthquake fault would be less than significant.

ii. Strong seismic ground shaking

As mentioned above, Southern California is subject to strong ground shaking in the event of an earthquake. Strong seismic ground-shaking potential hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects (e.g., severe structural damage and building collapse). All structures would be designed and built in conformance with applicable state building codes and subject to review by the Division of the State Architect to ensure safety in the event of an earthquake. Therefore, impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction

Liquefaction is the abrupt loss of strength in specific soils caused by saturation, leading them to lose their ability to support structures built upon them. Liquefaction potential has been found to be the greatest where the groundwater level and loose sands occur within 50 feet below ground surface (bgs). The Project Site is located within a liquefaction zone[10]; however, the Project would be designed and built in conformance with applicable state building codes and subject to review by the Division of the State Architect to ensure that impacts resulting from liquefaction would be less than significant.

iv. Landslides

Landslides occur when the stability of the slope changes from a stable to an unstable condition. The Project Site and adjacent areas are in a highly developed and relatively flat portion of the City and is not in a landslide zone.[11] Therefore, there is no potential for significant impacts from landslides.

10 CGS. "Zones of Required Investigation." 2022.

11 CGS. "Zones of Required Investigation." 2022.

Threshold: Result in substantial soil erosion, or the loss of topsoil

Construction

Soil erosion can be caused by natural occurrences such as wildfires, landslides, and stormwater runoff. As previously discussed, the Project Site and adjacent areas are in a highly developed and relatively flat portion of the City and is not in a landslide zone. Regardless, projects that include grading, earth moving, excavating, or other construction activities would loosen soil within a construction site. This would make the soil more prone to erosion by wind or by stormwater runoff and potential increases in erosion and pollutants in stormwater discharge could occur. The Project Site is greater than one-acre in size and construction activities are subject to the requirements of the statewide NPDES Construction General Permit which requires the preparation and implementation of a Stormwater Pollution Prevention Plans (SWPPP). The SWPPP would implement best management practices (BMPs) during construction to reduce soil erosion and pollutant levels to the maximum extent possible, which would result in less than significant impacts regarding substantial erosion, or the loss of topsoil during construction.

Operation

The proposed Project would be designed to minimize, to the extent practicable, the introduction of pollutants that may result in significant impacts generated from site runoff to the storm water conveyance systems. All runoff into existing or new city stormwater infrastructure would be required to comply with the components of the Regional Phase I Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit. One of the components of the Regional Permit is the Countywide Storm Water Quality Management Program which identifies design features required to be included in projects treat stormwater runoff. The Regional Permit enforces the water quality standards and waste discharge requirements of the Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). The Project will be designed in conformance with the MS4 General NPDES Permit would ensure that there would be less than significant impacts regarding erosion or the loss of topsoil during operation.

Threshold: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As previously discussed, the Project Site is not located in a landslide zone. The Project Site is located within a liquefaction zone; however, the Project would be designed and built in conformance with applicable state building codes and subject to review by the Division of the State Architect to ensure that potential impacts resulting from liquefaction would be less than significant.

Lateral Spreading

Lateral spreading refers to the horizontal movement of rock and soil in areas with loose materials like sand, silts, clays, and liquefaction zones, potentially affecting stability. As mentioned above, the Project Site is in a liquefaction zone. However, the Project would be designed and built in conformance with

applicable state building codes and subject to review by the Division of the State Architect to ensure that impacts resulting from lateral spreading would be less than significant.

Subsidence and Collapse

Subsidence and collapse is the sinking of soils that occurs due to over excavation or groundwater extraction. The Project Site consists of the existing Isbell Middle School and the proposed Project would not substantially change the existing condition of the site. The Project would be designed and built in conformance with applicable state building codes and subject to review by the Division of the State Architect to ensure that impacts resulting from subsidence and collapse would be less than significant.

Threshold: Located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Expansive soils shrink and swell with changes in soil moisture. Repeated changes in soil volume due to water content fluctuations may compromise structure foundations. According to the Web Soil Survey, the Project Site consists of approximately 90 percent of Mocho loam soil and five percent of Pico sandy loam and Terrace escarpments.[12] The soils are not classified as highly expansive soils. Additionally, the Project would be designed and built in conformance with applicable state building codes and subject to review by the Division of the State Architect to ensure that impacts resulting from subsidence and collapse would be less than significant.

Threshold: Have soils incapable to adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for disposal of wastewater?

The proposed Project does not include the use of septic tanks or alternative wastewater disposal systems. Isbell Middle School is currently connected to the City of Santa Paula sewer system. For this reason, there is no potential for significant impacts related to the use of alternative wastewater disposal systems.

Threshold: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project Site is in an alluvial landform[13], which is conducive to the preservation of paleontological resources. There is the possibility that during earthmoving activities, a previously unknown paleontological resource could be identified. However, the Santa Paula General Plan does not identify any known archaeological or paleontological resources within the City.[14] In addition, soil on the Project Site has been disturbed by construction of the existing Campus.

12 U.S. Department of Agriculture (USDA). "Web Soil Survey." Map. 2019. Accessed on February 13, 2024. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

13 USDA. "Web Soil Survey." 2019.

14 City of Santa Paula. "Cultural and Historical Resources." *2040 General Plan*. March 4, 2020.

Archaeological, paleontological, and historical sites are protected pursuant to a wide variety of state policies and regulations enumerated under the Public Resources Code (PRC). If subsurface paleontological resources are discovered during construction activities, construction activities in the immediate area of the discovery would stop until a certified paleontologist can conduct an assessment to identify the resources, determine their significance, and evaluate any potential impacts from ongoing construction as required by PRC Sections 5097.5 to 5097.991 protecting paleontological resources. The Project would be designed and built in conformance with PRC requirements regarding paleontological resources, therefore impacts to paleontological resources would be less than significant.

5.6. HYDROLOGY AND WATER QUALITY

Threshold: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction

Construction activities would involve grading and excavation that would temporarily expose soils, which could result in soil erosion or the loss of topsoil. The Project Site is greater than one-acre in size and construction activities are subject to the requirements of the statewide NPDES Construction General Permit which requires the preparation and implementation of a Stormwater Pollution Prevention Plans (SWPPP). The SWPPP would implement best management practices (BMPs) during construction to reduce soil erosion and pollutant levels to the maximum extent possible, which would result in less than significant impacts regarding surface or ground water quality during construction.

Operation

The proposed Project would be designed to minimize, to the extent practicable, the introduction of pollutants that may result in significant impacts generated from site runoff to the storm water conveyance systems. As previously discussed in **Section 5.5: Geology and Soils**, all runoff into existing or new city stormwater infrastructure would be required to comply with the components of the Regional Phase I MS4 Permit. The Project would be designed in conformance with the MS4 General NPDES Permit, which would ensure the Project would not result in significant surface or ground water quality impacts.

Threshold: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The use of the Project Site would not change as a result of the proposed Project. Development of the proposed Project would increase the student capacity of the school from the existing 700 students to 750 students and no faculty increases would occur from Project development, which would result in similar water use compared to existing conditions. The Project would involve the construction of new buildings replacing existing permanent and temporary buildings and would not result in a substantial increase in impervious surfaces on the Project Site. Additionally, the proposed Project would include the

development of permeable surfaces such as a new central courtyard and campus landscaping. Therefore, impacts would be less than significant.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner which would:

- **Result in substantial erosion or siltation on or off site;**
- **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

As detailed above, the Project Site is greater than one-acre in size and construction activities are subject to the requirements of the statewide NPDES Construction General Permit which requires the preparation and implementation of a Stormwater Pollution Prevention Plans (SWPPP). The Project would involve the construction of new buildings replacing existing permanent and temporary buildings and would not result in a substantial increase in impervious surfaces on the Project Site. Additionally, the design of the stormwater drainage system will incorporate BMP features to detain and treat stormwater runoff, which will reduce peak stormwater volumes. For these reasons, there will be no substantial increase in the rate or amount of surface runoff from the Project Site.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner which would:

- **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?**

As detailed above, the Project would not result in a substantial increase in impervious surfaces on the Project Site. The design of the stormwater drainage system will incorporate BMP features to detain and treat stormwater runoff, which will reduce peak stormwater volumes. For these reasons, there will be no substantial increase in the rate or amount of surface runoff from the Project Site. Therefore, the runoff generated would be similar to existing conditions and impacts would be less than significant.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner which would:

- **Impede or redirect flood flows?**

The Project Site is located in an area that has been mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) as Zone A99, which is an area with a one percent annual chance of flooding that will be protected by a federal flood control system where construction has

reached specified legal requirements.[15] As detailed above, the Project would not result in a substantial increase in impervious surfaces on the Project Site. Structural fill will be imported to raise portions of the Project Site where construction will occur above the existing grade to ensure structures are built above the flood level. This could potentially redirect flood flows on the Project Site. However, the design of the stormwater drainage system will incorporate BMP features to detain and treat stormwater runoff, which will reduce peak stormwater volumes. For these reasons, there will be no substantial increase in the rate or amount of surface runoff from the Project Site. Therefore, impacts to flood flows would be less than significant.

Threshold: Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

FEMA establishes base flood elevations for 100-year flood events which are defined as areas that could be inundated by a flood having a 1% probability of occurring in any given year. The Project Site is located within a 100-year flood zone,[16] specifically an A99 flood zone that will be protected by a federal flood control system where construction has reached specified legal requirements.

A tsunami is a sea wave (or series of waves) of local or distant origin that results from large-scale seafloor displacements associated with large earthquakes, major submarine slides, or exploding volcanic islands. The Project Site is not located within or adjacent to a tsunami zone. The closest tsunami zone is located approximately 13 miles southwest of Project Site, along the coast of the City of Ventura.[17]

A seiche is an oscillating wave caused by wind, tidal forces, earthquakes, landslides and other phenomena in a closed or partially closed water body such as a river, lake, reservoir, pond, and other large inland water body. Water bodies in the vicinity of the Project Site include the Santa Clara River and tributaries including creeks and barrancas passing through urbanized neighborhoods.[18] As these water features are not enclosed or partially enclosed, these water features are not subject to seiche risk.

The Project Site is located in a flood zone. However, construction will occur above the existing grade to ensure structures are built above flood level, eliminating the potential for release of pollutants during a flood event. Additionally, design of the stormwater drainage system will incorporate BMP features to detain and treat stormwater runoff, which will further reduce the potential for release of pollutants during a flood event. For these reasons, impacts related to the potential release of pollutants during a flood event would be less than significant.

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15 Federal Emergency Management Agency (FEMA). "Flood Insurance Rate Maps." Map. 2010. Accessed on February 13, 2024. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

16 City of Santa Paula. "Figure 5-3: Flood Hazard Zones." *2040 General Plan*. March 4, 2020.

17 California Department of Conservation (DOC). "Ventura County Tsunami Hazard Areas." Map. 2024. Accessed on February 13, 2024. https://www.conservation.ca.gov/cgs/tsunami/maps/ventura.

18 City of Santa Paula. "Biological Resources." *2040 General Plan*. March 4, 2020.

Threshold: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As detailed above, The Project Site is greater than one-acre in size and construction activities are subject to the requirements of the statewide NPDES Construction General Permit which requires the preparation and implementation of a Stormwater Pollution Prevention Plans (SWPPP). All runoff into existing or new city stormwater infrastructure would be required to comply with the components of the Regional Phase I MS4 Permit. The Project would be designed in conformance with the MS4 General NPDES Permit, which would ensure the Project would not conflict with the applicable water quality control plan.

The Project Site is located in the Santa Paula Groundwater Basin, which is an adjudicated basin exempted from the State Groundwater Management Act (SGMA). Because the basin is managed under the terms of the adjudication agreement preparation of a sustainable groundwater management plan was not required under SGMA.[19] Further, the student capacity of the campus would increase from 700 to 750 students and no faculty increases would occur from Project development, which would result in a minimal increase in water usage compared to existing conditions. For these reasons, the proposed Project would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.

5.7. LAND USE AND PLANNING

Threshold: Physically divide an established community?

The Project Site consists of the existing Isbell Middle School campus, and development of the proposed Project would be confined to the campus. Therefore, the proposed Project would not physically divide an established community and no impact would occur.

Threshold: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The Project Site has a General Plan land use designation of Institutional and Civic[20], and a zoning designation of Institutional-Civic (IN).[21] According to the City's General Plan and Municipal Code, these designations permit the development of schools, hospitals, community centers, government offices, cemeteries, and other public service facilities.[22,23] The Project is consistent with these designations as

19 United Water Conservation District. *2020 Santa Paula Basin Annual Report, Professional Paper 2022-01*. February 2022. Accessed November 2024. https://www.unitedwater.org/wp-content/uploads/2022/05/2020SPBasinAnnualReport_2022-03-22_Final_.pdf.

20 City of Santa Paula. "General Plan Land Use Map." Map. 2020. Accessed on February 6, 2024. https://www.spcity.org/DocumentCenter/View/1704/2040-General-Plan-Map-Final-2020-03-04---Web-Optimized.

21 City of Santa Paula. "Zoning Map." Map. 2022. Accessed on February 5, 2024. https://www.spcity.org/DocumentCenter/View/2739/COSP-Zoning-Map-072022-24x36.

22 City of Santa Paula. *2040 General Plan*. March 4, 2020. pp. 2-24.

23 City of Santa Paula. Municipal Code. Chapter 16.23. Section 16.23.020. Accessed on February 6, 2024. https://codelibrary.amlegal.com/codes/santapaula/latest/santapaula_ca/0-0-0-61075.

it aims to redevelop the school to accommodate SPUSD's 7th and 8th grade educational program, enhance student safety and well-being, and preserve the school's historic architecture. More specifically, the proposed Project would replace the existing main building, existing portable buildings, storage buildings, and cafeteria with a new single-story main building, classrooms, administrative building, courtyard, expanded parking lot and landscaping. New construction on the Project Site would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects, and impacts would be less than significant.

5.8. MINERAL RESOURCES

Threshold: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

As detailed in the City's General Plan EIR, a portion of the Project Site containing the cafeteria and southern parking lot is located within an aggregate mineral resource zone.[24] However, since the Project Site and surrounding area are developed with urban land uses and the depth and extent of excavation during site preparation would be limited, the proposed Project would have no impact on the availability of mineral resources within the City. Further, the Project Site is not zoned to allow mining operations and no changes to land use designations or zoning are proposed. Therefore, the Project Site is not compatible with mineral resource recovery and the Project will not result in the loss of availability of mineral resources identified as valuable.

Threshold: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

As mentioned above, a portion of the Project Site contains aggregate mineral resources; however, the Project Site contains the existing Isbell Middle School and is not located in a compatible area for mineral resource recovery. Therefore, impacts would be less than significant.

5.9. POPULATION AND HOUSING

Threshold: Induce substantial population growth in an area, either directly or indirectly?

Development of the proposed Project would increase the student capacity from the existing 700 students to 750 students. No faculty increases would occur from Project development. The proposed Project would not include residential uses and would not alter or cause a substantial change in population or housing in the City. Therefore, impacts would be less than significant.

24 City of Santa Paula. *Santa Paula 2040 General Plan Update Revised Draft Program Environmental Impact Report*. March 4, 2020. Volume II. p. 4.12-2. Accessed on February 6, 2024. https://www.spcity.org/DocumentCenter/View/1703/City-of-Santa-Paula-2040-General-Plan---Volume-II-DEIR-Revised-Final-Tracked-2020-03-04.

Threshold: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The Project Site consists of the Isbell Middle School campus, which does not contain any existing housing. Therefore, the Project would not displace existing housing, and there would be no impact.

5.10. PUBLIC SERVICES

Threshold: Result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

***i*. Fire Protection?**

Project impacts to public services can result when a project would induce population growth. As previously discussed, development of the proposed Project would replace existing buildings with new buildings in generally the same locations and would result in a minimal increase in the student capacity of the campus. The proposed Project would not include residential uses that would alter or cause a substantial change in population or housing in the City. All structures would be designed and built in conformance with the safety standards of applicable state building codes and subject to review by the Division of the State Architect. For these reasons, the proposed Project would not result in increase in demand for fire protection services that will require any alternations to existing fire department facilities or construction of new facilities. No impact would occur.

***ii*. Police Protection?**

As detailed above, the Project would not induce population growth or require additional public services and would undergo a design review to ensure adequate safety and emergency access. Therefore, no impact would occur.

***iii*. Schools?**

The existing Isbell Middle School main building currently does not meet seismic building safety standards, and its current facilities do not meet the needs of the SPUSD current educational program. Therefore, the Project will meet the District's performance objectives and no substantial adverse impact would occur.

***iv*. Parks?**

As mentioned above, the Project would not induce population growth. Therefore, there would be no increase in the demand for existing parks within the City and there would no impact.

***v*. Other Public Facilities?**

Other public facilities consist of hospitals and libraries. As mentioned above, the Project would not induce population growth. Therefore, there would not be an increase in the demand for existing hospitals and parks within the city. Additionally, the proposed Project would develop a new library for the Isbell Middle School campus, which would improve library services compared to existing conditions. No impact would occur.

5.11. RECREATION

Threshold: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Development of the proposed Project would increase the student capacity of the school from the existing 700 students to 750 students. No faculty increases would occur with the Project. The proposed Project would not include residential uses or a habitable component that would alter or cause a substantial change in population or housing in the City. Given that the Project would not induce a population increase, there would be no increase in demand for recreational facilities, and there would be no impact.

Threshold: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project does not include recreational facilities. Therefore, there would be no impact.

5.12. TRANSPORTATION

Threshold: Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Development of the proposed Project would include the expansion of the southern parking lot accessible from Harvard Boulevard, which would increase its capacity to 110 parking spaces. Additionally, a student loading zone would be established in this parking lot. The western driveway on S. 4th Street would be relocated approximately 100 feet westward and the adjacent bus stop would be relocated to the west of the relocated school driveway. The bus stop is used by school buses and public transit buses, and the new location of the bus stop would be identified in coordination with the Ventura County Transportation Commission (VCTC). The other three existing driveways and the staff-only access on Ventura Street would be retained. These changes are intended to provide additional parking capacity and improve the safety conditions for student drop-off and pick-up and would not alter the existing circulation pattern of traffic on or around the school.[25] The Ventura County Congestion Management Plan (CMP) provides local agencies and private developers with the procedures and tools necessary to manage and decrease traffic

25 **Appendix G**: Fehr and Peers Memorandum, *Site Access Analysis of the Isbell Middle School Modernization Project*.

congestion in the County.[26] The proposed Project would serve existing students in the District and would result in a minor increase in the student capacity of the campus compared to existing conditions. For this reason, the Project would not increase congestion and would not conflict with the CMP. Therefore, development of the proposed Project would not conflict with any plan, ordinance, or policy addressing circulation systems and impacts would be less than significant.

Threshold: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

CEQA Guidelines § 15064.3, subdivision (b) includes criteria for analyzing transportation impacts. For land use projects: "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact."

In response to Senate Bill 743 (SB 743), the Office of Planning and Research (OPR) has updated the CEQA guidelines to include new transportation-related evaluation metrics. Draft guidelines were developed in August 2014, with final guidelines published in November 2017 incorporating public comments from the August 2014 and January 2016 guidelines. In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package along with an updated Technical Advisory related to Evaluating Transportation Impacts in CEQA (December 2018). Full compliance with the guidelines that used to be based on level of service calculations cannot be the sole metric used to evaluate a project's impacts on the transportation system, and instead the vehicle miles traveled (VMT) metric is to be evaluated.

The Ventura County VMT Adaptive Mitigation Program (AMP) provides clear and consistent application of VMT assessment and reduction strategies to streamline the CEQA process in Ventura County and specifies that, "projects that provide services primarily for the local community such as neighborhood retail, schools, parks, community center, daycare and libraries could be presumed to be less than significant by a CEQA Lead Agency." [27] Further, the proposed Project would serve existing students in the District and would result in a minor increase in the student capacity of the campus compared to existing conditions. For these reasons, the Project would not increase VMT and would not conflict with the VMT AMP. Impacts would be less than significant.

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26 Ventura County Transportation Commission (VCTC). *Ventura County Congestion Management Program*. 2009. Accessed on February 7, 2024. https://www.goventura.org/wp-content/uploads/2018/03/Executive-Summary.pdf.

27 Ventura Council of Governments. *Ventura County CEQA Vehicle Miles Traveled Adaptive Mitigation Program, Recommendations to CEQA Lead Agencies in Ventura County to Streamline CEQA Transportation Assessment and Mitigation.* April 2023. Accessed on February 7, 2024. https://www.goventura.org/wp-content/uploads/2023/09/Ventura-County-AMP-Final-Report_Approved-by-VCTC-05.12.2023.pdf.

Threshold: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

As previously discussed, the western driveway on S. 4th Street would be relocated approximately 100 feet westward and the adjacent bus stop would be relocated to the west of the relocated school driveway. The precise location will be identified in coordination with VCTC. A licensed civil engineer will be engaged to ensure that the relocated western driveway to the Harvard Boulevard parking lot provides adequate sight distance and complies with other applicable roadway design requirements.[28] As with all improvements in the public right-of-way, the specific design and location of the relocated driveway and bus stop will be determined in consultation with the City of Santa Paula and will comply with City standards. Therefore, the proposed changes to site access would not substantially increase hazards due to a design feature and the impact would be less than significant.

Threshold: Result in inadequate emergency access?

Construction

During project demolition and construction activities, delivery truck trips and construction equipment would contribute additional traffic, which could in turn impact emergency access in the surrounding area. Additionally, partial lane closures may be needed along Harvard Boulevard and S. 4th Street for short periods during construction, which could potentially impact emergency vehicle access. Construction trip generation intensities would vary based on the construction phase. Potential impacts would be temporary and not significant for this reason.

Operation

As previously discussed, a licensed civil engineer will be engaged to ensure that the relocated western driveway to the Harvard Boulevard parking lot provides adequate sight distance and complies with other applicable roadway design requirements. The specific design and location of the relocated driveway and bus stop will be determined in consultation with the City of Santa Paula and will comply with City standards. These changes would not alter the existing circulation pattern of traffic on or around the school campus. Therefore, project operation would have no impact on emergency access and impacts would be less than significant.

5.13. TRIBAL CULTURAL RESOURCES

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope

28 **Appendix G**: Fehr and Peers Memorandum, *Site Access Analysis of the Isbell Middle School Modernization Project.*

of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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
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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

The Project Site is currently developed with Isbell School and located in an urbanized area. The new buildings are proposed in locations on the campus previously disturbed by construction of these existing buildings. Fill will be imported to raise the portions of the site containing new buildings above the existing flood level. For these reasons, the Project will not result in any substantial disturbance to areas not previously disturbed and, for this reason, no substantial adverse change to the significance of tribal cultural resources will occur.

Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014)(AB 52) applies to any project for which a Notice of Preparation is filed. AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.[29] Letters summarizing the Project description and location were sent via email to the NAHC-listed contacts for Ventura County on November 12, 2024, and no responses have been received to date.

5.14. UTILITIES AND SERVICE SYSTEMS

Threshold: **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

The Project Site is currently operating as a school campus and is served by existing utility connections. Development of the proposed Project would increase the student capacity of the school from 700 students to 750 students, with no increase in faculty. The Project would develop buildings that would be consistent with the latest California Building Code regulations, which would provide more energy efficient buildings and operations compared to the existing facilities. Existing utility facilities within the campus will be reconfigured and replaced as needed to serve the proposed new buildings. No major changes to offsite

29 California Natural Resources Agency. "AB 52 – Tribal Cultural Resources 2016 CEQA Update." *CEQA Guidelines Supplemental Documents.* Accessed December 2024. https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/ab52/Final%20AB%2052%20Notice%20of%20Proposed%20Rulemaking%20for%20Appendix%20G%20Update_revised%20Feb%2011%202015.pdf.

utility facilities are proposed. For these reasons, no significant environmental effects will result from the Project.

Threshold: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As described above, the Project would result in a small increase in the number of students and would include the development of new buildings meeting current water conservation standards. For these reasons, the Project would not result in a substantial increase in water demand and available water supplies are sufficient to serv the Project. Therefore, demand for water supplies would be similar to existing conditions and the impact of the Project on available water supplies would be less than significant.

Threshold: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As described above, the Project would result in a small increase in the number of students and would include the development of new buildings meeting current water conservation standards. For these reasons, the Project would not result in a substantial increase in water demand and available water supplies are sufficient to serv the Project. Therefore, the amount of wastewater produced would be similar to existing conditions and would not affect wastewater collection or treatment facilities.

Threshold: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As described above, the Project would result in a small increase in the number of students and the amount of solid waste produced would be similar to existing conditions and impacts would be less than significant.

Threshold: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As detailed above, the Project would not result in a substantial increase in solid waste or a significant change in the characteristics of solid waste generated at the site. Construction waste would include one-time disposal of material that cannot be recycled or reused. Where possible, appropriate measures would be undertaken to recycle or reuse solid waste generated during project construction. The proposed Project would comply with applicable local, state, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to regional landfills is reduced in accordance with existing regulations. The proposed Project would not conflict with federal, state, and local statutes and regulations related to solid waste and impacts would be less than significant.

5.15. WILDFIRE

Threshold: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Project Site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones.[30] The proposed Project would not result in any changes to the Project Site that would change or increase fire risks. No changes in access to the Project Site are proposed that would affect the ability of fire services to access the site in the event of a wildfire. For these reasons, the proposed Project would not conflict with the City's Emergency Operations Plan (EOP) or exacerbate wildfire risks compared to existing conditions of the school campus. Impacts would be less than significant.

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

As previously discussed, existing utility facilities within the campus will be reconfigured and replaced as needed to serve the proposed new buildings. No major changes to offsite utility facilities are proposed. Therefore, the proposed Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk and impacts would be less than significant.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Project Site and adjacent areas are in a developed and relatively flat portion of the City and not in a landslide zone. The Project Site is located in a flood zone; however, construction will occur above the existing grade to ensure structures are built above flood level, and design of the stormwater drainage system will incorporate BMP features to detain and treat stormwater runoff which will reduce peak stormwater volumes. For these reasons, impacts related to the downslope or downstream flooding or landslides would be less than significant.

30 State of California. Department of Forestry and Fire Protection. "Fire Hazard Severity Zones." Accessed October 2024. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.

6.0 OTHER CEQA CONSIDERATIONS

This section considers and discusses other topics identified in the CEQA Guidelines, including the potential for the Project to induce growth, and the identification of irreversible impacts.

6.1. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines, as amended, requires an EIR to include a discussion of the ways in which a project could directly or indirectly foster economic growth, population growth, or the construction of additional housing in the surrounding environment that may result in impacts on the environment. This discussion should address projects that would remove obstacles to population growth and consider any characteristics of a project which may encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively. This section of the *CEQA Guidelines* emphasizes that growth in an area should not be considered beneficial, detrimental, or of little significance. The section discusses the potential for the proposed Project to induce additional growth in accordance with this section of the *CEQA Guidelines*.

In general terms, a project may foster spatial, economic, or population growth in a geographic area if it results in the following:

- Remove an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).
- Create economic expansion or growth (e.g., construction of additional housing, changes in revenue base, employment expansion, etc.).
- Involve a precedent-setting action (e.g., an innovation, a change in zoning or general plan designation).
- Develop or encroach into an isolated, or adjacent, undeveloped or open space area.

6.1.1. Remove an Impediment of Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area, or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or general plan designations.

The area surrounding the Project Site is urban and developed with existing residential and commercial uses supported by existing infrastructure. The Project Site is comprised of the existing Isbell School campus and is designated for civic and institutional use by the City's General Plan and Zoning. The proposed Project involves the modernization of the Isbell School campus, which would be consistent with the existing General Plan and Zoning designations. Development of the Project would not require any major improvement or expansion of infrastructure that would remove an impediment to growth in the area around the Project site.

6.1.2. Economic Growth

The second criterion for considering potential for a project to induce additional growth is economic considerations. The Project proposes to redevelop a site currently developed with the Isbell School campus, to achieve the project objectives, which include providing facilities to meet the District's current 7th and 8th grade educational program needs; modernizing the Isbell School Campus to meet safety, community, and SPUSD goals and guidelines; and preserving the school's historic character. The development of the proposed Project would nominally increase the student capacity from the existing 700 students to 750 students. No increases in the number of faculty increases are proposed.

In the short term, the Project would provide for construction employment opportunities. It is anticipated that construction employees would commute from elsewhere in the region, rather than relocate to the City for a temporary assignment. No long-term growth impacts are anticipated because the proposed Project would not induce any permanent increases in population or employment. Accordingly, the economic contribution of this Project would not be considered growth-inducing.

6.1.3. Precedent-Setting Action

A proposed Project may also induce additional growth, if it would involve the approval of a precedent-setting action, such as a general plan amendment or zone change that could have implications for other properties, or that could make it easier for other properties to develop. The Project Site is comprised of the existing Isbell School campus and involves the modernization of the campus, and does not propose any changes to the use of the site. Accordingly, the Project does not involve any precedent setting actions that could result in more growth in this area.

6.1.4. Develop or Encroach into Undeveloped or Open Space Areas

As discussed previously, the Project would involve the redevelopment of an existing developed site in an urbanized area. The Project Site is surrounded by existing residential and commercial uses in an area planned and zoned for these uses by the City of Santa Paula. The Project would not, therefore, involve development of undeveloped or open space areas.

6.2. SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(c) of the *CEQA Guidelines* states that use of nonrenewable resources during the initial and continued phases of a project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or non-use thereafter unlikely. This section of the environmental impact report (EIR) evaluates whether the Project would result in the irretrievable commitment of resources, or would cause irreversible changes in the environment. Also, in accordance with Section 15126.2 of the *CEQA Guidelines*, this section identifies any irreversible damage that could result from environmental accidents associated with the Project.

6.2.1. Irreversible Commitment of Resources

Implementation of the Project would include the development of a new single-story administrative and multi-purpose room (MPR) building, seven single-story classroom buildings, and an expansion of the southern parking lot along Harvard Boulevard. A relocatable classroom campus could be initially constructed north of the existing portable classrooms to provide temporary classroom space to replace the classrooms in the existing main building. The construction and operation of the Project would contribute to the incremental depletion of resources, including renewable and non-renewable resources. Resources, such as lumber and other forest products, are generally considered renewable resources. Such resources would be replenished over the lifetime of the Project. For example, lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources over the life of the Project.

Non-renewable resources, such as natural gas, petroleum products, asphalt, petrochemical construction materials, steel, copper, other metals, and sand and gravel are considered to be commodities that are available in a finite supply. The processes that created these resources occur over a long period of time. Therefore, the replacement of these resources would not occur over the life of the Project. To varying degrees, the aforementioned materials are all readily available and some materials, such as asphalt, sand, or gravel, are abundant. Other commodities, such as metals, natural gas, and petroleum products, are also readily available, but they are finite in supply given the length of time required by the natural process to create them.

The proposed Project would meet all applicable energy conservation standards. As a school modernization and associated improvements project, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The demand for all such resources is expected to increase regardless of whether or not the Project is developed. Increase in population within the State would directly result in the need for more retail, commercial, and residential facilities, in order to provide the services associated with this growth. If not consumed by this Project, these resources would likely be committed to other projects in the region intended to meet this anticipated growth. Furthermore, the investment of resources in the Project would be typical of the level of investment normally required for an institutional/civic use of this scale.

6.2.2. Irreversible Environmental Changes

Irreversible, long-term environmental changes associated with the Project would include a change in the visual character of the site as a result of the development of new administrative and classroom buildings on the site. Design features have been incorporated into the Project that would minimize the effects of the environmental changes associated with the development of the Project to the maximum degree feasible. In addition, the Project Site is an urban site developed with the existing Isbell School campus, and the implementation of the Project would improve the campus and this location of the City. Even with this being the case, the Project would result in short-term noise impacts during construction and short-

term air quality and GHG emissions impacts from mobile sources during construction. These impacts are not significant.

6.2.3. Potential Environmental Damage from Accidents

The Project proposes no uniquely hazardous uses and its operation would not be expected to cause environmental accidents that would affect other areas. The Project Site is located within a seismically-active region and would be exposed to ground shaking during a seismic event. Conformance with the regulatory provisions of applicable building codes pertaining to construction standards would minimize, to the extent feasible, damage and injuries in the event of such an occurrence. Because development of the Project would require the removal of existing building foundations and the expansion of paved parking areas located on the Project Site, these materials could cause health and safety problems for on-site construction workers and the community. Federal, State, and local regulatory procedures included in this EIR would be implemented as part of the Project. Following these regulatory procedures, the potential for impacts would be reduced to a less than significant level.

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8.0 LIST OF PREPARERS / ORGANIZATIONS CONSULTED

8.1 EIR PREPARERS

8.1.1 Lead Agency

Santa Paula Unified School District
201 South Steckel Drive
Santa Paula, California 93060

Douglas Henning, Facilities and Construction Manager

8.1.2 Meridian Consultants

860 Hampshire Road, Suite P
Westlake Village, California 91361

Tony Locacciato, Principal
Leanna Williams, Associate Principal
Grace Bridges, Project Manager
Victor Paitimusa, Project Manager
Nikki Heredia, Project Environmental Scientist
Lisa Maturkanic, Senior Administrative Manager
Andrew Soto, Publication Specialist
Tom Brauer, Graphics Specialist

8.2 ORGANIZATIONS CONSULTED

8.2.1 San Buenaventura Research Associates

1328 Woodland Drive
Santa Paula, California 93060

Mitch Stone, Preservation Planner
Judy Triem, Historian

8.2.2 Fehr & Peers

600 Wilshire Boulevard, Suite 1050
Los Angeles, California 90017

Netai Basu, AICP CTP