



Notice of Preparation

To: Public Agencies and Interested Parties

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

Date: February 1, 2017

Subject: Notice of Preparation of a Supplemental Environmental Impact Report

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

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

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

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

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

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

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

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

ATTACHMENT A
PROJECT DESCRIPTION

The General Plan addresses the community's vision for development to the horizon year of 2040. The General Plan includes a map of proposed urban boundaries and planned land uses. It also contains goals, objectives and policies that will govern the growth of the City of Santa Paula and the management of its resources. All of the mandated General Plan Elements (Govt. Code Section 65302) are included in this comprehensive update with the exception of the Housing Element, which was adopted in 2013 pursuant to the schedule for housing element updates established in state law.

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

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

1. Precise Location and Boundaries

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

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

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

Comments Specifically Requested:

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

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2. Statement of Objectives

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

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

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

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

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

3. Project Characteristics

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

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

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

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

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4. Intended Uses of the EIR

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

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

Comments Specifically Requested:

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

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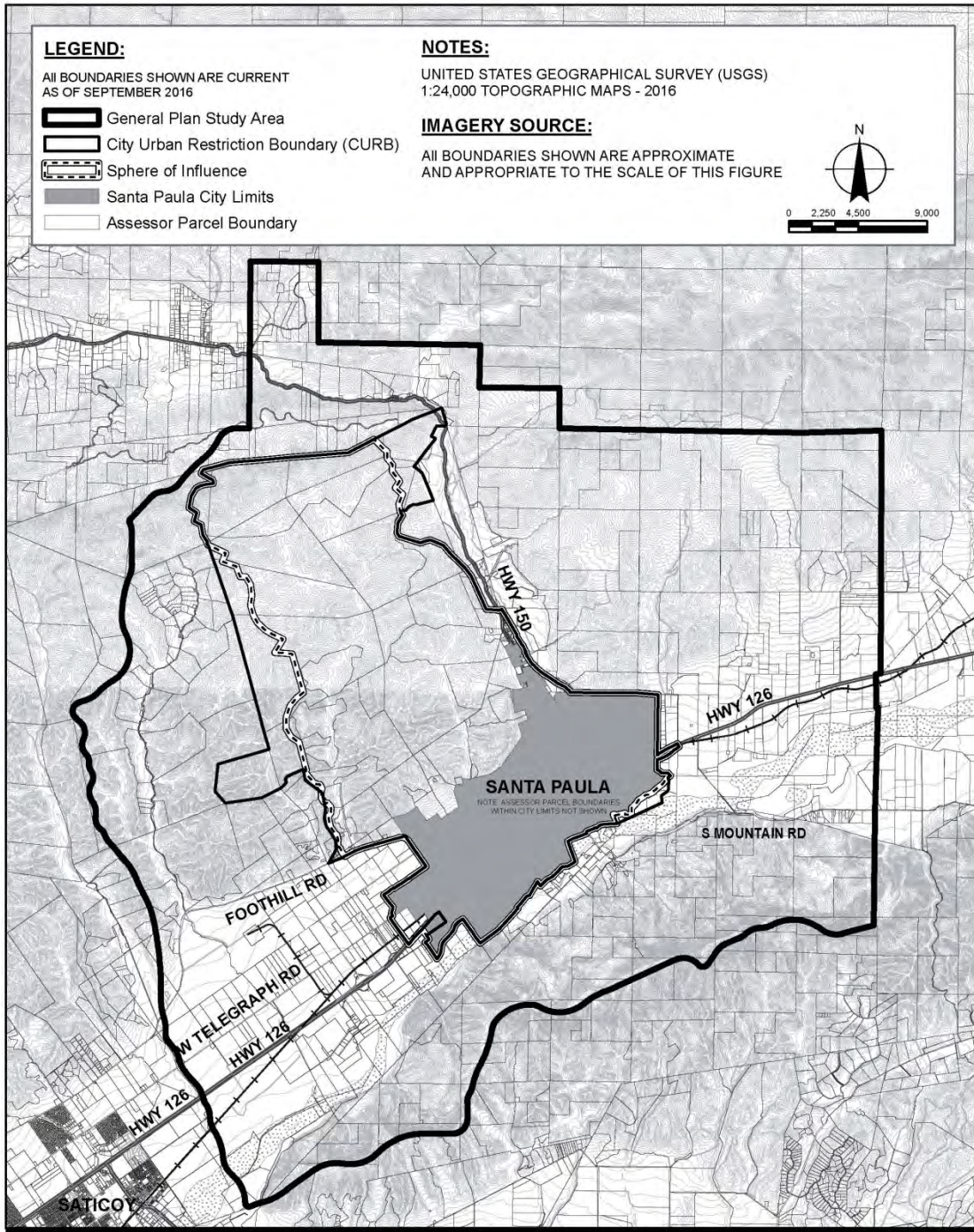


SANTA PAULA GENERAL PLAN UPDATE
CITY PROJECT NO.: 14-C103

REGIONAL LOCATION MAP

AECOM
FIGURE 1

**ATTACHMENT A
PROJECT DESCRIPTION**



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

PLANNING AREAS



FIGURE 2

ATTACHMENT B
INITIAL STUDY

I. SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT ANTICIPATED

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

CEQA Guidelines Section 15162(a) states:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

II. PUBLIC INPUT REQUESTED

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

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

III. BACKGROUND/PURPOSE

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

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

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

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

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

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IV. ENVIRONMENTAL SETTING - ASSUMPTIONS

A. BASELINE

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

Comments Specifically Requested:

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

B. PROJECT BUILDOUT

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

Comments Specifically Requested:

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

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V. ENVIRONMENTAL ISSUES TO BE STUDIED

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

A. AESTHETICS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Have a substantial adverse effect on a scenic vista?			X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X

Discussion:

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

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

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

B. AGRICULTURE AND FOREST RESOURCES

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

Discussion:

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

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

Comments Specifically Requested:

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

C. AIR QUALITY

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Conflict with or obstruct implementation of the applicable air quality plan?	X		
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	X		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	X		
d) Expose sensitive receptors to substantial pollutant concentrations?	X		
e) Create objectionable odors affecting a substantial number of people?	X		

Discussion:

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

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

Comments Specifically Requested:

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

D. BIOLOGICAL RESOURCES

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

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Discussion:

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

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

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

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

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

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

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

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

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

Comments Specifically Requested:

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

E. CULTURAL RESOURCES

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

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Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X		
d) Disturb any human remains, including those interred outside of formal cemeteries?	X		

Discussion:

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

Comments Specifically Requested:

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

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F. GEOLOGY AND SOILS

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

Discussion:

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

b/c/d. Potential impacts due to landslides, subsidence, liquefaction and other soil-related conditions are addressed in Section 4.6.2 of the Prior EIR. The current General Plan Safety Element

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

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

Comments Specifically Requested:

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

G. GREENHOUSE GAS EMISSIONS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X		
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X		

Discussion:

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

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

Comments Specifically Requested:

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

H. HAZARDS AND HAZARDOUS MATERIALS

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X		
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	X		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	X		

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

Discussion:

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

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

I. HYDROLOGY AND WATER QUALITY

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

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

Discussion:

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

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

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

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

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

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

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

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

Comments Specifically Requested:

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

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J. LAND USE AND PLANNING

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

Discussion:

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

Comments Specifically Requested:

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

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K. MINERAL RESOURCES

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	X		
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	X		

Discussion:

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

Comments Specifically Requested:

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

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L. NOISE

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

Discussion:

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

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

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

Comments Specifically Requested:

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

M. POPULATION AND HOUSING

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	X		
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?		X	
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?		X	

Discussion:

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

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

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

Comments Specifically Requested:

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

N. PUBLIC SERVICES

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

Discussion:

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

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

Comments Specifically Requested:

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

O. RECREATION

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	X		
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	X		

Discussion:

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

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

Comments Specifically Requested:

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

P. TRANSPORTATION

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

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

Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	X		
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	X		

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Would the City of Santa Paula General Plan Update and its implementation:	Potentially Significant; will be studied in this SEIR	Less than Significant; will not be studied in this SEIR	Issue was adequately addressed in Prior EIR for present General Plan (SCH#97081084); therefore, issue will not be studied in this SEIR
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?		X	
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X		
e) Result in inadequate emergency access?	X		
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	X		

Discussion:

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

Comments Specifically Requested:

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

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Q. UTILITIES AND SERVICE SYSTEMS

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

Discussion:

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

ATTACHMENT B
INITIAL STUDY

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

Comments Specifically Requested:

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

VI. LONG TERM IMPACTS

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

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

VII. ALTERNATIVES

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