

2.0 EIR SUMMARY

This section provides information on the background of the Project assessed in the EIR and a summary of the information in the 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 these impacts.

2.1 PROJECT OVERVIEW

The Santa Paula West Business Park Specific Plan (“Specific Plan”) is a proposed comprehensive set of plans, exhibits, regulations, conditions, and programs for the orderly development of a portion of the West Area 2 Expansion Area (“West Area 2”) as defined in the City of Santa Paula (“City”) General Plan. The Specific Plan and off-site improvements proposed to support the development of the Specific Plan Area are collectively referred to as the “Project” in this Final EIR.

The Specific Plan would guide future development on approximately 53.81 acres of the City’s 125-acre West Area 2 Expansion Area. West Area 2 was identified as an expansion area in the City’s 1998 General Plan to provide land needed for manufacturing, research and development, professional office, and limited commercial uses, with integrated vehicular circulation, pedestrian walkways, and infrastructure. The land uses envisioned within the Specific Plan will be a mix of low-intensity industrial (such as light manufacturing or research and development), professional offices, and supporting commercial businesses. These uses are allowed in the City’s Commercial/Light Industrial and Light Industrial zones.

The Specific Plan was prepared to implement the City’s General Plan for a portion of West Area 2 in accordance with the requirements of the California Government Code (Sections 65450–65457) and Chapter 16.216 of the City of Santa Paula Development Code. The Specific Plan would establish the regulations, programs, and procedures required to implement the General Plan goals and polices for this expansion area of the City. The Specific Plan would facilitate development within the Project Site as a master-planned business park that includes a variety of light industrial and commercial uses.

The Project includes the following discretionary actions:

- General Plan Amendment for the West Area 2 Expansion Area;
- Specific Plan Approval and Rezoning;
- Approval of the Master Vesting Tentative Map;
- Annexation to the City of Santa Paula;

- Encroachment permit by the California Department of Transportation for the construction of roadway and utility improvements in the State right-of-way; and
- California Public Utilities Commission approval for an at-grade crossing of the Ventura County Transportation Commission (VCTC) railroad.

2.2 PROJECT OBJECTIVES

The following Project objectives are based on the overall intent of the City's General Plan and the existing physical, environmental, demographic, and market conditions:

1. Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in West Area 2 that reflects and complements the existing pattern and scale of development in Santa Paula;
2. Provide for light industrial and commercial uses that complement existing uses adjacent to the Project area; and
3. Provide suitable sites for light industrial and commercial buildings that meet the needs of the community but which are not presently available in the City of Santa Paula.

2.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A summary of the potential environmental impacts of the Project and the measures identified to mitigate those impacts is provided in **Table 2.0-1: Summary of Project Impacts**, for each topic addressed in the Draft EIR. **Table 2.0-1** was arranged into four columns: the identified impact under each EIR issue area; 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. Compliance with existing City ordinances, programs, practices, and procedures is assumed for purposes of determining the level of significance prior to mitigation.

A summary of the alternatives to the Project to promote informed decision making follows **Table 2.0-1**.

**Table 2.0-1
Summary of Project Impacts**

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Aesthetics			
<i>Threshold: Have a substantial adverse effect on a scenic vista?</i>			
Construction activities within the Project Site and off-site improvements, such as along Beckwith Road and Faulkner Road, could potentially be visible from State Route 126 (SR 126) and Telegraph Road and other vantage points that currently have views of these areas. Additionally, initial land development including, site clearing, grading, roadway construction, and improvements of the Project Site are anticipated to occur over approximately a 4-month period starting in sometime in 2019. For purposes of the analysis within this EIR, construction of individual buildings is assumed to occur over approximately 10 years in response to market conditions.	Potentially Significant	The impact is temporary and there are no feasible measures available to mitigate these temporary impacts.	Potentially Significant and Unavoidable on a Temporary Basis
The Project would provide for the development of commercial and light industrial uses, along with roadways and open space across the 53.81-acre Project Site. Building heights would be consistent with 1- to 2-story buildings having similar uses to the east of the Project Site, with a maximum building height of 35 feet and 45 feet for commercial/light industrial and industrial uses, respectively. Views of the agricultural fields from the SR 126 would be	Less than Significant	No mitigation measures required.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>replaced with views of commercial and industrial uses related to the Project. Scenic aspects of the Project Site of the Project Site also include the agricultural lands and Adams Barranca west of the Site. While implementation of the Project would result in the loss of views of the existing agricultural lands in the immediate foreground with the addition of structures, circulation system, and supporting infrastructure, the urbanized appearance is similar to the adjacent uses. More distant scenic vistas of the Santa Clara River Valley would not be significantly altered upon the development of structures on the Project Site. Therefore, the Project would result in less than significant adverse impacts to scenic vistas.</p>			
<p>Threshold: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</p>			
<p>The Project would incorporate various open space/passive uses into the Project design to preserve the visual quality of Adams Barranca, would not remove visually important trees or geologic features, and since the segment of SR 126 that is adjacent to the Project Site is not eligible for designation as a scenic highway, implementation of the Project would not damage scenic resources within a designated state scenic highway.</p>	<p>Less than Significant</p>	<p>No mitigation measures required.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Threshold: Substantially degrade the existing visual character or quality of the site and its surroundings?			
<p>The existing visual character and quality of the Project Site is predominantly agricultural in nature, with ancillary agricultural facilities, row crops, and orchards. Due to the Project Site’s relatively low and flat elevations, many off-site vantage points of the Project Site are obstructed by existing structures and buildings. However, development within the Project Site can be seen from vantage points that are located immediately adjacent to the Project Site, such as those along SR 126, Telegraph Road, Beckwith Road, Todd Lane, and Faulkner Road. Furthermore, while elevations of the Project Site would remain relatively flat and at low elevations, and although the Specific Plan development standards will be required to ensure a consistent and compatible aesthetic character with the developments to the east, the existing open space and agricultural character of the Project Site would substantially change. The altered views from the public viewpoints that immediately surround the Project Site are considered significant and unavoidable.</p>	Significant	No mitigation measures.	Significant and Unavoidable
Threshold: Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?			
<p>The Project’s development standards establish the types of materials that can be used for various types of structures on the Project Site; reflective, glare-producing materials are prohibited. Daytime sources of glare would include the sun reflecting off glass windows of structures and vehicles.</p>	Potentially Significant	AES-1: Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula Planning Director for approval that identifies the types of shielding that will be used for outside lighting and must comply with all applicable dark sky ordinances/regulations.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Glare produced from these sources would be brief and intermittent. Therefore, impacts related to glare would be less than significant.</p> <p>The Project’s nighttime sources of light would include outdoor lights, such as mounted lights and lighted signs on the buildings, parking lot lighting, interior building lights, and headlights of vehicles. Given that minimal outdoor lighting is currently emitted from the Project Site, these impacts related to the additional nighttime light and glare from the Project are considered to be potentially significant.</p>		<p>All exterior night lighting installed on the Project Site shall be of low-intensity, low-glare design, and hooded to direct light directly downward onto the area being lighted to prevent spillover onto adjacent parcels. Shielding must be included to eliminate uplighting. Exterior lighting fixtures must be kept to the minimum number and intensity needed to ensure public safety. These lights shall be dimmed after 10:00 PM to the maximum extent practical without compromising safety. Upward directed exterior lighting is prohibited.</p>	
Cumulative Impacts			
<p>In combination with the Project, all of the proposed expansion areas would change the visual character of the area over time from a more rural setting to one with more urbanized development, especially along the main travel corridors, such as SR 126. The cumulative development would transform the visual character of the City by reducing the amount of open space within the City limits and expanding the urban visual character. However, implementation of the Project and related projects would be consistent with the City’s General Plan. While the Santa Paula West Business Park Specific Plan would include various open space and would not affect the Adams Barranca, the development would contribute (albeit to a lesser degree) to the cumulative changes in visual character of the City in combination</p>	<p>Significant</p>	<p>No mitigation measures.</p>	<p>Significant and Unavoidable</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>with the other relatively large scale related projects. Therefore, as with the Project, impacts related to the views and visual character of the City as a result of the Specific Plan amendment, are considered cumulatively considerable, and significant and unavoidable.</p>			
<p>Agricultural Resources</p>			
<p>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?</p>			
<p>According to the Farmland Mapping & Monitoring Program (FMMP) Important Farmland Map for the County of Ventura, there are approximately 44.22 acres of prime farmland and 4.88 acres of farmland of Statewide importance on the site (total of 49.1 acres). Implementation of the Specific Plan would result in the conversion of the 49.1 acres of both prime farmland and important farmland to urbanized uses.</p>	<p>Significant</p>	<p>AG-1: To reduce or minimize impacts to Prime Farmland, and Important Farmland, the Applicant shall provide mitigation through one, or some combination of, the following mitigation measures, prior to the issuance of a grading permit by the City:</p> <ol style="list-style-type: none"> 1. The Applicant shall secure a conservation easement in perpetuity, on land officially designated by the State of California as Prime Farmland and Important Farmland. The mitigation ratio shall be 1:1 for each class of designated farmland, resulting in a conservation easement being placed on a total of 44.20 acres of Prime Farmland, and 4.88 acres of Important Farmland, within the State of California. The applicant may satisfy the Important Farmland mitigation requirement by conserving Prime Farmland; or 2. The Applicant shall make payments to a local, regional, or Statewide organization whose purpose is to acquire agricultural conservation easements for Prime Farmland and Important Farmland and has demonstrated a successful track record in doing so, over at least 5 years. If the applicant elects to pursue this option alone, or in combination with option 1, the Applicant shall 	<p>Significant and Unavoidable</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>demonstrate to the City Planning Director that it has paid funds sufficient to allow the state, regional, or local conservation organization to acquire conservation easements in perpetuity over Prime Farmland and important Farmland resulting in a mitigation conservation ratio or 1:1 for each class of Farmland.</p> <p>If, prior to the issuance of a grading permit, the Applicant contends that satisfying mitigation options 1 and/or 2 is not financially feasible, the Applicant shall provide substantial evidence to the City Planning Director, as that term is defined in the CEQA Guidelines, including but not limited to expert opinion evidence supported by facts, to support its contention that such mitigation is not financially feasible. The Applicant's substantial evidence shall be independently reviewed by the City's financial experts or outside consultant, the cost of which shall be paid by the Applicant. If the City concurs with the Applicant's conclusion that mitigation options 1 and or 2 are not financially feasible, the Applicant shall provide mitigation at less than a 1:1 ratio, to the extent feasible, to minimize or reduce the level of impacts to Prime Farmlands and important Farmland.</p>	
Threshold: Conflict with existing zoning for agricultural use, or a Williamson Act contract?			
<p>The County zoning designation for the Project area is Agricultural Exclusive (A-E) Urban Reserve for land currently in agricultural use. The Specific Plan area would be zoned Commercial/Light Industrial and Light Industrial in accordance with the Specific Plan's Zoning Implementation Plan and consistent with the City's Municipal Code for these designations. The development of a variety of manufacturing, research and development, office, and commercial uses that would be allowed under the Specific Plan</p>	<p>Less than Significant</p>	<p>No mitigation measures required.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
would be compatible with the proposed City's General Plan designations. There are no Williamson Act contracts preserving agricultural that govern any parcels within the Project area.			
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))?			
<p>The Project Site would be zoned C/LI (Commercial Light Industrial) and LI (Light Industrial) for areas that would be developed under the Specific Plan. The Adams Barranca and related detention basin used for flood control would be preserved with an Open Space/Passive zoning designation.</p> <p>The Project Site is not zoned as forestland or timberland, and there is no timberland production within the vicinity of the Proposed Project.</p>	No Impacts	No mitigation measures required.	No Impacts
Threshold: Result in the loss of forestland or conversion of forestland to non-forest use?			
The Project does not include any loss of forestland or conversion of such forestland to any other designations.	No Impacts	No mitigation measures required.	No Impacts
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?			
<p>On-Site Agriculture</p> <p>As stated previously, approximately 49 acres of the 53.81-acre Project Site are under agricultural cultivation and would be taken out of production as a result of implementation of the Specific Plan.</p>	Significant for On-Site Agriculture	Implementation of mitigation measure AG-1 .	Significant and Unavoidable for On-Site Agriculture

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Adjacent Agriculture</p> <p>Existing agricultural lands producing avocados, citrus fruits, and a variety of row crops are located south of the Specific Plan area, south of SR 126, and near the western boundary of the Specific Plan area, west of Adams Barranca. Agricultural operations to the south are separated from the Project Site by SR 126. The Specific Plan would not readily accommodate outdoor recreational activities for the general public or provide residential habitation components. As such, residential and general public exposure to dust, noise, and odors associated with nearby farming activities is considered less than significant. Therefore, based on the nature of the Project and design features to reduce any conflicts with adjacent agricultural land, potential impacts related to the conversion of off-site farmland to nonagricultural uses would be less than significant.</p>	<p>Less than Significant for Adjacent Agriculture</p>		<p>Less than Significant for Adjacent Agriculture</p>
<p>Cumulative Impacts</p>			
<p>Implementation of the General Plan would result in a long-term commitment to nonagricultural uses in areas that currently support prime and important Farmland, particularly within the West Area 2 and East Area 2 Expansion Areas. Since both of these expansion areas include Statewide important farmland, development of these areas in accordance with the General Plan will result in cumulative impacts to agricultural resources within the City's Planning Area. While development of these areas would be</p>	<p>Significant</p>	<p>Implementation of mitigation measure AG-1.</p>	<p>Significant and Unavoidable</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
consistent with local planning policies, the cumulative impact on agricultural resources would be a significant and unavoidable impact.			
Air Quality			
Threshold: Conflict with or obstruct implementation of the applicable air quality plan?			
<p>According to the Ventura County Air Pollution Control District (VCAPCD) Guidelines, to be consistent with the South Coast Air Quality Management (SCAQMD) Air Quality Management Plan (AQMP), a project must conform to the local general plan and must not result in or contribute to an exceedance of the County's projected population growth forecast.</p> <p>The Project's addition of 1,510 employees would be consistent with the projections per Southern California Association of Governments (SCAG). The planned uses would also be consistent with the City's land use and zoning designation of the Project Site. As such, the Project would not conflict with the 2007 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in the County of Ventura.</p>	Less than Significant	No mitigation measures necessary.	Less than Significant
Threshold: Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			
Construction			
The VCAPCD's 25 lb/day threshold for reactive organic gas (ROG) and nitrous oxide	Potentially Significant	AQ-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions shall	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>(NOx) does not apply to construction emissions because such emissions are temporary. Emissions of toxic air contaminants (TACs) are localized, not regional, in nature; impacts related to construction activities would be limited to the area immediately surrounding the construction site within the Project area, and the VCAPCD does not recommend any thresholds of significance for their associated emissions. Instead, the VCAPCD bases the determination of significance on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended by the VCAPCD Guidelines are implemented for a project, then construction emissions are not considered significant. All construction activities would adhere to the VCAPCD Rule 50 for Opacity, Rule 51 for Nuisance, and Rule 55 for Fugitive Dust.</p>		<p>be controlled by regular watering or other dust-preventative measures using the following procedures, as specified by the VCAPCD (including without limitation, to VCAPCD Rule 50 (Opacity) and Rule 51 (Nuisance):</p> <ul style="list-style-type: none"> • On-site vehicle speed shall not to exceed 15 miles per hour (the Project Site will contain posted signs with the speed limit). • All on-site construction roads with vehicle traffic shall be watered as necessary to prevent excessive dust; • Streets adjacent to the Project reach shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust. • All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day. • All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust (contact the VCAPCD meteorologist for current information about average wind speeds). • All material transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust. • The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust. 	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>These control techniques shall be indicated on Project grading plans. The Applicant and/or its contractor shall be responsible for implementing these measures and compliance with this measure will be subject to periodic site inspections by the City.</p> <p>AQ-2: Project grading plans shall show that for the duration of construction, ozone precursor emissions from construction equipment vehicles must be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer’s specifications, to the satisfaction of the City Engineer. Compliance with this measure will be subject to periodic inspections of construction equipment vehicles by the Public Works Department.</p> <p>AQ-3: All trucks that will haul excavated or graded material on site shall comply with California Vehicle Code Section 23114 with special attention to subsections 2311(b)(F), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.</p> <p>AQ-4: A comprehensive Fugitive Dust Control Plan shall be developed by the Applicant and approved by the VCAPCD before the applicant commences grading and excavation operations. The Plan shall include all feasible, but environmentally safe, dust control methods. If a particular dust control method is determined or believed not to be feasible, or if it would conflict with other regulations, justification for not including the subject method shall be provided at the time the Fugitive Dust Control Plan is submitted to the VCAPCD. The Plan shall identify all fugitive dust sources, the means by which fugitive dust from each identified source will be minimized, and the schedule of frequency that each dust control method will be applied for each identified source.</p>	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>AQ-5: The construction contractor shall adhere to VCAPCD Rule 74.2 (Architectural Coatings) for limiting volatile organic compounds from architectural coatings. This rule specifies architectural coatings storage, clean up, and labeling requirements.</p>	
Operations			
<p>The Project would generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD for ROG. Many of the measures that the VCAPCD recommends to reduce significant operational impacts are features of the Project. The off-site transportation demand management (TDM) fund is a mitigation measure that can be used by project proponents for projects and program that exceed the ROG and NOx significance thresholds. The City of Santa Paula utilizes this program to mitigate the significant air quality impacts of projects with its jurisdiction. While impacts will be reduced with mitigation, they will remain significant and unavoidable.</p>	Significant	<p>AQ-6: Use low emission water heaters for commercial water heating (Emissions reduction of 11 percent for ROG and 9.5 percent for NOx).</p> <p>AQ-7: Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, and bikeways and/or lanes and bike racks. Sidewalks and bikeways should be landscaped with trees (an approximately 4 percent emissions reduction).</p> <p>AQ-8: Provide shuttle/minibus service between the Project commercial and industrial land uses and the Santa Paula downtown area during the lunchtime period (11:00 AM to 2:00 PM).</p>	Significant and Unavoidable
<p>Threshold: 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 threshold for ozone precursors)?</p>			
According to the VCAPCD, if an individual project results in air emissions of criteria	Significant	AQ-12: The Applicant and/or its contractor must plant and maintain shade trees to reduce heat build-up on structures.	Significant and Unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>pollutants that exceed VCAPCD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. By applying VCAPCD's cumulative air quality impact methodology, implementation of the Project would result in an increase of ROG, an ozone precursor, and NOx, such that significant cumulative impacts would occur. Accordingly, cumulative impacts would be potentially significant.</p>		<p>AQ-13: The Applicant and/or its contractor shall prepare a TDM for review and approval by the City and VCAPCD, before the City issues building permits. The plan shall incorporate reasonable and feasible measures to reduce Project-related traffic and vehicle miles traveled. At minimum, the TDM Program shall include the following measures:</p> <ul style="list-style-type: none"> • Provision of connections to identified adjacent City or regional trails. • Provision of adequate way-finding features to direct pedestrians and bicyclists to nearby Project and City destinations, such as school, retail, and civic facilities. • Provision of adequate setbacks and design features such that the proposed future enhancement of commuter rail opportunities is not hindered by Project design. • Construction of pedestrian- and transit-friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeways, or lanes. Sidewalks and bikeways should be landscaped with trees. • Perform a traffic light synchronization study on streets impacted by Project development to reduce vehicle queuing time. <p>The Project shall offset the increase in daily emission over the 25 pounds of reactive organic compounds and nitrogen oxides per day either through the purchase of emission offsets or through the in-lieu fees shall be paid to fund off-site TDM facilities or services, if such a program has been established at that time. These fees can reduce emissions from non-Project-generated motor vehicle trips by funding programs to promote ridesharing, public transit, and</p>	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		bicycling. The amount of this financial contribution should be calculated on a pro-rate basis as determined to be equitable by the VCAPCD, and in accordance with the VCAPCD Guidelines. These fees should be paid prior to the issuance of building permits by the County. The applicant shall demonstrate the availability of the offsets or contribution to fund off-site TDM services to the VCAPCD through a contract or other agreement with the offset source(s), which binds the reduction to the Project.	
<i>Threshold: Expose sensitive receptors to substantial pollutant concentrations?</i>			
All but one study area intersection is projected to operate at level of service (LOS) D or better. This intersection is a freeway ramp and there are no sensitive receptors located within close proximity so as to be affected by vehicle emissions at this intersection. The closest residence is located approximately 200 feet east of the freeway ramp. Consequently, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.	Less than Significant	No mitigation measures necessary.	Less than Significant
A health risk assessment (HRA) was prepared to determine whether diesel particulate emissions from construction within the Santa Paula West Specific Plan will cause significant impacts to nearby sensitive receptors. In comparison to the applicable 10 in 1 million threshold level, carcinogenic risks do not	Less than Significant	No mitigation measures necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
exceed the level posing no significant risk. Therefore, impacts are less than significant.			
An evaluation of the potential noncarcinogenic effects was also conducted. Results of the analysis demonstrate that construction of the Project will not generate any significant air quality impacts with regards to emissions of toxic air contaminants.	Less than Significant	No mitigation measures necessary.	Less than Significant
Grading will include earth-moving activities during the grading phase that will cut soil and use as fill at the Project Site. These activities could be considered conducive to disturbing the <i>Coccidioides immitis</i> spores if they are present. The fungus is not likely to be found in soil that has been or is being cultivated and fertilized. Furthermore, the construction activities will be required to conform to Rule 403 to control fugitive dust, along with other rules, that will prevent significant dust. Use of enhanced dust control procedures such as continual soil wetting, use of supplemental binders, early paving, etc. can achieve a significant improvement in PM10 control efficiency. However, impacts related to exposure of people of Valley Fever during construction may be potentially significant.	Potentially Significant	<p>AQ-9: To the extent feasible, construction employees shall be hired from local populations, since it is more likely that they have been previously exposed to the fungus and are therefore immune. An individual is quite likely to be affected by valley fever if he or she lives in an area where the fungus is prevalent. A person (or animal) with a positive test has had a valley fever infection and has developed immunity to the fungus and therefore, will never contract valley fever again.</p> <p>AQ-10: During periods of high dust in the grading phase, crews must use respirators in accordance with California Department of Occupational Safety and Health regulations.</p> <p>AQ-11: The operator cab of area grading and construction Equipment must be enclosed and air-conditioned.</p>	Less than Significant
The uses allowed by the Santa Paula West Business Park Specific Plan do not include any operations that require amounts of hazardous materials that could pose a significant health risk. Accordingly, the Project will not result in a significant impact	Less than Significant	No mitigation measures necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
with respect to use of hazardous materials during long-term operations.			
Threshold: Create objectionable odors affecting a substantial number of people?			
Commercial and light industrial uses are not typically associated with objectionable odor complaints. However, the types of industrial activities that would occur with the Project are not known at this time, but would be evaluated at the time that permits to construct and operate are applied for from the VCAPCD. Therefore, the potential impacts associated with objectionable odors will be less than significant.	Less than Significant	No mitigation measures necessary.	Less than Significant
Cumulative Impacts			
<p>The Project would not have a cumulatively considerable contribution to this impact with respect to conflicting with or obstructing the implementation of the applicable air quality plan.</p> <p>Cumulative development activity within the City of Santa Paula would continue to implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development within the city is not expected to cause a significant impact associated with construction activities.</p> <p>However, because the County of Ventura is currently in nonattainment for ozone, related projects could exceed an air quality standard or contribute to an existing or projected air</p>	Significant	Implementation of mitigation measures AQ-6 through AQ-8 and AQ-12 through AQ-13 .	Significant and Unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
quality exceedance. Therefore, the emissions generated by the Project would be cumulatively considerable and are a significant and unavoidable impact.			
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 Wildlife or US Fish and Wildlife Service?			
The Project includes the dedication of Open Space for the areas identified as Mixed Willow Riparian, and no development would occur within the Mixed Willow Riparian habitat area, potential impacts to vegetation communities are considered less than significant.	Less than Significant	No mitigation measures necessary.	Less than Significant
Southern California black walnut (<i>Juglans californica</i>) is the only special-status plant species that was documented or determined to have a high likelihood of occurring within the Project Site. A total of 19 individual trees are located along the perimeter of the Project Site, mainly along the southwest boundary within the riparian habitat of the Adams Barranca and along the SR 126 right-of-way along the southeast boundary of the Project Site, however, the Project does not currently propose to remove any of the 19 Southern California black walnut trees. Impacts to special-status plant species (e.g. black walnut) are considered potentially significant.	Potentially Significant	BR-1 Before issuance of a grading permit, the Applicant must identify on grading plans, the locations of any protected trees (such as the Southern California black walnut, <i>Juglans californica</i>) and must include a report pertaining to preserving the tree(s) that could be affected by the grading activity. The report shall be prepared by a tree expert and shall evaluate the Applicant's proposals for protected tree preservation, including avoiding grading, land movement, or other activity within the drip line of any protected tree. Prior to grading, the drip line must be fenced to prevent earthmoving equipment from inadvertently entering the drip line. In the event protected tree cannot be avoided, then the Applicant must provide a tree report in accordance with the City's Tree Protection Ordinance and must provide for the replacement or relocation of any protected trees that are to be removed, or would be subject to landmoving or grading within its drip line.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>The southwestern willow flycatcher breeds in dense riparian habits along rivers and streams, and almost all southwestern flycatchers breeding habitat is within close proximity of water or saturated soils. The Project includes construction activity that could result in a temporary impact to the species if members are foraging or in the unlikely event they nest near the Project Site at the time of construction. Therefore, impacts are considered potentially significant.</p>	<p>Potentially Significant</p>	<p>BR-3 To avoid impacts to native nesting birds, the Applicant must retain a qualified biologist (with selection to be approved by the City) to conduct nest surveys in potential nesting habitat within the Project Site prior to construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Wildlife Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. Surveys for special-status bird species can be conducted concurrently with general nesting bird surveys. Because birds known to use the Project area nest during the late winter, breeding bird surveys shall be carried out both during the typical nesting/breeding season (mid-March through September) and in January and February. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than 3 days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees, shrubs, and the ground within grassland for nesting birds, as several bird species known to occur in the area and are shrub or ground nesters, including burrowing owl, California horned lark, and mourning dove. In addition, due to the potential for least Bell's vireo and southwest willow flycatcher to exist, protocol surveys should be completed prior to the start of construction.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>BR-4 If active nests are found, clearing and construction activities within 300 feet of the nest (500 feet for raptors) shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the qualified biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts to these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.</p>	
<p>The least Bell’s vireo was not observed during the Project surveys; however, Adams Barranca provides potential habitat for the species. Impacts are considered potentially significant in the unlikely event this species nests on site or in the immediate vicinity and is subject to disturbance from construction activity.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure BR-3 and BR-4.</p>	<p>Less than Significant</p>
<p>Although, the Pallid bat was not observed during the Project surveys, Adams Barranca provides foraging and roosting habitat for the species. Construction under the Specific Plan</p>	<p>Potentially Significant</p>	<p>BR-6 To avoid potential impacts to the Pallid bat (<i>Antrozous pallidus</i>) and the Hoary Bat (<i>Lasiurus cinereus</i>), the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct roosting bat surveys within the Specific Plan area prior to site preparation activities. Thirty days before ground disturbance activities</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>could result in potentially significant impacts to pallid bats.</p> <p>The Hoary Bat was not observed during the Project Surveys, however, Adams Barranca provides foraging and roosting habitat for the species. This species is not expected to breed in Adams Barranca but may use the habitat for roosting, and the agricultural areas of Project Area for foraging.</p>		<p>associated with construction or grading, a qualified biologist shall conduct weekly surveys in accordance with standard protocols to determine if roosting western red bats are present in the construction zone or within 300 feet of the construction zone. Roosting bat surveys shall be carried out from March through September. Surveys for special-status bat species may be conducted concurrently with nesting bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than three days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees and large shrubs in which this species is known to roost. Any bats found outside of the breeding season (May through August) shall be relocated by having a qualified biologist remove the bat from the roost. If roosting female bats are found with young during the breeding season (May through August) clearing and construction activities within 300 feet of the roost, shall be postponed or halted until the roost is vacated and juveniles have been weaned, as determined by the biologist. Limits of construction to avoid an active roost site shall be established in the field with flagging, fencing, or other appropriate barriers. Construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active roost areas to ensure that no inadvertent impacts on these roosts will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with</p>	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		applicable state and federal laws pertaining to the protection of these bat species.	
<p>The avocado orchard within the Project Site and the ecotone between the agricultural fields and Adams Barranca provides forging habitat for the American badgers, as they are most abundant in the drier, open stages of most shrub, forest, and herbaceous habitats with friable soils. Development under the Specific Plan could result in the loss of American badger habitat. Impacts are considered potentially significant.</p>	Potentially Significant	<p>BR-5 The Applicant shall retain a qualified biologist (approved by the City of Santa Paula) to survey the Project Site for the presence of the American badger no earlier than 1 day prior to any grading activity. In particular, the survey shall include an examination of the fallow agricultural field in the eastern portion of the site that will be impacted during project implementation.</p> <p>If American badger is located on site, potential loss of individual animals shall be mitigated through one of the following: (1) an on-site passive relocation program, through which badgers are excluded from occupied burrows by installation of a one-way door in burrow entrances, monitoring of the burrow for 1 week to confirm badger usage has been discontinued, and hand excavation and collapse of the burrow to prevent reoccupation; or (2) active trapping and relocation of badgers to suitable off-site habitat by a qualified biologist and in coordination with the California Department of Fish and Wildlife (CDFW), as approved by the City and CDFW.</p>	Less than Significant
<p>No active bird nests were observed at the time of survey; however, suitable nesting habitat is present within the avocado orchard, ornamental trees within the Project area, and adjacent trees to the Project Site and within Adams Barranca. However, impacts to nesting birds may be potentially significant.</p>	Potentially Significant	Implementation of mitigation measure BR-3 and BR-4.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Threshold: 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 Wildlife or US Fish and Wildlife Service?</p>			
<p>Development under the Specific Plan would require the removal of the agricultural drainage ditch that bisects the Project Site and is considered State Waters pursuant to the Fish and Wildlife Code and the Clean Water Act. Other state and federal jurisdictional waters (i.e., those within Adams Barranca) would be preserved through an Open Space dedication and the prohibition of construction activities within the Barranca. All Project impacts to United States (US) Army Corps of Engineers (ACOE) and CDFW jurisdictional areas are considered potentially significant, they would be mitigated to a less than significant level through the conditions imposed pursuant to the Project’s 404, 401, and 1602 permits/agreement as well as by mitigation measures imposed by this EIR.</p>	<p>Potentially Significant</p>	<p>BR-7 Before the issuance of a grading permit for areas that require state permits, the applicant shall coordinate with the CDFW to verify the impact to state-protected waters and associated vegetation on the Project Site. A Streambed Alteration Agreement (SAA) must be obtained, and mitigation measures recommended by the CDFW as part of the SAA shall be implemented. The SAA shall be provided to the City prior to issuance of a grading permit.</p> <p>The Applicant must mitigate for impacts to jurisdictional waters as administered by the CDFW jurisdiction by restoring habitats within those jurisdictions acceptable to the resource agency. Habitat must be mitigated onsite or within the same watershed, if feasible.</p> <ul style="list-style-type: none"> • The mitigation site(s) shall have been evaluated and selected on the basis of their suitability for use as riparian mitigation areas. • The mitigation area shall provide procedures to prepare soils in the mitigation area, provide detailed seeding/planting mixtures, provide seeding/planting methods, and other procedures that will be used for successful re-vegetation. • Impacts to jurisdictional waters shall be avoided to the extent feasible in the design phase of the Project. • Maintenance and monitoring requirements shall be established, including quarterly and annual monitoring reports to CDFW. <p>BR-8 Prior to the issuance of a grading permit for areas that require state or federal permits, the applicant and/or its contractor shall coordinate with the ACOE to verify the</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>impact to federally regulated waters on the Project Site. A Nationwide Permit (NWP) shall be obtained and mitigation measures recommended by the ACOE and National Marine Fisheries, as part of the NWP shall be implemented. The NWP shall be provided to the City prior to initiating construction of the bridge crossing Santa Paula Creek.</p> <p>Areas determined to be federally regulated by the ACOE shall also fall under the jurisdiction of the Regional Water Quality Control Board (RWQCB), and a Clean Water Act Section 401 Water Quality Certification (401 Certification) will be required from the RWQCB for impacts to those areas.</p> <p>BR-9 For impacts to Regional Board jurisdiction, the Applicant shall:</p> <ul style="list-style-type: none"> • Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio) on site; or • Provide a one-time in-lieu fee to a Regional Board–approved mitigation bank and/or in-lieu fee program within the Santa Clara River Watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1.27 acres of Regional Board jurisdiction; or • A combination of on-site and/or off-site compensatory mitigation options, as described above. <p>BR-10 As mitigation impacts to CDFW jurisdiction, the Applicant shall:</p> <ul style="list-style-type: none"> • Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio acres of CDFW jurisdiction for loss of State Waters; or • Provide a one-time in-lieu fee to a CDFW-approved mitigation bank and/or in-lieu fee program within the 	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>Santa Clara River Watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1:1 CDFW jurisdiction area; or</p> <p>A combination of on-site and/or off-site compensatory mitigation options, as described above.</p>	
<p>The development of the Project Site would increase the number of nighttime light and glare sources on the site. Light and glare can “spill over” into adjacent open space areas, increasing the level of light currently experienced there. Nighttime light can disturb breeding and foraging behavior and can potentially alter foraging and breeding behavior of nocturnal birds, mammals, and invertebrates, which is considered a potentially significant impact. However, Section 4.6 of the Specific Plan for the proposed Project addresses lighting guidelines for the Project Site, including but not limited to, height of lighting, requirements for screened lighting, and submittal of a lighting plan to the police Chief or designee for approval prior to issuance of a building permit. Impacts from lighting and glare would be considered less than significant.</p>	Less than Significant	<p>No mitigation necessary.</p> <p>Implementation of mitigation AES-1 which includes the installation of low intensity, low-glare design, and hooded to direct light downward preventing spillover into adjacent areas would further reduce impact.</p>	Less than Significant
<p>Development under the Project can be expected to increase human activity near Adams Barranca, which could result in an increase in the frequency of human encroachment into the Barranca when compared to existing conditions. The Open</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Space area designations of the Specific Plan, upland buffers from the riparian area and development under the Project, and the Project characteristics that would provide predominantly indoor daytime work areas would minimize any potential for increase human disturbance to the Adams Barranca. Therefore, indirect impacts from human encroachment would be less than significant.</p>			
<p>Invasive exotic species introduced as landscaping could be dispersed by stormwater, wind, or wildlife, or by various other means to natural habitats in the area, including Adams Barranca and other downstream water bodies, such as the Santa Clara River. Impacts from the introduction of invasive exotic landscape plants could be potentially significant.</p>	<p>Potentially Significant</p>	<p>BR-2 Before issuance of a grading permit for development within the Specific Plan area, a landscaping and irrigation plan must be prepared and must incorporate the planting of native vegetation and use of water conserving irrigation. The landscaping and irrigation plan must be prepared by a licensed landscape architect, and use native plant and tree species. The landscape and irrigation plan must be submitted to the City of Santa Paula Planning Department for review and approval.</p> <p>Nonnative plants or vegetation must be avoided in future development areas. The landscaping plans within common areas of development areas must include appropriate provisions to prevent other invasive plant species from colonizing remaining natural areas. These provisions must include the following: (a) review and screening of proposed plant palette and planting plans to identify and avoid the use of invasive species; (b) weed removal during the initial planting of landscaped areas; and (c) the monitoring for and removal of weeds and other invasive plant species as part of ongoing landscape maintenance activities. The frequency and method of monitoring for invasive species must be determined by a qualified botanist.</p> <p>For areas adjacent to Adams Barranca riparian corridors, the plan must provide for adequate landscaping to reduce</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		indirect impacts including attenuation of noise and reduction of nighttime lighting and glare.	
The Project includes the dedication of Open Space for the areas identified as Mixed Willow Riparian, and no development would occur within the Mixed Willow Riparian habitat area, potential impacts to vegetation communities are considered less than significant.	Less than Significant	No mitigation measures necessary.	Less than Significant
The Specific Plan is designed to include stormwater infiltration and treatment. This includes low-impact development (LID) best management practices (BMPs) to ensure that the Project does not result in adverse effects to water quality in the Adams Barranca or the Santa Clara River. The Santa Paula West Business Park Specific Plan Drainage Master Plan will provide storm drains and runoff directed to an on-site detention basin for passive treatment of runoff from the Project driveways and other hard surfaces. Overall, the BMPs and the Project Design Features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all applicable federal, state, and local water quality rules and regulations in order to effectively minimize the Project's impact on water quality. Accordingly, impacts would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
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?			
Alteration of state-protected waters and associated riparian vegetation would require the acquisition of a Fish and Wildlife Code Section 1602 SAA from the CDFW. Due to the high habitat value that drainages and swales are known to provide for wildlife and because these areas are under the jurisdiction of the CDFW, the proposed removal of these waters is considered a potentially significant impact.	Potentially Significant	Implementation of mitigation measures BR-7, BR-8, BR-9, and BR-10.	Less than Significant
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?			
Adams Barranca, located along the western border of the Project Site could provide a wildlife movement corridor with linkage between the foothills of the mountains north of the City and the Santa Clara River, however, the Project does not propose to obstruct or develop in the Barranca. The Project would not result in potentially significant impacts to the movement of resident or migratory fish or terrestrial wildlife species. No historical or active raptor nests or communal roosts exist at the Project Site or within 100 feet of any area that is or will be subject to development within the Project Site. Raptors are mobile species with generally large home ranges, they are capable of compensating for the loss of small acreages of foraging habitat in a local area by moving to other suitable foraging habitats. Therefore, development of the Project would not eliminate significant raptor foraging	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>areas or limit raptors’ access to food resources, making potential impacts to raptors due to the development of the Project less than significant.</p>			
<p>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?</p>			
<p>The Project includes the dedication of approximately 4.9 acres (9.1 percent) of the Project Site as Open Space along the western boundary to preserve and provide a buffer area from the Adams Barranca. Therefore, the Project is consistent with the City General Plan Conservation and Open Space Element because it provides for the protection the City’s natural resources, and impacts would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>The Project is consistent with the recovery plan for the least Bell’s vireo because the least Bell’s vireo habitat present on the site would not be impacted. The Project would result in potentially significant impacts to the least Bell’s vireo. However, mitigation measures are included within this EIR, and the Project would include an Open Space dedication along the western boundary to avoid impacts to habitat for least Bell’s vireo individuals in the Santa Clara River Watershed.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure BR-2.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>All potential impacts to the southwestern willow flycatcher during construction would be mitigated by measures included in this EIR, and the Project includes an Open Space dedication along the western boundary to avoid impacts to habitat for southwestern willow flycatcher individuals in the Santa Clara River Watershed. The southwestern willow flycatchers would not be permanently impacted, and therefore the Project is consistent with the recovery plan.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure BR-2.</p>	<p>Less than Significant</p>
<p>Cumulative Impacts</p>			
<p>Most wildlife species that could be expected to use the Project Site are species that are adapted to the disturbance that is caused by human-induced activities. Because of the present condition of the Project Site and the surrounding lands, it is unlikely that development of the site would contribute significantly to cumulative adverse impacts to regional flora and fauna. However, the loss of habitat associated with development of the Project area would contribute to the overall cumulative loss of biological resources in the Santa Paula region. Given that the impacted habitat within the Project area consists primarily of agricultural and urban developed land, and the impacted waters are small (less than 1 acre), the incremental contribution of the Project to this habitat loss is not cumulatively considerable.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Cultural Resources			
<i>Threshold: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i>			
While a majority of the Project Site consists of younger Holocene alluvial soils, older Pleistocene alluvial deposits are presumed to underlie these younger soils. Because these depths of older alluvial soils are unknown, there is a moderate to high potential for development-related earthmoving activities and unauthorized fossil collecting within older alluvium on the Project Site to result in the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data.	Potentially Significant	CUL-1: Should unexpected paleontological resources be discovered during any ground-disturbance activities greater than 10 feet below existing grade of Project Site, work in the immediate area of the discovery shall be halted and the City shall require an assessment by a qualified paleontologist to determine the significance of the find.	Less than Significant
The Project Site consists in majority of younger alluvial soils, which are considered to have low potential of containing significant paleontological resources. At shallow depths, the younger alluvium is considered too young to contain remains old enough to be considered fossilized. As a result of the unlikelihood of significant fossil resources being found within these younger soils, ground-disturbing activities of less than 10 feet below the current grade of the Project Site are anticipated to have low potential to impact any paleontological resources.	Potentially Significant	Implementation of mitigation measure CUL-1 .	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Threshold: Disturb any human remains, including those interred outside of formal cemeteries?			
<p>The nearest formal cemetery to the Project Site is the Pierce Brothers Santa Paula Cemetery, which is located approximately 1.4 miles northeast of the Site at 380 Cemetery Road. No known sites containing human remains exist within the Project area. However, currently unknown human remains potentially could be discovered during the construction of future projects within the Specific Plan. Project construction would require ground-disturbing activities, including grading and excavation, and the presence of construction equipment. These construction activities could potentially result in the discovery of previously unrecorded human remains, including Native American burials. Impacts related to construction would be limited to the construction area for each individual project within the Specific Plan.</p>	Potentially Significant	<p>CUL-2: In the event of a discovery of human bones, suspected human bones, or a burial, during ground-disturbing activities, all excavation in the vicinity must halt immediately and the area of the find protected until a qualified archaeologist determines whether the bone is human. If the qualified archaeologist determines the bones are human, the Ventura County Coroner must be notified before additional disturbance occurs. The construction contractor must ensure that the remains and vicinity of the find are protected against further disturbance until the Coroner has made a finding with regard to Public Resources Code (PRC) 5097 procedures, in compliance with Health and Safety Code Section 7050.5(b). If it is determined that the find is of Native American origin, the City will comply with the provisions of PRC Section 5097.98 regarding identification and involvement of the Native American Most Likely Descendant (MLD).</p>	Less than Significant
Threshold: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Government Code Section 15064.5?			
<p>A majority of the Project Site has been extensively farmed with various row crops and orchards, which has continually disturbed the surface of the soils. While the Project Site does not contain any known sensitive archaeological resources within the disturbance area, the general Santa Clara River Valley is considered sensitive, and there is potential for unknown resources to be</p>	Potentially Significant	<p>CUL-3: In the event that previously unidentified archaeological resources are discovered during building construction, the contractor must cease work in the immediate area and the City Planning Director shall be contacted. An independent qualified archaeologist, retained by the City at the expense of the applicant, must assess the significance of the find and make mitigation recommendations, which shall be implemented to the extent feasible.</p>	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
uncovered by activities, such as grading, that disturb the ground surface.			
Threshold: Cause a substantial adverse change in the significance of a historical resource as defined in Government Code Section 15064.5?			
The historic resource evaluation report concludes that while the development of the Project would result in an adverse impact by eliminating elements that contribute to a historic district, this impact would not cause a substantial change in the significance of the Santa Clara Valley rural historic district. Given the large size and complex nature of the historic district, the loss of a single employee residence and associated fields would not reduce the integrity of the historic district such that it could no longer convey historic significance. The Santa Clara Valley rural historic district would remain eligible for the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Therefore, the impact resulting from the Project would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Cumulative Impacts			
Other Specific Plan projects that would likely have similar potentially significant impacts to paleontological, archaeological, and historic resources include the remainder of West Area 2, Adams Canyon, Fagan Canyon, and the recently approved East Area 1 Specific Plan Amendment area. The Specific Plan, in combination with other currently planned projects, would result in the potential for a significant cumulative impact. Mitigation	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
measures would reduce the potentially significant cumulative contribution to paleontological, archaeological, and historical resources.			
Geology and Soils			
Threshold: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			
a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issue by the State Geologist for the area or based on other substantial evidence of known fault?			
The Specific Plan area is neither located within an established Alquist-Priolo Earthquake Fault Zone, nor is it crossed by a known active fault. The risk of loss, injury, or death associated with surface rupture of a known earthquake fault is considered very low, and impacts will be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
b. Strong seismic groundshaking?			
The Specific Plan area could be subject to strong ground shaking in the event of an earthquake originating along one of the nearby faults. Construction allowed by the Specific Plan will be required to comply with the version of the California Building Standards Code (CBC) in effect at the time individual building permits are obtained. The Project will not expose residents to unknown safety issues associated with seismicity (including ground shaking), and potential impacts are less than significant.	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
c. Seismic-related ground failure, including liquefaction?			
<p>Most of the Project Site lies within a liquefaction hazard zone, an area where the historic occurrence of liquefaction or groundwater conditions indicate a potential for ground displacements as a result of liquefaction, as designated by the State of California and the City of Santa Paula. Settlement caused by ground shaking is often not uniformly distributed, which can result in differential settlement. If settlement occurs, it could result in damage to improvements. Seismic settlement could occur on the site and is thus considered a potentially significant impact.</p>	Potentially Significant	<p>G-1: Additional explorations must be performed at the tentative tract map and grading plan review stages of the development planning. The purpose of the explorations would be to establish required removal depths and delineate any portion of the Project Site deemed susceptible to seismically induced settlement. The Project shall comply with all CBC/Uniform Building Code (UBC) requirements for seismic safety.</p>	Less than Significant
d. Landslides?			
<p>The topography of the project area is relatively flat and has no landforms where a landslide could form. Therefore, the potential for impacts from earthquake-induced landslides or other landslides (except lateral spread landslides) is considered less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: Result in substantial soil erosion, or the loss of topsoil?			
<p>The native topsoil and alluvial soils in the annexation area may be moderately susceptible to erosion. Construction activities would comply with erosion control requirements, including existing grading and dust control measures, imposed by the City pursuant to grading permit regulations. After construction, the project may result in a</p>	Potentially Significant	<p>G-2: Detailed, design-level geotechnical investigation reports for all future subdivision and other discretionary development approvals must be submitted to the Public Works Director, or designee, for approval. In addition, grading plans and geotechnical reports prepared by a licensed Engineering Geologist (approved by the Public Works Director) must be provided to the Public Works Director, or designee, before the City issues grading building</p>	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>limited degree of soil erosion effects from vegetated areas. However, in accordance with National Pollutant Discharge Elimination System (NPDES) requirements, the project would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of each development within the Specific Plan. While BMP design features would be developed with more refined engineering for each development prior to implementation of the above requirements, impacts associated with erosion and sedimentation are considered potentially significant.</p>		<p>permits for individual development projects within the Project Site. Requirements for the geotechnical reports and compliance are described below.</p> <ul style="list-style-type: none"> • The Engineering Geologist must make recommendations to address any seismically induced settlement within portions of the Project Site. In particular, seismically induced settlement must be addressed in the western parts of the Project Site, where preliminary geotechnical investigations determined that the area may experience up to several inches of seismically induced settlement in the event of strong ground motion. • The Engineering Geologist must inspect and certify that any expansive soils underlying individual building pads and all roadway subgrades have been either removed or amended in accordance with construction specifications, and make site-specific recommendations for grading, drainage installation, and foundation design, as appropriate. • The Public Works Director, or designee, must ensure that all soils and engineering report recommendations are incorporated into the project engineering and construction plans, including soils tests to ensure that it meets the soil classifications assumed in the soils reports, and that soils meet the CBC requirements. • All Project plans as determined necessary by the Public Works Director, or designee, including Grading and Construction Plans, must be reviewed and stamped by a Project soils engineer and submitted to the Public Works Director, or designee, for review and verification that all requirements are incorporated before the City issues grading or construction permits. 	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<ul style="list-style-type: none"> The Applicant and/or contractor must retain a licensed soils engineer acceptable to the Public Works Director, or designee, to review all construction plans for consistency with the soils reports and to monitor on-site grading and construction to ensure the conditions at the Project Site do not substantially change the requirements of report recommendations for design-level geotechnical investigations. The project soils engineer must monitor grading and construction activity and report observations to the Public Works Director, or designee. The Public Works Director, or designee, will conduct field inspections as needed. 	
<p>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; and be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?</p>			
<p>Expansive soils units may be found in the Qht deposits that could cause damage to foundations and walls due to repeated drying and wetting (shrink and swell). Therefore, geologic, soils, and geotechnical impacts would be potentially significant.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure G-2 and:</p> <p>G-3: The final grading and erosion control plan shall be designed to minimize erosion. The plan shall include, but not be limited to, the following:</p> <p>BMPs, such as temporary berms and sedimentation traps (such as silt fencing, straw bales, and sand bags), shall be installed in association with project grading. The BMPs shall be placed at the base of all cut/fill slopes and soil stockpile areas where potential erosion may occur and shall be maintained to ensure effectiveness. The sedimentation basins and traps shall be cleaned periodically, and the silt shall be removed and disposed of in a location approved by the City.</p> <p>Nonpaved areas shall be revegetated or restored (i.e. geotextile binding fabrics) immediately after grading and</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>installation of utilities to minimize erosion and to re-establish soil structure and fertility. Revegetation shall include drought-resistant, fast-growing vegetation that would quickly stabilize exposed ground surfaces. Alternative materials rather than reseeding (e.g., gravel) may be used, subject to review and approval by the City.</p> <p>Runoff shall not be directed across exposed slopes. All surface runoff shall be conveyed in accordance with the approved drainage plans.</p> <p>Energy dissipaters or similar devices shall be installed at the end of drainpipe outlets to minimize erosion during storm events.</p> <p>Grading shall occur during the dry season (April 15 to November 1) unless a City-approved erosion control plan is in place and all erosion control measures are in effect. Erosion control measures shall be identified on an erosion control plan and shall prevent runoff, erosion, siltation, and tracking of mud and soil onto City streets. All exposed graded surfaces shall be reseeded with ground cover vegetation to minimize erosion. Graded surfaces shall be reseeded within four (4) weeks of grading completion, with the exception of surfaces graded for the placement of structures. These surfaces shall be reseeded if construction of structures does not commence within four (4) weeks of grading completion.</p> <p>Site grading shall be completed such that permanent drainage away from foundations and slabs is provided and so that water shall not pond near proposed structures or pavements.</p>	
Cumulative Impacts			
At a minimum, all development occurring within the City of Santa Paula would be subject to CBC and construction standards	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>relative to seismic and other geologic conditions that are prevalent within the region. Also, individual project geotechnical investigation reports, required prior to permit approval, would provide recommendations to account for site-specific design requirements to avoid subjecting on- and off-site properties to geologic hazards, in accordance with the CBC. With regard to erosion and sedimentation, development under the Santa Paula West Specific Plan and related projects are required to implement a stormwater pollution prevention plan (SWPPP) during construction, as required by the NPDES permit, to minimize impacts to off-site properties from the effects of erosion. The Project will meet the applicable standards and will sufficiently reduce its incremental cumulative geology and soil impacts to a less than significant cumulative impact.</p>			
Greenhouse Gasses			
<i>Threshold: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i>			
<p>All industrial land use projects that exceed 10,000 MTCO₂e per year would be considered potentially significant under the screening threshold. The estimated Project operational greenhouse gas (GHG) emissions with project design features would be 6,674.83 MTCO₂e per year, which would not exceed the screening threshold. In addition, the proposed Project would generate approximately 1,510 job opportunities and</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>would achieve a project-level efficiency target of 4.4 MTCO₂e per service population. This would be below the 4.8 MTCO₂e per service population threshold. Potential impacts would be less than significant based on the screening threshold.</p>			
<p>Threshold: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</p>			
<p>The Specific Plan would incorporate measures that reduce GHG emissions compared to a conventional project of similar size and scope. The Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of a building’s life cycle. These designs would increase the structures energy efficiency, water efficiency, and overall sustainability. These measures and features are consistent with existing recommendations to reduce GHG emissions. In addition, the Project would result in less than significant impact. Therefore, the Specific Plan would not conflict with the 2008 Scoping Plan and the 2014 Updated Scoping Plan.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>Cumulative Impacts</p>			
<p>GHG emission reductions would be achieved through energy-efficient lighting and building design; installation of low-flow appliances; and water conservation. The methods used</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>to establish this relative reduction are consistent with the approach used in the CARB's Scoping Plan for the implementation of Assembly Bill (AB) 32 through 2020. The Project's features and GHG reduction measures make the Project consistent with the goals of AB 32. Therefore, the Project will result in a less than significant contribution to cumulatively significant GHG emissions.</p>			
<p>Hazards and Hazardous Materials</p>			
<p><i>Threshold: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</i></p>			
<p>Construction of the Project would involve deliveries and disposal of hazardous materials such as fuels, oils, solvents, and other equipment maintenance and building materials. Spills or leakages encountered during construction and hauling would be temporary and would be required to be remediated in accordance with the State and local regulations for hazardous waste cleanup. As such, impacts from the use and handling of hazardous materials would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>If the railroad is commissioned for service within the future, any transport of hazardous materials would comply with US Department of Transportation (USDOT) Federal Railroad Administration (FRA) safety regulations. Therefore, the probability of an accident involving the transport of hazardous materials within proximity to the Project Site</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
is considered to be very low. Impacts would be less than significant.			
Threshold: 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?			
Construction			
<p>During construction of the Project, delivered materials to the site could contain hazardous materials, such as fuels, solvents, oils, coatings, etc. The event of a spill or release related to these hazardous materials could cause a short-term threat of exposure to nearby schools and residential areas along SR 126 and W. Telegraph Road. Therefore, the Project would have potentially significant impacts related to the transport of hazardous materials during construction activities.</p> <p>The Project Site has been historically used for agricultural uses for more than 75 years, it is possible that residual pesticides may be exposed during grading and excavation activities. The limited Phase II Environmental Site Assessment (ESA) conducted for the Project Site determined that exposure of residual pesticides is considered low. However, soil testing may not always indicate of every condition within the Project and clearing of existing debris or soils could uncover hazardous material contamination not previously known to occur on site. Therefore, potential impacts related to the presence of hazardous substances would be potentially significant.</p>	Potentially Significant	<p>HM-1: Prior to demolition and construction activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that an asbestos survey has been conducted on any buildings and irrigation pipelines that are to be demolished or removed from the Project Site. If asbestos is found, the Applicant shall follow all procedural requirements and regulations of the VCAPCD Rule 62.7 to properly dispose of all on-site ACM's before general demolition activities commence.</p> <p>HM-2: Prior to demolition and any renovation activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that a lead-based paint survey has been conducted at all existing buildings located on the Project Site. If lead-based paint is found, the Applicant shall follow all Occupational Safety and Health Administration (OSHA) procedural requirements and regulations for its proper removal and disposal before general demolition activities commence.</p> <p>HM-3: Prior to disposal, all fluorescent light fixtures within the existing buildings shall be inspected for polychlorinated biphenyl (PCB) content labels throughout demolition of the Project Site.</p> <p>HM-4: Pole-mounted transformers, light ballasts, or other equipment suspected to contain PCBs must be inspected for the presence of PCBs prior to before any disturbance or removal. All equipment found to contain PCBs must be</p>	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		<p>removed and disposed in accordance with all applicable local, State and Federal regulations including but not limited to California Code of Regulations (CCR) Title 22, 40 Code of Federal Regulations (CFR) Part 261, and Environmental Protection Agency (EPA) 40 CFR. Utility Plans prepared as part of building permit review must include notes requiring inspection and plan for removal and disposal.</p> <p>HM-5: In the unlikely event that hazardous materials are encountered during grading or excavation activities anywhere on the Project Site, earthwork must be temporarily suspended in order to coordinate investigation/remediation efforts with the oversight of the Santa Paula Fire Department. An environmental professional (e.g. a professional geologist) is recommended to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan consistent with federal and state remedial requirements, must be developed by a professional geologist approved by the City and submitted to the City Planning Director, or designee, for approval as required before continued work in the area.</p>	

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Operations			
<p>The Project Site has historically been used for agricultural production. However, any new development occurring on any of these documented hazardous materials sites would have to be preceded by remediation and cleanup under the supervision of the State Department of Toxic Substances Control (DTSC) or other regulatory agency (as deemed appropriate) before construction activities could begin, if such actions have not already occurred. In addition, these listed areas are down gradient from the Project Site, so exposure to contaminants from migration through surface water or groundwater flow from the contaminated zones is not expected. Therefore, potential for contamination of the Project Site from off-site contamination sources is considered less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
<p><i>Threshold: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</i></p>			
<p>The Project Site is not within 0.25 miles of an existing school. The Project may involve the use of hazardous materials on site typical of industrial-type uses. The storage and disposal of these hazardous materials on the Project Site would comply with City and Santa Paula Fire Department (SPFD) regulations and standards. Therefore, impacts would be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Threshold: 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?			
<p>The Project Site contained two historical Aboveground Storage Tanks (ASTs) and one Underground Storage Tank (UST). These historical tanks have either been abandoned or removed from the Project Site as of 2005. Sources of contamination were identified within the areas of the ASTs and UST; however, these areas on the Project Site have been cleaned up and remediated and are not considered an environmental concern. Due to the regulatory status of hazardous materials incidents at the facility (e.g., closed case), the distance between the facility and the site, or the hydrogeologically cross-gradient location from the site, and given that site reconnaissance did not reveal the presence of hazardous chemicals, on-site impacts related to nearby hazardous materials sites are considered less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: For a project located within an airport land use plan or, where such 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?			
<p>The Specific Plan is not located within any of the three Safety Zones as established by the Ventura County Airport Land Use Commission (ALUC) within their Comprehensive Land Use Plan (CLUP). Therefore, the Specific Plan would not conflict with the requirements set forth in the Ventura County ALUC or the City's</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
General Plan. Impacts would be less than significant.			
Threshold: 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?			
No portion of the Specific Plan is within a private airstrip other than the Santa Paula Airport. Implementation of the Project would result in less than significant impacts related to the exposure of employees or visitors to hazards from plane accidents due to the proximity of any private airstrips.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			
Construction activities of the Project may require the closure of vehicle travel lanes. The City's designated evacuation routes are along SR 126 and SR 150. While, SR 126 runs along the southern boundary of the Project Site, construction activities of the Project are not anticipated to interfere with access to the roadway or interfere with operation of the County's Hazard Mitigation Plan. Emergency access and potential traffic access impacts would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>The Specific Plan area has the potential for employees to encounter human-made and natural hazards, which could cause undue hardship to employees. The working population within the Specific Plan would be made aware of such disaster plans through public education and outreach activities. In addition, the Project would comply with the SPFD’s recommended standards for emergency accessibility and circulation. Thus, the Project’s operational impacts on the implementation of the Ventura County Hazard Mitigation Plan would be considered less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than significant</p>
<p>Threshold: Increased fire hazard in areas with flammable brush?</p>			
<p>The Specific Plan is not located within a California Department of Forestry and Fire Protection (CAL FIRE) designated Local Responsibility Area (LRA) or State Responsibility Area (SRA). As the Project would not expose employees or visitors to any increased risks to fire hazards on the site, impacts are considered to be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>Cumulative Impacts</p>			
<p>Although each related project has potentially unique hazardous materials considerations, it is anticipated that all hazardous materials delivered and hazardous waste removed from the Specific Plan area and each related project would be in accordance with Title 24 of the Code of Federal Regulations.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Development of any projects would be required to comply with existing applicable laws and regulations pertaining to hazardous wastes, and the risk with identified hazardous material sites would be eliminated or reduced. Businesses would also be required to prepare a Hazardous Materials Business Plan (HMBP) including an annual inventory of hazardous materials used on site and submit a business emergency plan to the City for an annual review.</p> <p>Development under the Specific Plan would comply with all applicable laws and regulations related to the transport, use, treatment, storage, and disposal of hazardous materials and fire prevention.</p>			
Hydrology and Water Quality			
Threshold: Violate any water quality standards or waste discharge requirements?			
<p>Pollutants such as soil, sediments, and other substances associated with construction activities (e.g. oil, gasoline, grease, and surface litter) could be present in stormwater runoff from the site. Through compliance with the State Water Resources Control Board (SWRCB) and United States Environmental Protection Agency (USEPA) permits and SWPPP requirements, potential impacts to water quality during Project construction would be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>The development of the Project would increase the amount of impervious surfaces on the Project Site, which has the potential to increase runoff within the Project Site. The BMPs and the project design features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all existing applicable federal, state, and local water quality rules and regulations to effectively minimize the Project's impact on water quality. Accordingly, impacts would be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
<p><i>Threshold: 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 pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</i></p>			
<p>The Project will not result in a significant new demand for water and will not substantially deplete groundwater supplies. In addition, the Project would use less water than the existing agricultural operations, and the Specific Plan would incorporate design features such as bioswales, bioretention cells, infiltration trenches and permeable pavement to allow surface water runoff percolation. Therefore, the Specific Plan would not substantially interfere with groundwater recharge. There will be no substantial impact to local groundwater recharge. Therefore, impacts would be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Threshold: 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?			
<p>The Project does not alter the course of a stream or river, however site-clearing and grading operations have the potential for discharging sediment downstream during storm events. The Project would be required to develop a site-specific SWPPP in accordance with the NPDES Program General permits authorized under the Clean Water Act for Construction Activities. Adherence to the SWPPP and implementation of standard BMPs during construction would reduce the potential for increased siltation, erosion, and hazardous material spills. Through compliance with the SWPPP and standard BMPs, potential erosion and siltation, potential impacts will be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>The operation of the Specific Plan will contain a number of features to reduce the amount of runoff that will occur within the Specific Plan area, and limit the amount and rate of surface water flow downstream of the Specific Plan. The existing SR 126 culverts are exposed, but once the site is elevated by fill, the pipes would be underground and integrated into the new storm drain system. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. Therefore, potential impacts are considered less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Threshold: 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?			
The Specific Plan would not substantially alter drainage patterns within the Project area, nor alter a stream or river. The storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. Therefore, impacts are considered less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: 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?			
The Project incorporates detention basins sized to treat 10 percent of the Q50 (50-year storm event) from the storm drain system consistent with the Ventura County Storm Water Urban Impact Mitigation Plan (SQUIMP) guidelines. The proposed detention basins would be incorporated into the underground storm drain system, preventing any sedimentation to occur. Consequently, impacts related to water quality would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: Otherwise substantially degrade water quality?			
To reduce the discharge of expected pollutants during grading and other construction activities, such as sediment into receiving waters during construction, the Project Applicant will be required to prepare	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>a SWPPP consistent with the Ventura County NPDES permit and the Technical Guidance Manual for Storm Water Quality Control Measures to minimize or eliminate the discharge of pollutants into receiving waters. The design features would comply with all NPDES permit requirements and no significant impacts to water quality will result.</p>			
<p>Threshold: 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?</p>			
<p>The Specific Plan would not introduce new housing into the area. Therefore, impacts to housing within a 100-year flood hazard area would be considered less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
<p>Threshold: Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</p>			
<p>The new channel design would have the capacity to handle flows that overtop the bank on the east side and the water that ponds due to the undersized culvert at SR 126. The channel also has a debris catchment area at the railroad bridge with a second culvert under the railroad bridge to accommodate peak flows rerouted due to the debris. A geotextile would be used in the channel to stabilize the soil for high velocities. Accordingly, impacts would be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
<p>Threshold: 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?</p>			
<p>The Specific Plan does not propose any residential land uses. Therefore, no new</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
residential uses would be located in the flooding hazard zone. As such, impacts would be less than significant.			
Threshold: Inundation by seiche, tsunami, or mudflow?			
The Project Site is approximately 12 miles inland from the Pacific Ocean and is approximately 230 to 350 feet above mean sea level (amsl). There are no lakes, ponds, or dams adjacent to the Project Site. Therefore, the risk that the Project Site would be inundated by a seiche is considered negligible, and impacts associated with tsunamis or seiches would be less than significant. The proposed parallel channel and debris basin are incorporated into plans to improving the Adams Barranca. In addition, no on-site stormwater would be directed to the Adams Barranca. Therefore, impacts associated with mudflows would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Cumulative Impacts			
The Project would not contribute to a cumulatively significant hydrology or water quality impact. First, the Project does not alter any streams or rivers. Second, each related project would be required to comply with NPDES requirements and local regulations designed to prevent polluted runoff from entering local storm drain systems and receiving water bodies during construction and after development, the cumulative impact to water quality would be less than significant. Implementation of	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>applicable City requirements, including the standards of the Ventura County SQUIMP, on all new development within the watershed would reduce cumulative impacts to area hydrology to a less than significant level. Additionally, the Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume of the local groundwater table level.</p>			
Land Use			
<i>Threshold: Physically divide an established community?</i>			
<p>The Project would not physically divide the existing community of Santa Paula or any smaller enclaves outside the City limits. The Project would not create incompatible land use relationships between the Project Site and existing off-site uses, and as a result of would not disrupt, divide, or isolate existing neighborhoods or communities. Therefore, impacts related to dividing an established community would be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
<i>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?</i>			
<p>The Project would be consistent with the County of Ventura General Plan and Non-Coastal Zoning Ordinance, the Santa Paula General Plan and Santa Paula Municipal Code (SPMC), the 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and with</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Ventura Local Agency Formation Commission (LAFCo) policies. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and impacts would be less than significant.</p>			
<p>Threshold: Conflict with any applicable habitat conservation plan or natural community conservation plan?</p>			
<p>The Specific Plan includes a dedication of Open Space/Passive uses over 4.9 acres that includes the Adams Barranca and buffer areas on the western portion of the Project Site. This dedication would preserve the habitat and natural community as envisioned in the City’s Open Space and Conservation Element of the General Plan. Therefore, impacts related to habitats conservation or natural community conservation plans would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>Cumulative Impacts</p>			
<p>No significant cumulative land use impacts from future development within the expansion areas would result as these areas will be developed in accordance with the City’s General Plan. Additionally, environmental review will also be required and will be conducted prior to the adoption of future Specific Plans.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>Noise</p>			

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Threshold: 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?			
<p>Construction noise could exceed construction noise thresholds for the County with an increase of greater than 3 dB(A) at residences located within the agricultural operations to the west. There is a residence located near the northwest boundary of the Project Site within 75 feet that would be subject to construction noise in excess of 65 dB(A) for exterior areas. Therefore, construction noise impacts to residences to the west are considered potentially significant.</p>	Potentially Significant	<p>N-1: Stationary construction equipment, such as pumps, generators, or compressors, shall be placed as far from noise sensitive uses as feasible during all phases of project construction.</p> <p>N-2: All construction equipment shall be equipped with appropriate mufflers in good working condition.</p> <p>N-3: Before any site activity, the contractor shall be required to submit a material haul route plan to the City of Santa Paula and the County of Ventura for review and approval. The contractor shall ensure that the approved haul routes are used for all materials hauling, to minimize exposure of sensitive receivers to potential adverse noise levels from hauling operations.</p> <p>N-4: During all site preparation, grading and construction, the construction contractor shall locate all stockpiling and vehicle staging areas away from existing residences, to the extent feasible.</p>	Less than Significant
<p>An increase of 3 dB(A) or greater in traffic noise levels that occurs from Project-related activities would be considered significant if the resulting noise levels that occurs from Project-related activities would exceed the City Noise Compatibility Matrix for “acceptable” exterior or interior noise levels. These roadway systems will not experience an increase in noise levels of 3 dB(A) or greater. In addition, vehicle trips and traffic noise levels would remain the same with the proposed Beckwith Road extension and would not cause an increase of 3 dB(A) or</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
greater due to Project-related activities. Therefore, the Santa Paula West Specific Plan Area would not result in significant noise impacts in the local and regional street system. Impacts along these roadway systems are considered less than significant.			
Predicted noise levels at 50 feet from the railway centerline to the southern boundary would be approximately 69.4 dB(A). Due to its proximity to the rail road track, uses allowed within the southern boundary of the Project Site are not sensitive to that estimate level.	Less than Significant	No mitigation necessary.	Less than Significant
Assuming noise levels at 69.4 dB(A) within 50 feet from the railway centerline, interior noise will be reduced to 44.4 dB(A), below the General Plan noise threshold of 45 dB(A), in compliance with City Building Code requirements. Therefore, potential interior noise within the proposed development would be considered less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			
The surrounding land uses within 25 feet of the Project Site include the scattered residential uses immediately to the west. The construction near this portion of this site may include some earthwork and grading activities. While offsite surrounding land uses may experience vibration events, these would be temporary and would not be frequent and impacts would be considered less than significant.	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the Project's operational-related vibration sources, such as mechanical and electrical equipment, would incorporate vibration attenuation mounts, as required by the particular equipment specifications. Therefore, operation of the Project Site would not increase the existing vibration levels at off-site surrounding uses; and as such, vibration impacts associated with operations would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Given vibration from the railroad track would not be constant and would be approximately 50 feet from the track, uses allowed within Santa Paula West Specific Plan Area would not be susceptible to these conditions. Therefore, impacts would be considered less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			
The noise that could be generated from within the Specific Plan area and mobile source noise impacts would not substantially increase the ambient noise conditions in the surrounding area. Any permanent increase in ambient noise levels is considered less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			
It takes a doubling of average daily trips on roadways to increase noise by 3 dB(A). The average daily trips associated with	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>construction activities would not result in a doubling of trip volume along study-area roadways. Noise-level increases associated with construction vehicle trips along major arterials in the City of Santa Paula and nearby roadways that are within the area (unincorporated County of Ventura) would be less than 3 dB(A), and potential impacts will be less than significant.</p>			
<p>Threshold: 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?</p>			
<p>Threshold: 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?</p>			
<p>There are no commercial aircraft in operation at the airport. The general aircraft travel pattern is south of the City, with a required approach and departure altitude of 1,500 feet. Noise levels for the Airport, where most of the flight activities occur, are below 60 dB(A). Thus, people residing, attending school, or working within the future land uses of the Specific Plan area would not be exposed to excessive noise due to the aircraft travel pattern. Therefore, implementation of the Specific Plan would result in less than significant impacts related to noise generated by the Santa Paula Airport.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>Cumulative Impacts</p>			
<p>All the stationary sources would be required to provide 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</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>noise from multiple cumulative projects would interact to create a significant combined noise impact. As such, it is not anticipated that a significant cumulative increase in permanent ambient noise levels would occur and, therefore, the impact would be less than significant.</p>			
Public Services			
<p>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 following public services:</p>			
Fire Protection and Emergency Medical Services			
<p>The Specific Plan will result in an increase in the need for services from existing Santa Paula Fire Department facilities, equipment, and staff personnel. No new facilities would be required to serve the Project Site as a result of the implementation of the Specific Plan. As such, mitigation is not required.</p> <p>The SPFD will review all future building plans and require adequate fire-flow pressure and flow rates through automatic fire sprinkler systems, fire hydrants, and other design features where appropriate (as required by appropriate federal, state, and local fire code and building code requirements. As such, potential impacts with regard to fire-flow requirements will be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
Police Services			
Development of the Specific Plan would increase the demand for services and	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
resources provided by the Santa Paula Police Department. The Project would not require construction of new or expanded police protection facilities, project-related police protection impacts would be less than significant.			
Public Schools			
No new residential zoning or new residential development is proposed; the Project would not generate new housing with residents who would have a need for public school facilities. Therefore, the Project would not significantly impact the local school districts.	Less than Significant	No mitigation necessary.	Less than Significant
Parks and Recreation Facilities			
The Project does not include any new residential zoning or any new residential development projects, it would not result in an increase in the residential population that could visit the City's parks and recreation facilities. Project impacts would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Other Public Services			
Annexation of the Project area would shift all local government services to the City of Santa Paula. There would be increased demand for a variety of City resources, especially during the development planning, permitting, and inspection phases, and much less so thereafter. All services can be provided from the City's existing administrative facilities. No new governmental facilities would need to be constructed to administer governmental	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
services for the Project area, there would be no environmental impacts related to public facilities construction projects.			
Cumulative Impacts			
The City has regulations and ordinances in place to address impacts on public services (e.g., police, fire), including the provision and acquisition of new facilities and equipment. All planned development would be reviewed by the respective agencies and corresponding mitigation design features and payment of existing fees would be required prior to building permit issuance. Therefore, cumulative impacts associated with public services would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Transportation and Traffic			
Threshold: 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?			
Existing with Project with Beckwith Road			
If Beckwith Road is extended south to Faulkner Road, 10 th Street and Harvard Boulevard intersection is forecast to operate at LOS D during the AM peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Significant	10th Street & Harvard Boulevard (Intersection 1). No feasible mitigation measures are available. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as physically feasible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, cumulative impacts to this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one	Significant and Unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these improvements were not considered to be a feasible mitigation measure.	
If Beckwith Road is extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street is forecast to operate at LOS D during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	<p>TRA-1 Peck Road & Harvard Boulevard/Telegraph Road/Main Street (Intersection 8).This intersection could be mitigated to LOS C or better with the addition of one travel lane to both the northbound and southbound approaches on Peck Road and the addition of a northbound right overlap phase. The northbound lane configuration would be one right-turn lane, two through lanes, and one left-turn lane. The northbound right-turn movement would also have an overlap signal head installed to accommodate the overlap phase. The southbound lane configuration would be one shared through/right-turn lane, one through lane, and one left-turn lane.</p> <p>Since this is a cumulative impact, the Project applicant shall be responsible for their fair share contribution for this mitigation improvement.</p>	Less than Significant
If Beckwith Road is extended south to Faulkner Road, Peck Road and SR 126 Eastbound On/Off Ramps/Acacia Way is expected to operate at LOS E during the PM peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by	Potentially Significant	<p>TRA-2 Peck Road & SR 126 EB On/Off Ramps/Acacia Way (Intersection 10). This intersection could be mitigated to LOS C or better by installing a traffic signal. A peak-hour signal-warrant analysis is provided in Appendix D of the Traffic Impact Analysis and indicates that the installation of a traffic</p>	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
the proposed project would cause or contribute to significant traffic impacts at this intersection.		<p>signal would be warranted under existing plus project conditions during the PM peak hour.</p> <p>Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.</p>	
<p>If Beckwith Road is extended south to Faulkner Road, Beckwith Road and Telegraph Road is expected to operate at LOS D during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	Potentially Significant	<p>TRA-3 Beckwith Road & Telegraph Road (Intersection 12). This intersection could be mitigated to LOS C or better by installing a traffic signal and reconfiguring the westbound approach. A peak-hour signal-warrant analysis is provided in Appendix E and indicates that the installation of a traffic signal would be warranted under existing plus project conditions. The westbound approach can be restriped to provide one right-turn lane, one through lane, and one left-turn lane (a reconfiguration of the existing two-way left-turn lane). With the development of the Santa Paula West Business Park, Beckwith Road will be widened to full City standards, which provide for a 64-foot roadway within an 84-foot right-of-way. With the additional roadway width, the northbound approach could be widened from its current single-lane configuration to provide one left-turn lane and one shared through/right-turn lane. With this configuration as mitigation, the intersection would operate at LOS C or better under existing plus project conditions.</p> <p>Since the impacts at this intersection are project-related impacts (rather than cumulative impacts to which the project would contribute), the Project applicant shall be responsible for providing 100 percent of these mitigation improvements.</p>	Less than Significant
Existing with Project without Beckwith Road			
If Beckwith Road is not extended south to Faulkner Road, Peck Road and Harvard	Potentially Significant	Implementation of mitigation measure TRA-1.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Boulevard/Telegraph Road/Main Street would operate at LOS D during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.			
If Beckwith Road is not extended south to Faulkner Road, Peck Road and SR 126 Eastbound On/Off Ramps/Acacia Way would operate at LOS E during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	Implementation of mitigation measure TRA-2 .	Less than Significant
If Beckwith Road is not extended south to Faulkner Road, Beckwith Road and Telegraph Road would operate at LOS D during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	Implementation of mitigation measure TRA-3 .	Less than Significant
Other Impacts with Project			
The freeway segments currently operate at LOS C or better in both directions. Based on the significance threshold for the Los Angeles County CMP, the Project will not operate at	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
LOS F after the addition of project traffic and the Project does not cause a net increase in traffic demand of 2 percent of capacity or more. Therefore, the Project would result in less than significant impacts to freeway and multilane segments.			
Threshold: 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?			
An analysis was completed to comply with the monitoring requirements found in the Ventura County Transportation Commission's (VCTC) 2009 Ventura County Congestion Management Program (VCCMP). The analysis indicated that these facilities would operate at LOS C or better during both peak hours under the Existing plus Project scenario and cumulative base plus project conditions in the year 2031. Therefore, impacts to the VCCMP would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: 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?			
The nearest airport is the Santa Paula Airport, located to the southeast of the Project Site. The Project Site is not located within any of the various safety zones established by the CLUP, nor is it within the Safety Zone, which includes the Inner Safety Zone (ISZ), the Outer Safety Zone (OSZ), and the Traffic Pattern Zone (TPZ), as provided in the City's General Plan Safety Element. Therefore, the	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Project would result in a less than significant impact to air traffic patterns or safety risks.			
Threshold: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			
The internal circulation network would be constructed in compliance with the Santa Paula Municipal Code and would not contain dangerous design features (e.g., sharp curves, dangerous intersections) and would be designed to accommodate traffic of the Project, including any delivery trucks related other commercial vehicles related to the uses allowed under the Specific Plan. Implementation of the Project would result in less than significant impacts related to roadway design features and incompatible uses.	Less than Significant	No mitigation necessary.	Less than Significant
Threshold: Result in inadequate emergency access?			
No changes are proposed that would impact emergency access. In addition, as required by the City's Fire Code all individual building permit applications will include a review by the SPFD to ensure adequate setbacks between structures are maintained and that all sides of a building can be accessed by emergency personnel and emergency equipment. Impacts with regard to emergency accessibility would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Threshold: Conflict with adopted policies, plan, or program regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			
The City's General Plan includes goals to ensure that City residents have alternative transportation opportunities, such as public transit, bikeways, and pedestrian routes. Therefore, impacts to public transit, bicycle, or pedestrian facilities would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
Cumulative Impacts			
Cumulative Base Conditions			
Under future conditions without the Project, 10th Street and Harvard Boulevard is expected to operate at LOS E during the AM Peak hour and LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would cause or contribute to significant traffic impacts at this intersection.	Significant	10th Street & Harvard Boulevard (Intersection 1). No feasible mitigation measures are available. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a physically feasible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, cumulative impacts to this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these improvements were not considered to be a feasible mitigation measure.	Significant and Unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Under future conditions without the Project, Peck Road and Harvard Boulevard/Telegraph Road/Main Street is expected to operate at LOS E during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would cause or contribute to significant traffic impacts at this intersection.</p>	Significant	<p>Implementation of mitigation measure TRA-1.</p> <p>This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.</p>	Significant and Unavoidable
<p>Under future conditions without the Project, Peck Road and SR 126 eastbound (EB) On/Off Ramps/ Acacia Way is expected to operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions with or without the Project would cause or contribute to significant traffic impacts at this intersection.</p>	Potentially Significant	Implementation of mitigation measure TRA-2 .	Less than Significant
<p>Under future conditions without the Project, Faulkner Road and SR 126 westbound (WB) On/Off Ramps is expected to operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic</p>	Potentially Significant	<p>TRA-4 Faulkner Road & SR-126 Westbound On/Off Ramps (Intersection 11). This intersection could be mitigated to LOS C or better by reconfiguring the westbound approach. The westbound approach can be restriped to provide one shared through/right-turn lane and two left-turn lanes. While the freeway on-ramp at this location currently provides two</p>	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>generated from future conditions with or without the Project would cause or contribute to significant traffic impacts at this intersection.</p>		<p>lanes, this improvement would require coordination with and approval by Caltrans.</p> <p>Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.</p>	
<p>Cumulative with Project with Beckwith Road</p>			
<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, 10th Street and Harvard Boulevard would operate at LOS F during the AM and PM Peak hours. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Significant</p>	<p>10th Street & Harvard Boulevard (Intersection 1). No feasible mitigation measures are available. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a physically feasible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, cumulative impacts to this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these improvements were not considered to be a feasible mitigation measure.</p>	<p>Significant and Unavoidable</p>
<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would operate at LOS F during the AM Peak</p>	<p>Significant</p>	<p>Implementation of mitigation measure TRA-1.</p>	<p>Significant and Unavoidable</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>		<p>This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.</p>	
<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Peck Road and SR 126 EB On/Off Ramps/Acacia Way would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	Potentially significant	Implementation of mitigation measure TRA-2.	Less than Significant
<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Faulkner Road and SR 126 WB On/Off Ramps would operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would</p>	Potentially Significant	Implementation of mitigation measure TRA-4.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
cause or contribute to significant traffic impacts at this intersection.			
Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Beckwith Road & Telegraph Road would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	Implementation of mitigation measure TRA-3 .	Less than Significant
Cumulative with Project without Beckwith Road			
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, 10th Street and Harvard Boulevard would operate at LOS F during the AM and PM Peak hours. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Significant	10th Street & Harvard Boulevard (Intersection 1). No feasible mitigation measures are available. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, cumulative impacts to this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes,	Significant and Unavoidable

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
		these improvements were not considered to be a feasible mitigation measure.	
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would operate at LOS F during the AM Peak hour and LOS D during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Significant	Implementation of mitigation measure TRA-1 . This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.	Significant and Unavoidable
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Peck Road and SR 126 Eastbound On/Off Ramps would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	Implementation of mitigation measure TRA-2 .	Less than Significant
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Faulkner Road and SR 126 Westbound On/Off Ramps would operate at LOS F during the AM Peak hour. The City of	Potentially Significant	Implementation of mitigation measure TRA-4 .	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.			
Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Beckwith Road and Telegraph Road would operate at LOS E during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	Implementation of mitigation measure TRA-3 .	Less than Significant
Other Cumulative			
Of the 10 directional freeway segments selected for analysis, all are projected to operate at LOS E or better during both the AM and PM peak hours under cumulative base conditions. As defined in the VCCMP, the minimum desirable level of service on freeway segments is LOS E. Therefore, no freeway segments would be significantly impacted due to cumulative development.	Less than Significant	No mitigation necessary.	Less than Significant
Utilities			
Threshold: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			
Development of the Project will result in the removal of the existing septic tanks that currently serve the site. Once developed and occupied, uses within the Specific Plan area	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>will generate wastewater that will be connected to the City’s sewer system and conveyed through a series of pipelines to the water recycling facility (WRF) for treatment. Effluent from the treatment plant must comply with the SPMC to meet the requirements of the Waste Discharge Requirements (WDR) permit issued to the City by the Los Angeles RWQCB.</p> <p>The treated effluent from the Project will not exceed applicable requirements, and the Project’s potential impacts related to wastewater treatment are less than significant.</p>			
<p>Threshold: 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?</p>			
<p>Water and recycled water pipeline construction impacts would be less than significant because they would be required to comply with the City’s noise ordinance, construction traffic management plan, requirements to cease construction should cultural resources be uncovered, and restrictions to avoid underground pipelines during excavation. In addition, no new or increased severity of impacts would occur as a result of the Project.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>The new WRF has a normal operating capacity of 3.15 mgd, with a final build-out capacity of 4.2 mgd and a peak operating capacity of 7.0 mgd. The City is currently generating approximately 2.0 mgd, so there is unused capacity at the facility to accept the</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>incremental addition of 0.026 mgd that is anticipated from occupancy of the Specific Plan area. Therefore, the Project would have less than significant impacts to wastewater treatment capacity within the City.</p>			
<p>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?</p>			
<p>As concluded in the Sanitary Sewer Technical Report, the Project Site sewer system will be in accordance with the City of Santa Paula design guidelines. The Santa Paula West sewer system is in agreement with the design flows anticipated within the City's Wastewater Master Plan for this development. Also, the main backbone, will have additional capacity before reaching 50% pipe utilization of 253 gpm (0.564 cfs) for future connections and therefore there would be no impacts.</p>	Less than Significant	No mitigation necessary.	Less than Significant
<p>Threshold: 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?</p>			
<p>The storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. The existing SR 126 culverts are exposed, but once the site is elevated by fill, the pipes would be underground and integrated into the new storm drain system. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. The detention basins will significantly reduce</p>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>peak runoffs downstream by storing the peak event flows and lagging their release after the storm peak. The Project's proposed design features and drainage plan would not result in an increase in stormwater runoff from the site or exceed stormwater drainage requirements established by the ACOE, Ventura County Waterworks District (VCWWD), or City. Impacts would be less than significant.</p>			
<p>Threshold: Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</p>			
<p>Water demand from the Project represents 0.81 percent of City's total projected urban water demand in 2017, and decreasing to 0.65 percent in 2037.</p> <p>The 2010 Urban Water Management Plan (UWMP) Update projects total water demands for the Santa Paula Business Park through 2035 and demonstrates that supplies are sufficient to meet demands. The projected demand for the Project will account for only a small fraction of the projected demands. Therefore, there would be no impacts to available water supplies and no new or expanded entitlements are needed.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>Threshold: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? Threshold: Comply with federal, state, and local statutes and regulations related to solid waste?</p>			
<p>As provided by the SPMC, Section 50.140, Construction and Demolition Diversion, demolition and construction must divert 50</p>	<p>Potentially Significant</p>	<p>SW-1 Before issuance of a demolition permit or construction permit, the applicant must implement waste reduction and recycling programs to divert construction solid</p>	<p>Less than Significant</p>

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>percent of waste tonnage from landfills. Separate calculations and reports are required for the demolition and construction portion of projects involving both activities. Impacts related to construction solid waste generation are considered potentially significant.</p>		<p>waste from the area landfill. A construction recycling plan must be submitted and approved by the Director of Public Works. A final report as to the amount recycled must be provided to the Director of Public Works at the completion of construction activities documenting the waste reduction efforts conducted, including a listing of solid waste diversion amounts, and the amount of waste sent to landfills. The report must also document how the construction contractor complied with applicable state and local statutes and regulations to reduce and recycle solid waste generated during construction.</p>	
<p>The proposed Project would account for less than 1 percent of the Toland Road Landfill permitted daily capacity. Additionally, the Project would account for less than 1 percent of the maximum permitted daily capacity for Chiquita Canyon Sanitary Landfill and Simi Valley Landfill & Recycling Center. However, the Chiquita Canyon Sanitary Landfill is only permitted through 2019. While there would be a substantial increase in generated solid waste on the Project Site, adequate landfill capacity appears to be available within the City and nearby landfills. Solid waste generated during construction and operation of the Project would be required to comply with all federal, state, and local statutes and regulations to reduce and recycle solid waste. Therefore, impacts would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
Cumulative Impacts			
<u>Wastewater</u>	Less than Significant	No mitigation necessary.	Less than Significant

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>Completion of proposed Project improvements would convey most of the wastewater flow to the point of connection (POC) along the existing sewer lines north of the site along Telegraph Road. In addition, the WRF has been designed to accept wastewater from the cumulative growth of the City under the General Plan, including all related projects. As such, the Project's contribution to cumulative wastewater system and treatment impacts would be less than significant.</p> <p><u>Water</u></p> <p>The Specific Plan's demand for water use would meet the projected development demands within the City. Additionally, the Project would use less water than the existing agricultural operations. Therefore, the cumulative increase in water demand of related projects and build-out of the City pursuant to the General Plan is considered less than significant.</p> <p><u>Solid Waste</u></p> <p>The City would utilize the Toland Road Landfill until the landfill reaches capacity. At the time Toland Road Landfill closes, the City would utilize the capacity of the five remaining landfills previously used for solid waste disposal. The combined remaining capacity of the five landfills is estimated to last for 95 years, or an average of 19 years.</p>			

Project Impacts	Impact without Mitigation	Mitigation Measures	Impact with Mitigation
<p>As such, cumulative impacts would be less than significant because the six landfills discussed above have sufficient capacity for decades to service the development of the Specific Plan and other development requiring solid waste disposal.</p>			

2.4 SUMMARY OF ALTERNATIVES

The Draft EIR considered a range of alternatives to the Project in accordance with CEQA Guidelines Section 15126.6, which requires that an EIR describe and evaluate a range of reasonable alternatives to a project to promote informed decision making.

The alternatives to the Project evaluated in the Draft EIR include the following:

Alternative 1: No Project Alternative—No Development

Alternative 2: 25 Percent Reduction Alternative

Alternative 3: 50 Percent Reduction Alternative

A brief description of each of these alternatives is provided below, along with a summary of the evaluation of each.

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 proposed project. Section 4.0: Environmental Impact Analysis, of the Draft EIR concludes that Project implementation would result in significant and unavoidable environmental impacts. These include construction and operation impacts to aesthetics; impacts to agricultural resources; construction impacts to air quality; and Project and cumulative impacts to transportation and traffic. In response to these impacts, the City of Santa Paula identified and considered several alternatives to the proposed Project to determine if the alternatives could avoid or substantially lessen these significant impacts.

Alternative 1: No Project Alternative—No Development

The No Project Alternative—No Development is required to be evaluated by Section 15126(2)(4) of the CEQA Guidelines. As required by the CEQA Guidelines, the analysis must examine impacts that might occur if the site were 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 Alternative—No Development, the Project Site would not be developed with additional uses and would remain in its current state, as agricultural fields.

Alternative 2: 25 Percent Reduction Alternative

This alternative assumes that there would be a 25 percent reduction in the 53.81 acres that make up the proposed Project. This assumes that 75 percent, or approximately 40.36 acres, of the Project would be built within the Specific Plan area; and 25 percent, or approximately 13.45 acres, would remain under the

jurisdiction of the County of Ventura, with land use subject to the County's General Plan and zoning and agricultural operations continuing.

The 25 Percent Reduction Alternative would reduce impacts to agricultural resources, air quality, greenhouse gas, transportation and traffic, wastewater, solid waste, and stormwater when compared to the proposed Project. However, significant and unavoidable impacts would not be avoided or substantially lessened. Land use impacts would be greater because this alternative would be potentially inconsistent with the goals and objectives of the General Plan Land Use Element, specifically, objective 5(f), "Sufficient land should be provided for all uses, including parks, low-density residential, industrial and neighborhood commercial, to accommodate projected population growth to the year 2020."

Alternative 3: 50 Percent Reduction Alternative

Alternative 3 assumes that there would be a 50 percent reduction in the 53.81 acres that make up the proposed Project. This assumes that 50 percent, or approximately 26.90 acres, of the Project would be built with the Specific Plan area; and 50 percent, or approximately 26.90 acres, would remain under the jurisdiction of the County of Ventura, with land use subject to the County's General Plan and zoning, and agricultural operations continuing.

The 50 Percent Reduction Alternative would result in reduced impacts to aesthetics, agricultural resources, air quality, biological resources, greenhouse gases, noise, transportation and traffic, wastewater, solid waste, and stormwater when compared to the proposed Project, and would avoid the significant and unavoidable traffic impact of the proposed Project at one intersection. Land use impacts would be greater because this alternative would be potentially inconsistent with the goals and objectives of the General Plan Land Use Element, specifically, objective 5(f), "Sufficient land should be provided for all uses, including parks, low-density residential, industrial and neighborhood commercial, to accommodate projected population growth to the year 2020."

Environmentally Superior Alternative

The CEQA Guidelines require that an environmentally superior alternative be identified among the selected alternatives.¹ If the No Project Alternative is determined to be the environmentally superior alternative, an environmentally superior alternative must also be identified among the remaining alternatives.

Alternative 1, the No Project Alternative, would have the fewest impacts and would not result in any significant impacts; making it the environmentally superior alternative. However, the No Project

1 California Code of Regulations, tit. 14, sec. 15126.6(e)(2).

Alternative would not meet the objectives of the proposed Project. As noted above, if the No Project Alternative is determined to be environmentally superior, the CEQA Guidelines require that an environmentally superior alternative must also be identified among the remaining alternatives.

The environmentally superior alternative among the remaining alternatives would be Alternative 3, the 50 Percent Reduction Alternative. This alternative would avoid the significant and unavoidable traffic impacts identified at one intersection.

However, this alternative would not eliminate the significant and unavoidable impacts for aesthetics, agricultural resources, and air quality during construction; would not be consistent with applicable land use policies; and would not achieve the basic objectives of the Project as defined by the City of Santa Paula. Additionally, water usage would be greater by approximately 120.6 acre-feet per year (afy) when compared to the build-out of the proposed Project, because of the higher water use for the existing agriculture uses.