

**APPENDIX F**

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**Baseline Traffic and Growth Validation**



## MEMORANDUM

Date: September 18, 2018  
To: Chad Penrod, McGaelic Group, Ltd.  
From: Netai Basu & Vivian Lee, Fehr & Peers  
**Subject: Santa Paula West Business Park Specific Plan EIR – Traffic Baseline and Growth Forecast Validation**

*LA18-3037.00*

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### EXECUTIVE SUMMARY

In early 2015, Fehr & Peers completed the “Traffic Impact Analysis for the Santa Paula West Business Park Specific Plan” (March 2015, Fehr & Peers). That study was based, in part, on traffic counts collected in 2014. The draft EIR was released in November 2016, and the final EIR is currently in preparation. Because four years have passed since the baseline counts were taken, City staff asked for a comparison of the 2014 baseline traffic volumes with more recent traffic volumes in order to confirm the reasonableness of the conclusions of the EIR study. In response, Fehr & Peers collected more recent traffic counts, compared it with the baseline data used in the EIR, and conducted other checks to determine whether and how local conditions have changed. This memorandum presents a summary of the new data collected and comparisons made, leading to a determination that the conclusions of the traffic study remain valid.

### DATA COLLECTION

The 2015 traffic study analyzed weekday AM and PM peak hour conditions at 16 intersections near the project site, as well as five freeway segments. More recent traffic counts from February 2016 were obtained from the City of Santa Paula’s General Plan Update, Existing Conditions report for 13 of the 16 existing study intersections. Traffic volume data from Caltrans was also reviewed to determine the level of change near the project site at the five freeway segments. In addition, 24-hour daily traffic counts were collected at eight locations in May 2018 and compared with the 2016 daily counts in the Santa Paula General Plan Update. New counts can be found in the attachment to this memo. Recent baseline counts from Ventura County Transportation Commission (VCTC) were also requested but the counts were not deemed relevant for the purposes of this memo because they were too old (Year 2012).



Additionally, lane configurations and signal phasing were field-checked in May 2018. Based on the recent field observations, changes were identified at only one location, Intersection 6. The northbound approach at Steckel Drive & Main Street has been reconfigured from one shared through-left and one shared through-right to one shared left-through lane and one right-turn lane. This appears to be related to a curb extension (installed as part of the Santa Paula Bike Trail) on the far side of the intersection.

## SUMMARY OF KEY VOLUME COMPARISONS

### Intersection Volumes

A comparison of the existing 2014 volumes and the cumulative base 2031 volumes presented in the draft EIR traffic study is shown in **Table 1**. By 2031, the volumes are forecasted to increase between 11.7% and 139.3%. This increase factors in an ambient growth rate of 0.5% and traffic increase from related projects in the area. The compounded annual growth rate ranges from 0.7% to 5.3% during the AM peak hour and 0.8% to 5.2% in the PM peak hour. The compounded annual growth rate for total intersection volumes is 2.2% during the AM peak hour and 2.1% during the PM peak hour.

**Table 2** shows a comparison of the weekday AM and PM peak hour intersection between years 2014 and 2016 at 13 of the 16 study intersections. As shown, the changes in volume range from -89 to 206 in the AM peak hour and from -162 to 446 in the PM peak hour. The percentage change in total intersection volumes at each count location between 2014 and 2016 ranged from -14.2% to 10.2% in the AM peak hour and from -11.2% to 43.2% in the PM peak hour. The compounded annual growth rate ranges from -7.4% to 5% in the AM peak hour and -5.8% to 19.7% in the PM peak hour. The count locations are shown in **Figure 1**.

The total intersection volumes both increased and decreased at the 13 intersections analyzed in the draft EIR. Most increased or decreased within 10% except for Intersection 6 (Steckel Drive & Main Street), where the percentage change in total intersection volumes decreased by 7% in the Am peak hour and increased by about 43% in the PM peak hour. Intersection 8b (Peck Road/Main Street & Telegraph Road/Harvard Boulevard) also increased by 14.1%; however, the higher percentage increase in traffic is largely due to the small volume of traffic at this location. Overall, the change in total intersection volume throughout the study area decreased by about 1.0% in the AM peak hour and increased by 2.7% in the PM peak hour over the course of two years. The compounded annual growth rate for total intersection volumes was -0.5% during the AM peak hour and 1.4% during the PM peak hour.



-  Project Site
-  Study Intersection
-  Future Roadways
-  Intersection with 2016 Count
-  Roadway Segment
-  Freeway Segment



Figure 1  
Count Locations

**Table 1: Comparison of Intersection Traffic Volumes Between Existing 2014 and Cumulative Base 2031**

Intersection	Traffic Control	Peak Hour	Year 2014	Year 2031	Delta	Change in	CAGR <sup>3</sup>
			Total Volume <sup>1</sup>	Total Volume <sup>2</sup>	(2031-2014)	Volume	
1 Ojai Santa Paula Road/10th Street & Harvard Boulevard	Signal	AM	2,054	2,708	654	31.8%	1.6%
		PM	2,232	3,012	780	34.9%	1.8%
2 8th Street & Main Street	Signal	AM	914	1,183	269	29.4%	1.5%
		PM	1,102	1,411	309	28.0%	1.5%
3 8th Street & Harvard Boulevard	Signal	AM	1,138	1,755	617	54.2%	2.6%
		PM	1,468	2,135	667	45.4%	2.2%
4 Palm Avenue & Main Street	Signal	AM	1,356	1,800	444	32.7%	1.7%
		PM	1,442	1,928	486	33.7%	1.7%
5 Palm Avenue & Harvard Boulevard	Signal	AM	2,026	2,889	863	42.6%	2.1%
		PM	2,397	3,285	888	37.0%	1.9%
6 Steckel Drive & Main Street	AWSC	AM	944	1,272	328	34.7%	1.8%
		PM	1,054	1,489	435	41.3%	2.1%
7 Steckel Drive & Harvard Boulevard	Signal	AM	1,229	1,715	486	39.5%	2.0%
		PM	1,571	2,114	543	34.6%	1.8%
8 Peck Road & Telegraph Road/Harvard Boulevard	Signal	AM	1,635	2,336	701	42.9%	2.1%
		PM	1,772	2,534	762	43.0%	2.1%
8b Peck Road/Main Street & Telegraph Road/Harvard Boulevard (5th Leg)	Signal	AM	324	410	86	26.5%	1.4%
		PM	163	227	64	39.3%	2.0%
9 Peck Road & Faulkner Road	Signal	AM	1,079	1,523	444	41.1%	2.0%
		PM	1,265	1,791	526	41.6%	2.1%
10 Peck Road & SR-126 EB Ramps/Acacia Way	AWSC	AM	627	892	265	42.3%	2.1%
		PM	974	1,331	357	36.7%	1.9%
11 SR-126 WB Ramps & Faulkner Road	AWSC	AM	731	991	260	35.6%	1.8%
		PM	625	892	267	42.7%	2.1%
12 Beckwith Road & Telegraph Road/Harvard Boulevard	TWSC	AM	625	698	73	11.7%	0.7%
		PM	728	831	103	14.1%	0.8%
13 Briggs Road & Telegraph Road/Harvard Boulevard	Signal	AM	768	1,322	554	72.1%	3.2%
		PM	765	1,283	518	67.7%	3.1%
14 Briggs Road & Faulkner Road	TWSC	AM	356	852	496	139.3%	5.3%
		PM	321	761	440	137.1%	5.2%
15 Briggs Road & SR-126 WB Ramps	TWSC	AM	387	887	500	129.2%	5.0%
		PM	377	821	444	117.8%	4.7%
16 Briggs Road & SR-126 EB Ramps	TWSC	AM	260	474	214	82.3%	3.6%
		PM	310	579	269	86.8%	3.7%
<b>Total for All Analyzed Intersections</b>		AM	16,453	23,707	7,254	44.1%	2.2%
		PM	18,566	26,424	7,858	42.3%	2.1%

**Notes:**

<sup>1</sup> Baseline traffic counts used in the TIA for the Santa Paula West Business Park Specific Plan were collected during the weekday morning (7:00 to 9:00 AM) and evening (4:00 to 6:00 PM) peak-period conditions in August 2014.

<sup>2</sup> Forecasted cumulative base 2031 counts from the TIA for the Santa Paula West Business Park Specific Plan.

<sup>3</sup> CAGR = Compounded annual growth rate

**Table 2: Comparison of Intersection Traffic Volumes Between Existing 2014 and 2016**

	Intersection	Traffic Control	Peak Hour	Year 2014	Year 2016	Delta	Change in	CAGR <sup>3</sup>
				Total Volume <sup>1</sup>	Total Volume <sup>2</sup>	(2016-2014)	Volume	
1	Ojai Santa Paula Road/10th Street & Harvard Boulevard	Signal	AM	2,054	2,055	1	0.0%	0.0%
			PM	2,232	2,137	-95	-4.3%	-2.2%
2	8th Street & Main Street	Signal	AM	914	899	-15	-1.6%	-0.8%
			PM	1,102	1,147	45	4.1%	2.0%
3	8th Street & Harvard Boulevard	Signal	AM	1,138	1,142	4	0.4%	0.2%
			PM	1,468	1,306	-162	-11.0%	-5.7%
4	Palm Avenue & Main Street	Signal	AM	1,356	1,306	-50	-3.7%	-1.9%
			PM	1,442	1,377	-65	-4.5%	-2.3%
5	Palm Avenue & Harvard Boulevard	Signal	AM	2,026	2,232	206	10.2%	5.0%
			PM	2,397	2,377	-20	-0.8%	-0.4%
6	Steckel Drive & Main Street	AWSC	AM	944	875	-69	-7.3%	-3.7%
			PM	1,054	1,509	455	43.2%	19.7%
7	Steckel Drive & Harvard Boulevard	Signal	AM	1,229	1,263	34	2.8%	1.4%
			PM	1,571	1,561	-10	-0.6%	-0.3%
8	Peck Road & Telegraph Road/Harvard Boulevard	Signal	AM	1,635	1,559	-76	-4.6%	-2.4%
			PM	1,772	1,996	224	12.6%	6.1%
8b	Peck Road/Main Street & Telegraph Road/Harvard Boulevard (5th Leg)	Signal	AM	324	332	8	2.5%	1.2%
			PM	163	186	23	14.1%	6.8%
9	Peck Road & Faulkner Road	Signal	AM	1,079		No Data		
			PM	1,265		No Data		
10	Peck Road & SR-126 EB Ramps/Acacia Way	AWSC	AM	627	538	-89	-14.2%	-7.4%
			PM	974	865	-109	-11.2%	-5.8%
11	SR-126 WB Ramps & Faulkner Road	AWSC	AM	731	665	-66	-9.0%	-4.6%
			PM	625	699	74	11.8%	5.8%
12	Beckwith Road & Telegraph Road/Harvard Boulevard	TWSC	AM	625		No Data		
			PM	728		No Data		
13	Briggs Road & Telegraph Road/Harvard Boulevard	Signal	AM	768	725	-43	-5.6%	-2.8%
			PM	765	793	28	3.7%	1.8%
14	Briggs Road & Faulkner Road	TWSC	AM	356		No Data		
			PM	321		No Data		
15	Briggs Road & SR-126 WB Ramps	TWSC	AM	387	393	6	1.6%	0.8%
			PM	377	402	25	6.6%	3.3%
16	Briggs Road & SR-126 EB Ramps	TWSC	AM	260	268	8	3.1%	1.5%
			PM	310	343	33	10.6%	5.2%
<b>Total for All Analyzed Intersections</b>			AM	14,393	14,252	-141	-1.0%	-0.5%
			PM	16,252	16,698	446	2.7%	1.4%

**Notes:**

<sup>1</sup> Baseline traffic counts used in the TIA for the Santa Paula West Business Park Specific Plan were collected during the weekday morning (7:00 to 9:00 AM) and evening (4:00 to 6:00 PM) peak-period conditions in August 2014.

<sup>2</sup> Source: City of Santa Paula General Plan Update, Existing Conditions Report - Circulation and Mobility, September 2017. Count date: February 2016.

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<sup>3</sup> CAGR = Compounded annual growth rate



### Roadway Segment Volumes

**Table 3** shows a comparison of the 24-hour daily volumes between years 2016 and 2018 for eight roadway segments. New 2018 counts were collected to compare to the 24-hour daily volumes reported in the City of Santa Paula's General Plan Update. The changes in volume range from -1,243 to 2,371. The percentage change in daily volumes at each count location between 2016 and 2018 ranged from -10.7% and 37.8%. Additionally, the compounded annual growth rate ranged from -5.5% to 17.4%. The count locations are shown in **Figure 1**.

Of the eight count locations, half of the locations saw an increase in volume and half saw a decrease in volume. The highest increase occurred on Telegraph Road, west of Peck Road where the volume increased by 37.8%, followed by Briggs Road between Faulkner Road & Telegraph Road, where the volume increased by 23.8%. However, the counts from the General Plan Update and the new counts taken in May 2018 may vary in exact location on the roadway segment, which may account for the higher increases. Overall, the change in total ADT volumes increased by 3.1% over the course of two years. The compounded annual growth rate for all roadway segments was 1.5%.

### Freeway Segment Volumes

**Table 4** shows a comparison of the Caltrans peak hour bi-directional volume between years 2014 and 2016 for the five existing freeway segment locations. The changes in volume range from -100 to 600. The percentage change at each count location between 2016 and 2018 ranged from -3.8% to 18.5%. Additionally, the compounded annual growth rate ranged from -1.9% and 8.8%. The count locations are shown in **Figure 1**.

The highest increase in volumes occurred on the SR-126 between 10<sup>th</sup> Street and Palm Avenue. This segment saw an 18.5% increase during the two-year period. Overall, the change in volumes for all freeway segments was 3.4% with a compounded annual growth rate of 1.7%.

**Table 3: Comparison of 24-Hour Roadway Segment Volumes Between Years 2016 and 2018**

Roadway Segment		Year 2016 24-Hr Volume <sup>1</sup>	Year 2018 24-Hr Volume <sup>2</sup>	Delta (2018-2016)	Change in Volume	CAGR <sup>3</sup>
1	Briggs Road between Faulkner Road & Telegraph Road	3,476	4,305	829	23.8%	11.3%
2	Telegraph Road between Briggs Road & Peck Road	6,266	8,637	2,371	37.8%	17.4%
3	Peck Road between Faulkner Road & Acacia Way	8,272	8,608	336	4.1%	2.0%
4	Harvard Boulevard between Peck Road & Stecker Drive	13,125	11,882	-1,243	-9.5%	-4.9%
5	Main Street between Peck Road & Cameron Street	5,406	5,099	-307	-5.7%	-2.9%
6	Main Street between Palm Avenue & 8th Street	10,085	9,003	-1,082	-10.7%	-5.5%
7	Havard Boulevard between Palm Avenue & 8th Street	12,587	14,645	2,058	16.4%	7.9%
8	10th Street between Harvard Boulevard & Ventura Street	15,901	15,269	-632	-4.0%	-2.0%
<b>Total for All Roadway Segments</b>		75,118	77,448	2,330	3.1%	1.5%

Notes:

<sup>1</sup> Source: City of Santa Paula General Plan Update, Existing Conditions Report - Circulation and Mobility, September 2017. Count date: February 2016.  
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<sup>2</sup> New counts were collected in May 2018.

<sup>3</sup> CAGR = Compounded annual growth rate



**Table 4: Comparison of Freeway Segment Volumes Between Years 2014 and 2016**

Freeway Segment	Year 2014 Peak Hour Bi-Directional Volume <sup>1</sup>	Year 2016 Peak Hour Bi-Directional Volume <sup>2</sup>	Delta (2016-2014)	Change in Volume	CAGR <sup>3</sup>
1 SR-126 - Hallock Drive to 10th Street (SR-150)	2,650	2,550	-100	-3.8%	-1.9%
2 SR-126 - 10th Street (SR-150) to Palm Avenue	3,250	3,850	600	18.5%	8.8%
3 SR-126 - Palm Avenue to Peck Road	3,300	3,500	200	6.1%	3.0%
4 SR-126 Peck Road to Briggs Road	4,200	4,150	-50	-1.2%	-0.6%
5 SR-126 Briggs Road to Wells Road	4,450	4,400	-50	-1.1%	-0.6%
<b>Total for All Freeway Segments</b>	17,850	18,450	600	3.4%	1.7%

Notes:

<sup>1</sup> Source: 2014 Traffic Volumes on California State Highways, Caltrans. <http://www.dot.ca.gov/trafficops/census/volumes2014/>  
 Accessed: May 2018

<sup>2</sup> Source: 2016 Traffic Volumes on California State Highways, Caltrans. <http://www.dot.ca.gov/trafficops/census/volumes2016/>  
 Accessed: May 2018

<sup>3</sup> CAGR = Compounded annual growth rate



## FUTURE TRAFFIC VOLUMES

### **Related Projects and Ambient Growth Factor**

Because the project future traffic volumes are based in part on traffic volumes from 18 related projects, more recent information was collected to update the trip generation estimates from what is in the original traffic impact study. In 2014, there were 18 related projects with a totaling 49,538 daily vehicle trips, 4,609 AM peak hour trips, and 5,346 PM peak hour trips. As of May 2018, there are two additional projects that have been added to the list for a total of 50,458 daily trips, 4,708 AM peak hour trips, and 5,432 PM peak hour trips. One project is a fast food restaurant located approximately 1.5 miles from the project site and the other is an industrial site located south of SR-126, about a half mile south of the project site. In addition, six related projects have since been completed and are in operation as of May 2018. **Table 5** shows the updated related projects list with corresponding trip generation.

An ambient growth factor of 0.5% was used to determine future traffic volumes in the original traffic impact study. The current SCAG travel demand model was reviewed to identify the long-term level of traffic growth anticipated near Santa Paula. Year 2016 and Year 2040 forecasts from the eight selected roadway segments were compared to determine the anticipated growth rate over the 24-year period. **Table 6** shows that the compounded annual growth rate ranged from -0.33% to 1.55% in the AM peak hour and -0.20% to 0.44% in the PM peak hour. The compounded annual growth rate for the total volumes for all roadway segments was less than 0.1% for both the AM and PM peak hours.

**Table 5: Trip Generation Estimates for Santa Paula West Business Park Related Projects**

Project Location	Land Use	Size	ITE Code[a]	Trip Generation							
				Daily	AM			PM			
					In	Out	Total	In	Out	Total	
1	Cliff Dr & Forrest Dr	Single Family Units	19 du	210	181	4	10	14	12	7	19
2	North of Foothill Rd & Steckel Dr	Single Family Units	88 du	210	838	17	49	66	55	33	88
3	North of Foothill Rd & Peck Rd	Single Family Units	79 du	210	752	15	44	59	50	29	79
4	Fagan Canyon	Single Family Units	450 du	210	4,284	85	253	338	284	166	450
		Retail	76.2 ksf	820	3,254	45	28	73	136	147	283
		Active Parks [b]	32 ac	412	73	1	0	1	2	1	3
		School [c]	10 ac	520	387	74	61	135	22	23	45
5	Adams Canyon	Passive Open Space [d]	208 ac	413	135	2	2	4	2	2	4
		Single Family Units	495 du	210	4,712	93	278	371	312	183	495
		Public Elementary School [e]	40 ac	520	387	61	74	135	22	23	45
		Public Middle School [e]	300 su	522	486	89	73	162	n/a	n/a	n/a
		Public Recreational Facilities [f]	100 ac	413	65	1	1	2	1	1	2
		Destination Resort Hotel [g]	150 rooms	330	n/a	40	16	56	32	42	74
6	1445 East Main St	Golf Course [h]	18 hole	430	643	29	8	37	27	26	53
		Public Passive Open Space [d]	200 ac	413	130	2	2	4	2	2	4
		Motel	16 rooms	320	90	3	4	7	4	4	8
		Restaurant	0.5 ksf	932	64	3	2	5	3	2	5
		Live/work studios	9 du	220	60	1	4	5	4	2	6
7	East Area 1	Residential/School/Commercial [j]	from traffic study [b]		16,982	762	1,038	1,800	1,031	797	1,828
8	East Area 2/Gateway	Shopping Center/Business Park [i]	360 ksf	820/770	10,183	414	82	496	512	532	1,044
9	Cal Pipe	Manufacturing	44 ksf	140	168	25	7	32	12	20	32
10*	100-106 Calavo	General Light Industrial	35.7 ksf	110	249	29	4	33	4	31	35
11	324 W. Santa Maria St	Industrial Park	571.37 ksf	130	3,902	385	84	469	102	384	486
12*	310 S. Palm	Coffee/Donut Shop without Drive-Thru	1,798 ksf	936	n/a	49	48	97	19	18	37
13*	126-140 Santa Barbara St	Manufacturing	139.7 ksf	140	534	80	22	102	37	65	102
14*	Cemetery & Santa Paula St	Single Family Units	8 du	210	76	2	4	6	5	3	8
15*	125 Oak Street	Apartment	8 du	220	53	1	3	4	3	2	5
16*	327 Acacia Road	Apartment	6 du	220	40	1	2	3	3	1	4
		Apartment	37 du	220	246	4	15	19	15	8	23
17	1170 Montebello St	General Light Industrial	72.2 ksf	110	503	58	8	66	8	62	70
		Apartment	1 du	220	7	0	1	1	1	0	1
18	250 S Hallock Dr	General Light Industrial	7.8 du	110	54	6	1	7	1	7	8
		Apartment	1 du	220	7	0	1	1	1	0	1
<b>TOTAL RELATED PROJECT TRAFFIC</b>					<b>49,538</b>	<b>2,381</b>	<b>2,228</b>	<b>4,609</b>	<b>2,723</b>	<b>2,623</b>	<b>5,346</b>

NEW RELATED PROJECTS (May 2018)											
19	630 Todd Lane (south of SR-126)	General Light Industrial	52 ksf	110	362	42	6	48	6	44	50
20	132 Harvard Blvd [k]	Fast Food	2,249 ksf	934	558	13	38	51	10	27	37
<b>TOTAL NEW RELATED PROJECT TRAFFIC</b>					<b>920</b>	<b>55</b>	<b>44</b>	<b>99</b>	<b>16</b>	<b>71</b>	<b>87</b>

<b>TOTAL UPDATED RELATED PROJECT TRAFFIC</b>					<b>50,458</b>	<b>2,436</b>	<b>2,272</b>	<b>4,708</b>	<b>2,739</b>	<b>2,694</b>	<b>5,432</b>
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Notes:

- du = dwelling units; ac = acres; ksf = one thousand square feet
- \* = Project is complete and in operation as of May 2018
- [a] Trip generation estimates based on "Trip Generation" (9th Edition, ITE, 2012) unless otherwise noted.
- [b] Trip generation rates for ITE LU 412 County Park used
- [c] General Plan Land Use Plan and Expansion Areas map does not indicate the size or type of the 10 acre school site; table assumes an elementary school with 300 students.
- [d] Treated as a state park.
- [e] General Plan Land Use Plan and Expansion Areas map does not indicate the size or type of schools on the 40-acre site; table assumes an elementary school and a middle school, with 300 students.
- [f] General Plan Land Use Plan and Expansion Areas map does not indicate the size of the recreation center; table treats this acreage as additional passive open space.
- [g] General Plan Land Use Plan and Expansion Areas map does not indicate the size of the resort hotel; table assumes a 150-room resort hotel.
- [h] General Plan Land Use Plan and Expansion Areas map does not indicate the size of the golf course; table assumes an 18-hole course.
- [i] Source: *Transportation Analysis Report East Area Gateway Project*, Fehr and Peers, 2012.
- [j] Source: *East Area 1 Specific Plan Transportation Analysis Report*, Fehr and Peers, 2014.
- [k] Assumes 50% pass-by credit based on data from the ITE Trip Generation handbook, 3rd Edition, 2014.
- Related project data obtained from the City of Santa Paula in December 2013 (RP 1-18) and May 2018 (RP 19-20).

**Table 6: Comparison of SCAG Travel Demand Model Volumes Between Years 2016 Forecast and 2040 Forecast**

Roadway Segment		Peak Hour	Year 2016 Forecast Volume <sup>1</sup>	Year 2040 Forecast Volume <sup>1</sup>	Delta (2040-2016)	Change in Volume	CAGR <sup>2</sup>
1	Briggs Road between Faulkner Road & Telegraph Road	AM	825	762	-63	-7.6%	-0.33%
		PM	1,426	1,359	-67	-4.7%	-0.20%
2	Telegraph Road between Briggs Road & Peck Road	AM	672	769	97	14.4%	0.56%
		PM	1,275	1,415	140	11.0%	0.44%
3	Peck Road between Faulkner Road & Acacia Way	AM	633	698	65	10.3%	0.41%
		PM	1,707	1,785	78	4.6%	0.19%
4	Harvard Boulevard between Peck Road & Stecker Drive	AM	121	175	54	44.6%	1.55%
		PM	217	206	-11	-5.1%	-0.22%
5	Main Street between Peck Road & Cameron Street	AM	146	145	-1	-0.7%	-0.03%
		PM	219	218	-1	-0.5%	-0.02%
6	Main Street between Palm Avenue & 8th Street	AM	890	933	43	4.8%	0.20%
		PM	1,547	1,553	6	0.4%	0.02%
7	Harvard Boulevard between Palm Avenue & 8th Street	AM	572	573	1	0.2%	0.01%
		PM	834	821	-13	-1.6%	-0.07%
8	10th Street between Harvard Boulevard & Ventura Street	AM	2,585	2,422	-163	-6.3%	-0.27%
		PM	3,506	3,441	-65	-1.9%	-0.08%
<b>Total for All Roadway Segments</b>		AM	6,444	6,477	33	0.5%	0.02%
		PM	10,731	10,798	67	0.6%	0.03%

**Notes:**

<sup>1</sup> Source: 2016 SCAG RTP/SCS Travel Demand Model

<sup>2</sup> CAGR = Compounded annual growth rate



## CONCLUSIONS

A comparison of more recent traffic counts and intersection operating conditions with the existing 2014 conditions analysis presented in the traffic study shows that there have been minor increases and decreases at certain locations. However, the overall compounded annual growth in the area has been less than what was estimated in analysis of the traffic study. The traffic study shows that total intersection volumes are anticipated to increase by over 2% per year while the comparison of recent intersection, roadway segment, and freeway segment volumes shows that growth has increased by less than 2% per year since 2014. The higher percentage of growth at certain locations does not appear to be a result of any systemic change in the area, nor do we believe it would change the existing LOS in the original study based on the 2014 volumes. The SCAG travel demand model also anticipates a slower rate of increase in growth over the next 24 years.

The addition of related projects is not expected to affect the results of the original analysis given their size and location. As for the change in lane configuration to Steckel Drive & Main Street, LOS was rerun for the intersection for cumulative plus project scenarios, with and without the Beckwith Road extension. The results show that had the EIR analysis accounted for the lane reconfiguration, forecasted LOS for both scenarios would remain unchanged and no significant impact would occur.

Based on this data and analysis, we have determined that the conclusions of the original traffic impact study remain valid and that no new significant impacts would occur that are not already identified in the original study.

If you have questions or require additional information, please call us at (213) 261-3050.



**ATTACHMENT: 24-Hour Daily Counts**

# VOLUME

Briggs Rd Bet. Telegraph Rd & Faulkner Rd

Day: Tuesday  
Date: 5/22/2018

City: Santa Paula  
Project #: CA18\_5369\_001

DAILY TOTALS					NB	SB	EB	WB	Total		
					2,307	1,998	0	0	4,305		
AM Period	NB	SB	EB	WB	TOTAL	PM Period	NB	SB	EB	WB	TOTAL
00:00	1	3			4	12:00	43	23			66
00:15	5	3			8	12:15	33	52			85
00:30	0	3			3	12:30	27	28			55
00:45	3	9	3	12	21	12:45	38	141	22	125	266
01:00	1	0			1	13:00	35	30			65
01:15	2	4			6	13:15	29	35			64
01:30	4	3			7	13:30	32	39			71
01:45	5	12	6	13	25	13:45	33	129	20	124	253
02:00	2	2			4	14:00	37	27			64
02:15	1	2			3	14:15	37	20			57
02:30	1	2			3	14:30	41	26			67
02:45	0	4	0	6	10	14:45	47	162	33	106	268
03:00	2	4			6	15:00	53	51			104
03:15	4	4			8	15:15	30	39			69
03:30	2	4			6	15:30	45	57			102
03:45	1	9	3	15	24	15:45	46	174	31	178	352
04:00	3	3			6	16:00	45	57			102
04:15	8	12			20	16:15	46	35			81
04:30	4	12			16	16:30	46	39			85
04:45	7	22	3	30	52	16:45	52	189	37	168	357
05:00	5	8			13	17:00	64	42			106
05:15	5	13			18	17:15	64	43			107
05:30	16	33			49	17:30	48	33			81
05:45	20	46	38	92	138	17:45	47	223	20	138	361
06:00	28	25			53	18:00	47	27			74
06:15	35	38			73	18:15	29	15			44
06:30	51	39			90	18:30	41	14			55
06:45	62	176	39	141	317	18:45	31	148	21	77	225
07:00	36	38			74	19:00	22	16			38
07:15	60	32			92	19:15	33	28			61
07:30	48	57			105	19:30	20	8			28
07:45	69	213	45	172	385	19:45	17	92	12	64	156
08:00	30	40			70	20:00	12	9			21
08:15	29	35			64	20:15	18	9			27
08:30	41	30			71	20:30	16	14			30
08:45	27	127	27	132	259	20:45	10	56	6	38	94
09:00	27	35			62	21:00	12	4			16
09:15	16	22			38	21:15	17	7			24
09:30	20	23			43	21:30	11	8			19
09:45	17	80	19	99	179	21:45	6	46	7	26	72
10:00	21	25			46	22:00	14	5			19
10:15	18	28			46	22:15	5	3			8
10:30	19	27			46	22:30	5	4			9
10:45	22	80	22	102	182	22:45	4	28	7	19	47
11:00	36	34			70	23:00	7	5			12
11:15	27	17			44	23:15	7	2			9
11:30	19	25			44	23:30	5	4			9
11:45	38	120	32	108	228	23:45	2	21	2	13	34
<b>TOTALS</b>	<b>898</b>	<b>922</b>			<b>1820</b>	<b>TOTALS</b>	<b>1409</b>	<b>1076</b>			<b>2485</b>
<b>SPLIT %</b>	<b>49.3%</b>	<b>50.7%</b>			<b>42.3%</b>	<b>SPLIT %</b>	<b>56.7%</b>	<b>43.3%</b>			<b>57.7%</b>

DAILY TOTALS					NB	SB	EB	WB	Total
					2,307	1,998	0	0	4,305

AM Peak Hour	07:00	07:30			07:00	PM Peak Hour	16:45	15:15			16:30
AM Pk Volume	213	177			385	PM Pk Volume	228	184			387
Pk Hr Factor	0.772	0.776			0.844	Pk Hr Factor	0.891	0.807			0.904
7 - 9 Volume	340	304	0	0	644	4 - 6 Volume	412	306	0	0	718
7 - 9 Peak Hour	07:00	07:30			07:00	4 - 6 Peak Hour	16:45	16:00			16:30
7 - 9 Pk Volume	213	177	0	0	385	4 - 6 Pk Volume	228	168	0	0	387
Pk Hr Factor	0.772	0.776	0.000	0.000	0.844	Pk Hr Factor	0.891	0.737	0.000	0.000	0.904

**VOLUME**

Telegraph Rd W/O Peck Rd

Day: Tuesday  
Date: 5/22/2018City: Santa Paula  
Project #: CA18\_5369\_002

DAILY TOTALS					NB	SB						Total			
					0	0						8,637			
					4,208		4,429								
AM Period	NB	SB	EB	WB	TOTAL		PM Period	NB	SB	EB	WB	TOTAL			
00:00			4	4	8		12:00			78	89	167			
00:15			0	3	3		12:15			76	72	148			
00:30			4	3	7		12:30			70	66	136			
00:45			4	12	4	14	12:45			57	281	76	303	133	584
01:00			1	1	2		13:00			68	78	146			
01:15			3	3	6		13:15			67	73	140			
01:30			4	3	7		13:30			72	82	154			
01:45			0	8	2	9	13:45			87	294	74	307	161	601
02:00			5	2	7		14:00			72	74	146			
02:15			0	1	1		14:15			75	76	151			
02:30			0	2	2		14:30			81	60	141			
02:45			2	7	3	8	14:45			100	328	96	306	196	634
03:00			4	1	5		15:00			113	70	183			
03:15			3	4	7		15:15			93	68	161			
03:30			2	2	4		15:30			112	91	203			
03:45			5	14	1	8	15:45			113	431	82	311	195	742
04:00			9	8	17		16:00			98	75	173			
04:15			3	7	10		16:15			101	77	178			
04:30			9	12	21		16:30			113	83	196			
04:45			11	32	13	40	16:45			94	406	77	312	171	718
05:00			11	15	26		17:00			116	73	189			
05:15			17	30	47		17:15			86	91	177			
05:30			18	54	72		17:30			93	78	171			
05:45			32	78	67	166	17:45			77	372	91	333	168	705
06:00			33	76	109		18:00			62	81	143			
06:15			20	79	99		18:15			64	55	119			
06:30			31	58	89		18:30			77	58	135			
06:45			34	118	82	295	18:45			50	253	58	252	108	505
07:00			38	65	103		19:00			49	53	102			
07:15			42	66	108		19:15			53	58	111			
07:30			50	91	141		19:30			45	54	99			
07:45			58	188	71	293	19:45			48	195	48	213	96	408
08:00			47	70	117		20:00			45	36	81			
08:15			49	71	120		20:15			45	49	94			
08:30			53	39	92		20:30			31	40	71			
08:45			59	208	63	243	20:45			38	159	33	158	71	317
09:00			38	47	85		21:00			25	32	57			
09:15			39	55	94		21:15			31	28	59			
09:30			48	52	100		21:30			19	14	33			
09:45			49	174	51	205	21:45			12	87	21	95	33	182
10:00			45	57	102		22:00			20	17	37			
10:15			47	60	107		22:15			12	16	28			
10:30			57	56	113		22:30			19	16	35			
10:45			49	198	46	219	22:45			15	66	12	61	27	127
11:00			51	61	112		23:00			13	7	20			
11:15			64	58	122		23:15			13	4	17			
11:30			67	64	131		23:30			8	3	11			
11:45			75	257	78	261	23:45			8	42	3	17	11	59
<b>TOTALS</b>				1294	1761	<b>3055</b>	<b>TOTALS</b>			2914	2668	<b>5582</b>			
<b>SPLIT %</b>				42.4%	57.6%	<b>35.4%</b>	<b>SPLIT %</b>			52.2%	47.8%	<b>64.6%</b>			

DAILY TOTALS					NB	SB						Total	
					0	0						8,637	
					4,208		4,429						
AM Peak Hour			11:45	11:45	11:45	PM Peak Hour			15:00	17:15	15:30		
AM Pk Volume			299	305	604	PM Pk Volume			431	341	749		
Pk Hr Factor			0.958	0.857	0.904	Pk Hr Factor			0.954	0.937	0.922		
7 - 9 Volume	0	0	396	536	932	4 - 6 Volume	0	0	778	645	1423		
7 - 9 Peak Hour			08:00	07:30	07:30	4 - 6 Peak Hour			16:15	17:00	16:15		
7 - 9 Pk Volume	0	0	208	303	507	4 - 6 Pk Volume	0	0	424	333	734		
Pk Hr Factor	0.000	0.000	0.881	0.832	0.899	Pk Hr Factor	0.000	0.000	0.914	0.915	0.936		



### VOLUME

Peck Rd Bet. Faulkner Rd & Acacia Way

Day: Tuesday  
Date: 5/22/2018

City: Santa Paula  
Project #: CA18\_5369\_003

DAILY TOTALS					NB	SB	EB	WB	Total		
					6,048	2,560	0	0	8,608		
AM Period	NB	SB	EB	WB	TOTAL	PM Period	NB	SB	EB	WB	TOTAL
00:00	10	1			11	12:00	93	41			134
00:15	18	2			20	12:15	78	43			121
00:30	8	3			11	12:30	82	38			120
00:45	6	42	1	7	7	12:45	78	331	38	160	116
01:00	3	3			6	13:00	66	29			95
01:15	7	2			9	13:15	95	37			132
01:30	5	1			6	13:30	83	40			123
01:45	3	18	2	8	5	13:45	94	338	36	142	130
02:00	5	1			6	14:00	88	28			116
02:15	5	0			5	14:15	89	32			121
02:30	7	0			7	14:30	113	48			161
02:45	3	20	1	2	4	14:45	122	412	48	156	170
03:00	7	2			9	15:00	108	52			160
03:15	2	3			5	15:15	114	54			168
03:30	4	4			8	15:30	125	50			175
03:45	11	24	16	25	27	15:45	136	483	56	212	192
04:00	11	8			19	16:00	159	47			206
04:15	9	6			15	16:15	144	46			190
04:30	9	10			19	16:30	141	46			187
04:45	14	43	12	36	26	16:45	181	625	42	181	223
05:00	22	19			41	17:00	150	59			209
05:15	28	22			50	17:15	170	58			228
05:30	30	25			55	17:30	173	54			227
05:45	42	122	29	95	71	17:45	125	618	41	212	166
06:00	36	39			75	18:00	121	40			161
06:15	39	14			53	18:15	124	27			151
06:30	66	27			93	18:30	118	57			175
06:45	64	205	36	116	100	18:45	84	447	47	171	131
07:00	57	28			85	19:00	96	43			139
07:15	79	35			114	19:15	98	37			135
07:30	97	34			131	19:30	83	38			121
07:45	114	347	52	149	166	19:45	73	350	21	139	94
08:00	67	51			118	20:00	86	28			114
08:15	62	39			101	20:15	87	19			106
08:30	52	34			86	20:30	61	29			90
08:45	58	239	37	161	95	20:45	53	287	22	98	75
09:00	45	30			75	21:00	45	31			76
09:15	54	29			83	21:15	48	19			67
09:30	48	39			87	21:30	47	11			58
09:45	57	204	30	128	87	21:45	40	180	12	73	52
10:00	60	27			87	22:00	32	13			45
10:15	58	24			82	22:15	29	16			45
10:30	71	30			101	22:30	22	0			22
10:45	55	244	26	107	81	22:45	20	103	5	34	25
11:00	69	27			96	23:00	19	4			23
11:15	70	38			108	23:15	16	5			21
11:30	82	41			123	23:30	15	4			19
11:45	77	298	26	132	103	23:45	18	68	3	16	21
<b>TOTALS</b>	<b>1806</b>	<b>966</b>			<b>2772</b>	<b>TOTALS</b>	<b>4242</b>	<b>1594</b>			<b>5836</b>
<b>SPLIT %</b>	<b>65.2%</b>	<b>34.8%</b>			<b>32.2%</b>	<b>SPLIT %</b>	<b>72.7%</b>	<b>27.3%</b>			<b>67.8%</b>

DAILY TOTALS					NB	SB	EB	WB	Total
					6,048	2,560	0	0	8,608

AM Peak Hour	07:15	07:30			07:15	PM Peak Hour	16:45	16:45			16:45
AM Pk Volume	357	176			529	PM Pk Volume	674	213			887
Pk Hr Factor	0.783	0.846			0.797	Pk Hr Factor	0.931	0.903			0.973
7 - 9 Volume	586	310	0	0	896	4 - 6 Volume	1243	393	0	0	1636
7 - 9 Peak Hour	07:15	07:30			07:15	4 - 6 Peak Hour	16:45	16:45			16:45
7 - 9 Pk Volume	357	176	0	0	529	4 - 6 Pk Volume	674	213	0	0	887
Pk Hr Factor	0.783	0.846	0.000	0.000	0.797	Pk Hr Factor	0.931	0.903	0.000	0.000	0.973

### VOLUME

Harvard Blvd Bet. Acacia Rd & Elm St

Day: Tuesday  
Date: 5/22/2018

City: Santa Paula  
Project #: CA18\_5369\_004

DAILY TOTALS					NB	SB	EB	WB	Total			
					0	0	6,420	5,462	11,882			
AM Period	NB	SB	EB	WB	TOTAL	PM Period	NB	SB	EB	WB	TOTAL	
00:00			11	8	19	12:00			104	92	196	
00:15			11	1	12	12:15			100	102	202	
00:30			5	1	6	12:30			96	79	175	
00:45			2	29	3	12:45			83	383	85	358
01:00			1	2	3	13:00			88	78	166	
01:15			10	6	16	13:15			96	88	184	
01:30			5	4	9	13:30			84	97	181	
01:45			2	18	1	13:45			105	373	81	344
02:00			8	2	10	14:00			80	100	180	
02:15			4	1	5	14:15			107	78	185	
02:30			4	5	9	14:30			118	81	199	
02:45			3	19	4	14:45			141	446	98	357
03:00			5	3	8	15:00			149	90	239	
03:15			0	9	9	15:15			132	83	215	
03:30			2	3	5	15:30			138	82	220	
03:45			6	13	6	15:45			149	568	82	337
04:00			6	11	17	16:00			182	98	280	
04:15			7	13	20	16:15			165	99	264	
04:30			7	22	29	16:30			176	95	271	
04:45			13	33	14	16:45			175	698	87	379
05:00			18	30	48	17:00			176	86	262	
05:15			15	49	64	17:15			147	123	270	
05:30			22	87	109	17:30			175	108	283	
05:45			32	87	74	17:45			136	634	90	407
06:00			30	96	126	18:00			124	103	227	
06:15			16	90	106	18:15			127	70	197	
06:30			40	75	115	18:30			138	83	221	
06:45			51	137	73	18:45			108	497	65	321
07:00			45	68	113	19:00			101	79	180	
07:15			77	77	154	19:15			87	73	160	
07:30			91	121	212	19:30			92	67	159	
07:45			100	313	113	19:45			83	363	51	270
08:00			90	78	168	20:00			93	57	150	
08:15			81	77	158	20:15			85	62	147	
08:30			55	64	119	20:30			60	43	103	
08:45			74	300	65	20:45			57	295	40	202
09:00			74	54	128	21:00			48	45	93	
09:15			57	66	123	21:15			48	41	89	
09:30			56	71	127	21:30			42	26	68	
09:45			61	248	65	21:45			35	173	36	148
10:00			70	56	126	22:00			32	22	54	
10:15			62	63	125	22:15			26	19	45	
10:30			68	73	141	22:30			33	22	55	
10:45			66	266	73	22:45			16	107	17	80
11:00			73	83	156	23:00			18	11	29	
11:15			74	86	160	23:15			19	15	34	
11:30			101	91	192	23:30			16	4	20	
11:45			100	348	82	23:45			19	72	10	40
<b>TOTALS</b>			1811	2219	4030	<b>TOTALS</b>			4609	3243	7852	
<b>SPLIT %</b>			44.9%	55.1%	33.9%	<b>SPLIT %</b>			58.7%	41.3%	66.1%	

DAILY TOTALS					NB	SB	EB	WB	Total		
					0	0	6,420	5,462	11,882		
AM Peak Hour			11:30	07:15	11:30	PM Peak Hour			16:00	17:15	16:00
AM Pk Volume			405	389	772	PM Pk Volume			698	424	1077
Pk Hr Factor			0.974	0.804	0.955	Pk Hr Factor			0.959	0.862	0.962
7 - 9 Volume	0	0	613	663	1276	4 - 6 Volume	0	0	1332	786	2118
7 - 9 Peak Hour			07:30	07:15	07:30	4 - 6 Peak Hour			16:00	17:00	16:00
7 - 9 Pk Volume	0	0	362	389	751	4 - 6 Pk Volume	0	0	698	407	1077
Pk Hr Factor	0.000	0.000	0.905	0.804	0.881	Pk Hr Factor	0.000	0.000	0.959	0.827	0.962

**VOLUME**

Main St E/O Peck Rd

Day: Tuesday  
Date: 5/22/2018City: Santa Paula  
Project #: CA18\_5369\_005

DAILY TOTALS					NB	SB	EB	WB	Total		
					0	0	2,665	2,434	5,099		
AM Period	NB	SB	EB	WB	TOTAL	PM Period	NB	SB	EB	WB	TOTAL
00:00			4	3	7	12:00			47	54	101
00:15			1	3	4	12:15			30	38	68
00:30			5	8	13	12:30			51	41	92
00:45			2	12	14	12:45			36	164	200
01:00			4	0	4	13:00			40	38	78
01:15			4	2	6	13:15			35	41	76
01:30			1	2	3	13:30			43	35	78
01:45			3	12	15	13:45			40	158	198
02:00			0	1	1	14:00			45	39	84
02:15			1	1	2	14:15			45	40	85
02:30			3	2	5	14:30			55	48	103
02:45			2	6	8	14:45			53	198	251
03:00			1	5	6	15:00			60	40	100
03:15			0	1	1	15:15			52	36	88
03:30			1	5	6	15:30			65	62	127
03:45			1	3	4	15:45			64	241	305
04:00			3	4	7	16:00			55	39	94
04:15			5	10	15	16:15			64	37	101
04:30			2	11	13	16:30			76	36	112
04:45			4	14	18	16:45			79	274	353
05:00			3	11	14	17:00			79	40	119
05:15			6	25	31	17:15			73	52	125
05:30			13	33	46	17:30			62	55	117
05:45			7	29	36	17:45			66	280	346
06:00			15	29	44	18:00			57	33	90
06:15			17	38	55	18:15			45	27	72
06:30			15	41	56	18:30			46	26	72
06:45			21	68	89	18:45			52	200	252
07:00			18	32	50	19:00			45	26	71
07:15			22	34	56	19:15			53	32	85
07:30			30	55	85	19:30			36	30	66
07:45			43	113	156	19:45			25	159	184
08:00			41	40	81	20:00			36	26	62
08:15			21	34	55	20:15			36	24	60
08:30			19	21	40	20:30			29	20	49
08:45			22	103	125	20:45			22	123	145
09:00			13	25	38	21:00			27	27	54
09:15			21	33	54	21:15			24	12	36
09:30			18	20	38	21:30			13	9	22
09:45			37	89	126	21:45			10	74	84
10:00			26	29	55	22:00			19	11	30
10:15			36	27	63	22:15			16	17	33
10:30			25	27	52	22:30			10	6	16
10:45			36	123	159	22:45			7	52	59
11:00			32	35	67	23:00			7	6	13
11:15			48	41	89	23:15			6	1	7
11:30			34	36	70	23:30			4	2	6
11:45			33	147	180	23:45			6	23	29
<b>TOTALS</b>			719	999	1718	<b>TOTALS</b>			1946	1435	3381
<b>SPLIT %</b>			41.9%	58.1%	33.7%	<b>SPLIT %</b>			57.6%	42.4%	66.3%

DAILY TOTALS					NB	SB	EB	WB	Total		
					0	0	2,665	2,434	5,099		
AM Peak Hour			11:15	07:15	11:45	PM Peak Hour			16:30	16:45	16:45
AM Pk Volume			162	191	343	PM Pk Volume			307	191	484
Pk Hr Factor			0.844	0.770	0.849	Pk Hr Factor			0.972	0.868	0.968
7 - 9 Volume	0	0	216	308	524	4 - 6 Volume	0	0	554	345	899
7 - 9 Peak Hour			07:15	07:15	07:15	4 - 6 Peak Hour			16:30	16:45	16:45
7 - 9 Pk Volume	0	0	136	191	327	4 - 6 Pk Volume	0	0	307	191	484
Pk Hr Factor	0.000	0.000	0.791	0.770	0.779	Pk Hr Factor	0.000	0.000	0.972	0.868	0.968

# VOLUME

Main St Bet. 4th St & 7th St

Day: Tuesday  
Date: 5/22/2018

City: Santa Paula  
Project #: CA18\_5369\_006

DAILY TOTALS					NB	SB	EB	WB	Total		
					0	0	4,933	4,070	9,003		
AM Period	NB	SB	EB	WB	TOTAL	PM Period	NB	SB	EB	WB	TOTAL
00:00			9	0	9	12:00			109	73	182
00:15			4	1	5	12:15			86	61	147
00:30			3	3	6	12:30			92	80	172
00:45			2	18	20	12:45			72	359	431
01:00			1	1	2	13:00			77	58	135
01:15			2	3	5	13:15			78	69	147
01:30			5	5	10	13:30			60	54	114
01:45			2	10	12	13:45			79	294	373
02:00			1	0	1	14:00			85	85	170
02:15			1	1	2	14:15			65	84	149
02:30			1	0	1	14:30			119	95	214
02:45			1	4	5	14:45			118	387	505
03:00			1	2	3	15:00			99	73	172
03:15			1	6	7	15:15			101	105	206
03:30			2	1	3	15:30			103	83	186
03:45			1	5	6	15:45			94	397	491
04:00			1	0	1	16:00			130	77	207
04:15			4	7	11	16:15			90	89	179
04:30			8	9	17	16:30			112	74	186
04:45			11	24	35	16:45			90	422	512
05:00			17	9	26	17:00			109	107	216
05:15			16	10	26	17:15			109	88	197
05:30			17	21	38	17:30			108	78	186
05:45			17	67	84	17:45			121	447	568
06:00			21	26	47	18:00			101	71	172
06:15			26	31	57	18:15			91	66	157
06:30			23	42	65	18:30			71	65	136
06:45			31	101	132	18:45			91	354	445
07:00			30	37	67	19:00			81	68	149
07:15			42	44	86	19:15			89	56	145
07:30			94	54	148	19:30			94	62	156
07:45			130	296	426	19:45			72	336	408
08:00			69	67	136	20:00			54	44	98
08:15			55	44	99	20:15			52	53	105
08:30			50	33	83	20:30			41	44	85
08:45			52	226	278	20:45			51	198	249
09:00			50	37	87	21:00			37	39	76
09:15			56	32	88	21:15			30	32	62
09:30			50	56	106	21:30			37	21	58
09:45			50	206	256	21:45			28	132	160
10:00			53	63	116	22:00			17	17	34
10:15			54	41	95	22:15			21	8	29
10:30			72	58	130	22:30			16	10	26
10:45			71	250	321	22:45			11	65	76
11:00			64	46	110	23:00			10	5	15
11:15			64	61	125	23:15			3	14	17
11:30			87	54	141	23:30			12	3	15
11:45			90	305	395	23:45			5	30	35
<b>TOTALS</b>			1512	1287	2799	<b>TOTALS</b>			3421	2783	6204
<b>SPLIT %</b>			54.0%	46.0%	31.1%	<b>SPLIT %</b>			55.1%	44.9%	68.9%

DAILY TOTALS					NB	SB	EB	WB	Total		
					0	0	4,933	4,070	9,003		
AM Peak Hour			11:45	11:45	11:45	PM Peak Hour			17:00	14:30	17:00
AM Pk Volume			377	299	676	PM Pk Volume			447	366	813
Pk Hr Factor			0.865	0.879	0.929	Pk Hr Factor			0.924	0.871	0.931
7 - 9 Volume	0	0	522	398	920	4 - 6 Volume	0	0	869	682	1551
7 - 9 Peak Hour			07:30	07:15	07:30	4 - 6 Peak Hour			17:00	16:45	17:00
7 - 9 Pk Volume	0	0	348	254	602	4 - 6 Pk Volume	0	0	447	358	805
Pk Hr Factor	0.000	0.000	0.669	0.713	0.687	Pk Hr Factor	0.000	0.000	0.924	0.836	0.931

**VOLUME**

Harvard Blvd Bet. 5th St &amp; 7th St

Day: Tuesday  
Date: 5/22/2018City: Santa Paula  
Project #: CA18\_5369\_007

DAILY TOTALS					NB	SB	EB	WB	Total					
					0	0	6,723	7,922	14,645					
AM Period	NB	SB	EB	WB	TOTAL	PM Period	NB	SB	EB	WB	TOTAL			
00:00			6	7	13	12:00			135	117	252			
00:15			6	6	12	12:15			124	135	259			
00:30			5	1	6	12:30			114	101	215			
00:45			8	25	6	12:45			104	477	109	462	213	939
01:00			3	0	3	13:00			108	128	236			
01:15			0	11	11	13:15			83	107	190			
01:30			7	0	7	13:30			100	143	243			
01:45			4	14	0	13:45			114	405	123	501	237	906
02:00			5	3	8	14:00			88	103	191			
02:15			2	1	3	14:15			107	130	237			
02:30			1	1	2	14:30			131	182	313			
02:45			1	9	3	14:45			146	472	190	605	336	1077
03:00			2	5	7	15:00			158	135	293			
03:15			1	4	5	15:15			130	139	269			
03:30			1	5	6	15:30			135	129	264			
03:45			1	5	6	15:45			121	544	146	549	267	1093
04:00			1	10	11	16:00			130	125	255			
04:15			8	11	19	16:15			143	174	317			
04:30			9	17	26	16:30			146	135	281			
04:45			20	38	23	16:45			130	549	164	598	294	1147
05:00			21	26	47	17:00			131	137	268			
05:15			31	52	83	17:15			137	160	297			
05:30			30	77	107	17:30			141	156	297			
05:45			53	135	76	17:45			123	532	194	647	317	1179
06:00			61	81	142	18:00			125	135	260			
06:15			51	86	137	18:15			107	110	217			
06:30			65	66	131	18:30			118	130	248			
06:45			51	228	70	18:45			118	468	128	503	246	971
07:00			39	87	126	19:00			104	156	260			
07:15			78	96	174	19:15			134	109	243			
07:30			113	223	336	19:30			110	100	210			
07:45			134	364	233	19:45			85	433	111	476	196	909
08:00			66	113	179	20:00			85	100	185			
08:15			73	83	156	20:15			76	95	171			
08:30			56	61	117	20:30			83	94	177			
08:45			62	257	87	20:45			72	316	87	376	159	692
09:00			66	80	146	21:00			85	85	170			
09:15			85	72	157	21:15			55	108	163			
09:30			90	79	169	21:30			59	55	114			
09:45			83	324	92	21:45			55	254	48	296	103	550
10:00			89	104	193	22:00			28	41	69			
10:15			81	82	163	22:15			28	23	51			
10:30			71	101	172	22:30			23	23	46			
10:45			89	330	88	22:45			30	109	20	107	50	216
11:00			82	102	184	23:00			18	15	33			
11:15			88	108	196	23:15			18	20	38			
11:30			118	85	203	23:30			11	13	24			
11:45			89	377	116	23:45			11	58	8	56	19	114
<b>TOTALS</b>				2106	2746	<b>4852</b>	<b>TOTALS</b>			4617	5176	<b>9793</b>		
<b>SPLIT %</b>				43.4%	56.6%	<b>33.1%</b>	<b>SPLIT %</b>			47.1%	52.9%	<b>66.9%</b>		

DAILY TOTALS					NB	SB	EB	WB	Total		
					0	0	6,723	7,922	14,645		
AM Peak Hour			11:30	07:15	07:15	PM Peak Hour			14:45	17:00	14:30
AM Pk Volume			466	665	1056	PM Pk Volume			569	647	1211
Pk Hr Factor			0.863	0.714	0.719	Pk Hr Factor			0.900	0.834	0.901
7 - 9 Volume	0	0	621	983	1604	4 - 6 Volume	0	0	1081	1245	2326
7 - 9 Peak Hour			07:15	07:15	07:15	4 - 6 Peak Hour			16:15	17:00	17:00
7 - 9 Pk Volume	0	0	391	665	1056	4 - 6 Pk Volume	0	0	550	647	1179
Pk Hr Factor	0.000	0.000	0.729	0.714	0.719	Pk Hr Factor	0.000	0.000	0.942	0.834	0.930

### VOLUME

10th St Bet. Harvard Blvd & Ventura St

Day: Tuesday  
Date: 5/22/2018

City: Santa Paula  
Project #: CA18\_5369\_008

DAILY TOTALS					NB	SB	EB	WB	Total		
					7,009	8,260	0	0	15,269		
AM Period	NB	SB	EB	WB	TOTAL	PM Period	NB	SB	EB	WB	TOTAL
00:00	19	4			23	12:00	81	109			190
00:15	17	14			31	12:15	100	108			208
00:30	8	4			12	12:30	81	110			191
00:45	5	49	4	26	9	12:45	82	344	103	430	185
01:00	8	2			10	13:00	92	105			197
01:15	4	10			14	13:15	102	105			207
01:30	4	4			8	13:30	101	125			226
01:45	5	21	3	19	8	13:45	117	412	120	455	237
02:00	5	4			9	14:00	100	112			212
02:15	5	5			10	14:15	141	138			279
02:30	4	5			9	14:30	116	140			256
02:45	1	15	5	19	6	14:45	111	468	149	539	260
03:00	7	7			14	15:00	136	149			285
03:15	4	12			16	15:15	133	159			292
03:30	3	16			19	15:30	131	142			273
03:45	2	16	19	54	21	15:45	153	553	132	582	285
04:00	3	18			21	16:00	141	173			314
04:15	11	26			37	16:15	136	123			259
04:30	19	41			60	16:30	133	122			255
04:45	10	43	55	140	65	16:45	161	571	128	546	289
05:00	13	65			78	17:00	144	155			299
05:15	27	105			132	17:15	151	143			294
05:30	42	153			195	17:30	138	142			280
05:45	43	125	131	454	174	17:45	151	584	115	555	266
06:00	43	129			172	18:00	147	90			237
06:15	51	114			165	18:15	125	102			227
06:30	80	175			255	18:30	140	104			244
06:45	96	270	147	565	243	18:45	156	568	85	381	241
07:00	73	163			236	19:00	101	77			178
07:15	104	156			260	19:15	119	103			222
07:30	109	181			290	19:30	108	74			182
07:45	110	396	186	686	296	19:45	70	398	73	327	143
08:00	124	151			275	20:00	82	70			152
08:15	88	136			224	20:15	60	68			128
08:30	101	146			247	20:30	89	55			144
08:45	87	400	128	561	215	20:45	99	330	63	256	162
09:00	81	112			193	21:00	89	56			145
09:15	61	116			177	21:15	68	81			149
09:30	74	112			186	21:30	73	54			127
09:45	67	283	110	450	177	21:45	56	286	35	226	91
10:00	84	99			183	22:00	32	37			69
10:15	74	111			185	22:15	42	23			65
10:30	60	98			158	22:30	36	22			58
10:45	82	300	96	404	178	22:45	40	150	21	103	61
11:00	68	128			196	23:00	29	19			48
11:15	57	90			147	23:15	28	13			41
11:30	86	112			198	23:30	33	19			52
11:45	98	309	94	424	192	23:45	28	118	7	58	35
<b>TOTALS</b>	<b>2227</b>	<b>3802</b>			<b>6029</b>	<b>TOTALS</b>	<b>4782</b>	<b>4458</b>			<b>9240</b>
<b>SPLIT %</b>	<b>36.9%</b>	<b>63.1%</b>			<b>39.5%</b>	<b>SPLIT %</b>	<b>51.8%</b>	<b>48.2%</b>			<b>60.5%</b>

DAILY TOTALS					NB	SB	EB	WB	Total		
					7,009	8,260	0	0	15,269		
AM Peak Hour	07:15	07:00			07:15	PM Peak Hour	16:45	15:15			15:15
AM Pk Volume	447	686			1121	PM Pk Volume	594	606			1164
Pk Hr Factor	0.901	0.922			0.947	Pk Hr Factor	0.922	0.876			0.927
7 - 9 Volume	796	1247	0	0	2043	4 - 6 Volume	1155	1101	0	0	2256
7 - 9 Peak Hour	07:15	07:00			07:15	4 - 6 Peak Hour	16:45	16:45			16:45
7 - 9 Pk Volume	447	686	0	0	1121	4 - 6 Pk Volume	594	568	0	0	1162
Pk Hr Factor	0.901	0.922	0.000	0.000	0.947	Pk Hr Factor	0.922	0.916	0.000	0.000	0.972



**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
(916) 373-3710  
(916) 373-5471 Fax



October 26, 2016

Janna Minsk / Trayci Nelson  
City of Santa Paula / Michael Baker International

Sent via e-mail: [jminsk@spcity.org](mailto:jminsk@spcity.org)  
Cc: [tnelson@mbakerintl.com](mailto:tnelson@mbakerintl.com)

RE: Proposed Santa Paula West Business Park Specific Plan Project, City of Santa Paula, Ventura County, California

Dear Ms. Minsk and Ms. Nelson:

Government Code §65352.3 requires **local governments** to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting, and/or mitigating impacts to cultural places in creating or amending general plans, including specific plans. Attached is a consultation list of tribes traditionally and culturally affiliated with the area that may have cultural places located within the boundaries of the project referenced above.

As a part of consultation, the NAHC recommends that local governments conduct record searches through the NAHC and California Historic Resources Information System (CHRIS) to determine if any cultural places are located within the area(s) affected by the proposed action. The form to request searches of the NAHC Sacred Lands File (SLF) can be found at <http://nahc.ca.gov/wp-content/uploads/2015/08/Local-Government-Tribal-Consultation-List-Request-Form-Update.pdf>.

Local governments should be aware that records maintained by the NAHC and CHRIS are not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of tribal cultural resources.

If you receive notification of change of addresses and phone numbers from tribes on the attached list, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov).

Sincerely,

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



**Native American Heritage Commission  
Tribal Consultation List  
Ventura County  
10/26/2016**

***Barbareno/Ventureno Band of  
Mission Indians***

Julie Lynn Tumamait-Stennsle,  
Chairperson  
365 North Poli Ave                      Chumash  
Ojai, CA, 93023  
Phone: (805)646-6214  
jtumamait@hotmail.com

***Coastal Band of the Chumash  
Nation***

Mia Lopez, Chairperson  
Phone: (805) 324 - 0135                      Chumash  
cbctribalchair@gmail.com

***Northern Chumash Tribal  
Council***

Fred Collins, Spokesperson  
67 South Street                              Chumash  
San Luis Obispo, CA, 93401  
fcollins@northernchumash.org

***Santa Ynez Band of Mission  
Indians***

Kenneth Kahn, Chairperson  
P.O. Box 517                                  Chumash  
Santa Ynez, CA, 93460  
Phone: (805) 688 - 7997  
Fax: (805) 686-9578  
kkahn@santaynezchumash.org

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 6097.98 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Government Code Sections 65352.3 and 65362.4 et seq for the proposed Santa Paula West Business Park Specific Plan Project, Ventura County.



"Citrus Capital of the World"

# City of Santa Paula

970 Ventura Street • Santa Paula, California • Mailing Address: P.O. Box 569 • 93061 • Phone: (805) 525-4478 • Fax: (805) 525-6278

November 3, 2016

Barbareño/Ventureño Band of Mission Indians  
Julie Tumamait-Stenslie  
Chairperson  
365 North Poll Avenue  
Ojai, CA 93023

**Subject: Senate Bill 18 Consultation Notification for the proposed Santa Paula West Business Park Specific Plan (Project No. 13-CDP-04) (City of Santa Paula/County of Ventura)**

Dear Ms. Tumamait-Stenslie:

The City of Santa Paula has completed the Draft Environmental Impact Report (DEIR) for the Santa Paula West Business Park Specific Plan project and is starting the 45-day public review period required by the California Environmental Quality Act (CEQA) process. In addition, since the project involves a Specific Plan, the City is contacting and consulting with California Native American tribes in compliance with Senate Bill 18 (SB18). As such, the City of Santa Paula is sending the Barbareño/Ventureño Band of Mission Indians this consultation notification in compliance with SB18. The purpose of this consultation notification is to obtain any questions, comments, or concerns you may have pertaining to the proposed project. The City of Santa Paula values your input regarding the proposed project and encourages you to submit comments. As defined in SB18, this notification begins the 90-day comment period which will run concurrent with the 45-day CEQA review period.

The City of Santa Paula is the lead agency for the Santa Paula West Business Park Specific Plan project. The Specific Plan site is a 53.81-acre (agricultural land) area near the western boundary of the City of Santa Paula and currently lies within the unincorporated County of Ventura. The site is bound to the north by Telegraph Road, to the south by SR 126, to the east by existing industrial and commercial development in the existing City limits, and to the west by the Adams Barranca and agricultural operations. The site is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way.

The Specific Plan would guide future land use development on approximately 53.81 acres of the City's 125-acre West Area 2 designation. West Area 2 was included as an expansion area in the City's General Plan, which was approved by the City of Santa Paula in 1998. This designation allows for a variety of 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 would 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 Commercial/Light Industrial and Light Industrial zones.

If you have any questions or wish to schedule a formal consultation, please do not hesitate to contact me at (805) 933-4214 x244 or via e-mail at [jminsk@spcity.org](mailto:jminsk@spcity.org). You may also contact Trayci Nelson, the Project Manager, at (562) 202-2492 or via email at [tnelson@mbakerintl.com](mailto:tnelson@mbakerintl.com).

Sincerely,

Janna Minsk, AICP  
Planning Director

Enclosures



"Citrus Capital of the World"

# City of Santa Paula

970 Ventura Street • Santa Paula, California • Mailing Address: P.O. Box 569 • 93061 • Phone: (805) 525-4478 • Fax: (805) 525-6278

November 3, 2016

Coastal Band of the Chumash Nation  
Mia Lopez  
Chairperson  
cbctribalchair@gmail.com  
(via email)

**Subject: Senate Bill 18 Consultation Notification for the proposed Santa Paula West Business Park Specific Plan (Project No. 13-CDP-04) (City of Santa Paula/County of Ventura)**

Dear Ms. Lopez:

The City of Santa Paula has completed the Draft Environmental Impact Report (DEIR) for the Santa Paula West Business Park Specific Plan project and is starting the 45-day public review period required by the California Environmental Quality Act (CEQA) process. In addition, since the project involves a Specific Plan, the City is contacting and consulting with California Native American tribes in compliance with Senate Bill 18 (SB18). As such, the City of Santa Paula is sending the Coastal Band of the Chumash Nation this consultation notification in compliance with SB18. The purpose of this consultation notification is to obtain any questions, comments, or concerns you may have pertaining to the proposed project. The City of Santa Paula values your input regarding the proposed project and encourages you to submit comments. As defined in SB18, this notification begins the 90-day comment period which will run concurrent with the 45-day CEQA review period.

The City of Santa Paula is the lead agency for the Santa Paula West Business Park Specific Plan project. The Specific Plan site is a 53.81-acre (agricultural land) area near the western boundary of the City of Santa Paula and currently lies within the unincorporated County of Ventura. The site is bound to the north by Telegraph Road, to the south by SR 126, to the east by existing industrial and commercial development in the existing City limits, and to the west by the Adams Barranca and agricultural operations. The site is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way.

The Specific Plan would guide future land use development on approximately 53.81 acres of the City's 125-acre West Area 2 designation. West Area 2 was included as an expansion area in the City's General Plan, which was approved by the City of Santa Paula in 1998. This designation allows for a variety of 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 would 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 Commercial/Light Industrial and Light Industrial zones.

If you have any questions or wish to schedule a formal consultation, please do not hesitate to contact me at (805) 933-4214 x244 or via e-mail at [jminsk@spcity.org](mailto:jminsk@spcity.org). You may also contact Trayci Nelson, the Project Manager, at (562) 202-2492 or via email at [tnelson@mbakerintl.com](mailto:tnelson@mbakerintl.com).

Sincerely,

Janna Minsk, AICP  
Planning Director

Enclosures



"Citrus Capital of the World"

# City of Santa Paula

970 Ventura Street • Santa Paula, California • Mailing Address: P.O. Box 569 • 93061 • Phone: (805) 525-4478 • Fax: (805) 525-6278

November 3, 2016

Northern Chumash Tribal Council  
Fred Collins  
Spokesperson  
67 South Street  
San Luis Obispo, CA 93401

**Subject: Senate Bill 18 Consultation Notification for the proposed Santa Paula West Business Park Specific Plan (Project No. 13-CDP-04) (City of Santa Paula/County of Ventura)**

Dear Mr. Collins:

The City of Santa Paula has completed the Draft Environmental Impact Report (DEIR) for the Santa Paula West Business Park Specific Plan project and is starting the 45-day public review period required by the California Environmental Quality Act (CEQA) process. In addition, since the project involves a Specific Plan, the City is contacting and consulting with California Native American tribes in compliance with Senate Bill 18 (SB18). As such, the City of Santa Paula is sending the Northern Chumash Tribal Council this consultation notification in compliance with SB18. The purpose of this consultation notification is to obtain any questions, comments, or concerns you may have pertaining to the proposed project. The City of Santa Paula values your input regarding the proposed project and encourages you to submit comments. As defined in SB18, this notification begins the 90-day comment period which will run concurrent with the 45-day CEQA review period.

The City of Santa Paula is the lead agency for the Santa Paula West Business Park Specific Plan project. The Specific Plan site is a 53.81-acre (agricultural land) area near the western boundary of the City of Santa Paula and currently lies within the unincorporated County of Ventura. The site is bound to the north by Telegraph Road, to the south by SR 126, to the east by existing industrial and commercial development in the existing City limits, and to the west by the Adams Barranca and agricultural operations. The site is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way.

The Specific Plan would guide future land use development on approximately 53.81 acres of the City's 125-acre West Area 2 designation. West Area 2 was included as an expansion area in the City's General Plan, which was approved by the City of Santa Paula in 1998. This designation allows for a variety of 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 would 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 Commercial/Light Industrial and Light Industrial zones.

If you have any questions or wish to schedule a formal consultation, please do not hesitate to contact me at (805) 933-4214 x244 or via e-mail at [jminsk@spcity.org](mailto:jminsk@spcity.org). You may also contact Trayci Nelson, the Project Manager, at (562) 202-2492 or via email at [tnelson@mbakerintl.com](mailto:tnelson@mbakerintl.com).

Sincerely,

Janna Minsk, AICP  
Planning Director

Enclosures



"Citrus Capital of the World"

# City of Santa Paula

970 Ventura Street • Santa Paula, California • Mailing Address: P.O. Box 569 • 93061 • Phone: (805) 525-4478 • Fax: (805) 525-6278

November 3, 2016

Santa Ynez Band of Mission Indians  
Kenneth Kahn  
Chairperson  
P.O. Box 517  
Santa Ynez, CA 93460

**Subject: Senate Bill 18 Consultation Notification for the proposed Santa Paula West Business Park Specific Plan (Project No. 13-CDP-04) (City of Santa Paula/County of Ventura)**

Dear Mr. Kahn:

The City of Santa Paula has completed the Draft Environmental Impact Report (DEIR) for the Santa Paula West Business Park Specific Plan project and is starting the 45-day public review period required by the California Environmental Quality Act (CEQA) process. In addition, since the project involves a Specific Plan, the City is contacting and consulting with California Native American tribes in compliance with Senate Bill 18 (SB18). As such, the City of Santa Paula is sending the Santa Ynez Band of Mission Indians this consultation notification in compliance with SB18. The purpose of this consultation notification is to obtain any questions, comments, or concerns you may have pertaining to the proposed project. The City of Santa Paula values your input regarding the proposed project and encourages you to submit comments. As defined in SB18, this notification begins the 90-day comment period which will run concurrent with the 45-day CEQA review period.

The City of Santa Paula is the lead agency for the Santa Paula West Business Park Specific Plan project. The Specific Plan site is a 53.81-acre (agricultural land) area near the western boundary of the City of Santa Paula and currently lies within the unincorporated County of Ventura. The site is bound to the north by Telegraph Road, to the south by SR 126, to the east by existing industrial and commercial development in the existing City limits, and to the west by the Adams Barranca and agricultural operations. The site is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way.

The Specific Plan would guide future land use development on approximately 53.81 acres of the City's 125-acre West Area 2 designation. West Area 2 was included as an expansion area in the City's General Plan, which was approved by the City of Santa Paula in 1998. This designation allows for a variety of 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 would 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 Commercial/Light Industrial and Light Industrial zones.

If you have any questions or wish to schedule a formal consultation, please do not hesitate to contact me at (805) 933-4214 x244 or via e-mail at [jminsk@spcity.org](mailto:jminsk@spcity.org). You may also contact Trayci Nelson, the Project Manager, at (562) 202-2492 or via email at [tnelson@mbakerintl.com](mailto:tnelson@mbakerintl.com).

Sincerely,

Janna Minsk, AICP  
Planning Director

Enclosures

**APPENDIX D**

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**Final Water Supply Assessment**

**Final**  
**Water Supply Assessment**  
  
**For the Proposed**  
**Santa Paula West Business Park**  
  
**Specific Plan**

**Prepared for:**

City of Santa Paula  
Planning Department  
200 South 10th Street  
Santa Paula, California, 93060

**Prepared by:**

Meridian Consultants LLC  
920 Hampshire Road, Suite A5  
Westlake Village, California 91361

**January 2018**

## TABLE OF CONTENTS

Section	Page
EXECUTIVE SUMMARY .....	ES-1
1.0 INTRODUCTION.....	1.0-1
1.1 Purpose of Document .....	1.0-1
1.2 Location.....	1.0-2
1.3 Project Description .....	1.0-4
1.4 Project Specific Water Demand .....	1.0-9
1.5 Regulatory Setting.....	1.0-12
2.0 WATER DEMANDS.....	2.0-1
2.1 Historical and Current Conditions.....	2.0-1
2.2 Water Conservation Measures .....	2.0-3
3.0 WATER SUPPLY ASSESSMENT .....	3.0-1
3.1 Identification of Water Sources .....	3.0-1
3.2 Analysis of Water Supply and Demand.....	3.0-20
3.3 Conclusions .....	3.0-26
4.0 LIST OF ACRONYMS.....	4.0-1
5.0 REFERENCES.....	5.0-1



## LIST OF FIGURES

Figure		Page
1	Regional Location Map .....	1.0-3
2	Project Location Map.....	1.0-6
3	Zoning Implementation Plan.....	1.0-7
4	Conceptual Domestic and Recycled Water Plan.....	1.0-10
5	Conceptual Sewer Plan .....	1.0-11

## LIST OF TABLES

Table		Page
1	Land Use Summary .....	1.0-5
2	Estimated Project Water Demands .....	1.0-9
3	Existing Well Pumping Records 2010-2014 .....	2.0-3
4	Water Shortage Contingency—Rationing Stages to Address Water Supply Shortages .....	2.0-7
5	Summary of Recent Groundwater Extractions .....	3.0-4
6	City of Santa Paula Water Production .....	3.0-5
7	City of Santa Paula Groundwater Resources 2015 .....	3.0-5
8	Annual Precipitation Totals: 2010–2016.....	3.0-7
9	Historical Santa Paula Basin Groundwater Extractions .....	3.0-8
10	Santa Paula Basin Water Allocations (2016).....	3.0-10
11	Existing and Projected City Water Resources and Demand (afy) 2016 UWMP.....	3.0-14
12	SWP Historical Deliveries: 2010–2017 .....	3.0-17
13	Projected City of Santa Paula 2016 UWMP Recycled Water Demand (afy) .....	3.0-19
14	Projected Supply Reliability by Source.....	3.0-21
15	Supply and Demand Comparison 2016 UWMP—Average Year (afy).....	3.0-21
16	Supply and Demand Comparison 2016 UWMP—Single Dry Year (afy).....	3.0-22
17	Supply and Demand Comparison 2016 UWMP—Multiple Dry Years (afy) .....	3.0-22
18	Project Supply and Demand Comparison 2016 UWMP—Average Year (afy) .....	3.0-24

## EXECUTIVE SUMMARY

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The purpose of this water supply assessment (WSA) is to document the sufficiency of the local water supply to meet the demand of development that could occur under the Santa Paula West Business Park Specific Plan (“Specific Plan” or “Project”). The Specific Plan area (“Project Site”) covers an area of approximately 53.81 acres of the West Area 2 Expansion Area of the City of Santa Paula’s General Plan. The Project includes the annexation of the Specific Plan area into the incorporated City limits. The Project includes a series of related actions, such as an amendment to the City’s General Plan Land Use Element and the zoning designations from the rezoning of the annexation area.

The Project land use designations, zoning, development standards, and other related land use specifications will govern future permitting of developments within the Specific Plan area. The Specific Plan designates the Project Site for light industrial and commercial uses, which is consistent with existing City rezoning and General Plan designations. These designations allow for the development of land uses consistent with offices, manufacturing, research and development, professional office, and limited commercial retail uses. Under the Specific Plan, these land use areas designated for development are integrated into one cohesive business park type of layout, complete with vehicular circulation, pedestrian walkways, and utility infrastructure.

The City’s General Plan requires the preparation and adoption of a Specific Plan for any identified expansion area prior to the City initiating annexation of the area to the City. Prior to considering the proposed Specific Plan for approval, the City is required to comply with the California Environmental Quality Act (CEQA). The City is currently preparing an Environmental Impact Report (EIR) to comply with CEQA.

The California Water Code (Sections 10910 through 10915) requires the preparation of a WSA by the public water system supplier that would provide water to the proposed project for all projects as defined in Section 10912 of the Water Code. This includes any mixed-use project including commercial space with a floor area greater than 250,000 square feet. The goal of a WSA is to provide information on the availability of water supplies to be included in EIRs.

The City of Santa Paula Public Works Department, Water Division, provides water service in the City of Santa Paula and would provide water service to the proposed Project after annexation of the site to the City. Currently, the Santa Paula Groundwater Basin (“Santa Paula Basin”) is the City’s sole source of water supply. Rights to withdraw groundwater from the Santa Paula Basin have been adjudicated, and the Santa Paula Basin is managed in accordance with this adjudication to ensure a safe groundwater yield. Recent

demand for water for the existing agricultural and associated uses on Santa Paula West Specific Plan site has averaged approximately 281.1 acre-feet per year (afy).

The eastern boundary of the Santa Paula Basin also demarcates the western boundary of the Fillmore Groundwater Basin (“Fillmore Basin”), which is generally located to the northeast of the Santa Paula Basin and upstream in relation to the Santa Clara River, which flows across both basins.

The City is required under California Water Code (Sections 10610 to 10656) to assess citywide water supply and demand during the next 20 years in 5-year increments in its Urban Water Management Plan (UWMP). The City completed its 2016 UWMP Update in 2017. The 2016 UWMP addresses water planning, including recycled water planning during a 20-year period in 5-year increments; identifies and quantifies adequate water supplies for existing and future water demands in normal, dry, and multiple dry years; identifies actions to prepare for and implement during a catastrophic interruption of water supplies; and implements conservation and efficient use of urban water supplies. No decrease in availability of groundwater supplies is anticipated through the year 2040.

Conservative assumptions concerning future water demand are used in this WSA. The City’s 2016 UWMP provides per capita and specific use (commercial, industrial, and residential) demand rates for estimating future water demand. This WSA utilizes the commercial and industrial rates provided in the UWMP.

The City has constructed a new Water Recycling Facility (WRF). The City WRF will produce recycled water that meets California Title 22 regulations. The WRF has a permitted dry-weather capacity of 4.2 million gallons per day (mgd) and a permitted wet-weather (also maximum) capacity of 8.0 mgd. Recycled water is anticipated to be available for irrigation of landscape areas in 2020.

To estimate water demand for the type and amount of land uses that would be permitted by the proposed Project, the water demand factors contained in the City’s 2016 UWMP were used. Based on these factors, the annual average water demand for the proposed Project is approximately 39.7 afy (20.4 afy for Commercial/Light Industrial use, 1.5 afy for Light Industrial use, and 17.8 afy for landscape irrigation).

The estimated supply for West Area 2 per the 2016 UWMP Update is 87.7 afy.<sup>1</sup> The potable demand of 21.9 afy for the Commercial/Light Industrial and Light Industrial uses is 25 percent of the West Area 2 total supply estimation. The landscape areas will be irrigated using recycled water to be delivered from the City’s wastewater treatment plant.

---

1 City of Santa Paula, *Final Urban Water Management Plan [UWMP] 2016 Update* (August 2017), 46, Table 3-2 (1,905,750 square feet of development at 15 gal/sq ft/year is 87.7 afy).

The Project will replace existing agricultural uses on the site. As such, water currently used for agricultural irrigation will be used instead for Project consumption. Currently, agricultural uses on the Project Site use approximately 281.1 afy (average during the past 5 years; see **Table 3**). As such, the proposed Project's consumption will be a net reduction in total water use of 241.4 afy (281.1 afy current agricultural water use less 39.7 afy projected water use equals 241.4 afy net reduction in water use).

It should be noted that the West Area 2 Planning Area has an estimated supply of 87.7 afy based on future development. The proposed Project could utilize a portion of this allocation. However, with the removal of the agricultural uses currently on the Project Site, the Project can a portion of the existing water currently used for irrigation. Existing wells will be utilized for construction water as the site is graded, in accordance with the Specific Plan, and then will be abandoned pursuant to state and local regulations.

The Project will use recycled water (17.8 afy) that will be available from the City's wastewater treatment facility for irrigation; this will further reduce the demand on potable water supplies. The City's 2016 UWMP forecast having between 400 afy (2020) and 2,000 afy (2040) of recycled water available for use (see **Table 13**). Based on these forecasts, the Project will require only a portion of the recycled water (4.45 percent in 2020 and 0.89 percent in 2040).

The Santa Paula West Business Park recycled water system would operate via a proposed 12-inch distribution main called for by the City's Recycled Water Plan. This will allow the project to use recycled water when the City extends a recycled water line to the site and the plant is producing sufficient recycled water to supply the site.

In accordance with the City of Santa Paula Municipal Code, landowners or developers are required to either provide water rights sufficient to serve the property or pay an equivalent in-lieu fee as a condition of project approval or when the property is annexed. Upon annexation, the applicants will transfer a portion of these rights in sufficient quantity to meet all the anticipated water demands of the project.

In summary, this Water Supply Assessment for the proposed Project concludes that the City of Santa Paula's projected water supply for the 20-year period from 2017 to 2037 is adequate to meet the demand projected for the project, existing and planned future uses in the City in normal, single dry, and multiple dry years.

## 1.0 INTRODUCTION

---

The environmental review of the proposed Project is being prepared in compliance with the California Environmental Quality Act (CEQA) process. The City of Santa Paula (“City”), the Public Water System (PWS) for the proposed Project, has determined that a water supply assessment (WSA) is necessary to complete the proposed Project’s CEQA process.

### 1.1 PURPOSE OF DOCUMENT

The purpose of this water assessment is to document the sufficiency of the local water supply to meet the demand associated with the proposed land uses of the Santa Paula West Business Park Specific Plan (proposed Project). It should be noted that this WSA addresses the overall water supply available to the City to meet the demands of existing customers and other future demands.

Adequacy of the delivery system is addressed in the City’s Final 2016 Urban Water Management Plan Update (Final 2016 UWMP Update). The WSA reviews and makes a finding of reasonable sufficiency of water supplies that either are available or will be available to the City to meet future demand. The California Water Code requires a determination for a 20-year period (2017–2037) from the start of project development.

#### 1.1.1 Water Supply Assessment

Requirements for the preparation of a WSA are set forth in Section 10910 of the California Water Code (“Water Code”) in accordance with SB 610, which was enacted in 2001 and became effective January 1, 2002. The Water Code requires a WSA be prepared for any project that would consist of one or more of the following:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space
- A hotel or motel with more than 500 rooms
- An industrial, manufacturing or processing plant, or industrial park planned to house more than 1,000 people, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- A mixed-use project that includes one or more of the projects specified above
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project

- For public water systems with fewer than 5,000 service connections, a project that meets the following criteria:
  - A proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of a public water system’s existing service connections
  - A mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by residential development that would represent an increase of 10 percent or more in the number of the public water system’s existing service connections

The proposed development is a “project” as defined by Water Code Section 10912 and requires a WSA because it consists of an industrial park occupying more than 40 acres of land.

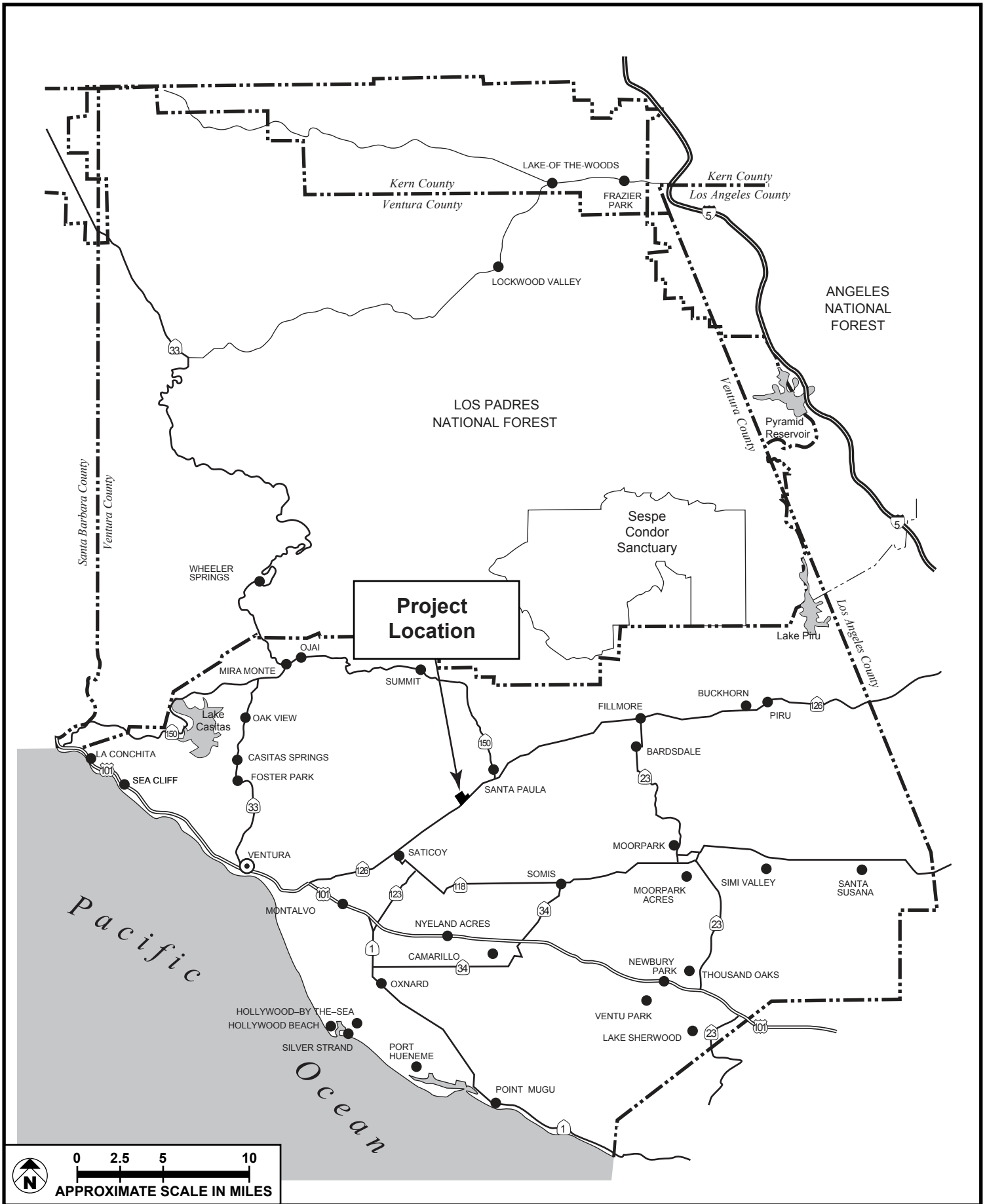
Section 10657 of the California Water Code requires cities and counties to request specific information on water supplies from the PWS that would serve any project that is subject to CEQA and is defined as a project in Water Code Section 10912. This information is to be incorporated into the environmental review document prepared pursuant to CEQA.

## 1.2 LOCATION

### 1.2.1 Regional Setting

The Santa Paula West Business Park Specific Plan area is directly adjacent to the western boundary of the City of Santa Paula, within the City Urban Restriction Boundary (CURB) of the City.

The City encompasses 4.5 square miles of incorporated area located approximately 17 miles inland from the Pacific Ocean in central Ventura County, as shown in **Figure 1, Regional Location Map**. The City lies within the Santa Clara River Valley, approximately 12 miles east of the City of San Buenaventura and approximately 9 miles west of the City of Fillmore.



SOURCE: Meridian Consultants – 2015

FIGURE 1

## 1.2.2 Community Setting

The Project Site is bound to the north by Telegraph Road, to the east by existing industrial and commercial development in the existing Santa Paula city limits, to the south by agriculture, and to the west by the Adams Barranca.

The Santa Paula West Business Park is located within the CURB of the City of Santa Paula, with frontage along State Route 126 and Telegraph Road, and is bisected by the railroad right-of-way as illustrated on **Figure 2, Project Location Map**. While it is just west of the Santa Paula City limits, it is within the City of Santa Paula Sphere of influence (SOI), and is outside of the Santa Paula–Ventura Greenbelt. Annexation of the Santa Paula West Business Park into the City of Santa Paula is planned to occur as part of the Specific Plan approval process.

## 1.3 PROJECT DESCRIPTION

### 1.3.1 Specific Plan Overview

The proposed Project consists of a specific plan for 53.81 acres of area located within the City's SOI. The uses envisioned within the Santa Paula West Business Park will be a mix of low-intensity industrial (such as light manufacturing or research and development), professional office, and supporting commercial businesses that are currently permitted in the Commercial/Light industrial and Light Industrial Zones of the City of Santa Paula.

The Santa Paula West Business Park Specific Plan would be adopted by the City, which would approve any request for annexation into the City. The Specific Plan would establish the necessary plans, development standards, regulations, infrastructure requirements, design guidelines, and implementation programs on which subsequent Project-related development activities would be founded.

It is intended that local public works projects, design review plans, detailed site plans, grading and building permits, or any other action requiring ministerial or discretionary approval applicable to the Project Site would be consistent with the Specific Plan.

The 20-year scenario is used to illustrate total Project demand within the required 20-year WSA time frame (2017-2037) established by SB 610.

### 1.3.2 Land Use Plan

The proposed Project would be a mix of low-intensity industrial (such as light manufacturing or research and development), professional office, and supporting commercial businesses that are currently permitted in the Commercial/Light industrial (C-LI) and Light Industrial Zones (LI) of the City of Santa Paula. These uses would cover approximately 41.96 acres, as shown in **Figure 3, Zoning Implementation Plan**.



In addition, the Project would have approximately 4.9 acres of open space and approximately 6.95 acres of roadways that would not require any use of water. The Project Site would total approximately 53.81 acres, as shown in **Table 1, Land Use Summary**.

**Table 1**  
**Land Use Summary**

<b>Land Use Type</b>	<b>Acres</b>	<b>Percent of Site</b>
Commercial/Light Industrial	41.96	78.0%
Roadways (Approximate)	6.95	12.9%
Open Space/Passive	4.90	9.1%
<b>Gross Area of SP West BP</b>	<b>53.81</b>	<b>100.0%</b>

The Santa Paula West Business Park Specific Plan includes lists of permitted uses, including those permitted without any conditions and those that require conditional use permits (CUPs) and public use permits. All development within the Santa Paula West Business Park will adhere to the standards of the Specific Plan.

### **1.3.3 Water and Wastewater**

#### ***Public Water Supply***

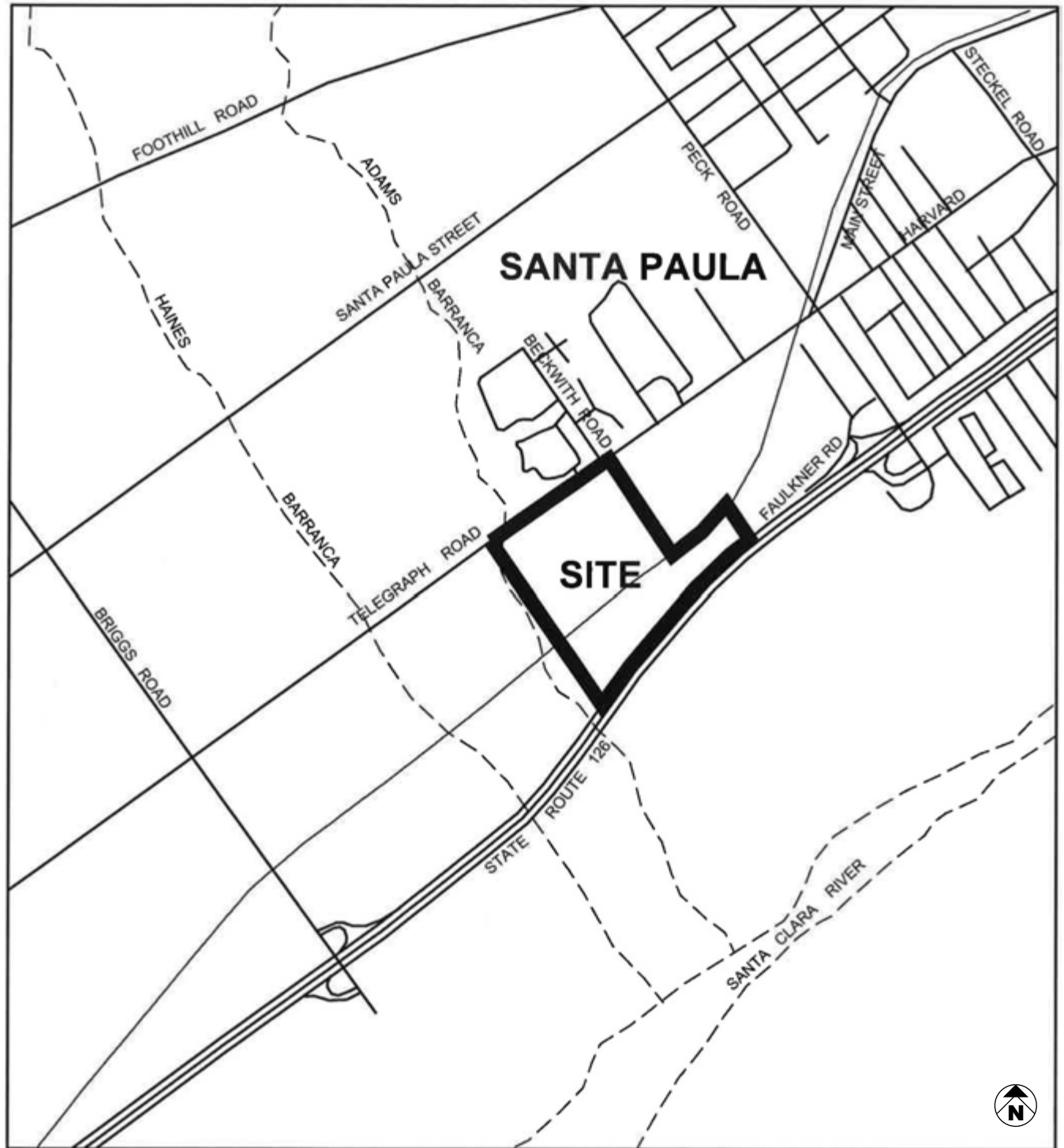
Surface water and groundwater resources within the City of Santa Paula are managed by the United Water Conservation District. However, the City is responsible for water supply and distribution within its 4.5-square-mile service area. The Project is located outside of the City's corporate boundary but within the West Area 2 identified in the General Plan for future expansion. A portion of the Project area is currently located in the City's water service area, and the entire site would be located within the City's service area after annexation of the site to the City.

As of 2015, the City had approximately 7,400 connections, and total demand within the City was 3,907 acre-feet (af).<sup>2</sup> The City does not generally provide wholesale water to any other agencies nor sell water to customers outside the City's service area. However, in 2010 the City provided 39 af to the Middleroad Mutual Water Company, and 44 af in 2015. The City does not use potable supplies for saline barriers, groundwater recharge, conjunctive use, raw water, or recycled water uses.<sup>3</sup>

Development in the City has been dependent on groundwater as a source of supply. However, the demand for groundwater is within the limits of natural recharge of the Santa Paula Basin.

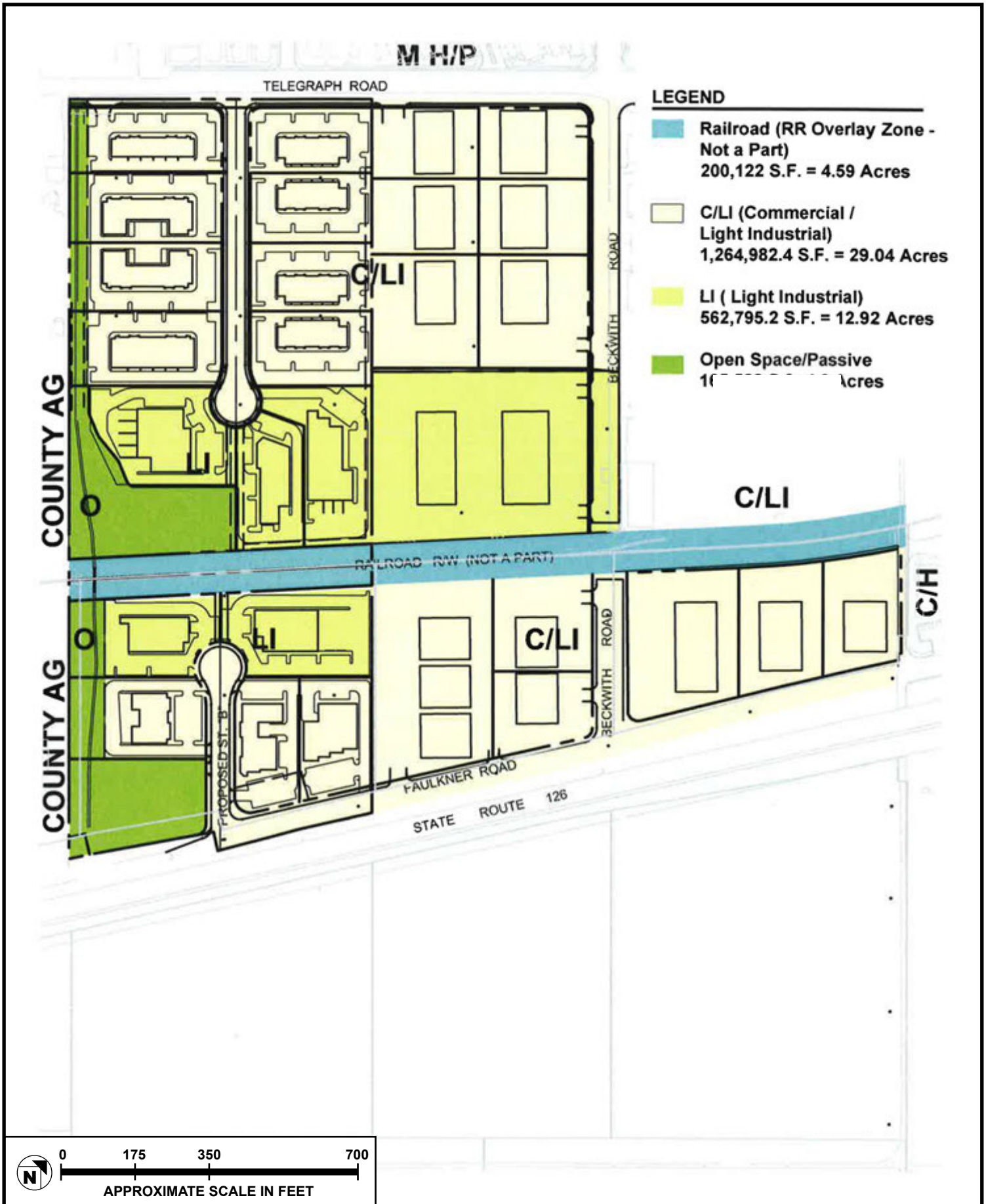
<sup>2</sup> City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 3

<sup>3</sup> City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 42.



SOURCE: Jensen Design and Survey – October 2016

FIGURE 2



SOURCE: Jensen Design and Survey – October 2016

FIGURE 3

## **Potable Water**

The City of Santa Paula would provide water service for the Project Site. Existing wells will be utilized for construction water as the site is graded, in accordance with the Specific Plan, and then will be abandoned pursuant to state and local regulations.

As shown on **Figure 4, Conceptual Domestic and Recycled Water Plan**, the system for the Specific Plan domestic water system would operate entirely within the City's 200 Zone, and would receive water via proposed 12-inch distribution mains as called for in the City's Potable Water System Master Plan. The points of connection (POCs) for the Project will be at Faulkner Road and Telegraph Road. The existing 8-inch ACP located in Beckwith Road will remain in place.

From the POC, a new 12-inch line will proceed north through the proposed Project. The proposed potable distribution system will comprise 8-inch through 12-inch mains. The water mains located in Beckwith Road, Road "A," and Faulkner Road will be publicly owned and maintained, while the remaining on-site domestic water and fire lines be master metered.

## **Irrigation and Fire Suppression System**

A water system analysis would be prepared during the final construction documents to ensure that the required fire flow is provided at each fire hydrant and each fire sprinkler system. Every building would be required to provide an approved fire sprinkler system.

## **Wastewater**

The City of Santa Paula would provide service for the Project Site. The City's wastewater system includes more than 50 miles of sewer lines and the new City Water Recycling Facility (WRF).

The average daily flow rate for the City WRF during the period from 2010 through 2015 is 1.85 mgd. The annual average daily flow in 2015 was 1.75 mgd. Projected wastewater flow to the City's WRF is nearly 2,400 afy for the year 2040, based on normal water-year data, current wastewater flow, and new potential wastewater flows.<sup>4</sup>

There is no existing sewer system in the Santa Paula West Business Park Specific Plan area. The City's *Wastewater System Management Plan* identifies a new off-site mainline that will need to be completed prior to implementation of the Specific Plan. These improvements would bring the POC for sewer service for the Santa Paula West Business Park to north along Faulkner Road at the southeast corner of the Santa Paula West Business Park area. **Figure 5, Conceptual Sewer Plan**, identifies the lines, directions, and points of connection.

---

<sup>4</sup> City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 76.

## 1.4 PROJECT SPECIFIC WATER DEMAND

To estimate water demand for the type and amount of land uses that would be permitted by the proposed Specific Plan, the water demand factors contained in the City's 2016 UWMP Update were used.

The unit water usage for this WSA are based on indoor water use performance standard as provided in the California Water Code for residential water demand; the American Water Works Association Research Foundation for commercial water demands; and the City's Landscape Ordinance, which meets the water conservation goals of the California Department of Water Resources (DWR) Model Water Efficient Landscape Ordinance. The overall goal of the ordinance is to reduce landscape water use; reduce or eliminate runoff in streets; and limit turf.

The Project planning area includes a total of 53.81 acres within West Area 2 in the City's Planning Area. To provide a more accurate estimate of the proposed Project's water demand, a site-specific analysis was completed. Potable water demand was calculated for all uses based on Project-specific estimates.

The projected water demands are distinguished between indoor and outdoor usage. **Table 2, Estimated Project Water Demands**, summarizes the indoor water demands of the residential portion of the Project.

**Table 2**  
**Estimated Project Water Demands**

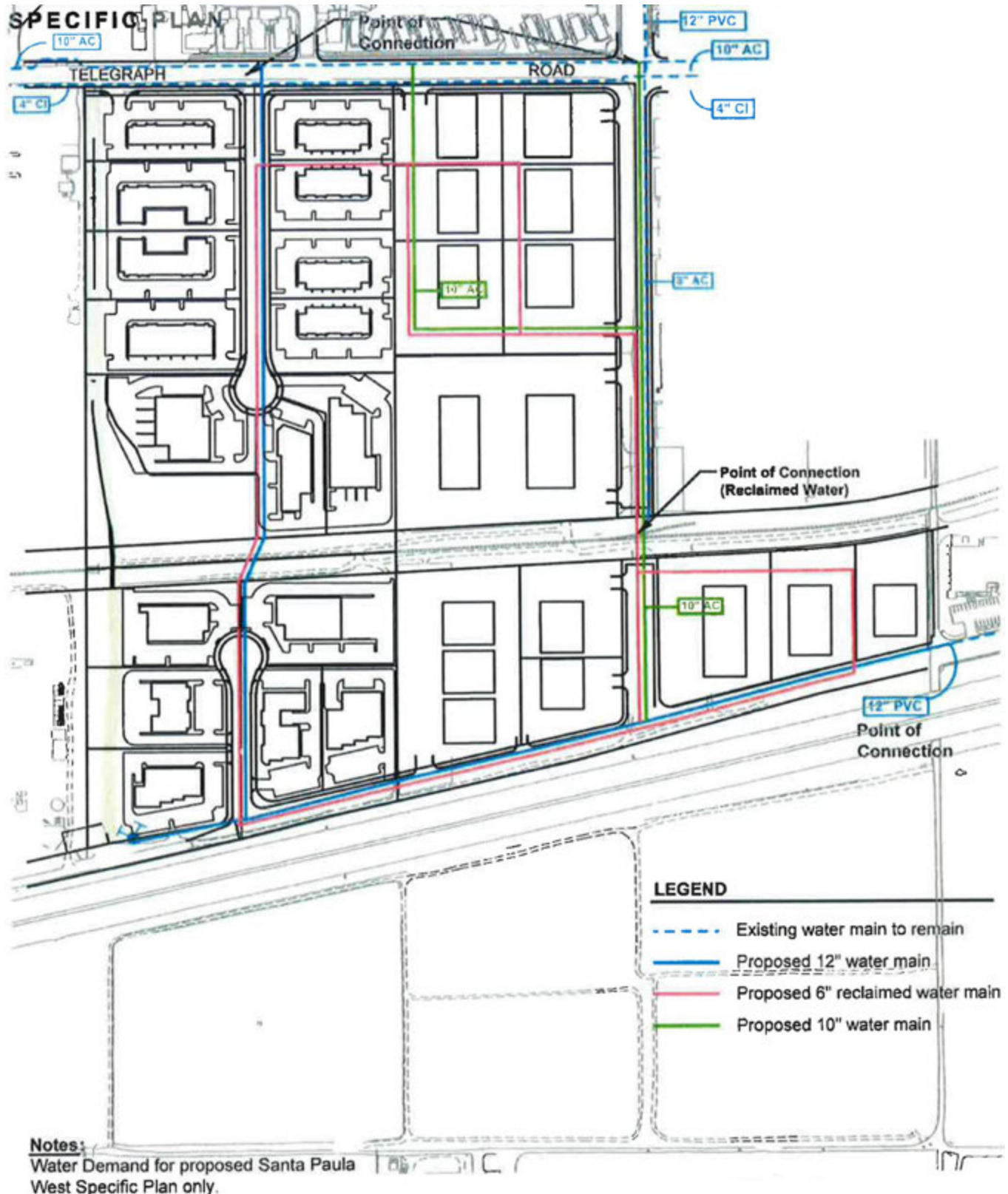
Land Use	Sq. Ft./ Acreage	Demand Rate <sup>a</sup>	Annual Demand (afy)
Commercial/Light Industrial <sup>b</sup>	442,743.8	15 gal./sq. ft./yr.	20.4
Light Industrial <sup>b</sup>	196,978.3	2.49 gal./sq. ft./yr.	1.5
Landscaped areas <sup>c</sup>	8.1	2.2 AF/acre/yr.	<u>17.8</u>
<b>Total Estimated Demand</b>			<b>39.7</b>

*Notes: afy = acre-feet per year; gal./sq. ft./yr. = gallons per square foot per year.*

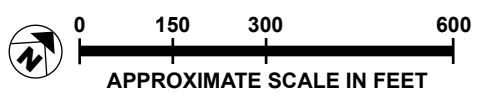
<sup>a</sup> Demand Rates per City of Santa Paula, Final 2016 UWMP Update (August 2017), 46, Table 3-2.

<sup>b</sup> Building square footage for C-LI and LI land uses found by multiplying total area square footage by 0.35 FAR per the October 2016 Specific Plan.

<sup>c</sup> Landscaped areas assume 15% of total area or 8.07 acres per the October 2016 Specific Plan.

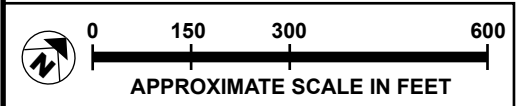
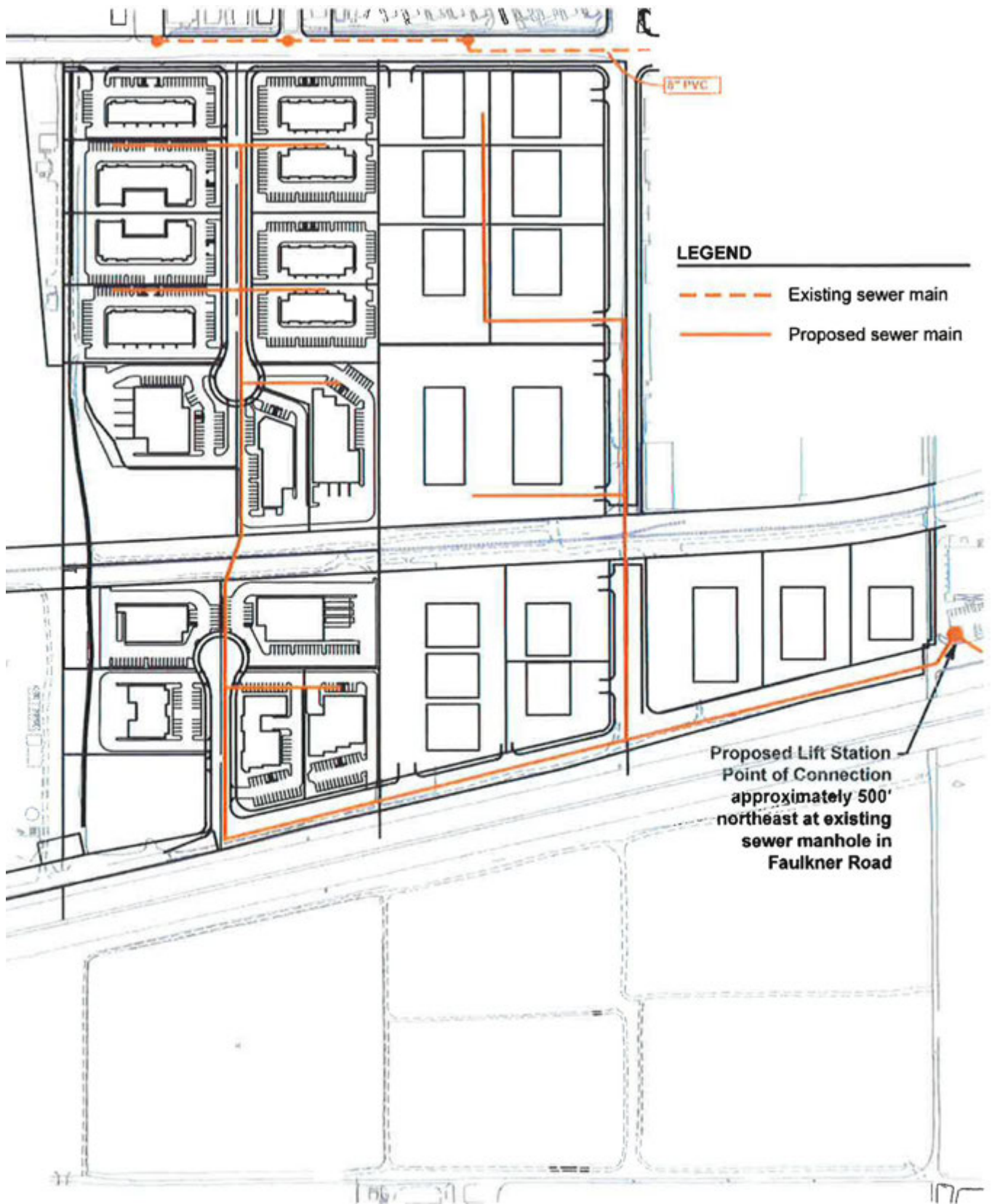


- LEGEND**
- - - Existing water main to remain
  - Proposed 12" water main
  - Proposed 6" reclaimed water main
  - Proposed 10" water main



SOURCE: Jensen Design and Survey – October 2016

FIGURE 4



SOURCE: Jensen Design and Survey – October 2016

FIGURE 5

The estimated supply to West Area 2 per the Final 2016 UWMP Update is 87.7 afy.<sup>5</sup> The estimated potable demand for the proposed Project is approximately 25 percent of the West Area 2 total supply.<sup>6</sup> The landscaped areas will be irrigated using recycled water to be delivered from the City's wastewater treatment plant. Construction is expected to begin in 2017 and be completed by 2020.

The Project will replace existing agricultural uses on the site. As such, a portion of the water currently used for agricultural irrigation will be used instead for Project consumption.

In addition to the previously described City-specific water conservation measures, Project developers shall be required to implement the following features to assure the most efficient use of water resources throughout the life of the Project:<sup>7</sup>

- Develop a budget for landscape irrigation use, pursuant to Section 5.304.1 of the City's Municipal Code.
- For new water service or for addition or alteration requiring upgraded water service for landscaped areas of at least 1,000 square feet but not more than 5,000 square feet (the level at which Water Code Section 535 applies), separate submeters or metering devices shall be installed for outdoor potable water use.
- Automatic irrigation system controllers (weather with rain sensors or soil moisture based) installed at the time of final inspection.
- All planted landscape areas within the Santa Paula West Business Park will have irrigation systems that are fully automatic and employ the latest "Low Volume" water conservation design criteria. No overspray of irrigation water onto walkways, common area hardscape areas, or any architectural walls will be allowed.
- Landscape plant and tree materials will be chosen for aesthetic quality and will consist of at least 75 percent low maintenance, California or drought tolerant, and ability to retain and treat storm water runoff.

## 1.5 REGULATORY SETTING

### 1.5.1 California Department of Water Resources

The DWR released its *State Water Project Final Delivery Capability Report* ("Report") in July 2015. The Report updates the estimated water delivery capacity of the State Water Project (SWP) for current conditions and two decades from 2015.<sup>8</sup> The estimates include the best-known future effects of climate

5 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 46, Table 3-2 (1,905,750 square feet of development at 15 gal/sq ft/year is 87.7 afy).

6 Estimated potable water demand is approximately 21.9 afy, total estimated water demand for West Area 2 is 87.7 afy.

7 California Green Building Code (2013), tit. 24, pt. 11, Revision Record for the State of California (July 1, 2015).

8 Department of Water Resources (DWR), *The State Water Project Final Delivery Capability Report 2015* (July 1, 2015), <https://msb.water.ca.gov/documents/86800/144575dd-0be1-4d2d-aeff-8d7a2a7b21e4>.



change and the anticipated changes in Sacramento River basin land uses. The assessment of current and future SWP reliability allows DWR to plan for reliable future water supplies in California.

### 1.5.2 Comprehensive Water Legislation

In November 2009, four legislative bills (SBX7-1, SBX7-6, SBX7-7, and SBX7-8) and the supporting bond bill (SBX7-2), creating a comprehensive water package designed to meet California’s water challenges, were approved by then-governor Arnold Schwarzenegger.<sup>9</sup> The legislation establishes the governmental framework to achieve the co-equal goals of providing a more reliable water supply to California and restoring and enhancing the San Francisco Bay/Sacramento–San Joaquin Delta Estuary (“Bay-Delta”) ecosystem. The package includes requirements to improve the management of our water resources by monitoring groundwater basins, developing agricultural water management plans, reducing statewide per capita water consumption 20 percent by 2020, and reporting water diversions and uses in the Delta. It also appropriates \$250 million for grants and expenditures for projects to reduce dependence on the Delta if the bond issue is approved by the voters in the future.

The Safe, Clean, and Reliable Drinking Water Supply Act of 2010 (SBX7-2) was placed and passed on the November 2014 ballot as California Proposition 1, the Water Bond (Assembly Bill [AB] 1471). AB 1471 provides funding for California’s aging water infrastructure, as well as for projects and programs to improve the ecosystem and water supply reliability for California. The bond bill includes \$2.7 billion for actions improving Bay-Delta sustainability. These investments will help to reduce seismic risk to Bay-Delta water supplies, protect drinking water quality, and reduce conflict between water management and environmental protection.

Part of the comprehensive water package included SBX7-7 (Steinberg, Chapter 4, Statutes of 2009—Statewide Water Conservation). This bill creates a framework for future planning and actions by urban and agricultural water suppliers to reduce California’s water use. SBX7-7 requires the development of agricultural water management plans and requires urban water agencies to reduce statewide per capita water consumption 20 percent by 2020.

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9 DWR, *California Water Plan Update 2009*, vol. 4 (December 2009); Reference Guide, Legislation, 2009 Comprehensive Water Package, Special Session Policy Bills and Bond Summary (November 2009).

### 1.5.3 Recent Regulations, Executive Orders and SWRCB Actions

#### *Executive Orders*

On January 17, 2014, Governor Brown declared a drought state of emergency.<sup>10</sup> On April 25, 2014, the governor signed Executive Order (EO) B-26-14<sup>11</sup> (April 2014 Proclamation) stating, among other things, that

*severe drought conditions continue to present urgent challenges: water shortages in communities across the state, greatly increased wildfire activity, diminished water for agricultural production, degraded habitat for many fish and wildlife species, threat of saltwater contamination of large fresh water supplies conveyed through the Sacramento-San Joaquin Bay Delta, and additional water scarcity if drought conditions continue into 2015.*

On December 22, 2014, Governor Brown issued EO B-28-14,<sup>12</sup> which extended the suspension of certain activities subject to CEQA contained in the January 2014 and April 2014 Proclamations, including the State Water Resources Control Board (SWRCB) adoption of emergency regulations, pursuant to Water Code Section 1058.5, through May 31, 2016. On March 17, 2015, the SWRCB adopted an expanded emergency conservation regulation prohibiting certain irrigation practices, restricting certain commercial activities, and ordering all urban water suppliers to implement mandatory restrictions on outdoor irrigation. The emergency regulation orders larger urban water suppliers—those providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 af of water annually, excluding wholesalers—to provide monthly data on water production, enforcement, and outdoor water conservation measures being implemented.

On April 1, 2015, Governor Brown signed EO B-29-15,<sup>13</sup> directing the SWRCB to impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage, compared to the amount used in 2013, through February 2016. The governor instructed the SWRCB to consider the relative per capita water usage of each supplier’s service area and to require those areas with high per capita use to achieve proportionally greater reductions than those with low use. The order mandated that the governor’s

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10 Office of the Governor, “Governor Brown Declares Drought State of Emergency” (January 17, 2014), <http://gov.ca.gov/news.php?id=18368>.

11 Office of the Governor, “Governor Brown Issues Executive Order to Redouble State Drought Actions” (April 25, 2014), <http://gov.ca.gov/news.php?id=18496>.

12 Office of the Governor, “Executive Order B-28-14” (December 22, 2014), <https://www.gov.ca.gov/news.php?id=18815>.

13 State of California, Executive Department, “Executive Order B-29-15” (April 1, 2015), [http://gov.ca.gov/docs/4.1.15\\_Executive\\_Order.pdf](http://gov.ca.gov/docs/4.1.15_Executive_Order.pdf).

January 17, 2014, Proclamation, his April 25, 2014, Proclamation, EO B-26-14, and EO B-28-14 remain in full force and effect except as modified.

As of April 7, 2017, the State of California Drought Emergency<sup>14</sup> has been lifted by Governor Brown due to increased rainfall. However, the governor retained the prohibition on wasteful practices, and conservation will continue to be required. Based on the only dialogue occurring with the SWRCB, conservation is expected to become more stringent through the years.

### **State Water Resources Control Board**

In 2014, the SWRCB determined that an emergency existed due to severe drought conditions and that adoption of the proposed emergency regulation was necessary to address the emergency.

On May 5, 2015, the SWRCB adopted an emergency conservation regulation in accordance with the governor's directive. The provisions of the emergency regulation went into effect on May 18, 2015.<sup>15</sup> The emergency regulation identifies how much water communities must conserve based on their average residential water use, per person per day, last summer. Every person should be able keep indoor water use to no more than 55 gallons per day. For the most part, the amount of water that each person uses in excess of this amount is water that is applied to lawns and other ornamental landscapes.

To reduce water use by 25 percent statewide, a regulation adopted by the SWRCB places each urban water supplier into one of eight tiers, each of which is assigned a conservation standard, ranging between 4 and 36 percent.<sup>16</sup>

As of March 2016, the City of Santa Paula had a Conservation Standard of 26 percent as directed by the SWRCB; from March to June 2016, the City had achieved 24.2 percent water savings. The Governor issued a new EO as of June 1, 2016, reducing the Conservation Standards as a result of improved conditions, and the City now has a zero percent conservation standard.<sup>17</sup>

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14 Executive Order B-40-17, [https://www.gov.ca.gov/docs/4.7.17\\_Exec\\_Order\\_B-40-17.pdf](https://www.gov.ca.gov/docs/4.7.17_Exec_Order_B-40-17.pdf).

15 State Water Resources Control Board, Resolution No. 2015-2032, Emergency Regulation for Statewide Urban Water Conservation (adopted May 5, 2015).

16 State of California, Office of Administrative Law, OAL File No. 2015-0506-02 EE, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board (May 18, 2015).  
[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/drought/docs/emergency\\_regulations/oal\\_approve\\_d\\_regs2015.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/oal_approve_d_regs2015.pdf).

17 State Water Resources Control Board, Self-Certification Conservation Standards—“Stress-test” (by supplier), [http://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/docs/emergency\\_reg/uw\\_self-cert\\_summary.pdf](http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/emergency_reg/uw_self-cert_summary.pdf). Accessed October 18, 2016.

## ***Legislative Actions***

### **Sustainable Groundwater Management Act**

In September 2014, Governor Edmund G. Brown Jr. signed a three-bill package known as the Sustainable Groundwater Management Act (SGMA). The legislation allows local agencies to customize groundwater sustainability plans to their regional economic and environmental needs. SGMA creates a framework for sustainable, local groundwater management for the first time in California history. Moreover, SGMA empowers local agencies to adopt groundwater management plans that are tailored to the resources and needs of their communities.

The three bills that make up SGMA are AB 1739 (Dickinson), SB 1168 (Pavley) and SB 1319 (Pavley).

#### ***AB 1739—Groundwater Management***

AB 1739 (Dickinson) authorizes the DWR or a groundwater sustainability agency (GSA) to provide technical assistance to entities that extract or use groundwater to promote water conservation and protect groundwater resources. This bill requires the DWR, by January 1, 2017, to publish on its Internet website best management practices for the sustainable management of groundwater, and requires the DWR to prepare and release a report by December 31, 2016, on the agency's best estimate of water available for replenishment of groundwater in the state.

AB 1739 requires a GSA to submit a groundwater sustainability plan (GSP) to DWR for review upon adoption. The bill authorizes a local agency to submit to DWR for evaluation and assessment an alternative that the local agency believes satisfies the objectives of these provisions. AB 1739 also requires DWR to review any of the above-described submissions at least every 5 years after initial submission to DWR.

In addition, AB 1739 requires that prior to the adoption or any substantial amendment of a general plan, the planning agency review and consider a GSP; groundwater management plan; groundwater management court order, judgment, or decree; adjudication of water rights; or a certain order or interim plan by the SWRCB. AB 1739 requires the planning agency to refer a proposed action to adopt or substantially amend a general plan to any GSA that has adopted a GSP or local agency that otherwise manages groundwater, and to the SWRCB if it has adopted an interim plan that includes territory within the planning area.

**SB 1168—Groundwater Management**

SB 1168 (Pavley) notes that the policy of the state is that groundwater resources be managed sustainably for long-term reliability and multiple economic, social, and environmental benefits for current and future beneficial uses. This bill states that sustainable groundwater management is best achieved locally through the development, implementation, and updating of plans and programs based on the best available science.

SB 1168 requires DWR to categorize each basin as high, medium, low, or very low priority. The initial priority for each basin was to be established no later than January 31, 2015. The bill authorizes a local agency to request that DWR revise the boundaries of a basin and required DWR to adopt by January 1, 2016, regulations on the methodology and criteria to be used to evaluate the proposed revision.

In addition, all groundwater basins designated as high- or medium-priority basins by the DWR that are designated as basins subject to critical conditions of overdraft are to be managed under a GSP or coordinated GSPs by January 31, 2020; all other groundwater basins designated as high- or medium-priority basins are to be managed under a GSP or coordinated GSPs by January 31, 2022.

This bill would authorize any local agency, as defined, or combination of local agencies to elect to be a GSA and would require, within 30 days of electing to be or forming a GSA, said agency to inform the DWR of its election or formation and its intent to undertake sustainable groundwater management.

**SB 1319—Groundwater**

SB 1319 (Pavley) prohibits the SWRCB from establishing an interim plan to remedy a condition where the groundwater extractions result in significant depletions of interconnected surface waters until January 1, 2025. This provision delays the similar provision in AB 1739 from 2022 to 2025. The bill further requires the SWRCB to exclude any portion of a basin in compliance with groundwater management requirements from probationary status. This provision narrows the similar provision in AB 1739 to only apply to the portion of the basin that is out of compliance.

The bill requires the SWRCB to include any element of a GSP or the entire plan in its interim plan if SWRCB finds it would help meet the sustainability goal. This provision revises the similar provision in AB 1739 to allow for the inclusion of local plans when developing interim plans for basins with probationary status.

A GSP has not yet been adopted for the Santa Paula Basin pursuant to SGMA and is not required until 2022.

## **SB 1262 (Pavley)—Water Supply Planning**

In September 2016, Governor Brown signed SB 1262 (Pavley), which states that if a water supply for a proposed project includes groundwater from a basin that is not adjudicated and is designated as medium or high priority, the following additional information must be included in the WSA: whether DWR has identified the basin as being subject to critical conditions of overdraft; and if a GSA has adopted a (GSP) or approved an alternative plan under the SGMA, a copy of the GSP, or an alternative plan. For a basin that is not adjudicated and is designated by DWR as low or very low priority, the WSA must include information as to whether DWR has identified the basin as being overdrafted or projected that the basin will become overdrafted if present management conditions continue.

SB 1262 is not effective until January 1, 2017. However, as noted earlier, pursuant to SB 1262 and the amended Water Code Section 10910, the Santa Paula Basin is an adjudicated Basin of which the DWR has not indicated is in overdraft.<sup>18</sup>

### **1.5.4 United Water Conservation District**

The United Water Conservation District (UWCD or District) is a public agency that encompasses nearly 213,000 acres of central and southern Ventura County. The District covers the downstream (Ventura County) portion of the valley of the Santa Clara River, as well as the Oxnard Plain. The District serves as a steward for managing the surface water and groundwater resources for all or portions of eight interconnected groundwater sub-basins. The developed areas of the District are a mix of agriculture and urban areas, with prime agricultural land supporting high-dollar crops such as avocados, berries, row crops, tomatoes, lemons, oranges, flowers, ornamental nursery stock, and sod. Approximately 370,000 people live within the District boundaries, including those living in the cities of Oxnard, Port Hueneme, Santa Paula, Fillmore, and eastern Ventura.

The District is authorized under its principal act (California Water Code Section 74000 et. Seq.) to exercise multiple powers; including the authority to conduct water resource investigations, acquire water rights, build facilities to store and recharge water, construct wells and pipelines for water deliveries, commence actions involving water rights and water use, prevent interference with or diminution of stream/river flows and their associated natural subterranean supply of water, and to acquire and operate recreational facilities in connection with dams, reservoirs, or other District works.

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18 California's Groundwater Bulletin 118, Santa Clara River Valley Basin Santa Paula Subbasin, [http://www.water.ca.gov/pubs/groundwater/bulletin\\_118/basindescriptions/4-4.04.pdf](http://www.water.ca.gov/pubs/groundwater/bulletin_118/basindescriptions/4-4.04.pdf).

### **1.5.5 City of Santa Paula**

#### ***Urban Water Management Plan***

Section 10610 et seq. of the California Water Code, known as the Urban Water Management Planning Act, calls for creation and periodic update of UWMPs by all urban water suppliers and sets forth the requirements for such plans, including definition of relevant terms.

Under the definition given in Section 10617, an urban water supplier is an entity “providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 af of water annually.” Water for this development will be supplied from the City of Santa Paula’s existing water system which is supplied via groundwater wells throughout the City.

Accordingly, this WSA, in concert with the most recent Final 2016 UWMP prepared by the City, includes all necessary data and analyses required by California Water Code section 10910 et seq. and by Government Code section 66437.7 et seq.

In 2017, the City of Santa Paula completed an UWMP update based on the current and future uses within the City. This UWMP did not discuss the specific development and activities contemplated by the Santa Paula West Business Park, although it did discuss, in general terms, the nature and extent of the long-term water supply for the City for the West Area 2 and included an estimated 1,906,000 square feet of commercial/industrial/institutional uses on approximately 125 acres. The UWMP update is based on more current and future uses within the City. Much of this general discussion is cited and paraphrased in this WSA. The UWMP contains an analysis of the factors required by Government Code section 66437.7 (a)(2), and such factors apply to this WSA.

## 2.0 WATER DEMANDS

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### 2.1 HISTORICAL AND CURRENT CONDITIONS

#### 2.1.1 Existing Land Use

The local economy is composed of agricultural, industrial, and commercial interests. Residential development is currently the single largest land use. Santa Paula currently has a housing stock totaling approximately 9,100 units. Of these, 67 percent are single-family houses or condos; 26 percent are multifamily units; and 7 percent are mobile homes and trailers. Because a significant amount of its residential growth occurred prior to 1970, more than half of the housing stock in Santa Paula is more than 45 years old.<sup>19</sup> Commercial development comprises less than 5 percent of the City's area, and industrial uses comprise approximately 6 percent.<sup>20</sup> City total water demands for the period of 1990 to 2014 ranged from a low of 4,376 af (1995) to 6,153 af (1990), with an average of 4,993 afy during that period.<sup>21</sup> Projected water demands in 2020 are 4,609 af.<sup>22</sup>

Future land uses are based on the City's General Plan. Within the City's existing limits and planning areas there is a potential for the following: 2,052 residential dwelling units (single- and multifamily); 131 acres of new commercial, industrial, and institutional development; and 797 acres of parks, recreation, golf courses, and open space, and 2 schools.<sup>23</sup>

The City's General Plan anticipates approval of an amendment of the City's 1978 SOI to include six Expansion Areas, with a variety of land uses. Amending the SOI boundary and annexing the Expansion Areas to the City requires the authorization of the Local Agency Formation Commission (LAFCO); previous LAFCO hearings approved Adams Canyon, Fagan Canyon, East Area 1, East Area 2, and West Area 2 for inclusion into the City's SOI. Annexation of each Expansion Area will occur on a case-by-case basis after the completion of a Specific Plan and a market and fiscal evaluation; the City has recently completed annexation of two of these identified areas (East Area 1 [2010] and East Area 2 [2013]). In addition, each annexation area will require environmental review in accordance with CEQA. Ultimate build-out of residential units will be in accordance with the City's existing Growth Management Ordinance adopted in 1985. Type and amount of development that actually occurs will depend on many factors.

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19 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 37.

20 City of Santa Paula, *General Plan, "Land Use Element"* (rev. January 22, 2013), City Council Resolution No. 6821.

21 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 41.

22 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 48, Table 3-3.

23 City of Santa Paula, *General Plan, "Land Use Element."* Rev 1/22/13, City Council Resolution No. 6821.



The proposed Project is located within the boundaries of the West Area 2 Expansion Area. The City's 2016 UWMP Update projects an estimated water demand of 87.7 afy for West Area 2.<sup>24</sup> At approximately 53.81 acres, the Santa Paula West Business Park Specific Plan would take up approximately 43 percent of the 125-acre West Area 2 planned expansion as designated in the General Plan.<sup>25</sup> As such, based on a pro rata share of the proposed development contemplated in the General Plan for West Area 2 and the corresponding water demand estimated in the 2016 UWMP Update, the proposed Project has a projected demand of 39.7 afy.

The Santa Paula West Business Park Specific Plan site is currently in agricultural use.<sup>26</sup> Water is currently supplied by a single on-site water well, which supplies water for both domestic and agricultural irrigation use.

### 2.1.2 Existing Water Supply and Demand

The existing land uses within the Specific Plan area includes approximately 54 acres of agricultural land, fallow agricultural land, and a small amount of industrial uses.

Water supply for irrigation on the Specific Plan area has been historically supplied from an on-site well that overlies the Santa Paula Basin. The existing well in the area (E11S) is owned and operated by McGaelic Group and Bender combined.

Approximately 49 acres of the Santa Paula West Specific Plan site is under cultivation for avocados, herbs, and a variety of row crops. Production records for the irrigation well for the period 2010 to 2014 are shown on **Table 3, Existing Well Pumping Records 2010 – 2014**. Water usage has been from one well but delivered to several parcels including McGaelic West (McGrath owners), Ilan Bender, and Jaime Santana; only the McGaelic West and Bender parcels are within the Project Site.<sup>27</sup> As shown on **Table 3**, during the last 5 years (2010 to 2014), the total water used on site has averaged 281.1 afy.

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24 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 46, Table 3-2.

25 City of Santa Paula, *Santa Paula West Business Park Specific Plan* (amended October 2016).

26 City of Santa Paula, *Santa Paula West Business Park Specific Plan* (amended October 2016).

27 Email from Beverly Gutierrez, Hoffman, Vance & Worthington, Inc., Existing Water Use Spreadsheet (2015) (June 9, 2015).

**Table 3**  
**Existing Well Pumping Records 2010–2014**

<b>Year</b>	<b>McGaelic West (acre-feet)</b>	<b>Bender (acre-feet)</b>	<b>Total Usage (acre-feet)</b>
2010	N/A	112.9	112.9
2011	122.9	89.4	212.3
2012	176.5	162.9	339.4
2013	187.8	232.7	420.5
2014	120.8	199.6	320.4
<b>Total</b>	<b>608.0</b>	<b>797.5</b>	<b>1,405.5</b>
<b>2010–2014 Average per year</b>	<b>121.6</b>	<b>159.5</b>	<b>281.1</b>

*Source: Email from Beverly Gutierrez, Hoffman, Vance & Worthington, Inc., Existing Water Use Spreadsheet (2015).*

## 2.2 WATER CONSERVATION MEASURES

### 2.2.1 State of California Measures

The State of California Assembly Bill (AB) 1881 was enacted in 2009 to help California move forward as a leader in sustainable landscaping and water efficiency and to address the danger of our drought situation. Many residential and commercial properties currently use outdated irrigation technology; AB 1881 is a forward-thinking standard that prevents excessive or wasteful irrigation techniques by emphasizing the use and application of modern irrigation technology.<sup>28</sup>

With current drought conditions persisting, emergency regulation amendments are proposed.

#### ***Mandatory Prohibitions on Water Wasting***

“Water waste” can be defined as any excessive, unnecessary or unwarranted use of water, including, but not limited to, any use that causes unnecessary runoff beyond the boundaries of any property as served by its meter and any failure to repair as soon as reasonably possible any leak or rupture in any water pipes, faucets, valves, plumbing fixtures, or other water service appliances.

#### **California Code of Regulations: Model Water Efficient Landscape Ordinance**

The Model Water Efficient Landscape Ordinance was adopted in January 1, 2010, to, but not limited to, promote the conservation and efficient use of water and to prevent the waste of water; establish a

<sup>28</sup> Assembly Bill No. 1881, ch. 559 (January 23, 2006; approved, September 28, 2006; filed, September 28, 2006).

structure for planning, designing, installing, maintaining and managing water-efficient landscapes in new construction and rehabilitated projects; establish provisions for water management practices and water waste prevention for existing landscapes; and to encourage local agencies and water purveyors to use economic incentives that promote the efficient use of water, such as implementing a tiered rate structure.<sup>29</sup>

### **California Green Building Standards Code (CALGreen)**

The purpose of California Green Building Standards Code (“CALGreen”) is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:

1. Planning and design
2. Energy efficiency
3. Water efficiency and conservation
4. Material conservation and resource efficiency
5. Environmental quality

The residential mandatory measures are provided in chapter 4 and the nonresidential ones in chapter 5 of the CALGreen Code.

In response to State of Emergency proclamations issued by Governor Brown in January and April of 2014, and the EO B-29-15 (issued April 1, 2015), California Department of Housing and Community Development (HCD) proposed emergency building standard regulations pertaining to the reduction of potable water use for exterior landscape irrigation for newly constructed residential buildings. HCD, in coordination with the California Building Standards Commission (CBSC),

DWR, the Division of the State Architect, and other stakeholders developed emergency regulations that amend the 2016 CALGreen Code.<sup>30</sup>

CALGreen provides mandatory residential measures, such as stormwater drainage and retention systems, which are thought to prevent flooding of adjacent properties and prevent pollution from stormwater

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29 California Code of Regulations, tit. 23, Waters, div. 2, Department of Water Resources, ch. 2.7, Model Water Efficient Landscape Ordinance.

30 California Department of Housing and Community Development, Finding of Emergency Regarding the 2013 California Green Building Standards Code (CALGreen), California Code of Regulations, tit. 24, pt. 11.

runoff by retaining soil on site or by providing filtering to restrict sedimentation from reaching stormwater drainage systems and receiving streams or rivers. To comply, the retention basin must be sized and shown on the site plan, and water has to be filtered and routed to a public drainage system. The new residential structure also must comply with local stormwater ordinances. The drainage system must also be shown on the site plan (swales, drain piping, retention areas, and groundwater recharge).

The code also requires a 20 percent reduction of indoor water use, and it utilizes both a prescriptive and performance method. The prescriptive method provides some technical features that must be followed:

- Showerheads  $\leq$  2.0 gallons per minute (gpm) at 80 pounds per square inch (psi)
- Lavatory faucets  $\leq$  0.5 gpm at 60 psi
- Kitchen faucets  $\leq$  1.8 gpm at 60 psi
- Urinals  $\leq$  0.5 gal/flush
- Water closets  $\leq$  1.28 gallon/flush

CALGreen also specifies acceptable performance standards for plumbing fixtures with reduced water usage. Fixtures can be installed if they meet standards listed in the code.

Outdoor water usage is also regulated. CALGreen requires irrigation controls to be weather or soil moisture based and to automatically adjust irrigation in response to changes in plants' needs as weather conditions change, or have rain sensors or communication systems that account for local rainfall.

## 2.2.2 City of Santa Paula

### ***Urban Water Management Plan (UWMP) Update***

The City of Santa Paula has implemented water conservation measures to ensure that customers use water efficiently and that negligent use will have appropriate consequences. Water conservation policies are described in the Final 2016 UWMP Update.

Below is a partial list of current adopted water conservation policies from the Final 2016 UWMP Update:<sup>31</sup>

- Water waste prevention ordinances
- Metering
- Conservation pricing
- Public education and outreach
- Water loss control
- Conservation program coordination and staffing
- Other demand management measures that significantly impact water use

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31 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 99.

The combined effect of these policies places responsibility for water conservation on both the developer and the City.

### ***City Municipal Code, Ordinance 993 Section 52.038—Water Waste***

“No person shall [un]lawfully or neglectfully waste water in any manner whatsoever. Continued wasting of water after mailing of [City] notice by registered mail to the customer of record at the mailing address of record by the [City] Director may result in discontinued water service.”<sup>32</sup> This Code is a beneficial tool to curb misuse and waste of potable water within the City. The provisions of the Code can be utilized during periods of normal water supply and supply deficiency. Violation of this Code is subject to City penalties.

### ***City Municipal Code, Ordinance 1223, Chapter 59—Landscape Water Conservation Standards***

In accordance with Government Code 65565(c) for the purpose of complying with California law and promoting water conservation the City maintains Ordinance 1223, Landscape Water Conservation Standards, to be utilized in conjunction with the City of Santa Paula land Development Provisions for Landscaping and the Guidelines for Implementation of Water Efficient Landscape.<sup>33</sup> Compliance with the guidelines and Landscape Water conservation Standards is mandatory for all new development projects that are subject to discretionary review by the City of Santa Paula.

### ***Water Shortage Contingency Plan***

The City’s Water Shortage Contingency Plan was originally prepared to comply with AB 11x (1991). The bill required every urban water supplier to file a plan due to the worsening 1986-1992 drought.

The City has several options for meeting future water demands, including increased deliveries of local groundwater, increased deliveries of imported water, evaluating recycled water, and supporting water demand management programs. This has allowed the City, to date, to meet demands in spite of the prior drought conditions. Water shortages can be triggered by a hydrologic limitation in supply (i.e., a prolonged period of below-normal precipitation and runoff), limitations or failure of supply and treatment infrastructure, or both. Hydrologic or drought limitations tend to develop and abate more slowly, whereas infrastructure failure tends to happen quickly and relatively unpredictably.

Drought periods going back to 1929 have caused pumping levels to decrease, however there never has been a necessity to implement mandatory restrictions of water use. More efficient use of water was

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32 City of Santa Paula, Santa Paula Municipal Code, Ordinance 993, sec. 52.038—Water Waste.

33 City of Santa Paula, Santa Paula Municipal Code, Ordinance 1223, ch. 59—Landscape Water Conservation Standards Ordinance (December 2009).

encouraged during the 1976 to 1977 period. An even greater awareness of water conservation occurred during the 1987 to 1992 drought. This increased awareness resulted in more efficient use of water.

Additional supply reductions could be caused by regional power outage, terrorist activity, earthquake, tsunami or other significant meteorological event. The City prepared an Emergency Response Plan (2004) which provides details of emergency responses for numerous significant events that may affect the City's water system.

### ***Reductions in Santa Paula Basin Production Required by the Stipulated Judgment***

According to the Judgment if it is found that the safe yield of the Santa Paula Basin is less than the total pumping allocations, then the pumping allocations shall be reduced. The Judgment specified that reductions in pumping will be required in the order of priority specified in **Table 4, Water Shortage Contingency—Rationing Stages to Address Water Supply Shortages.**

**Table 4**  
**Water Shortage Contingency—Rationing Stages to Address Water Supply Shortages**

Stage	Water Supply Conditions
1	All uses in excess of the pumping allocations will be cut back to the approved allocations
2	Cumulative pumping allocation of the Santa Paula Basin Pumpers Association (SPBPA) will be reduced by 500 af annually. This reduction will reflect reasonable conservation that can be achieved. The SPBPA will determine how a reduction in its cumulative allocation will be implemented
3	Pumping allocation of the City of San Buenaventura shall be reduced to 1,141 af per year. This allocation reflects the City of San Buenaventura's historical maximum annual production prior to the Judgment
4	The remaining pumping allocations of all parties to the Judgment will be further reduced simultaneously. The SPBPA will reduce their total annual allocations by 2,000 af. The City of San Buenaventura will reduce their total annual allocations by 500 AF
5	The City of San Buenaventura will cease pumping from the Santa Paula Basin
6	The remaining pumping allocations of the SPBPA will be reduced by the amount required to bring production into balance with the revised safe yield of the Santa Paula Basin

*Source: City of Santa Paula, 2016 UWMP Update (August 2017), 17–18.*

### ***Proposed Water Demand Reduction Program***

The City is establishing a water demand reduction program for worst-case planning purposes consisting of the implementation of a five-stage water demand reduction program. Stage 1 would impose a voluntary 10 percent water demand reduction goal, Stage 2 would impose a 20 percent mandatory reduction goal, and Stage 3 would impose a 30 percent mandatory reduction goal, Stage 4 would impose a 40 percent mandatory reduction goal, and Stage 5 would impose a 50 percent mandatory reduction

goal. Each stage would be implemented as needed based on actual or anticipated supply reductions. The City's Public Works Director would monitor water supplies and demands on a daily basis, which would allow the City to determine the effects of reductions on water production within the system. If evidence of a shortage exists, the Public Works Director would determine the extent of the severity and recommend the applicable stage. The Public Works Director would notify the City Council of the water supply situation, and the Council would be responsible for ratifying the proposed measures.

Proposed specific water demand reduction measures and triggering mechanisms for each stage are listed in the Final 2016 UWMP Update and presented below.<sup>34</sup>

### **Stage 1: 10 Percent Voluntary Reduction—Supply Watch**

Stage 1 would be implemented when 10 percent reduction in water production capacity (or supplies) occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or other event. All restrictions during Stage 1 are voluntary. The goal for Stage 1 is a 10 percent reduction in water demand. Measures to be implemented during this stage include but are not limited to the following:

- City to communicate to the customers through press releases, brochures, mailings, and/or water bills the need to voluntarily conserve water and the many ways possible to conserve without affecting their overall lifestyles.
- Water customers requested to voluntarily limit the irrigation of landscaped areas.
- Water customers requested to voluntary limit nonessential water use. Nonessential water used defined as:
  - Use of water to wash any motor vehicle, motorbike, airplane, or other vehicle.
  - Use of water to wash down sidewalks, walkways, driveways, parking lots, tennis courts, or other hard-surfaced areas.
  - Use of water to wash down buildings or structures for purposes other than immediate fire protection.
  - Flushing gutters or permitting water to run or accumulate in any gutter or street.
  - Use of water to fill, refill, or add to any outdoor or indoor swimming pools, or Jacuzzi-type pools.
  - Use of water in a fountain or pond for aesthetic or scenic purposes except where necessary to support aquatic life.
  - Failure to repair a controllable leak within a reasonable period after having been given notice directing the repair of such leak.

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34 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 93.

### **Stage 2: 20 Percent Mandatory Reduction—Supply Caution**

Stage 2 would be implemented when up to a 20 percent reduction in water production capacity occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or other event. All restrictions in Stage 2 are mandatory. The goal for Stage 2 is 20 percent reduction in City customer water demand. Measures to be implemented during this stage include but are not limited to the following:

- Continue to maintain Stage 1 measures; however, they become mandatory in Stage 2.
- City to mail information to water customers regarding the importance of significant water use reductions.
- Assess a monetary fee to repeat offenders of water demand reduction measures.
- Prohibit watering landscape between 8:00 AM to 6:00 PM.
- All restaurants are prohibited from serving water to patrons except upon request of the patron.
- Perform an evaluation of Stage 1 water conservation measures and implement those not completed. Public Works Director to report to the City Council as appropriate.
- Appoint a Water Conservation Coordinator. This can be an individual already working for the City with related duties.

### **Stage 3: 30 Percent Mandatory Reduction—Supply Warning**

Stage 3 would be implemented when up to a 30 percent reduction in water production capacity occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or other event. The goal for this stage is 30 percent reduction in City customer water demand. Measures to be implemented during this stage include but are not limited to the following:

- Continue to maintain measures included in Stages 1 and 2.
- Landscape irrigation by means of hand-held hoses, hand-held buckets, soaker hoses, drip irrigation, hose-end sprinklers, or permanently installed automatic sprinkler systems are limited to twice per week. Landscape irrigation by grey water and recycled water authorized.
- Perform an evaluation of Stage 2 water conservation measures and implement those not completed. Public Works Director to report to the City Council as appropriate.

### **Stage 4: 40 Percent Mandatory Reduction—Supply Danger**

Stage 4 would be implemented when up to a 40 percent reduction in water production capacity occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or another event. All restrictions in Stage 4 are mandatory. The goal for Stage 4 is 40 percent reduction in City customer water demand. Measures to be implemented during this stage include but are not limited to the following:



- Continue to maintain measures included in Stages 1 to 3.
- Landscape irrigation by means of hand-held hoses, hand-held buckets, soaker hoses, drip irrigation, hose-end sprinklers, or permanently installed automatic sprinkler systems are limited to once per week. Landscape irrigation by grey water and recycled water authorized.
- Perform an evaluation of Stage 3 water conservation measures and implement those not completed. Public Works Director to report to the City Council as appropriate.

**Stage 5: 50 Percent Mandatory Reduction—Supply Critical**

Stage 5 would be implemented when up to a 50 percent reduction in water production capacity occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or another event. All restrictions in Stage 5 are mandatory. The goal for Stage 5 is 50 percent reduction in City customer water demand. Measures to be implemented during this stage include but are not limited to the following:

- Continue to maintain measures included in Stages 1 to 4.
- Landscape irrigation shall be prohibited except by grey water and recycled water.
- Perform an evaluation of Stage 4 water conservation measures and implement those not completed. Public Works Director to report to the City Council as appropriate.
- Consider implementing a customer water allocation based on a yearly average for metered services. For those users who exceed their allocation, impose a 25 percent fee for the excess water demand (based on prior month's usage). Install a flow restrictor on meter for repeat offenders of excessive use.
- All water use not required for health and safety is prohibited.

## 3.0 WATER SUPPLY ASSESSMENT

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A WSA is required to identify and describe the water supply sources of the PWS that will serve the project.

State Water Code Section 10910(d) requires a WSA to include identification of any existing SWP water, water rights, or water service contracts relevant to the identified water supply for the proposed Project. A complete discussion of SWP source and Table A allocations is provided, as well as a description of the quantities of water received in prior years by the PWS is also to be provided.<sup>35</sup>

### 3.1 IDENTIFICATION OF WATER SOURCES

#### 3.1.1 Primary Water Source

The City of Santa Paula will provide water service to the proposed Project.<sup>36</sup> The City currently has secured water rights from two sources: groundwater allocation from the Santa Paula Basin and a surface water wheeling agreement with the Canyon Irrigation Company. Surface water from Santa Paula Creek was a major source of potable water supply for the City's service area until wells were drilled into the Santa Paula Basin to augment the supply from Santa Paula Creek. Currently the Santa Paula Basin is the City's sole source of water supply.

#### 3.1.2 Analysis of Water Supply

##### *Groundwater*

As previously stated, the City of Santa Paula has been dependent primarily on groundwater as a source of domestic water supply. Groundwater is also used to supply water for crop irrigation and commercial and industrial uses within the City.

Water Code Section 10910 (f) requires additional information when a groundwater basin is cited as the water supply source for a project including a description of the basin, the rights of the PWS to use the basin, the overdraft status of the basin, any past or planned overdraft mitigation efforts, historical use of the basin by the PWS, projected use of the basin by the project, and a sufficiency analysis of the basin.

##### **Description of the Aquifer**

The Santa Paula Basin is a subbasin of the larger Santa Clara River Valley Groundwater Basin. Other subbasins within the Santa Clara River Valley Groundwater Basin include the Fillmore, Piru, Mound, and Oxnard Subbasins. Each of the five subbasins is an alluvial basin recharged, in part, by the Santa Clara

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<sup>35</sup> California Water Code, sec. 10910–10915, 10910(b).

<sup>36</sup> City of Santa Paula, *Santa Paula West Business Park Specific Plan* (amended October 2016).

River.<sup>37</sup> For the sake of simplicity, and because the subbasins are subject to varying forms of management, this WSA refers to the Santa Paula Basin as basin rather than subbasin.

The Santa Paula Basin underlies the City of Santa Paula and unincorporated areas to the southwest of the City within the Santa Clara River Valley. The basin is bounded by the impervious rocks of the Topatopa Mountains to the north, impervious rocks of Oak Ridge and South Mountain, the Oak Ridge fault, and Saticoy fault on the south.<sup>38</sup> The eastern edge of the basin is marked by a bedrock constriction, with the boundary placed at the position of maximum rising water. The western boundary separates the Santa Paula basin from the Mound and Oxnard Subbasins, with the western boundary placed where there is a distinct change in the slope of the water table. Ground surface elevations range from 140 feet above sea level in the west to about 1,000 feet above sea level along the Santa Paula Creek drainage. The Santa Clara River and Santa Paula Creek drain the valley westward toward the Pacific Ocean. Average annual precipitation ranges from 14 to 18 inches.

The principal fresh water-bearing strata of the Santa Paula Basin are the Pleistocene San Pedro Formation, Pleistocene river deposits of the ancient Santa Clara River, alluvial fan deposits shed from the uplifted mountain blocks, and recent river and stream sediments deposited locally along the Santa Clara River and its tributaries. These water-bearing sediments are underlain by relatively impermeable Pliocene and older units. The sediments of the basin have been warped into a syncline that is oriented in a northeast-southwest direction along the center of the basin. To the east, the Santa Paula basin is in hydraulic connection with the Fillmore basin, its' primary source of recharge. To the south, the Oak Ridge fault forms a partial barrier to groundwater movement. On the north, the portion of the aquifer represented by the San Pedro Formation is exposed in an outcrop along the Sulphur Mountain foothills.

The western boundary of the Santa Paula Basin is more complex, with local uplift, artesian conditions, and faults mapped by some investigators. Although there is general agreement that there is hydraulic connection between Santa Paula Basin, the Oxnard Forebay Basin, and the Mound Basin, the degree of connection is uncertain. The Santa Paula Basin has a storage capacity of approximately 754,000 af. The basin is estimated to be approximately 90 percent full, with about 675,000 af of groundwater in storage.<sup>39</sup>

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37 California Resources Agency, DWR, *California's Groundwater*, Bulletin 118 Update 2003 (October 2003).

38 California Resources Agency, DWR, *California's Groundwater*, Bulletin 118 Update 2003 (October 2003).

39 California Resources Agency, DWR, *California's Groundwater*, Bulletin 118, Santa Clara River Valley Basin: Santa Paula Subbasin (February 2004).

As reported by the Ventura County Watershed Protection District, the 2016 total precipitation for Santa Paula was 9.88 inches. The accumulated total rainfall to date for 2017 is 25.66, approximately 142.2 percent of normal (18.05 inches).<sup>40</sup>

The Santa Paula Basin is recharged by percolation of surface flow from the Santa Clara River, Santa Paula Creek, and other minor tributary streams, as well as subsurface flow from the Fillmore Basin.<sup>41</sup> Some of the surface flow in the Santa Clara River originates as release from Lake Piru and contains natural runoff of precipitation and imported SWP water, it is important to note that there has not been a release from Lake Piru in the last year due to drought.<sup>42</sup> Control of the quagga mussel is another limiting factor for water release.<sup>43</sup> Percolation of precipitation and unused irrigation waters provide additional recharge. Groundwater in the Santa Paula Basin generally flows toward the southwest.<sup>44</sup>

### Groundwater Extraction

While there have been periodic declines in water levels within the Santa Paula Basin, it is not in considered to be in a state of overdraft. The “assumed initial yield” of the basin is 33,500 afy. Under the terms of the Judgment, a 7-year study period (1996 to 2003) formed the basis for determining actual safe yield. After 7 years, water use data was analyzed to refine the assumed initial yield of 33,500 afy. United Water Conservation District prepared a report on the status of the Santa Paula Basin.<sup>45</sup> The UWCD Report concluded that the average groundwater production during the period 1983 to 1995 was 26,000 af. According to the Report, no overdraft was observed at the documented production rates over the period 1983 to 1995. The Report also identified that during the period 1997 to 2003 parties to the Judgment had cumulatively produced 42,111 af less than their combined total allocation for this period. Yield of the Santa Paula Groundwater Basin appeared to be no less than 26,000 afy.<sup>46</sup> Approximately 12,000 acres or agricultural land is irrigated by groundwater in the Santa Paula Basin. Groundwater extractions are reported on the semiannual groundwater production statements filed with UWCD’s Finance Department by individual pumpers. These production statements constitute all known pumping from the Santa Paula

40 Ventura County Watershed Protection District, Watershed Resource and Technology Division, *Automated Daily Rainfall Report: Current Rain Totals and Percent of Normal* (June 9, 2015).

41 United Water Conservation District (UWCD), *Combined 2013 and 2014 Santa Paula Basin Annual Report*, professional paper 2016-01, prepared by the Santa Paula Basin Technical Advisory Committee (January 2016).

42 UWCD, Groundwater Resources Department, *Groundwater and Surface Water Conditions Report—2013* (May 2014).

43Carolynn S. Culver, A. Kimo Morris, and Michael Anghera, *Dive Assessment of the Quagga Mussel Infestation at Lake Piru* (February 2014), <http://www.unitedwater.org/images/stories/Lake-Piru/Quagga-Mussel/DiveAssessmentRptPiruFeb2014.pdf>.

44 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

45 UWCD, *Santa Paula Basin 2003 Annual Report*, <https://www.unitedwater.org/images/stories/Resource-Conservation/GW-Management/Groundwater-Hearing/Exhibits/U62%20-%20Santa%20Paula%20Basin%202003%20Annual%20Report.pdf> (November 2004).

46 UWCD, *Santa Paula Basin 2003 Annual Report*, <https://www.unitedwater.org/images/stories/Resource-Conservation/GW-Management/Groundwater-Hearing/Exhibits/U62%20-%20Santa%20Paula%20Basin%202003%20Annual%20Report.pdf> (November 2004).

basin. In calendar year 2011, 24,202 af of groundwater was extracted from the Santa Paula basin. A summary of the 2011 extractions is shown in **Table 5, Summary of Recent Groundwater Extractions**. The 2014 reported groundwater extractions of 27,437 af were greater than the average for the period of record (1980 to 2014) average of 25,771 af.<sup>47</sup> In addition to this information, the Urban Water Management Plan provides supplemental groundwater pumping data for the City of Santa Paula as a whole, including projected pumping figures ongoing until 2040.

**Table 5**  
**Summary of Recent Groundwater Extractions**

Pumper	2013 Extractions (af)	2014 Extractions (af)
City of San Buenaventura	901	791
Santa Paula Basin Pumpers Association (SPBPA) Pumpers with Individual Party Allocations (adjusted extractions)	25,530	26,610
SPBPA Pumpers with Individual Party Allocations (reported extractions)	25,554	26,613
Nonstipulated Parties	14	17
De Minimis Pumpers	16	16
<b>Total Production</b>		
<b>Adjusted by SPBPA</b>	26,461	27,434
<b>Reported to UWCD)</b>	26,485	27,437

*Source: United Water Conservation District, Combined 2013 and 2014 Santa Paula Basin Annual Report, professional paper 2016-01, prepared by Santa Paula Basin Technical Advisory Committee (January 2016).*

*Note: af = acre-feet.*

Long-term, gradual declines in water levels have been observed in many parts of the basin. These declines have not been rapid, and are relatively small; however, they may be indicative of changing hydrologic conditions in the basin that warrant further monitoring and, if the trend persists, the development of alternative basin management strategies.

Water production for the period 2005 to 2015 is presented in **Table 6, City of Santa Paula Water Production**. According to City Water Division staff, total water produced in 2010 was 4,455 af, and in 2015 was 3,907 af. City water production in 2005 was 5,047 af (592 af greater when compared to 2010, and 1,140 af greater when compared to 2015). The highest annual water demand for the period 2005 to 2015 was recorded in 2007 with 5,347 af produced. Groundwater production during 2011 was less than the average in recent years, and precipitation was above average. This resulted in water level rises or stable water levels from 2010 to 2011.

<sup>47</sup> UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016).

**Table 6**  
**City of Santa Paula Water Production**

Year	Groundwater Production from City Wells (af)
2005	5,047
2006	5,143
2007	5,347
2008	5,290
2009	4,902
2010	4,455
2011	4,473
2012	4,721
2013	4,998
2014	4,648
2015	3,907

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017), 64, Table 4-3.

Note: afy = acre-feet per year.

The City's current groundwater supply includes production from five active wells. Domestic water is pumped from Well Nos. 1-B, 11, 12, 13, and 14. and **Table 7, City of Santa Paula Groundwater Resources 2015**, summarizes the City's groundwater resources by well, including current status, well capacity, and 2015 production. The City no longer operates Wells Nos. 2, 8, and 9 due to a history of elevated nitrate levels in water extracted from these sources. These wells were sold to an agricultural enterprise.<sup>48</sup>

**Table 7**  
**City of Santa Paula Groundwater Resources 2015**

Well No.	Status	Capacity (gpm)	2015 Production (af)
1-B	Active	812	104
11	Active	1,203	392
12	Active	1,179	1,527
13	Active	2,042	378
14	Active	3,375	1,507
<b>Total</b>			<b>3,908</b>

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017), 63, Table 4-2.

Notes: gpm = gallons per minute; af = acre-feet.

<sup>48</sup> City of Santa Paula, Final UWMP 2016 Update (August 2017), 66.

### ***Pumping Allocations***

The Judgment governs groundwater production on a 7-year rolling average, which allows parties to produce more or less allocation in any particular year so long as their rolling 7-year average does not exceed their allocation. The average is a rolling average, in 2014 the average extraction amount will be based on the period from 2008 to 2014.

The total combined pumping allocations of the SPBPA (party and nonparty) and the City of San Buenaventura (Ventura) are now at 30,771.6 afy. Amendments to the Judgment in 2010 provided the Santa Paula Basin Pumpers Association with an additional 280.2 af of allocation, which was granted to pumpers that were not previously parties to or identified within the Judgment. The current allocations were calculated and granted using the lesser of the following two options: (1) the average production reported to UWCD from calendar years 2002 through 2008; or (2) the average production reported to UWCD prior to the Judgment (1989 to 1995). Additionally, a total of 40.7 af of SPBPA's allocation is held in "reserve" by the SPBPA for nonparty pumpers have declined to stipulate and become parties to the Judgment. In addition, the City of Ventura has acquired 225.8 af of prior SPBPA allocation through water allocation transfers to the City.<sup>49</sup>

The SPBPA's calendar year 2013 and 2014 allocations were 27,545.8 afy (excluding nonparties) distributed among its members with a 7-year average surplus of 2,123.8 af from pumping below the allocation. The City of San Ventura's 2013 and 2014 allocations were 3,000 af plus 225.8 af of prior Santa Paula Basin Pumpers Association allocation with a 7-year average surplus of 2,293.6 af from pumping below its allocation.<sup>50</sup>

The Judgment also allows for de minimis production by landowners that are not allocated an Individual Party Allocation, which allows these landowners to produce groundwater for uses on their overlying property so long as such use does not exceed 5 aft in any particular year. In calendar years 2013 and 2014, there were five de minimis producers.<sup>51</sup>

### ***Historical Groundwater Levels***

Historically, water level trends in the Santa Paula basin were summarized through the use of a Groundwater Level Index. The index includes nine key wells in the basin that were selected for their relatively long record and geographic distribution across the basin. The following observations were made of the Groundwater Level Index graph:

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49 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016).

50 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016).

51 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016).

- 1983 to drought period of 1990 and 1991: declining index that directly mimics the declining cumulative departure from average precipitation trend;
- 1991 to 1998: characterized as a wetter period than previous with an increasing index and cumulative departure from average precipitation;
- 1998 to 2011: a net positive cumulative departure from average precipitation during this period with partial rebounds in the groundwater level index during particularly wet water years 2005 and 2011;
- 2011 to 2014: a steep decline in groundwater level index, corresponding to below-average precipitation since water year 2012, including the driest back-to-back water years 2013 and 2014 recorded since 1898 and 1899.

Since 2005, there have been 3 above-average precipitation years, including 2011, and 5 below-average precipitation years. In general, the trend in the Groundwater Level Index tends to follow the trend in the cumulative departure from average precipitation curve, that is, trending down during drier-than-average periods and trending up during wetter-than-average periods.<sup>52</sup> As an update, since the year 2012, rainfall has declined to drought conditions, then increased again in 2015. Total annual precipitation data for the Santa Paula area from 2010 to 2016 is presented in **Table 8, Annual Precipitation Totals: 2010–2016**.

**Table 8**  
**Annual Precipitation Totals: 2010–2016**

Calendar Year	Total Annual Precipitation Station 173A (in.)	Total Annual Precipitation Station 245B (in.)	Total Annual Precipitation Station 018B (in.)
2010	27.09	(18.48*)	—
2011	31.76	25.76	27.35
2012	12.55	9.85	6.52
2013	8.35	5.96	9.38
2014	9.67	6.15	—
2015	NA	11.22	NA
2016	NA	9.88	NA

Source: Exported from Ventura County Watershed Protection District Hydrologic Data Server, Annual Rainfall Totals. Data from Station 245B (Santa Paula-Wilson Ranch), #173A (Santa Paula-Ferndale Ranch), and #018B (Santa Paula-Limoneira Ranch)

\*Data from Station #245A (Santa Paula-UWCD)

### **Historical Groundwater Extraction**

The historical groundwater extractions for the Santa Paula basin are shown in **Table 9, Historical Santa Paula Basin Groundwater Extractions**. The extractions vary from a high of 33,453 af in 1990 during the peak of the last drought to a low of 16,710 af during the very wet year of 1983. The extractions during

52 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016).



2010 (a wet year) were reportedly 4,322 aft below what was extracted in 2014, which received about one-third less water during the rainfall year.

**Table 9**  
**Historical Santa Paula Basin Groundwater Extractions**

Calendar Year	Groundwater Extractions (acre-feet)	Calendar Year	Groundwater Extractions (acre-feet)	Calendar Year	Groundwater Extractions (acre-feet)
1980	26,820	1992	24,355	2004	27,306
1981	27,545	1993	26,998	2005	24,700
1982	22,925	1994	26,244	2006	24,830
1983	16,710	1995	25,042	2007	28,077
1984	29,455	1996	26,008	2008	26,686
1985	26,533	1997	28,961	2009	25,820
1986	21,617	1998	21,622	2010	23,115
1987	24,852	1999	27,700	2011	24,202
1988	25,370	2000	26,798	2012	25,824
1989	29,362	2001	22,530	2013	26,485
1990	33,453	2002	27,259	2014	27,437
1991	27,056	2003	22,280	<b>Average</b>	<b>25,695</b>

*Source: United Water Conservation District, Combined 2013 and 2014 Santa Paula Basin Annual Report, professional paper 2016-01, prepared by the Santa Paula Basin Technical Advisory Committee (January 2016).*

While there have been periodic declines in water levels within the Santa Paula Basin, members of the SPBPA agree that the Santa Paula Basin is not in a state of overdraft. The parties agreed that the “assumed initial yield” of the basin is 33,500 afy. Under the terms of the Judgment, a 7-year study period (1996 to 2003) formed the basis for determining actual safe yield. After 7 years, water use data was analyzed to refine the assumed initial yield of 33,500 afy. United Water Conservation District prepared a report<sup>53</sup> on the status of the Santa Paula Basin. The UWCD report concluded that the average groundwater production during the period 1983 to 1995 was 26,000 af. According to the Report, no overdraft was observed at the documented production rates during the period 1983 to 1995. The Report also identified that during the period 1997 to 2003, parties to the Judgment had cumulatively produced 42,111 af less than their combined total allocation for this period. Yield of the Santa Paula Groundwater Basin appeared to be no

53 UWCD, *Santa Paula Basin 2003 Annual Report*, <https://www.unitedwater.org/images/stories/Resource-Conservation/GW-Management/Groundwater-Hearing/Exhibits/U62%20-%20Santa%20Paula%20Basin%202003%20Annual%20Report.pdf> (November 2004).

less than 26,000 afy.<sup>54</sup> However, the Report did not recommend a change in the basin’s yield. The UWCD is conducting an analysis to update the current safe yield of the basin with completion anticipated in 2016.<sup>55</sup>

### Aquifer Adjudication

Disagreement over the issue of safe yield of groundwater between the UWCD and other parties using water from the Santa Paula Basin, including the City of Santa Paula and the City of San Buenaventura (Ventura), led to the adjudication of groundwater rights within the Santa Paula Basin in 1996. A stipulated judgment was agreed to by the parties, and after review and approval by the Ventura County Superior Court, was entered as a final judgment (“Judgment”) to adjudicate groundwater rights within the basin. In summary, the Judgment adjudicates groundwater rights, regulates individual and collective pumping, provides for basin management through a Technical Advisory Committee (TAC), and reserves jurisdiction in the Superior Court to resolve future disputes and provide for supplementary orders as necessary.<sup>56</sup>

The Judgment allocates the use of groundwater in the Santa Paula Basin between the City of Ventura and the SPBPA, which is a consortium of water users in the Santa Paula area, including the City and farming interests. UWCD is also a party to the Judgment. Although UWCD does not produce water from the Santa Paula Basin, the basin is located within its boundaries, and UWCD is authorized to engage in groundwater management and replenishment activities and to act to protect water supplies that are of common benefit to the lands and residents within UWCD.<sup>57</sup>

Currently, the SPBPA possesses a collective groundwater right allocation of 27,551 afy that it holds in trust for its membership. The Judgment further subdivides the collective 27,515 afy allocation as sub-allocations to each of the SPBPA members and a few nonparties.<sup>58</sup> The allocations and sub-allocations for 2016 are summarized in **Table 10, Santa Paula Basin Water Allocations (2016)**.

Pursuant to the terms of the Judgment and recent acquisitions, the City of Santa Paula has a sub-allocation of 5,560 afy available for urban uses.<sup>59</sup> However, the City transferred 673 afy to Canyon Irrigation Company in January 1998. This amount could be adjusted if the terms of the Judgment are modified, or if

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54 UWCD, Santa Paula Basin 2003 Annual Report, <https://www.unitedwater.org/images/stories/Resource-Conservation/GW-Management/Groundwater-Hearing/Exhibits/U62%20-%20Santa%20Paula%20Basin%202003%20Annual%20Report.pdf> (November 2004).

55 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 62.

56 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 12.

57 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 12.

58 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 61.

59 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), Appendix D, Table 6-9 Retail: Water Supplies—Projected.

the City acquires additional water rights from areas subject to development or from other users within the SPBPA.<sup>60</sup>

**Table 10**  
**Santa Paula Basin Water Allocations (2016)**

Water User	Allocation (afy)
<b>Santa Paula Basin Pumpers Association</b>	
City <sup>a</sup>	5,560
Canyon Irrigation Company	673
Farmers Irrigation Company	9,913
Limoneira	3,549
Alta Mutual Water Company	763
All Other SPBPA Users <sup>b</sup>	7,093
<b>Subtotal SPBPA</b>	<b>27,551</b>
City of San Buenaventura	3,261
Unallocated Reserve	2,688
<b>Total</b>	<b>33,500</b>

Source: City of Santa Paula, *Final 2016 UWMP Update (August 2017)*, Table 4-1, p. 62.

Note: afy = acre-feet per year.

<sup>a</sup> City of Santa Paula, *Final UWMP 2016 Update (August 2017)*, Appendix D, Table 6-9 Retail: Water Supplies—Projected.

<sup>b</sup> Includes Bender and McGaelic Farms.

The City of Ventura has an allocation to pump on average 3,261 afy under a Class II Emergency. A long-term drought situation affecting surface water supplies would be considered a Class II Emergency. In addition, the Judgment also provides for an unallocated reserve of 2,688 afy.<sup>61</sup>

Water on the Project Site used for irrigation has been historically supplied from on-site wells. All wells are listed in the Judgment as being within the Santa Paula Basin. Withdrawals from all of the wells have been accounted for under the Santa Paula Basin Judgment. Currently, the members of the SPBPA have a cumulative allocation to pump on average 27,515 afy.<sup>62</sup> The Judgment sets forth an “assumed initial yield” of the basin at 33,500 afy, subject to modification if credible technical information demonstrates a need for a change. The Judgment also set forth a 7-year study period to evaluate the appropriateness of the assumed initial basin yield of 33,500 afy, which began on January 1, 1996. The average is a rolling average; thus, for 2011, the average extraction amount was based on the period from 2005 to 2011. After the 7-

60 City of Santa Paula, *Final UWMP 2016 Update (August 2017)*, 61.

61 City of Santa Paula, *Final UWMP 2016 Update (August 2017)*, 62, Table 4-1.

62 City of Santa Paula, *Final UWMP 2016 Update (August 2017)*, 18.

year study period, UWCD and the other members of the TAC collaborated to produce a study of the basin's groundwater conditions and the implications for the initial 33,500 afy yield allocation.<sup>63</sup>

Groundwater production during 2014 was greater than the average in recent years, and precipitation was less than average. Production has remained less than the pumping allocations.<sup>64</sup> The observed decline in groundwater levels has been a matter of some concern, but the decline has not been abrupt and further monitoring and research is in process to determine the cause of the decline and the most appropriate and cost-effective remedial action should this trend continue without stabilizing. More in-depth monitoring and research is underway to correlate annual basin recharge, discharge, and water level changes used to understand and determine the basin status.

UWCD has historical groundwater elevation data for 150 wells, 90 of which extensive records exist.<sup>65</sup> The other wells either have been destroyed or are no longer being monitored. Recorded groundwater level highs in 2009 and 2010 are below the recorded groundwater level highs seen in 1998. From 1998 to 2009, 47 wells show groundwater level declines, 1 well shows a groundwater level rise, 1 well shows no change in groundwater level, and 26 wells have no groundwater level measurements in 1998 or 2009. From 1998 to 2010, 49 wells show groundwater level declines, 1 well shows a groundwater level rise, 2 wells show no change in groundwater levels, and 23 wells have no groundwater level measurements in 1998 or 2010.

Since 1998, the basin has experienced only two significant wet years: 2001 at 26.54 inches of precipitation, and 2005 at 40.54 inches of precipitation.<sup>66</sup> The next highest precipitation years were in 2011 at 23.80, 2003 at 19.94 inches, and at 2010 at 19.33 inches. The groundwater level declines in the basin since 1998 are in response to this relatively dry period. If the basin is operating within a yield, groundwater levels should recover to 1998 levels or at least to 2005 levels with the onset of a wet period.<sup>67</sup>

The estimated subsurface outflow was reported by DWR in Bulletin 118 to be 7,200 afy. Average annual extraction was estimated to be 21,612 afy in Bulletin 118.<sup>68</sup> Based on the most recent data from 2003, the average annual pumping rate of approximately 26,000 afy for the period from 1983 through 1995 is considered sustainable.<sup>69</sup> Furthermore, it is the opinion of the Santa Paula Technical Advisory Committee that the yield of the basin is greater than the average annual production of 26,000 af. Fluctuations in

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63 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield*, prepared for Santa Paula Basin Technical Advisory Committee (July 2003).

64 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016)

65 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016)

66 UWCD, *2011 Santa Paula Basin Annual Report*, professional paper 2012-001 (September 2013).

67 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016)

68 California Department of Water Resources, *California's Groundwater Bulletin 118* (February 2004).

69 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield*, prepared for Santa Paula Basin Technical Advisory Committee (July 2003).

groundwater levels correlate with precipitation trends, and long-term observations suggest that the basin was not in a state of overdraft.<sup>70</sup> However, the TAC recommended that the yield remain at 33,500 afy.<sup>71</sup>

Water Code section 10631 requires that this WSA (a) identify whether the DWR has determined, in the most recent official department bulletin, whether the Santa Paula Basin is presently in a state of overdraft or at risk of becoming overdrafted under current conditions; and (b) provide an analysis of the sufficiency of the basin's groundwater supply to meet the projected water demands of the of the proposed Project. DWR's most recent assessment of conditions in the Santa Paula Basin was issued as part of DWR's Bulletin 118, Update 2003, which does not state that any portion of the Santa Paula Basin is presently, or was previously, in a state of overdraft.<sup>72</sup> Bulletin 118 does, however, report as follows:

*Hydrographs from the Santa Paula Subbasin show a range of up to 55 feet in water level elevation since 1975. The hydrographs show an annual cyclic rise and fall of water level of about 20 feet with longer-term variations apparently following precipitation cycles. The subbasin was at a low level in 1991 and 1992, then recovered by 1994 and has remained stable since then.*

A basin yield study by experts for the City of Ventura, SPBPA, and UWCD suggests that the safe yield of the basin is probably near the historic pumping amount.<sup>73</sup>

The 2013 and 2014 Combined Annual Report for the Santa Paula Basin concluded that the majority of the wells monitored in the Santa Paula basin have experienced a gradual groundwater level decline; however, the changes vary from well to well and period to period with some wells showing a slight increase in groundwater levels, but the majority of wells showing a modest decline in water levels."<sup>74</sup>

As the forgoing discussion illustrates the Santa Paula Basin is comprehensively managed by the TAC, UWCD, and the reserved jurisdiction of the Court, as provided in the Judgment. The basin's water tables have stabilized and appear to be sufficient to support the allocation of groundwater rights set forth within the Judgment. Moreover, groundwater production rights are defined and limited as a collective whole and in relation to each of SPBPA's individual members. This confinement and definition of the groundwater rights existing within the Santa Paula Basin provides additional certainty for the long-term reliability of the groundwater supply from the basin.

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70 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield* (July 2003).

71 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield* (July 2003).

72 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118, Update 2003 (October 2003).

73 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield* (July 2003).

74 UWCD, *Combined 2013 and 2014 Santa Paula Basin Annual Report* (January 2016).

### Groundwater Allocation Transfers from Developed Properties

In accordance with City Municipal Code section 52.021 (Water Resource In-Lieu Fee Ordinance No. 1058), landowners or developers are required to transfer their groundwater rights to the City as a condition of project approval. The intent of the Ordinance is to ensure that new urban land users provide sufficient water resources for their needs without taxing existing users. If the associated water rights are not sufficient to serve the proposed development's anticipated water use (as determined by the City), or if the water rights are held by another entity who cannot or will not dedicate those rights to the City, the developer must purchase additional water rights and dedicate them to the City or pay a water resource in-lieu fee to the City. This ordinance applies to water rights within City limits as well as parcels outside City limits who must receive service from the City Water Enterprise.

**Table 11 Existing and Potential City Water Resources and Demand 2016 UWMP** contains a summary of existing and potential water resources for the City. The City identified 1,925 afy of potential groundwater allocations that could be transferred to the City from overlying landowners within the City General Plan boundary. One property includes a reserve of 110 afy for agricultural uses. Thus, the maximum potential net groundwater transfer is 1,815 afy (further reduced to 1,738 afy in 2017 due to recent transfers). These transfers will occur in phases during the next 20 years as development occurs within the City. Transfers of allocations will need to be reported to the Technical Advisory Committee in accordance with the Judgment. The SPBPA will then transfer the applicable number of memberships (allocations) when transfers are between association members; a membership is equal to 1 afy of groundwater allocation.<sup>75</sup>

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<sup>75</sup> City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 71.

**Table 11**  
**Existing and Projected City Water Resources and Demand (afy) 2016 UWMP**

<b>Supplies vs Demands</b>	<b>2015***</b>	<b>2017*</b>	<b>2020</b>	<b>2025</b>	<b>2027*</b>	<b>2030</b>	<b>2035</b>	<b>2037*</b>	<b>2040</b>
<b>Existing Supplies</b>									
City Wells <sup>a</sup>	5,483	5,514	5,560	5,560	5,560	5,560	5,560	5,560	5,560
Santa Paula Creek <sup>b</sup>	500	500	500	500	500	500	500	500	500
Subtotal	5,983	6,014	6,060	6,060	6,060	6,060	6,060	6,060	6,060
<b>Projected Supplies</b>									
Groundwater Allocation Transfers <sup>c</sup>	454	348**	348	695	834	1,043	1,390	1,529	1,738
Purchased Groundwater Allocations <sup>d</sup>	200	100**	100	200	240	300	400	439	497
SWP <sup>3</sup>	0	0	0	0	0	0	0	0	0
Recycled Water <sup>f</sup>	0	0	400	800	960	1,200	1,600	1,760	2,000
Subtotal	654	448	848	1,695	2,034	2,543	3,390	3,728	4,235
<b>Total Projected Supplies</b>	<b>6,637</b>	<b>6,462</b>	<b>6,908</b>	<b>7,755</b>	<b>8,094</b>	<b>8,603</b>	<b>9,450</b>	<b>9,788</b>	<b>10,295</b>
<b>Existing Demands</b>									
Current Potable Demands <sup>h</sup>	3,630	3,630	3,630	3,630	3,630	3,630	3,630	3,630	3,630
Current Water Losses	277	277	277	277	277	277	277	277	277
Subtotal	3,907	3,907	3,907	3,907	3,907	3,907	3,907	3,907	3,907
<b>Potential Demands</b>									
New Potable Demands <sup>h</sup>	N/A	N/A	287	575	690	862	1,150	1,265	1,437
New Potable Water Losses <sup>i</sup>	N/A	N/A	14	29	35	43	57	63	72
New Recycled Demands <sup>f</sup>	N/A	N/A	380	760	912	1,140	1,520	1,672	1,900
New Recycled Water Losses <sup>i</sup>	N/A	N/A	20	40	48	60	80	88	100
Subtotal	N/A	N/A	701	1,404	1,685	2,105	2,807	3,088	3,509
<b>Total Estimated Demand (Potential + Existing Demand)</b>	<b>4,840</b>	<b>4,745</b>	<b>4,608</b>	<b>5,311</b>	<b>5,592</b>	<b>6,012</b>	<b>6,714</b>	<b>6,995</b>	<b>7,416</b>

Project Demands as % of Total City Supply	0%	0.61%	0.57%	0.51%	0.49%	0.46%	0.42%	0.41%	0.39%
<b>Difference (Supply less Demand)</b>	<b>1,797</b>	<b>1,717</b>	<b>2,300</b>	<b>2,444</b>	<b>2,502</b>	<b>2,591</b>	<b>2,736</b>	<b>2,793</b>	<b>2,879</b>

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017), 11.

\* Projected data.

\*\* Data taken from 2020 data.

\*\*\* 2015 data taken from Final 2010 UWMP (June 2011).

**Notes:**

All values rounded to the nearest 1 acre-foot (af).

Santa Paula West Area Business Park Specific Plan would start construction in 2017 and be completed by 2027. Conservatively assumed full build-out Project Demand numbers in 2017.

afy = acre-feet per year.

<sup>a</sup> The City's current allocation is 5,488 afy (California, 2011; Frank B. and Associates, 2016), updated in the 2016 UWMP to 5,560 afy 2016 UWMP Update (August 2017), Appendix D, Table 6-9 Retail: Water Supplies - Projected

<sup>b</sup> The City currently wheels the 500 afy of surface water from Santa Paula Creek to Farmers Irrigation Company, which uses the surface water in lieu of pumped groundwater, and the City gains 500 afy groundwater pumping credits in the Santa Paula Basin.

<sup>c</sup> The City anticipates receiving 1,816 afy of groundwater allocation transfers via agricultural land development by 2040. For planning purposes, the 1,816 afy is distributed equally from 2020 to 2040. Note that the method for dividing up groundwater allocations through the years was done differently in the 2016 Draft UWMP than in the 2010 Final UWMP, where allocation transfers were achieved during four equal 5-year periods (approximately 454 afy per 5-year period).

<sup>d</sup> The City anticipates purchasing 497 afy of additional groundwater allocations by 2040. For planning purposes, the 497 afy is distributed equally from 2020 to 2040.

<sup>e</sup> For planning purposes, the City does not anticipate receiving SWP water during the period 2020-2040.

<sup>f</sup> The City anticipates initiating a recycled water program by 2020. Estimate includes new community landscaped areas with irrigation, a potential golf course, and potential agricultural irrigation. It is anticipated that approximately 2,000 afy could be developed by 2040. For planning purposes, the 2,000 afy is distributed equally from 2020 to 2040.

<sup>g</sup> Existing demand is from 2015 data and is made up of 2,106 af from single-family residential, 868 af, from multifamily residential, 493 af from commercial/institutional, 48 af from industrial, 49 af from landscape irrigation, 22 af from other, 44 af from sales to Middleroad Mutual Water Company, and 277 af from estimate losses.

<sup>h</sup> City anticipates 2,808 afy of new potential residential, commercial institutional, industrial, and landscape development by 2040 for build-out of potential projects.

<sup>i</sup> Estimated at 5 percent of total new demands.



The 2016 UWMP Update anticipates that the City will acquire through allocation transfers 448 afy by 2020, 895 afy by 2025, 1,343 afy by 2030, 1,790 by 2035, and 2,235 afy by 2040.<sup>76</sup>

Implementation of these water supply programs is anticipated to provide the City with sufficient water supplies to meet future water demand. As shown in **Table 11**, the potential water supplies available to the City exceed the estimated water demand at City build-out conditions.

### **Purchased Groundwater Allocations**

In 2005, it was determined that there were 497 afy of potentially available groundwater allocations held by others within the Santa Paula Groundwater Basin boundary that were not being utilized). The City has the option to independently pursue the acquisition of groundwater allocations at any time in the future. The 2016 UWMP Update estimated that the City may purchase additional allocations of 348 afy by 2020, 695 afy by 2025, 1,043 afy by 2030, 1,390 by 2035, and 1,738 afy by 2040.<sup>77</sup>

### **State Water Project Water**

The SWP's California Aqueduct is owned and operated by DWR. Ventura County contracted for 20,000 afy of SWP water with 5,000 afy of that amount subcontracted to the UWCD. The UWCD has designated 2,198 afy of SWP water for use by the City.<sup>78</sup>

DWR estimates it will be able to deliver 85 percent, or 3,563,951 af, of requested SWP water in 2017.<sup>79</sup> The estimated demands by SWP contractors for deliveries of Table A water, 4,172,000 af per year, is assumed to be the maximum delivery SWP delivery amount for the 2016 Delivery Capability Report. DWR considered several factors, including existing conditions, SWP operational constraints such as the conditions of the recent Biological Opinions for Delta Smelt, Salmonids and Longfin Smelt incidental take permit, and 2017 contractor demands. DWR may revise allocations if warranted by the year's developing hydrologic and water supply conditions.

Historical allocation made by the SWP for the state as a whole and for the Ventura County Watershed Protection District (WPD) are represented in the **Table 12, SWP Historical Deliveries: 2010–2017**.

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76 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), Table 6-9.

77 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 11.

78 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 13.

79 Department of Water Resources, California State Water Project, "Notice to State Water Project Contractors No. 17-05: 2017 State Water Project Allocation—85 Percent" (April 14, 2017).

For planning purposes, the City does not anticipate directly receiving SWP water in the near future. However, the City may trade, transfer, and/or sell a portion of the SWP water rights to augment existing supplies.

**Table 12**  
**SWP Historical Deliveries: 2010–2017**  
**(acre-feet)**

Calendar Year	Percent Allocation	Total State Allocation	Ventura County WPD Approved Allocation
2010	50%	2,086,000	10,000
2011	80%	3,337,701	16,000
2012	65%	2,711,967	13,000
2013	35%	1,460,342	7,000
2014	5%	208,628	1,000
2015	20%	839,566	4,000
2016	60%	2,527,629	12,000
2017	85%	3,563,951	17,000

*DWR, SWPAO – Water Deliveries, Notice to Contractors, Historical State Water Project Table A Allocations Calendar Year 2010–2017.*  
<http://www.water.ca.gov/swpao/deliveries.cfm>

## Surface Water

The Santa Paula Creek has been and remains a valuable source of water for the City. The Creek has a drainage area of approximately 40 square miles<sup>80</sup>. The City owned the rights to the first 12 cubic feet per second (5,386 gallons per minute) of flow within the Santa Paula Creek.<sup>81</sup>

Santa Paula Creek facilities are located off the east side of Highway 150 approximately 3.5 miles north of Highway 126. Water is diverted to a 27-inch concrete pipe and flows by gravity into the 500,000-gallon Canyon Reservoir. From the Canyon Reservoir water either flows by gravity or is pumped by each irrigation customer.<sup>82</sup>

On 17 February 1998, the City entered into a lease and agreement with the Canyon Irrigation Company concerning the operation, maintenance, and capacity rights of the Canyon Irrigation System and associated surface and groundwater rights. Per the terms of the agreement<sup>83</sup>, the City transferred: (1) its

80 Santa Paula Water Works, *Hydrogeologic Assessment of the Santa Paula Groundwater Basin*, prepared by Richard C. Slade & Associates (1995).

81 Santa Paula Water Works, *Water System Report* (1993).

82 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 67.

83 City of Santa Paula, *Lease and Agreement Regarding the Canyon Irrigation System Between City of Santa Paula and Canyon Irrigation Company*, 1998.

obligation to provide irrigation water service to the Canyon Irrigation System customers; (2) its financial obligation of implementing system maintenance and capital facilities replacement and repairs; (3) all real property and appurtenant facilities necessary for operation of the system; and (4) groundwater rights to the Santa Paula Basin of 673 af. Additionally, the City leased the full capacity of the Canyon Irrigation System and the exclusive right to divert surface water sources flowing in the Santa Paula Creek to the Canyon Irrigation Company. In accordance with the lease and agreement, the City will purchase an annual average of 500 afy of surface water from Santa Paula Creek (or, at the option of the Canyon Irrigation Company, water from other sources, which is surplus to the irrigation needs of its members), for a total of no less than 5,000 af during a 10-year period commencing February 17, 1998. During the subsequent 20-year period, the City has the right to continue to purchase an average of 500 afy of surplus water supplies. If available, the City may also purchase additional surplus water supplies beyond the 500 afy mentioned previously from the Canyon Irrigation Company throughout the next 30 years.<sup>84</sup>

The City currently wheels the 500 afy of surface water from Santa Paula Creek to Farmers Irrigation Company, which uses the surface water in lieu of pumped groundwater, and the City gains 500 afy groundwater pumping credits in the Santa Paula Basin.<sup>85</sup>

### ***Recycled Water***

Construction of the new Santa Paula Water Recycling Facility (WRF) was completed early 2010. The city of Santa Paula purchased the facility on May 1, 2015. The WRF has a permitted dry-weather capacity of 4.2 mgd and permitted wet-weather (also maximum) capacity of 8.0 mgd. The City WRF produces water that meets California Title 22 regulations for recycled water. At present, recycled water is available within the City of Santa Paula area however, there is no infrastructure. The 2016 UWMP estimated recycled water urban demand within the City (and adjacent areas) would be approximately 2,000 afy by the year 2040, as identified in **Table 13, Projected City of Santa Paula 2016 UWMP Recycled Water Demand (afy)**.

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84 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 67.

85 City of Santa Paula, *Final UWMP 2016 Update* (August 2017), 67.

**Table 13**  
**Projected City of Santa Paula 2016 UWMP Recycled Water Demand (afy)**

Potential Use	2015	2020	2025	2030	2035	2040
Existing Landscape Irrigation <sup>a</sup>	0	0	0	0	0	0
Potential New Landscape Irrigation <sup>b</sup>	0	200	200	300	500	700
Golf Course Irrigation <sup>b,c</sup>	0	0	300	300	300	300
Agricultural Irrigation <sup>d</sup>	0	180	260	540	720	900
Groundwater Recharge <sup>e</sup>	0	0	0	0	0	0
Indirect/Direct Potable Reuse <sup>e</sup>	0	0	0	0	0	0
Water Losses <sup>f</sup>	0	20	40	60	80	100
<b>Total<sup>g</sup></b>	<b>0</b>	<b>400</b>	<b>800</b>	<b>1,200</b>	<b>1,600</b>	<b>2,000</b>

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017). Table 4-5.

Note: All values rounded to the nearest acre-foot.

<sup>a</sup> For planning purposes, existing landscape areas with irrigation will remain on potable water until such time that areas are converted to recycled water.

<sup>b</sup> All new community landscape areas, including golf courses, will be designed to be irrigated with recycled water (with potable water as backup supply).

<sup>c</sup> For planning purposes, the City estimates construction and operation of one new golf course (associated with Adams Canyon). If a golf course is not built or in operation, then recycled water could be sold to agriculture or beneficially used for groundwater recharge.

<sup>d</sup> For planning purposes, City's recycled water program may include potential sale of recycled water for agricultural irrigation.

<sup>e</sup> Not anticipated at this time.

<sup>f</sup> Estimated at 5 percent of total new demands.

<sup>g</sup> Total amount of recycled water available estimated to be 2,000 afy based on Santa Paula WRF influent and effluent flows for the period 2010–2015. For planning purposes, the 2,000 afy is distributed equally from 2020 to 2040.

Projected use of recycled water may include approximately 1,050 afy of urban landscape irrigation. At present, the urban landscaped areas proposed to be irrigated with recycled water will generally be within new developments constructed with recycled water infrastructure. In general, the initial phases of the recycled water program will not provide recycled water to existing urban landscaped areas due to the complexities and cost associated with converting to recycled water use. An additional 950 afy may be available for agricultural irrigation. However, one City report identified up to 13,590 afy of potential recycled water demand from local agricultural interests. Therefore, estimates for recycled water supply and demand are considered to be conservative.<sup>86</sup>

Although the potential may exist in the future, the City of Santa Paula is not developing plans for groundwater recharge.<sup>87</sup> The Judgment does not preclude the recharge of the Santa Paula Basin, and indeed includes provisions for potential recharge. According to the Judgment, such storage would require approval of the TAC, must not adversely impact the water quality of the Santa Paula Basin, and must not cause injury to any vested rights. In the event the storage of water causes the Santa Paula Basin to spill,

<sup>86</sup> City of Santa Paula, Final UWMP 2016 Update (August 2017), 78.

<sup>87</sup> City of Santa Paula, Final UWMP 2016 Update (August 2017), 78.

the first water lost to the Santa Paula Basin is deemed to be the stored water. Furthermore, title is retained to water stored underground, and stored water (minus losses) may be pumped in addition to the approved pumping allocations, provided no injury is caused to any intervener or party to the Judgment. In other words, if the City recharged 1,000 afy to the basin, they would be entitled to pump an additional 1,000 afy above and beyond their stipulated allocation.<sup>88</sup>

Currently there are no recycled water systems in the proposed Project vicinity. However, the 2012 Wastewater Master Plan has included West Area 2 to have a future wastewater flow of 0.082 million gallons per day or 919 af per year during an average dry-weather season.<sup>89</sup> The proposed Project includes an on-site recycled water distribution system to irrigate the greenbelt and other irrigation areas. This will allow the Santa Paula West Business Park to make use of recycled water when the City completes its planned recycled water plan and extends a line to the point of connection in the railroad right of way at Beckwith Road.<sup>90</sup>

The proposed Specific Plan recycled water system would operate via a proposed 12-inch distribution main constructed in Faulkner Road, within the City limits. This terminus would become the main POC for the proposed Project. The proposed distribution system will be comprised of 6-inch mains from the POC of the City's recycled water system.

## 3.2 ANALYSIS OF WATER SUPPLY AND DEMAND

The available supplies and water demands for the City's service area were analyzed to assess its ability to satisfy demands during three scenarios: a normal water year, a single dry year, and multiple dry years.

This WSA addresses the City's water supply and demand as it relates to a variety of concerns including:

1. Information and data available from the City's Final 2016 UWMP Plan Update,
2. Issues related to water supply reliability relating to nongroundwater sources (Santa Paula Creek, and SWP water),
3. Consideration of information available from the DWR's *State Water Project Final Delivery Capability Report July 2015*.

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88 City of Santa Paula, *Final UWMP 2016 Update* (August 2017).

89 City of Santa Paula, *Wastewater System Master Plan* (June 2012).

90 City of Santa Paula, *Santa Paula West Business Park Specific Plan* (amended October 2016).

**Table 14, Projected Supply Reliability by Source**, illustrates the assumptions associated with projected supply reliability by source and is used in the following discussion of City water supply and demand scenarios as they relate to the proposed Project.

**Table 14**  
**Projected Supply Reliability by Source**

Supply Sources	Normal Water	Single Dry	Multiple Dry Years		
	Year	Year	Year 1	Year 2	Year 3
City Wells	100%	100%	100%	100%	100%
Santa Paula Creek	100%	100%	100%	100%	100%

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017), Appendix D, Table 7-1,

## Average and Dry Year Water Supply and Demand

The following tables provide the City's projected urban water supplies and demands in an average year, a single dry year, and multiple dry years.

**Table 15, Supply and Demand Comparison 2016 UWMP—Average Year (afy)**, shows the City's projected urban water supplies and demands in an average year based on the 2016 UWMP.

**Table 16, Supply and Demand Comparison 2016 UWMP—Single Dry Year (afy)**, shows the City's projected urban water supplies and demands in a single dry year based on the 2016 UWMP.

**Table 17, Supply and Demand Comparison 2016 UWMP—Multiple Dry Years (afy)**, shows the City's projected urban water supplies and demand through 2040. According to the UWMP, the City's sources of supply are adequate for multiple dry years, for a 20-year period based on the 2016 UWMP.

**Table 15**  
**Supply and Demand Comparison 2016 UWMP—Average Year (afy)**

Supply vs Demand	2020	2025	2030	2035	2040
Supply Totals	6,908	7,755	8,603	9,450	10,295
Demand Totals	4,608	5,311	6,012	6,714	7,416
<b>Difference</b>	<b>2,300</b>	<b>2,444</b>	<b>2,591</b>	<b>2,736</b>	<b>2,879</b>

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017).

Note: afy = acre-feet per year.

**Table 16**  
**Supply and Demand Comparison 2016 UWMP—Single Dry Year (afy)**

Supply vs Demand	2020	2025	2030	2035	2040
Supply Totals	6,908	7,755	8,603	9,450	10,295
Demand Totals	4,608	5,311	6,012	6,714	7,416
<b>Difference</b>	<b>2,300</b>	<b>2,444</b>	<b>2,591</b>	<b>2,736</b>	<b>2,879</b>

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017).

Note: afy = acre-feet per year.

**Table 17**  
**Supply and Demand Comparison 2016 UWMP—Multiple Dry-Years (afy)**

Period	Supply vs Demand	2020	2025	2030	2035	2040
Multiple Dry Year	Supply Totals	6,908	7,755	8,603	9,450	10,295
First-Year Supply	Demand Totals	4,608	5,311	6,012	6,714	7,416
	<b>Difference</b>	<b>2,300</b>	<b>2,444</b>	<b>2,591</b>	<b>2,736</b>	<b>2,879</b>
Multiple Dry Year	Supply Totals	6,908	7,755	8,603	9,450	10,295
Second-Year Supply	Demand Totals	4,608	5,311	6,012	6,714	7,416
	<b>Difference</b>	<b>2,300</b>	<b>2,444</b>	<b>2,591</b>	<b>2,736</b>	<b>2,879</b>
Multiple Dry Year	Supply Totals	6,908	7,755	8,603	9,450	10,295
Third-Year Supply	Demand Totals	4,608	5,311	6,012	6,714	7,416
	<b>Difference</b>	<b>2,300</b>	<b>2,444</b>	<b>2,591</b>	<b>2,736</b>	<b>2,879</b>

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017).

Note: afy = acre-feet per year.

## Project Supply and Demand

The proposed Project will demand 39.7 afy at full build-out (see **Table 2**).

The estimated supply to West Area 2 per the 2016 UWMP Update is 87.7 afy.<sup>91</sup> The estimated water demand for the proposed Project is approximately 39.7 afy (20.4 afy for Commercial/Light Industrial use, 1.5 afy for Light Industrial use, and 17.8 afy for landscape irrigation). The potable demand of 21.9 afy for the Commercial/Light Industrial and Light Industrial uses, is approximately 25 percent of the West Area 2 total estimated amount. The landscaped areas will be irrigated using recycled water to be delivered from the City's wastewater treatment plant.

91 City of Santa Paula, Final UWMP 2016 Update (August 2017), 46, Table 3-2, (1,905,750 square feet of development at 15 gal/sq. ft./year is 87.7 afy).

The Project will replace existing agricultural uses on the site. As such, water currently used for agricultural irrigation will be used instead for Project consumption. Currently agricultural uses on the Project Site consume approximately 281.1 afy (average during the past 5 years; see **Table 3**). As such, the proposed Project's consumption of 39.7 afy will be a net reduction in total water use of 241.4 afy.

It should be noted that the West Area 2 Planning Area has an estimated supply of 87.7 afy based on future development. The proposed Project could utilize a portion of this allocation. However, with the removal of the agricultural uses currently on the Project Site, the Project can use a portion of the existing water currently used for irrigation. It should be noted that this portion of the pumped water will be pumped instead by the City from other wells, and not from the current well on site.

The Project will use recycled water (17.8 afy) that will be available from the City's wastewater treatment facility for irrigation; this will further reduce the demand on potable water supplies. The City's 2016 UWMP forecast having between 400 afy (2020) and 2,000 afy (2040) of recycled water available for use (see **Table 13**). Based on these forecasts, the Project will require only a portion of the recycled water (4.45 percent in 2020 and 0.89 percent in 2040).

**Table 18, Project Supply and Demand Comparison 2016 UWMP—Average Year (afy)** shows the proposed Project water demand as a percent of total supply throughout various milestones in the build-out schedule. By 2027 (build-out), the Project is estimated to demand 39.7 afy of water. Water demand from the Project based on the 2016 UWMP represents 0.61 percent of the City's total projected urban water demand in 2017, decreasing to 0.41 percent in 2037. The projected demand for the Project will account for only a small fraction of the projected City-wide demands.



**Table 18**  
**Project Supply and Demand Comparison 2016 UWMP—Average Year (afy)**

	2015	2017	2020	2025	2027	2030	2035	2037	2040
Total City Supply <sup>a</sup>	6,637 <sup>b</sup>	6,462 <sup>c</sup>	6,908	7,755	8,094	8,603	9,450	9,788 <sup>d</sup>	10,295
West Area 2 Allocation <sup>e</sup>	87.7	87.7	87.7	87.7	87.7	87.7	87.7	87.7	87.7
Existing Agricultural Use <sup>f</sup>	281.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Project Demand <sup>g</sup>	0	39.7	39.7	39.7	39.7	39.7	39.7	39.7	39.7
Percent of City's Total Supply	0%	0.61%	0.57%	0.51%	0.49%	0.46%	0.42%	0.41%	0.39%
Net change from agricultural use	0	(241.4)	(241.4)	(241.4)	(241.4)	(241.4)	(241.4)	(241.4)	(241.4)
Available recycled water	0	0	400	800	960	1,200	1,600	1,760	2,000
Project demand for recycled water (Part of Total Project Demand)	0	0	17.8	17.8	17.8	17.8	17.8	17.8	17.8
Percent of available recycled water	0.00%	0.00%	4.45%	2.23%	1.85%	1.48%	1.11%	1.10%	0.89%

Note: afy = acre-feet per year.

<sup>a</sup> City of Santa Paula, Final 2016 UWMP Update (August 2017), Table 4-4, p. 69

<sup>b</sup> 2015 Data taken from Final 2010 UWMP (June 2011).

<sup>c</sup> Value extrapolated from 2015 and 2020 data.

<sup>d</sup> Value extrapolated from 2035 and 2040 data.

<sup>e</sup> City of Santa Paula, Final 2016 UWMP Update (August 2017), 46, Table 3-2 (1,905,750 square feet of development at 15 gal/sq. ft./year is 87.7 afy).

<sup>f</sup> See Table 3.

<sup>g</sup> See Table 2.

### 3.3 CONCLUSIONS

#### City of Santa Paula Service Area

Based on the information, analysis, and findings documented in this WSA, substantial evidence exists to support a determination that there will be sufficient water supplies to meet the current and future demands of the Project in addition to all forecasted demands for the 20-year period from initial development (2017 to 2037). This is based on the volume of water available in the Santa Paula Basin, and water rights and water supply contracts. The City has committed sufficient resources to further implement the primary elements of the Final 2016 UWMP, which include the purchase of additional water supplies, water conservation, and source substitution (use of agricultural irrigation water and recycled water).

The domestic water supply (potable) for the Project will be supplied by water from on-site water well pumping from the Santa Paula Basin that will ultimately be transferred to the City, encompassing the City of Santa Paula. Groundwater storage will be used in dry years to make up the difference between supply and demand. The Santa Paula groundwater basin has an “assumed initial yield” of the basin is 33,500 afy and currently contains about 26 million af and acts as a very large reservoir. It is capable of meeting the water demands of the City for extended normal and drought periods.

As discussed in the Final 2016 UWMP and this WSA, the City of Santa Paula has many programs to eliminate overdraft and maximize the water resources recycled wastewater, and water conservation including water rates, landscaping ordinance, outreach and education.

The proposed Project falls within the boundaries of the West Area 2 Expansion Area. At 53.81 acres, the Santa Paula West Business Park Specific Plan would take up approximately 43 percent of the 125-acre planned expansion. The City’s General Plan projects an estimated water demand of 87.7 afy for West Area 2. As such, the proposed Project has a projected demand of 39.7 afy, which is included in the General Plan. However, the Project will replace existing agricultural uses that extract well water from the Santa Paula Basin; as such, the Project will result in a net reduction (241.4 afy) of water use on site at build-out.

Currently, the entire potable water supply for the City is obtained by pumping from the Santa Paula Basin. The City has obtained additional groundwater pumping rights through a wheeling agreement with the Canyon Irrigation Company. The potential future water supplies include groundwater rights transfers to the City as new development occurs, City acquisition of potentially available groundwater allocations within the Santa Paula Basin, recycled water, and groundwater production from the Fillmore Basin.

The SPBPA and TAC monitor current and future groundwater pumping within the Santa Paula Basin. The City is not limited to its allocation in any single year, but may produce as much as seven times its annual average allocations during a 7-year period. There are no restrictions regarding pumping in single dry- or

multiple dry-water years subject to court order. As discussed earlier, the Santa Paula Basin Yield Study did not recommend that restrictions be imposed on the amount of groundwater that can be pumped during dry periods. Therefore, groundwater pumping by the City is not anticipated to be subject to any reductions in the dry year analysis.

Recycled water production will not be affected by single dry- or multiple dry-water years. Recycled water supply is directly related to wastewater generation, which is generally associated with indoor potable water use. Currently, there are no restrictions within the City regarding the use of potable water during dry periods. Additionally, the currently proposed uses of recycled water are restricted to nonpotable irrigation that, if reduced during dry periods, would have little or no impact on the community. Therefore, it is not anticipated that the recycled water supply will be reduced during dry periods.

SWP dry-year restrictions are not known due to the lack of specificity regarding how the water will be delivered. For the purposes of this analysis, it is assumed that no SWP water will be delivered in the near future. However, the City may trade, transfer, and/or sell a portion of the SWP water rights to augment existing supplies.

## **Project Water Requirements**

As shown in this WSA analysis, the projected demand for the proposed Project will account for only a small fraction of the total projected demands set forth in the City's General Plan, Land Use Element, for the total projected demands through 2037.

The proposed Project-specific water demand at build-out is 39.7 afy, which includes 21.9 afy of potable use and 17.8 afy for landscape irrigation that can be supplied with recycled water.

The proposed Project incorporates features that reduce the overall water demand and provide for a reduction in use. As previously explained, it is assumed that Project water demand is included within the estimated West Area 2 supply and demand projections necessary to recharge the groundwater basin. In 2037, the proposed Project would utilize approximately 0.41 percent of the total City projected available supply for 2037 based on the Final 2016 UWMP Update. As such, the proposed Project's demand is within the allowable demand necessary to manage the groundwater basin.

## 4.0 LIST OF ACRONYMS

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AB	Assembly Bill
af	acre-feet, equal to approximately 325,851 gallons
afy	acre-feet per year
CEQA	California Environmental Quality Act
DWR	California Department of Water Resources
gpd	gallons per day
gpm	gallons per minute
mgd	million gallons per day
psi	pounds per square inch
PWS	public water system
SB	Senate Bill
SWP	State Water Project
SWRCB	State Water Resources Control Board
UWMP	Urban Water Management Plan
WSA	Water Supply Assessment

## 5.0 REFERENCES

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**APPENDIX C**

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**Letter Correspondence from Doug Shaw**



**Douglas H. Shaw, Jr.**  
First Vice President  
Lic. 00857630

2761 Park View Court  
Oxnard, CA 93036

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Advisory & Transaction Services

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C +1 805 844 1750

March 28, 2017

doug.shaw@cbre.com  
[www.cbre.com/doug.shaw](http://www.cbre.com/doug.shaw)

Mike Penrod  
Chad Penrod  
McGaelic Group  
Via Electronic Mail  
[penrod@parkstoneinc.com](mailto:penrod@parkstoneinc.com)

**RE: Santa Paula West – Building Sizes  
Santa Paula, California**

Dear Mike and Chad:

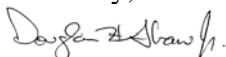
We talked about my concerns related to requiring smaller buildings on the Santa Paula West property. Tenants in the market can range from 10,000 sf up to 200,000 sf. Even larger in some cases. Limiting the maximum size of any individual building to 30,000 sf would drastically limit our ability to lease or sell the properties as we won't be able to respond to a large number of potential tenants. In addition, limiting the clear height would also be a "deal killer" for most tenants. In today's market, low clear height buildings do not lease as quickly and for most tenants, it would immediately remove that property from consideration. We are in an ecommerce era with most companies needing a minimum of 24' clear under the beam at the lowest point of the warehouse on up to 30' and even 32' clear.

For example, one of Santa Paula's largest tenants is Calavo. One of Calavo's competitors is Mission Produce in Oxnard. Mission recently finished a 200,000 sf cooler building that is 30 foot clear. If Calavo ever wants to expand and this limitation is enacted, they will have to relocate to another city in order to compete in their industry. Limoneira would be in a very similar situation.

Economically, this would mean it will take significantly longer to locate potential buyers and tenants putting the project at a huge disadvantage vs. competing properties in the neighboring cities. Since Time is the downfall of many real estate projects, limiting the size of buildings in the Santa Paula West project could cause the project severe economic damage.

Please let me know if you have any questions.

Sincerely,



Douglas H. Shaw, Jr.

**APPENDIX B**

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**Agricultural Survey Letters**

May 8, 2017

Mr. Ilan Bender  
Bender Farms  
410 Beckwith Road  
Santa Paula, CA 93060

RE: **Agricultural Conservation Easement Survey**

On behalf of McGaelic Group and Bender Farms, is conducting a survey to see if any interest in Agricultural Land Owners permanently conserving their Agricultural Land into an Agricultural Conservation Easement:

Are you interested in permanently placing your Agricultural Land in an Agricultural Conservation Easement **NO**

At what price? \_\_\_\_\_

Approximate Number of Agricultural acres   57  

If you have any questions please contact, Michael Penrod (805) 373-8808 ext: 105 or Chad Penrod (805) 373-8808 ext: 106

Sincerely,

Michael Penrod

Comments:    BENDER FARMS OWNS APPROXIMATELY 57 ACRES AND IS NOT INTERESTED IN PLACING THEM IN AN AGRICULTURAL CONSERVATION EASEMENT

---

Please return to:  
Parkstone Companies  
860 Hampshire Road, Suite U  
Westlake Village, CA 91361



May 8, 2017

Mr. Harold Edwards  
Limoneira Company  
1141 Cummings Road  
Santa Paula, CA 93060

RE: **Agricultural Conservation Easement Survey**

On behalf of McGaelic Group and Bender Farms, is conducting a survey to see if any interest in Agricultural Land Owners permanently conserving their Agricultural Land into an Agricultural Conservation Easement:

Are you interested in permanently placing your Agricultural Land in an Agricultural Conservation Easement

YES/NO

At what price?

No Price

Approximate Number of Agricultural acres

4,000 Acres - Ventura County

If you have any questions please contact, Michael Penrod (805) 373-8808 ext: 105 or Chad Penrod (805) 373-8808 ext: 106

Sincerely,

Michael Penrod

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please return to:  
Parkstone Companies  
860 Hampshire Road, Suite U  
Westlake Village, CA 91361



May 15, 2017

Mr. Tim McGrath  
McGrath Ranch  
P.O. Box 4549  
Ventura, CA 93007

RE: **Agricultural Conservation Easement Survey**

On behalf of McGaelic Group and Bender Farms, is conducting a survey to see if any interest in Agricultural Land Owners permanently conserving their Agricultural Land into an Agricultural Conservation Easement:

Are you interested in permanently placing your  
Agricultural Land in an Agricultural Conservation  
Easement

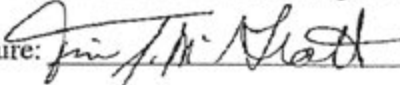
YES  NO

At what price?

NONE

Approximate Number of Agricultural acres

100

Signature: 

If you have any questions please contact, Michael Penrod (805) 373-8808 ext: 105 or  
Chad Penrod (805) 373-8808 ext: 106

Sincerely,

Michael Penrod

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please return to:

Parkstone Companies  
860 Hampshire Road, Suite U  
Westlake Village, CA 91361

860 Hampshire Rd., Ste. U, Westlake Village, CA 91361 ■ Phone: 805-373-8808 ■ Fax: 805-379-1219 ■ www.parkstoneinc.com

May 8, 2017

Mr. Mike Brucker  
JKJ Farms

RE: **Agricultural Conservation Easement Survey**

On behalf of McGaelic Group and Bender Farms, is conducting a survey to see if any interest in Agricultural Land Owners permanently conserving their Agricultural Land into an Agricultural Conservation Easement:

Are you interested in permanently placing your  
Agricultural Land in an Agricultural Conservation  
Easement

YES/NO

At what price?

N/A

Approximate Number of Agricultural acres

43

If you have any questions please contact, Michael Penrod (805) 373-8808 ext:  
105 or Chad Penrod (805) 373-8808 ext: 106

Sincerely,



ILAN BENDER

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please return to:  
Parkstone Companies  
860 Hampshire Road, Suite U  
Westlake Village, CA 91361

November 28, 2017

Mr. Kenneth M. High Jr. Esq.  
300 Esplanade Dr. Suite 850  
Oxnard, CA 93036

RE: **Agricultural Conservation Easement Survey**

On behalf of McGaelic Group LP and Bender Farms, which own approximately 49 acres of agricultural land on the westerly boundary of the City of Santa Paula now in the process of being annexed, zoned and developed into a business park, Parkstone Companies is conducting a survey to see if any owners of other prime agricultural lands in Ventura County are interested in selling an Agricultural Conservation Easement for the purpose of forever waiving development rights on their land, thereby partially mitigating the loss of this farm land to development. It would be greatly appreciated if you could please forward this letter to any of your clients who own prime agricultural land in Ventura County and see if they would be willing to participate in the survey. Doing so would be very help in giving guidance as to the extent of any interest by land owners in participating in this sort of transaction. All that need be done is to have the land owner fill in the blanks below and return this letter.

Currently, LAFCO staff is planning on recommending to the LAFCO Board that it condition annexation on the owner mitigating the loss of farm land to development by requiring that equal or greater acreage in Ventura County be subjected to Agricultural Conservation Easements. We are therefore attempting to determine the extent, if any, of interest by land owners in granting such easements.

Land Owner's name.

Red Hat Properties RANCH LP

Are you interested in selling a permanent  
Agricultural Conservation Easement

NO  
YES

At what price per acre

NOT INTERESTED AT ANY \$

Approximate Number of Agricultural acres owned

110

APN, address or approximate land location.

1/2 CORN POLE, CENTRAL

Currently used for the growing of

LEMONS & AVOCADOS

{0019129.0006 11090801.}

Red Hat Enterprises LLC  
By [Signature]  
Member of General Partner

If you have any questions please contact, Michael Penrod or Chad Penrod at (805) 373-8808 ext: 105 or ext: 106, respectively. Otherwise, please return this form in the envelope provided.

Sincerely,

Michael Penrod  
Parkstone Companies



**APPENDIX A**

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**Revisions to Draft EIR—Utilities**

## 4.14 UTILITIES AND SERVICE SYSTEMS

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This section describes the existing utilities and service systems located on and immediately surrounding the Santa Paula West Business Park Specific Plan (“Specific Plan”) area. The section addresses the potential impacts of the Project on water service, sewer service, and solid waste. Each subsection includes an introduction, followed by discussions of existing conditions, regulatory framework, methodology, potential environmental impacts, cumulative impacts, and recommended mitigation measures to help reduce or avoid identified impacts, and the level of significance of adverse impacts after mitigation.

Information presented in this section derives from the City of Santa Paula’s General Plan (1998), the City of Santa Paula’s ~~Draft-Final~~ *Water Supply Assessment for the Proposed Santa Paula West Business Park Specific Plan Project* (“~~Draft-Final~~ WSA”; ~~November 2016~~), the Final 2016~~0~~ Urban Water Management Plan (UWMP) Update (~~June 2011~~ *August 2017*), the 2005 Potable Water System Master Plan Amendment (June 2012), the Wastewater System Master Plan (2012), the *Sanitary Sewer Technical Report* prepared by Jensen Design & Survey, Inc. (May 2015), CalRecycle, well-pumping data through year 2014, and the proposed Santa Paula West Business Park Specific Plan (October 2016). The ~~Draft-Final~~ WSA is included in **Appendix 4.14**.

### 4.14.1 EXISTING CONDITIONS

#### Water

##### *On-Site Water Availability*

The Project Site currently contains two small farmworker dwelling units that use potable water and approximately 49 acres under agricultural production that also use water for irrigation. The remainder of the Project Site consists of nonirrigated open space and improvements such as roads and equipment storage areas associated with farming operations.

Within the Santa Paula Groundwater Basin, water for the Project Site is currently provided by an on-site water well that supplies water for existing agricultural irrigation uses and for domestic consumption (residents). This existing water well also provides water for off-site users other than those on the Project Site. This existing well has been in service for a long period of time and, for the purposes of future conditions, has run its design life.

## Water Demand

The City's water distribution system provides domestic water service to approximately ~~7,278~~ 400 end users/accounts.<sup>1</sup> As provided in **Table 4.14-1, 2015~~0~~ City Water Demand**, the total 2015~~0~~ water demand within the City was ~~4,416~~ 3,907 acre-feet (af).<sup>2</sup> The largest land use in the City for water demand is single-family residential, which accounted for approximately ~~54~~ 7 percent of the total 2010~~5~~ water demands. Multifamily residential accounts represented approximately ~~22~~ 0 percent of the 2015~~0~~ demands. Commercial/Institutional accounts represented approximately ~~13~~ 4 percent of the 2015~~0~~ demands. Industrial, landscape and agricultural-irrigation, sales to Middleroad Mutual Water Company, estimated losses/unmetered, and "other" accounts represented the balance of the demands.

**Table 4.14-1**  
**2015~~0~~ City Water Demand**

Customer Classification	Demand (acre-feet)	Percent of Total Water Demand
Single-family residential	<del>2,504</del> <u>106</u>	<del>56.7</del> <u>54</u>
Multifamily residential	<del>887</del> <u>868</u>	<del>20.1</del> <u>22</u>
Commercial/Institutional	<del>601</del> <u>493</u>	<del>13.6</del> <u>13</u>
Industrial	<del>48</del> <u>4</u>	<del>1.2</del> <u>1.2</u>
Landscape irrigation	<del>22</del> <u>49</u>	<del>0.5</del> <u>1.2</u>
Other	<del>41</del> <u>22</u>	<del>0.6</del> <u>0.9</u>
Agricultural irrigation/Sales to Middleroad Mutual Water Company	<del>44</del> <u>0</u>	<del>1.1</del> <u>0</u>
Unmetered/Estimated Losses	<del>317</del> <u>277</u>	<del>7.2</del> <u>7.2</u>
<b>Total</b>	<b><del>4,416</del> <u>3,907</u></b>	<b>100.00</b>

Source: City of Santa Paula, Final ~~2016~~ 2010 Urban Wastewater Management Plan (UWMP) Update, ~~June 2011~~ (August 2017), Table 3-1, 42.

The City does not generally provide wholesale water to any other agencies, nor does it purchase water from any wholesale agency. However, in 2010~~5~~, the City provided ~~44~~ 39 af to the Middleroad Mutual Water Company.<sup>3</sup> The City does not use potable supplies for saline barriers, groundwater recharge, conjunctive use, raw water, or recycled water uses.

The 2016~~0~~ UWMP Update includes estimated future water demand based on the City's General Plan (see **Table 4.14-2, Estimated Future Potable Water Demand**).<sup>4</sup> Future water requirements are estimated

- 1 City of Santa Paula, Final ~~2016~~ 2010 Urban Water Management Plan Update (UWMP), (~~June 2011~~ August 2017), 3.
- 2 City of Santa Paula, Final 2016 UWMP Update (August 2017), 3. City of Santa Paula, Final 2010 UWMP Update (June 2011).
- 3 City of Santa Paula, Final 2016 UWMP Update (August 2017), 3. City of Santa Paula, Final 2010 UWMP Update (June 2011).
- 4 City of Santa Paula, Final 2016 UWMP Update (August 2017), Table ES-2, 4. City of Santa Paula, Final 2010 UWMP Update (June 2011).

through 2035 according to future land use, population projections, and water demand characteristics. Potable water demands for potential developments were estimated to be a net increase of 1,697 af.

**Table 4.14-2  
Estimated Future Potable Water Demand**

Land Use	Potential Development <sup>a,b,c,d</sup>	Estimated Potable Water Demand (afy) <sup>e</sup>
Existing Demand		4,416
<b>Potential Future Demand</b>		
<b>Residential</b>		
Adams Canyon	495 du	
East Area 1	1,500 du	
Fagan Canyon	450 du	
Other	<del>200</del> 703 du	
Subtotal	<del>2,645</del> 3,148 du	<del>1,349</del> 259
<b>Commercial/Industrial/Institutional/Institutional<sup>e</sup>Mixed- Use<sup>e</sup></b>		
Adams Canyon <sup>f</sup>	100,000 sq. ft.	
East Area 1 <sup>g</sup>	<del>811,000</del> 998,993 sq. ft.	
East Area 2	<del>1,602,000</del> 234,500 sq. ft.	
Fagan Canyon <sup>h</sup>	<del>100,000</del> 76,230 sq. ft.	
West Area 2	1,905,750 <del>6,000</del> sq. ft.	
Other	<del>1,200,000</del> 115,050 sq. ft.	
Subtotal	<del>5,706,300</del> 3,664,293 sq. ft.	<del>267</del> 169
<b>Industrial</b>		
East Area 1	25,000 sq. ft.	
East Area 2	1,056,330 sq. ft.	
Other	128,000 sq. ft.	
Subtotal	1,209,330 sq. ft.	<u>9</u>
<b>Parks and Recreation<sup>e</sup></b>		
Adams Canyon <sup>i</sup>	<del>200</del> 460 acres	
East Area 1	<del>89</del> 225 acres	
Fagan Canyon	<del>7</del> 213 acres	
South Mountain	115 acres	
Other	0 acres	
Subtotal	<del>411</del> 1,013 acres <sup>1</sup>	0
Unaccounted Water <sup>h</sup> Landscape with Irrigation		<del>81</del> 901
Water Losses <sup>j</sup>		<u>117</u>
Subtotal Potential Future Demand		<u><u>1,696</u> 2,455</u>

Land Use	Potential Development <sup>a,b,c,d</sup>	Estimated Potable Water Demand (afy) <sup>e</sup>
<b>Total Future Potable Demands</b>		<b>6,112,362</b>

Source: City of Santa Paula, Final 2016 UWMP Update (August 2017), ~~Final 2010 UWMP Update (June 2011)~~, Table 2-4ES-2 and Table 2-4, pp. 5 and 39.

Notes: afy = acre-feet per year; du = dwelling units; sq. ft. = square feet.

<sup>a</sup> Source: City of Santa Paula General Plan, "Land Use Element" (2011).

<sup>b</sup> Source: City of Santa Paula General Plan (1998).

<sup>c</sup> East Area 1 Specific Plan (2007).

<sup>d</sup> Source: personal communication (City, 2011b)

<sup>e</sup> All new community landscape areas, including golf courses, will be irrigated with recycled water. However, this water demand will be approximately 900 afy.

<sup>f</sup> Includes school and destination resort hotel.

<sup>g</sup> Includes two schools, a community college, and an assisted living facility. It should be noted that the community college is not a part of the East Area 1 Specific Plan Amendment.

<sup>h</sup> Includes school.

<sup>i</sup> Includes golf course (Adams Canyon).

<sup>j</sup> Source: Assume 5 percent.

As shown in **Table 4.14-3, Potable Water Demands 2015–2040<sup>35</sup>**, the estimated total potable water demand (existing plus potential) is approximately 4,840,907 af in 2015 and will increase to approximately 6,116,416 af by 2035~~2040~~. Future water demand values represent the total potable water demand, including anticipated future development.

**Table 4.14-3  
Potable Water Demands 2015–2035~~2020~~-2040 (afy)**

	<del>2015</del>	<del>2020</del> <sup>15</sup>	<del>2025</del>	<del>2030</del> <sup>20</sup>	<del>2035</del>	<del>2040</del> <sup>35</sup>
Total Demand	<u>3,907</u>	<u>4,840,907</u>	<u>5,265,311</u>	<u>5,689,012</u>	<u>6,116,714</u>	<u>6,116,416</u>

Source: City of Santa Paula, Final 2016~~2010~~ UWMP Update (August 2017), ~~June 2011~~ August 2017), Table 3-3, p. 482.

Note: afy = acre-feet per year.

## Water Supply

The City of Santa Paula (City) Public Works, Water Division, supplies water to the City. The City of Santa Paula currently has secured water rights from two sources: groundwater allocation from the Santa Paula Basin, and surface water through an agreement with the Canyon Irrigation Company. Currently the Santa Paula Basin is the City’s sole source of water supply.<sup>5</sup>

The total amount of water produced by the City was 4,455,907 af in 2010<sup>5</sup>. In comparison, the City produced 5,046,047 af in 2005, ~~an amount that is 591 af more than was produced in 2010~~ which is 29

<sup>5</sup> City of Santa Paula, Final 2016~~2010~~ UWMP Update (August 2017), ~~June 2011~~ August 2017), 55.

greater than production in 2015. The highest annual water demand for the period 2000 to ~~2010~~2015 was recorded in 2002, when 5,359 af was produced.<sup>6</sup>

The City's current groundwater supply includes production from five active wells. Domestic water is pumped from Wells 1-B, 11, 12, 13, and 14, which can produce up to 10.6 million gallons per day.<sup>7</sup> **Table 4.14-4, City Groundwater Well Production**, summarizes the City's groundwater resources by well, including current status, well capacity, and 2010~~5~~ production. Wells 12 and 14 produced ~~81~~98 percent of the water for the City in ~~2010~~2015. The City no longer operates Wells 2, 8, and 9 because of a history of elevated nitrate levels in water extracted from these sources; these wells were sold to an agricultural enterprise.

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6 City of Santa Paula, Final 2016 UWMP Update (August 2017), 63.

7 City of Santa Paula, ~~Final 2016~~Final 2016 UWMP Update (~~June 2011~~August 2017), 266.

**Table 4.14-4  
City Groundwater Well Production**

Well No.	Status	Capacity (gpm)	2010 Production (acre-feet)
1-B	Active	<u>1,288,812</u>	<u>114.9104</u>
11	Active	<u>1,232,203</u>	<u>393.2392</u>
12	Active	<u>1,448,179</u>	<u>1,768.8527</u>
13	Active	<u>1,932,042</u>	<u>353.3378</u>
14	Active	<u>3,219,375</u>	<u>1,825.3507</u>
<b>Total</b>			<b><u>4,455.53,907</u></b>

Source: City of Santa Paula, Final 2016~~2010~~ UWMP Update (~~June 2011~~August 2017), Table 4-32, p. 63.

The Project Site is located outside of the incorporated City boundary but is within West Area 2, which is a future expansion area under the City's General Plan, and is within the City's Sphere of Influence. The entire Project Site would be located within the City's service area after annexation of the site to the City.

Construction of the City's centralized water conditioning facility and the Well 14 pumping plant was completed in 2000. The centralized water conditioning facility was designed to remove manganese and iron from up to 10 million gallons of water per day from Wells 11, 13, and 14, and future Well 15. Well 14 is anticipated to contribute an added 4.5 million gallons of water per day to the system. This added production capacity will help the City's water system to meet peak water use demands in hot summer weather. Both facilities are housed in a new building located along Main Street. Well 1-B was recently rehabilitated. Annual production from existing and planned wells will be limited by the City's current groundwater allocation (5,412 acre-feet per year [afy]) in the Santa Paula Basin.

There are several options that the City may consider for meeting future water demands including: long-term transfer of water rights; short-term transfer of water rights; State Water Project (SWP) water; use of recycled water; and supporting water demand management programs.<sup>8</sup> Implemented over time, these programs are expected to provide the City with sufficient supplies to meet future water demands.

### Water Supply Assessment

A ~~Draft~~ Final WSA was prepared for the Specific Plan in accordance with the requirements of Section 10910 of the California Water Code (Senate Bills [SB] 610 and 221) to verify the sufficiency of the local

<sup>8</sup> City of Santa Paula, Final 2016~~2010~~ UWMP Update (~~June 2011~~August 2017), 1.

water supply to meet the demand associated with the land uses allowed under the Specific Plan.<sup>9</sup> The ~~Draft-Final~~ WSA, included in **Appendix 4.14**, considered water supplies for the entire 53.81-acre Specific Plan area and specifically for the areas of light industrial, commercial, and landscaped areas that would be allowed for development under the Specific Plan. The ~~Draft-Final~~ WSA also considered the Project water demand in light of the existing water demand for the agriculture and related uses currently on the Project Site.

The ~~Draft-Final~~ WSA reported the 20-year water supply and demand estimates from the City's 2016~~0~~ UWMP, ~~prepared in 2011~~ the final 2017 document was prepared in accordance with California Water Code Sections 10610 and 10656. The ~~Draft-Final~~ WSA concluded that there would be no decrease in availability of groundwater supplies through the year 2037~~40~~. Furthermore, the ~~Draft-Final~~ WSA determined that the City of Santa Paula's projected water supply for 20 years is adequate to meet the demand for the Project, as well as existing and planned future uses in the City in normal, single dry, and multiple dry years.

Section 15155 (d) of the California Environmental Quality Act (CEQA) Guidelines states that when a WSA has been prepared for a project, no additional WSA is required if the water demands of the project have not substantially increased and there have been no changes in circumstances or conditions that would substantially affect the ability of City to supply the water needed for the project.

The Specific Plan ~~Draft-Final~~ WSA provided water demand estimates for the City of Santa Paula through 2037~~2040~~, which corresponded with the 20-year forecast required in a WSA if the Project were to be initiated in 2017. The 2016~~0~~ UWMP addresses new requirements developed by the State of California Department of Water Resources (DWR) as published in their *Guidebook to Assist Urban Water Suppliers to Prepare a 2016 Urban Water Management Plan* ~~2010 Urban Water Management Plan~~ (March 2014~~August 2017~~).

On January 17, 2014, the Governor of the State of California proclaimed a state of emergency due to current drought conditions and called on Californians to reduce their water usage by 20 percent. On March 1, 2014, the Governor signed into law emergency drought legislation that finds and declares that California is experiencing an unprecedented dry period and shortage of water for its citizens, local governments, agriculture, environment, and other uses.

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<sup>9</sup> ~~City of Santa Paula, Draft Water Supply Assessment for the Proposed Santa Paula West Business Park Specific Plan Project (November 2016)~~.<sup>10</sup> State of California, Office of Administrative Law, OAL File No. 2015-0506-02 EE, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board (May 18, 2015). [http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/drought/docs/emergency\\_regulations/oal\\_approve\\_d\\_regs2015.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/oal_approve_d_regs2015.pdf).



Additionally, the Fox Canyon Groundwater Management Agency (GMA), the local agency responsible for groundwater management for aquifers on the Santa Paula Basin, adopted an emergency pumping ordinance (Emergency Ordinance E) on April 11, 2014, that implements a phased 20 percent reduction over 18 months, consistent with Governor Brown's January 2014 drought declaration, other agencies' efforts, and the GMA's need to achieve groundwater basin sustainability.

On December 22, 2014, Governor Brown issued Executive Order B-28-14, which extended the suspension of certain activities subject to the CEQA contained in the January 2014 and April 2014 proclamations, including the State Water Resources Control Board's (SWRCB's) adoption of emergency regulations pursuant to Water Code section 1058.5, through May 31, 2016. On March 17, 2015, the SWRCB adopted an expanded emergency conservation regulation prohibiting certain irrigation practices, restricting certain commercial activities, and ordering all urban water suppliers to implement mandatory restrictions on outdoor irrigation. The emergency regulation orders larger urban water suppliers (i.e., those providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 af of water annually, excluding wholesalers) to provide monthly data on water production, enforcement, and outdoor water conservation measures being implemented.

On April 1, 2015, Governor Brown signed Executive Order B-29-15, directing the SWRCB to impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage through February 2016, as compared to the amount used in 2013. The Governor instructed the SWRCB to consider the relative per capita water usage of each supplier's service area and to require those areas with high per capita use to achieve proportionally greater reductions than those with low use. The order mandates that the Governor's January 2014 proclamation, April 2014 proclamation, Executive Order B-26-14, and Executive Order B-28-14 remain in full force and effect except as modified.

On May 5, 2015, the SWRCB adopted an emergency conservation regulation in accordance with the Governor's directive. The provisions of the emergency regulation went into effect on May 18, 2015. The emergency regulation identifies how much water communities must conserve based on their average residential water use, per person per day, last summer. Every person should be able keep indoor water use to no more than 55 gallons per day. For the most part, the amount of water that each person uses in excess of this amount is water that is applied to lawns and other ornamental landscapes.

To reduce water use by 25 percent statewide, a regulation adopted by the SWRCB places each urban water supplier into one of eight tiers, each of which is assigned a conservation standard ranging between 4 and 36 percent.<sup>10</sup>

As of March 2016, the City of Santa Paula had a Conservation Standard of 26 percent as directed by the SWRCB; from March to June 2016, the City achieved 24.2 percent water savings. The Governor issued a new Executive Order, as of June 1, 2016, reducing the Conservation Standards as a result of improved conditions, and the City now has a zero percent conservation standard.<sup>11</sup>

In September 2016, Governor Brown signed SB 1262 (Pavley). Details of this bill are discussed below under Regulatory Setting. It should be noted here, however, that SB 1262 is not effective until January 2017.

### ***Project Site Water Supply and Demand***

The existing land uses within the Specific Plan area includes approximately 54 acres of agricultural land, fallow agricultural land, and a small amount of industrial uses.

Water supply for irrigation on the Specific Plan area has been historically supplied from an on-site well that overlies the Santa Paula Basin. The existing well in the area (E11S) is owned and operated by McGaelic Group and Bender combined.

Approximately 49 acres of the Santa Paula West Specific Plan site is under cultivation for avocados, herbs, and a variety of row crops. Production records for the irrigation well for the period 2010 to 2014 are shown on **Table 4.14-5, Existing Well Pumping Records 2010–2014**. Water usage has been from one well but delivered to several parcels, including McGaelic West (McGrath owners), Bender Farms, and Jaime Santana; only the McGaelic West and Bender parcels are within the Project Site. As shown on Table 4.14-5, over the last five years (2010 to 2014), the total water used on site has averaged 281.1 afy.

**Table 4.14-5  
Existing Well Pumping Records 2010–2014**

<b>Year</b>	<b>McGaelic West (acre-feet)</b>	<b>Bender (acre-feet)</b>	<b>Total Usage (acre-feet)</b>
2010	N/A	112.9	112.9
2011	122.9	89.4	212.3

10 State of California, Office of Administrative Law, OAL File No. 2015-0506-02 EE, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board (May 18, 2015).

[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/drought/docs/emergency\\_regulations/oal\\_approved\\_regs2015.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/oal_approved_regs2015.pdf).

11 State Water Resources Control Board, Self-Certification Conservation Standards—“Stress-test” (by supplier), Pulled on October 18, 2016, [http://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/docs/emergency\\_reg/uw\\_self-cert\\_summary.pdf](http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/emergency_reg/uw_self-cert_summary.pdf).

2012	176.5	162.9	339.4
2013	187.8	232.7	420.5
2014	120.8	199.6	320.4
<b>Total</b>	<b>608.0</b>	<b>797.5</b>	<b>1,405.5</b>
<b>2010–2014 Average per Year</b>	<b>121.6</b>	<b>159.5</b>	<b>281.1</b>

Source: Email from Beverly Gutierrez, Hoffman, Vance & Worthington, Inc., Existing Water Use Spreadsheet (2015)

### Groundwater Allocation Transfers from Developed Properties

In accordance with Santa Paula Municipal Code Section 52.021, landowners or developers are required to transfer their groundwater rights to the City as a condition of project approval. This regulation is intended to ensure that new urban land users provide sufficient water resources for their needs. If the associated water rights are not sufficient to serve the proposed development's anticipated water use (as determined by the City), or if the water rights are held by another entity who cannot or will not dedicate those rights to the City, the developer must either purchase additional water rights and dedicate them to the City or pay a water resource in-lieu fee to the City. This regulation applies to developments inside and outside City limits that seek to receive potable water service from the City.

### Purchased Groundwater Allocations

Water availability is complicated by the fact that the actual safe yield of the Santa Paula Groundwater Basin is unknown.<sup>12</sup> Disagreement over the issue between the UWCD and the water users, including the City and the City of San Buenaventura (Ventura), led to the adjudication of the Santa Paula Groundwater Basin. The Stipulated Judgment<sup>13</sup> represents the beginning of a program of basin management, including the regulation of pumping, that is aimed at meeting the reasonable water supply needs of the parties, including protection for historic users, without harm to the Santa Paula Groundwater Basin.

The 2010~~06~~ UWMP recognizes that in 2005, it was determined that 497 afy of potentially available groundwater allocations held by others within the Santa Paula Basin boundary were not being utilized as shown in **Appendix 4.14**.<sup>14</sup> The City has the option to independently pursue the acquisition of groundwater allocations at any time in the future.

12 City of Santa Paula, Final 2016~~2010~~ UWMP Update (June 2011~~August 2017~~), 32-60.

13 *United Water Conservation District v. City of San Buenaventura* (California, 1996; 2010).

14 ~~City of Santa Paula, Draft Water Supply Assessment for the Proposed Santa Paula West Business Park Specific Plan Project (November 2016-15~~ City of Santa Paula, Final 2016 UWMP Update (August 2017), Table 6-9.

The available water resources and demand for water resources in the City is estimated in the ~~Draft~~ Final WSA. **Table 4.14-6, Existing and Projected City Water Resources and Demand**, provides a summary of existing and projected water demand through the year ~~2037~~ 2040.

**Table 4.14-6  
Existing and Projected City Water Resources and Demand (afy)**

Percent	2015	*2017	2020	2025	*2027	2030	2035	*2037	2040
<b>Existing SuppliesExisting Supplies</b>									
City Wells <sup>1</sup> City Wells	5,4835,483	5,5145,483	5,5605,483	5,5605,48	5,5605,483	5,5605,483	5,5605,483	5,5605,48	5,560
Santa Paula Creek <sup>2</sup> Santa Paula Creek	500500	500500	500500	500500	500500	500500	500500	500500	500
SubtotalSubtotal	5,9835,983	6,0145,983	6,0605,983	6,0605,98	6,0605,983	6,0605,983	6,0605,983	6,0605,98	6,060
<b>Projected SuppliesProjected Supplies</b>									
Groundwater Allocation Transfers <sup>3</sup> Groundwater Allocation Transfers	454454	348**544.8	348908	6951,362	8341,816	1,0431,816	1,3901,816	1,5291,81	1,738
Purchased Groundwater Allocations <sup>4</sup> Purchased Groundwater Allocations	200200	100**225	100300	200400	240497	300497	400497	439497	497
SWP <sup>5</sup> SWP	00	00	00	00	00	00	00	00	0
Recycled Water <sup>6</sup> Recycled Water	0400	0480	400800	8001,200	9601,622	1,2001,622	1,6001,622	1,7601,62	2,000
SubtotalSubtotal	6541,054	4481,244.8	8482,008	1,6952,96	2,0343,935	2,5433,935	3,3903,935	3,7283,93	4,235
<b>Total Projected SuppliesTotal Projected Supplies</b>	<b>6,6377,037</b>	<b>6,4627,228</b>	<b>6,9087,991</b>	<b>7,7558,94</b>	<b>8,0949,918</b>	<b>8,6039,918</b>	<b>9,4509,918</b>	<b>9,7889,9</b>	<b>10,295</b>
<b>Existing DemandsEstimated Demand</b>									
Current Potable Demands <sup>7</sup> City of Santa Paula	3,6304,840	3,6304,925	3,6305,265	3,6305,68	3,6306,113	3,6306,113	3,6306,113	3,6306,11	3,630
Current Water LossesWest Area 2 Allocation	27788.8	27788.8	27788.8	27788.8	27788.8	27788.8	27788.8	27788.8	277
SubtotalProjected Santa Paula West Project Area	3,9070	3,90739.8	3,90739.8	3,90739.8	3,90739.8	3,90739.8	3,90739.8	3,90739.8	3,907

<b>Potential Demands</b>									
New Potable Demands <sup>8</sup>	N/A	N/A	287	575	690	862	1,150	1,265	1,437
New Potable Water Losses <sup>9</sup>	N/A	N/A	14	29	35	43	57	63	72
New Recycled Demands <sup>6</sup>	N/A	N/A	380	760	912	1,140	1,520	1,672	1,900
New Recycled Water Losses <sup>9</sup>	N/A	N/A	20	40	48	60	80	88	100
Subtotal	N/A	N/A	701	1,404	1,685	2,105	2,807	3,088	3,509
<b>Total Estimated Demand</b>	<b>4,840</b>	<b>4,745</b>	<b>4,608</b>	<b>5,311</b>	<b>5,592</b>	<b>6,012</b>	<b>6,714</b>	<b>6,995</b>	<b>7,416</b>
<b>(Potential + Existing Demand) Total</b>	<b>0</b>	<b>80</b>	<b>0</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>0</b>	<b>52</b>	<b>80</b>
<b>Estimated Demand</b>									
<b>(Projected + City Demand)</b>									
Project Demands as % of Total City Supply	0%	0.61%	0.57%	0.51%	0.49%	0.46%	0.42%	0.41%	0.39%
Project Demand as % of West Area-2	0%	44.82%	44.82%	44.8%	44.82%	44.82%	44.82%	44.82%	44.82%
<b>Difference (Supply less Demand) Project Demand as % of Total City Supply</b>	<b>1,797</b>	<b>0%</b>	<b>1,717</b>	<b>0.81%</b>	<b>2,300</b>	<b>0.76%</b>	<b>2,444</b>	<b>0.70%</b>	<b>2,502</b>
<b>Total Estimated Demand</b>	<b>4,840</b>	<b>4,745</b>	<b>4,608</b>	<b>5,311</b>	<b>5,592</b>	<b>6,012</b>	<b>6,714</b>	<b>6,995</b>	<b>7,416</b>
<b>(Potential + Existing Demand) Difference (Supply - Demand)</b>	<b>0</b>	<b>80</b>	<b>0</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>0</b>	<b>52</b>	<b>80</b>

Source: City of Santa Paula, Final 2016<sup>10</sup> Urban Water Management Plan Update (June 2014-August 2017).

\* Projected data.

\*\* Data taken from 2020 data.

\*\*\* 2015 Data taken from Final 2016 UWMP (August 2017).

Notes:

All values rounded to the nearest 1 acre-foot (af).

Santa Paula West Area Business Park Specific Plan would start construction in 2017 and be completed by 2027. Conservatively assumed full build-out Project Demand numbers in 2017.

afy = acre-feet per year.

<sup>1</sup> The City's current allocation is 5,488 afy (California, 2011; Frank B. and Associates, 2016).

<sup>2</sup> The City currently wheels the 500 afy of surface water from Santa Paula Creek to Farmers Irrigation Company, which uses the surface water in lieu of pumped groundwater, and the City gains 500 afy groundwater pumping credits in the Santa Paula Basin.

<sup>3</sup> The City anticipates receiving 1,816 afy of groundwater allocation transfers via agricultural land development by 2040. For planning purposes, the 1,816 afy is distributed equally from 2020 to 2040. Note that the method for dividing up groundwater allocations through the years was done differently in the 2016 Draft UWMP than in the 2010 Final UWMP, where allocation transfers were achieved during four equal 5-year periods (approximately 454 afy per 5-year period).

<sup>4</sup> The City anticipates purchasing 497 afy of additional groundwater allocations by 2040. For planning purposes, the 497 afy is distributed equally from 2020 to 2040.

<sup>5</sup> For planning purposes, the City does not anticipate receiving SWP water during the period 2020-2040.

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<sup>6</sup> The City anticipates initiating a recycled water program by 2020. Estimate includes new community landscaped areas with irrigation, a potential golf course, and potential agricultural irrigation. It is anticipated that approximately 2,000 afy could be developed by 2040. For planning purposes, the 2,000 afy is distributed equally from 2020 to 2040.

<sup>7</sup> Existing demand is from 2015 data and is made up of 2,106 af from single-family residential, 868 af from multifamily residential, 493 af from commercial/institutional, 48 af from industrial, 49 af from landscape irrigation, 22 af from other, 44 af from sales to Middleroad Mutual Water Company, and 277 af from estimate losses.

<sup>8</sup> City anticipates 2,808 afy of new potential residential, commercial institutional, industrial, and landscape development by 2040 for build-out of potential projects.

<sup>9</sup> Estimated at 5 percent of total new demands. ~~Projected data~~

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**Notes:**

All values rounded to the nearest 1 AF.

~~Santa Paula West Area Business Park Specific Plan would start construction in 2017 and be completed by 2027. Conservatively assumed full build-out Project Demand numbers in 2017.~~

~~The City's current (2011) allocation is 5,483 AFY.~~

~~The City currently wheels the 500 AFY of surface water from Santa Paula Creek to farmers Irrigation Company, which uses the surface water in lieu of pumped groundwater, and the City gains 500 AFY groundwater pumping credits in the Santa Paula Basin.~~

~~Total of 1,815 AFY allocation transfers achieved over 4 equal 5-year periods (approximately 454 AFY per 5-year period).~~

~~The City anticipates purchasing groundwater allocations. It is anticipated that approximately 200 AFY could be developed by 2015, 300 AFY by 2020, 400 AFY by 2025, and 497 by 2030.~~

~~The City has rights to 2,198 AFY. However, actual delivery may be only 60 percent of water rights (DWR, 2010) in an average year, 7 percent in a single dry year, and 34 percent in multiple dry years. For the purposes of this UWMP, the City does not anticipate receiving SWP water in the near future.~~

~~The City purchased the WRF in 2015, however, currently there is no infrastructure to supply recycled water to the City. The 2010 UWMP anticipated that approximately 400 afy could be developed by 2015, 800 afy by 2020, 1,200 afy by 2025, and 1,622 afy by 2030.~~

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The 2016 UWMP Update anticipates that the City will acquire through allocation transfers 448 afy by 2020, 895 afy by 2025, 1,343 afy by 2030, 1,790 by 2035, and 2,235 afy by 2040.<sup>15</sup>

The 2010 UWMP Update anticipates that the City will acquire through allocation transfers 454 AFY by 2015, 908 AFY by 2020, 1,362 AFY by 2025, and 1,815 AFY by 2030 and 2035 through allocation transfers within the Santa Paula Basin as provided for in the Judgment.

Implementation of these water supply programs is anticipated to provide the City with sufficient water supplies to meet future water demand. As shown in **Table 4.14-67, Existing and Potential City Water Resources and Demands**, the potential water supplies available to the City exceed the estimated water demand at City build-out conditions.

**Table 4.14-7**  
**Existing and Potential City Water Resources and Demands**

Supplies	2010	2015	2020	2025	2030
City wells <sup>a</sup>	5,483	5,483	5,483	5,483	5,483
Santa Paula Creek <sup>b</sup>	500	500	500	500	500
<i>Subtotal</i>	<i>5,983</i>	<i>5,983</i>	<i>5,983</i>	<i>5,983</i>	<i>5,983</i>
Groundwater allocation transfers	0	454	908	1,362	1,816
Purchased groundwater allocations	0	200	300	400	497
SWP <sup>e</sup>	0	0	0	0	0
Recycled water <sup>d</sup>	0	400	800	1,200	1,622
<i>Subtotal</i>	<i>0</i>	<i>1,054</i>	<i>2,008</i>	<i>2,962</i>	<i>3,935</i>
<b>Total Potential Supplies</b>	<b>5,983</b>	<b>7,037</b>	<b>7,991</b>	<b>8,945</b>	<b>9,918</b>
<b>Total Estimated Demands</b>	<b>4,416</b>	<b>4,480</b>	<b>5,265</b>	<b>5,689</b>	<b>6,113</b>
<b>Net Surplus</b>	<b>1,567</b>	<b>2,197</b>	<b>2,726</b>	<b>3,256</b>	<b>3,805</b>

### State Water Project Water

The County of Ventura contracted for 20,000 afy of State Water Project (SWP) water, with 5,000 afy of that amount subcontracted to the UWCD, which has designated 2,198 afy of SWP water for use by the

<sup>15</sup> City of Santa Paula, Final 2016 UWMP Update (August 2017), Table 6-9.



City.<sup>16</sup> The City has discussed a contract with UWCD to ensure that 2,198 afy is reserved for the City. The City does not anticipate directly receiving SWP water in the near future.<sup>17</sup> However, the City may trade, transfer, and/or sell a portion of the SWP water rights to augment existing supplies.

Since the 2016~~0~~ UWMP was prepared, the California Department of Water Resources has updated its State Water Project Delivery Reliability Report three times (2011, 2013, and 2015). The biennial Report assists SWP contractors in assessing the reliability of the SWP component of their overall supplies. The 2015 SWP Reliability Report updates the DWR estimate of future water delivery reliability through 2035. The City's 2016~~0~~ UWMP update incorporates this updated information from DWR. The updated analysis in the 2015 SWP Reliability Report showed that the primary component of the annual SWP deliveries (referred to as Table A deliveries) would be less under current and future conditions.<sup>18</sup>

The 2015 SWP Reliability Report recognized continuing challenges to the ability of the SWP to deliver full contractual allotments of SWP water. For current conditions, the dominant factor for these reductions is the restrictive operational requirements contained in the federal biological opinions. Deliveries estimated for the 2015 Report expressly account for the operational restrictions of the biological opinions issued by the U.S. Fish and Wildlife Service in December 2008 and the National Marine Fisheries Service in June 2009 governing the SWP and Central Valley Project (CVP) operations. SWP exports have decreased since 2005, although the bulk of the change occurred by 2009 as the federal BOs went into effect, restricting operations. These effects are also reflected in the SWP delivery estimates. The most salient findings in this report are as follows:

- Under existing conditions, the average annual delivery of Table A water estimated for this 2015 Report is 2,550 thousand acre-feet per year (tafy), 3 tafy less than the 2,553 tafy estimated for the 2013 Report.
- The likelihood of existing-condition SWP Article 21 deliveries (supplemental deliveries to Table A water) being greater than 20 tafy has decreased by 3 percent relative to the likelihood presented in the 2013 Report.

For future conditions, the 2015 SWP Reliability Report conservatively assumed that the restrictions imposed by the biological opinions will still be in place, and includes the potential effects of climate change to estimate future deliveries. The changes in run-off patterns and amounts were included along with a potential rise in sea level. Sea level rise has the potential to require more water to be released to repel salinity from entering the San Francisco Bay/Sacramento-San Joaquin Delta Estuary ("Bay-Delta") to meet

16 City of Santa Paula, Final 2016~~2010~~-UWMP Update (June 2011/August 2017), 4213.

17 City of Santa Paula, Final 2016 UWMP Update (August 2017), 13. ~~City of Santa Paula, Final 2010 UWMP Update (June 2011), 44.~~

18 Department of Water Resources (DWR), *The State Water Project Final Delivery Capability Report 2015* (July 1, 2015), <https://msb.water.ca.gov/documents/86800/144575dd-0be1-4d2d-aeff-8d7a2a7b21e4>.

the water quality objectives established for the Delta. For the 2015 SWP Reliability Report, the changes in run-off patterns and amounts were incorporated into the analyses, but the potential rise in sea level was not.

The analyses in the 2015 SWP Reliability Report indicated that the SWP, using existing facilities operated under then current regulatory and operational constraints and future anticipated conditions, and with all contractors requesting delivery of their full Table A amounts in most years, could deliver 60 percent of Table A amounts on a long-term average basis.

Many of the same specific challenges to SWP operations described in the State Water Project Delivery Reliability Report 2013 remained in 2015—most notably, the effects on SWP pumping caused by issuance of the 2008 and 2009 federal biological opinions (BOs), which were reflected in the SWP delivery reliability report. The analyses in this report consider climate change and the effects of sea level rise on water quality, but do not incorporate the probability of catastrophic levee failure.

### Recycled Water

Construction of the new City Water Recycling Facility (WRF) that meets California Title 22 regulations for recycled water was completed in early 2010.<sup>19</sup> The WRF has a capacity of 3.15 million gallons per day (mgd), with a final build-out capacity of 4.2 mgd and a peak operating capacity of 7.0 mgd.

The 2016~~9~~ UWMP estimates recycled water urban demand within the City (and adjacent areas) will be approximately 1,622,000 afy. The 2010~~6~~ UWMP anticipates that the City will develop a recycled water program for landscape irrigation and that the estimate amounts that could be delivered in the future are 4800 afy by 2020, 1,200~~800~~ afy by 2025, ~~and 1,622-200~~ afy by 2030, 1,600 afy by 2035, 2,000 afy by 2040.<sup>20</sup> The recycled water demand could be fully met with recycled water from the new WRF.

Currently, there are no recycled water systems in the proposed Project vicinity. However, the 2012 Wastewater Master Plan has included West Area 2 to have a future wastewater flow of 0.082 mgd or 919 afy during average dry weather season.<sup>21</sup>

19 City of Santa Paula, *Wastewater System Master Plan* (June 2012), 1.

20 City of Santa Paula, *Final 2016 UWMP Update* (August 2017), 13; ~~City of Santa Paula, *Final 2010 UWMP Update* (June 2011), 47.~~

21 City of Santa Paula, *Wastewater System Master Plan* (June 2012)

### ***Water Conveyance System***

The City's domestic water supply is conveyed via gravity throughout its distribution network system. The City currently delivers a portion of the overall domestic water supplies to the Project Site. The closest existing domestic water system to the Project Site includes a main line within Telegraph Road.

### **Wastewater**

The City of Santa Paula Public Works Water Division provides wastewater services to the City.

### ***On-site Sewer***

The Project Site is not connected to the City's wastewater treatment system. There are two small farmworker dwelling units and ancillary agricultural facilities located on-site. These residences and the ancillary facilities utilize septic systems to store wastewater, which is periodically pumped and disposed of via private sewage collection services. The nearest sewer system pipeline is an 8-inch line located beneath Telegraph Road to the north of the Project Site.

### ***Citywide Sewer System***

The City's Wastewater System Master Plan, prepared by Boyle Engineering and updated by the City of Santa Paula in June 2012, addresses the provisions of wastewater collection facilities to serve the West Area 2 Expansion Area. In May 2015, Jensen Design & Survey, Inc. prepared the Sanitary Sewer Technical Report to provide a blueprint for the design of the sanitary system within the Specific Plan area and to develop conceptual design parameters. The wastewater system consists of approximately 60 miles of collection lines, with pipeline diameters ranging from 6 to 24 inches, 0.5 miles of force mains, 1,190 manholes, and two lift stations. Wastewater flows are conveyed by gravity through the existing pipe network. Two City-owned and -operated sewer lift stations (Harding Park and Lemonwood pump stations) are also used to convey these flows in areas where gravity flow is inadequate. These flows are eventually treated at the existing wastewater treatment plant (WTP) located in the southwest corner of the City.

In January 2012, the City adopted the 2011 Sanitary Sewer Management Program, which provides long-term maintenance for the system to preserve and provide adequate collection and transportation of local wastewater.

### ***Treatment Plant Capacity***

The City residents generate and treat approximately 2 mgd of sewage. The City has defined geographic boundaries in which residential, commercial, public, and industrial areas are defined. Each group generates wastewater, which enters the sewer system and is ultimately treated at the WTP. The City constructed a water recycling facility (WRF) for the treatment of sewage generated by the City to replace

the original WTP. The new WRF began operations in May of 2010. This new facility 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 process design is a membrane bioreactor (MBR) and reduces energy costs by more than 35 percent. The facility, which has a footprint of 1.5 acres, is completely enclosed for maximum odor and noise control.

The WRF will be capable of producing California Code of Regulations (CCR) Title 22 unrestricted water reuse for agricultural and municipal needs. The treated effluent produced meets the Los Angeles Regional Water Quality Control Board's (RWQCB's) current wastewater discharge requirements, as well as California Department of Health Service (DHS) requirements for recycled water use. Prior discharges to the Santa Clara River received advanced secondary treatment.

## Solid Waste

Solid waste collection services are provided in the City of Santa Paula by a private solid waste collection company and disposed of at the Toland Road Landfill, operated by the Ventura Regional Sanitation District (VRSD).

The City participates in a curbside recycling program, which includes the recycling of glass (food and beverage containers), metal (aluminum cans, etc.), and plastic. Curbside pickup of paper, cardboard, and yard trimmings is provided, as well as community drop-off events for residents to dispose of large items, household hazardous waste, and motor oil and filters.

In 2015, the City disposed of 25,684 tons of solid waste at all landfills identified below except for the Bakersfield Metropolitan (Bena) Sanitary Landfill.<sup>22</sup> The City provides refuse collection, recycling, and disposal through contracts with Crown Disposal Co., Inc., a private hauling company. Crown Disposal collects 100 percent of the City's solid waste. The solid waste is disposed of at Toland Road Sanitary Landfill; Chiquita Canyon Sanitary Landfill; Simi Landfill and Recycling Center; Azusa Land Reclamation Co. Landfill; Antelope Valley Public Landfills I and II; and the Bakersfield Metropolitan (Bena) Sanitary Landfill. **Table 4.14-8, Solid Waste Facilities**, provides the characteristics of the disposal waste facilities that currently accept waste from the City.

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22 California Department of Resources Recycling and Recovery (CalRecycle), Disposal Reporting System (DRS), Jurisdiction Disposal by Facility during 2015 for Santa Paula.

**Table 4.14-8  
Solid Waste Facilities**

<b>Facility</b>	<b>Daily Capacity (tons/day)</b>	<b>Remaining Capacity (cy)</b>	<b>Ceased Operation Date</b>
Toland Road Sanitary Landfill	1,500	21,983,000 <sup>a</sup>	2027
Chiquita Canyon Sanitary Landfill	6,000	8,617,126 <sup>b</sup>	2019
Simi Valley Landfill & Recycling Center	9,250	119,600,000 <sup>c</sup>	2052
Azusa Land Reclamation Co. Landfill	8,000	51,512,201 <sup>d</sup>	N/A
Antelope Valley Public Landfills I and II	3,564	20,400,000 <sup>e</sup>	2042
Bakersfield Metropolitan (Bena) Sanitary Landfill	4,500	32,808,260 <sup>f</sup>	2046

Source: CalRecycle, Solid Waste Information System (SWIS) database,  
<http://www.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx>, accessed October 2016.

Note: cy = cubic yards.

<sup>a</sup> As of June 2006.

<sup>b</sup> As of April 2016.

<sup>c</sup> As of September 2012.

<sup>d</sup> As of March 1996.

<sup>e</sup> As of April 2011.

<sup>f</sup> As of July 2013.

The existing uses within the Project Site include two small farmworker dwelling units and agricultural operations for the production of orchards, row crops, and a limited number of livestock. Therefore, the Project Site currently generates approximately 4.08 tons of solid waste per year.<sup>23</sup> The existing amount of agricultural crop residual is considered negligible because it is a subcomponent of the “other organic” standard material type developed by CalRecycle (formerly the California Integrated Waste Management Board).<sup>24</sup>

## 4.14.2 REGULATORY SETTING

### Water

#### *Federal*

#### Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996 and requires a variety of actions to protect drinking water and its sources. SDWA authorizes the U.S.

23 Solid Waste generation is 2.04 tons per year per residential unit. Source: Ventura County Solid Waste Management Department, Estimated Solid Waste Generation Rates for Industrial/Commercial/Residential Establishments, Guidelines for Preparation of Environmental Assessments for Solid Waste Impacts.

24 CalRecycle (formerly the California Integrated Waste Management Board), *California 2008 Waste Characterization Study* (August 2009), 107.

Environmental Protection Agency (USEPA) to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water. The USEPA, state agencies, and water purveyors work together to ensure that SDWA standards are met.

## **State**

### **California Department of Water Resources**

The State of California Department of Water Resources (DWR) released its *State Water Project Final Delivery Capability Report* (“Report”) in July 2015. The Report updates the estimated water delivery capacity of the SWP for current conditions and two decades from 2015.<sup>25</sup> The estimates include the best-known future effects of climate change and the anticipated changes in Sacramento River basin land uses. The assessment of current and future SWP reliability allows DWR to plan for reliable future water supplies in California.

### **Comprehensive Water Legislation**

In November 2009, four legislative bills (SBX7-1, SBX7-6, SBX7-7, and SBX7-8) and the supporting bond bill (SBX7-2), creating a comprehensive water package designed to meet California’s water challenges, were approved by then-governor Arnold Schwarzenegger.<sup>26</sup> The legislation establishes the governmental framework to achieve the coequal goals of providing a more reliable water supply to California and restoring and enhancing the Delta ecosystem. The package includes requirements to improve the management of California’s water resources by monitoring groundwater basins; developing agricultural water management plans; reducing statewide per capita water consumption 20 percent by 2020; and reporting water diversions and uses in the Delta. It also appropriates \$250 million for grants and expenditures for projects to reduce dependence on the Delta if the bond issue is approved by the voters in the future.

The Safe, Clean, and Reliable Drinking Water Supply Act of 2010 (SBX 7-2) was placed and passed on the November 2014 ballot as California Proposition 1, the Water Bond (AB 1471). AB 1471 provides funding for California’s aging water infrastructure, as well as for projects and programs to improve the ecosystem and water supply reliability for California. The bond bill includes \$2.7 billion for actions improving Bay-Delta sustainability. These investments will help to reduce seismic risk to

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25 Department of Water Resources (DWR), *The State Water Project Final Delivery Capability Report 2015* (July 1, 2015), <https://msb.water.ca.gov/documents/86800/144575dd-0be1-4d2d-aeff-8d7a2a7b21e4>.

26 Department of Water Resources (DWR), *California Water Plan Update 2009*, vol. 4 (December 2009). Reference Guide, Legislation, 2009 Comprehensive Water Package, Special Session Policy Bills and Bond Summary, (November 2009).

Bay-Delta water supplies, protect drinking water quality, and reduce conflict between water management and environmental protection.

Part of the comprehensive water package included SBX7-7 (Steinberg, Chapter 4, Statutes of 2009—Statewide Water Conservation). This bill creates a framework for future planning and actions by urban and agricultural water suppliers to reduce California’s water use. SBX7-7 requires the development of agricultural water management plans and requires urban water agencies to reduce statewide per capita water consumption 20 percent by 2020. CVWD has included the provisions of SBX7-7 in its 2010 UWMP and has reduced water demand by 20 percent since 2006.

On January 17, 2014, California Governor Brown declared a drought state of emergency, and directed state officials to take all necessary actions to prepare for these drought conditions.<sup>27</sup> State agencies, led by the Department of Water Resources, are in the process of executing a statewide water conservation campaign, calling on Californians to reduce their water usage by 20 percent.

### **Recent Regulations, Executive Orders and SWRCB Actions**

#### **Executive Orders**

On January 17, 2014, Governor Edmund G. Brown Jr. declared a drought state of emergency.<sup>28</sup> On April 25, 2014, the governor signed Executive Order B-26-14<sup>29</sup> (April 2014 Proclamation) stating, among other things, that

*severe drought conditions continue to present urgent challenges: water shortages in communities across the state, greatly increased wildfire activity, diminished water for agricultural production, degraded habitat for many fish and wildlife species, threat of saltwater contamination of large fresh water supplies conveyed through the Sacramento-San Joaquin Bay Delta, and additional water scarcity if drought conditions continue into 2015.*

On December 22, 2014, Governor Brown issued Executive Order B-28-14,<sup>30</sup> which extended the suspension of certain activities subject to CEQA contained in the January 2014 and April 2014 Proclamations, including the SWRCB adoption of emergency regulations pursuant to Water Code section 1058.5, through May 31, 2016. On March 17, 2015, the SWRCB adopted an expanded emergency

27 Office of the Governor, “Governor Brown Declares Drought State of Emergency,” January 17, 2014, <http://gov.ca.gov/news.php?id=18368>.

28 Office of the Governor, “Governor Brown Declares Drought State of Emergency,” January 17, 2014, <http://gov.ca.gov/news.php?id=18368>.

29 State of California, Executive Order for State Drought Actions, B-26-14, April 25, 2014, <http://gov.ca.gov/news.php?id=18496>.

30 State of California, Office of Governor Edmund G. Brown Jr., “Executive Order B-28-14” (December 22, 2014), <https://www.gov.ca.gov/news.php?id=18815>.

conservation regulation prohibiting certain irrigation practices, restricting certain commercial activities, and ordering all urban water suppliers to implement mandatory restrictions on outdoor irrigation. The emergency regulation orders larger urban water suppliers—those providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, excluding wholesalers—to provide monthly data on water production, enforcement, and outdoor water conservation measures being implemented.

On April 1, 2015, Governor Brown signed Executive Order B-29-15,<sup>31</sup> directing the SWRCB to impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage, compared to the amount used in 2013, through February 2016. The governor instructed the SWRCB to consider the relative per capita water usage of each supplier's service area and to require those areas with high per capita use to achieve proportionally greater reductions than those with low use. The order mandates that the governor's January 17, 2014, Proclamation, April 25, 2014, Proclamation, Executive Order B-26-14, and Executive Order B-28-14 remain in full force and effect except as modified.

### **State Water Resources Control Board**

In 2014, the State Water Resources Control Board (SWRCB) determined that an emergency existed due to severe drought conditions and that adoption of the proposed emergency regulation was necessary to address the emergency. California is currently in the fourth year of a significant drought resulting in severe impacts to California's water supplies and its ability to meet all the demands for water in the State.

On May 5, 2015, the SWRCB adopted an emergency conservation regulation in accordance with the governor's directive. The provisions of the emergency regulation went into effect on May 18, 2015.<sup>32</sup> The emergency regulation identifies how much water communities must conserve based on their average residential water use, per person per day, last summer. Every person should be able keep indoor water use to no more than 55 gallons per day. For the most part, the amount of water that each person uses in excess of this amount is water that is applied to lawns and other ornamental landscapes.

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31 State of California, Executive Department, Executive Order B-29-15 (April 1, 2015), [http://gov.ca.gov/docs/4.1.15\\_Executive\\_Order.pdf](http://gov.ca.gov/docs/4.1.15_Executive_Order.pdf)

32 State Water Resources Control Board, Resolution No. 2015-2032, Emergency Regulation for Statewide Urban Water Conservation (adopted May 5, 2015).



To reduce water use by 25 percent statewide, a regulation adopted by the SWRCB places each urban water supplier into one of eight tiers which are assigned a conservation standard, ranging between four percent and 36 percent.<sup>33</sup>

As of March 2016, the City of Santa Paula had a Conservation Standard of 26 percent as directed by the SWRCB and from March 2016 to June 2016, they had achieved 24.2 percent water savings. The Governor issued new Executive Order, as of June 1, 2016, reducing the Conservation Standards as a result of improved conditions and the City now has a zero percent conservation standard.<sup>34</sup>

## ***Legislative Actions***

### **Sustainable Groundwater Management Act**

In September 2014, Governor Edmund G. Brown Jr. signed a three-bill package known as the Sustainable Groundwater Management Act (SGMA). The legislation allows local agencies to customize groundwater sustainability plans to their regional economic and environmental needs. SGMA creates a framework for sustainable, local groundwater management for the first time in California history. SGMA empowers local agencies to adopt groundwater management plans that are tailored to the resources and needs of their communities.

The three bills that make up SGMA are AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley).

#### ***AB 1739—Groundwater Management***

AB 1739 (Dickinson) authorizes the DWR or a groundwater sustainability agency (GSA) to provide technical assistance to entities that extract or use groundwater to promote water conservation and protect groundwater resources. This bill requires the DWR, by January 1, 2017, to publish on its Internet website best management practices for the sustainable management of groundwater, and requires the DWR to prepare and release a report by December 31, 2016, on the agency's best estimate of water available for replenishment of groundwater in the state.

AB 1739 –requires a GSA to submit a groundwater sustainability plan (GSP) to DWR for review upon adoption. The bill authorizes a local agency to submit to DWR for evaluation and assessment an alternative

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33 State of California, Office of Administrative Law, OAL File No. 2015-0506-02 EE, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board (May 18, 2015).  
[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/drought/docs/emergency\\_regulations/oal\\_approved\\_regs2015.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/oal_approved_regs2015.pdf).

34 State Water Resources Control Board, Self-Certification Conservation Standards—"Stress-test" (by supplier), [http://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/docs/emergency\\_reg/uw\\_self-cert\\_summary.pdf](http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/emergency_reg/uw_self-cert_summary.pdf). Accessed October 18, 2016.

that the local agency believes satisfies the objectives of these provisions. AB 1739 also requires DWR to review any of the above-described submissions at least every 5 years after initial submission to DWR.

In addition, AB 1739 -requires that prior to the adoption or any substantial amendment of a general plan, the planning agency review and consider a GSP; groundwater management plan; groundwater management court order, judgment, or decree; adjudication of water rights; or a certain order or interim plan by the SWRCB. AB 1739 requires the planning agency to refer a proposed action to adopt or substantially amend a general plan to any GSA that has adopted a GSP or local agency that otherwise manages groundwater, and to the SWRCB if it has adopted an interim plan that includes territory within the planning area.

### ***SB 1168—Groundwater Management***

SB 1168 (Pavley) notes that the policy of the state is that groundwater resources be managed sustainably for long-term reliability and multiple economic, social, and environmental benefits for current and future beneficial uses. This bill states that sustainable groundwater management is best achieved locally through the development, implementation, and updating of plans and programs based on the best available science.

SB 1168 requires DWR to categorize each basin as high, medium, low, or very low priority. The initial priority for each basin was to be established no later than January 31, 2015. The bill authorizes a local agency to request that DWR revise the boundaries of a basin and required DWR to adopt by January 1, 2016, regulations on the methodology and criteria to be used to evaluate the proposed revision.

In addition, all groundwater basins designated as high- or medium-priority basins by the DWR that are designated as basins subject to critical conditions of overdraft are to be managed under a GSP or coordinated GSPs by January 31, 2020; all other groundwater basins designated as high- or medium-priority basins are to be managed under a GSP or coordinated GSPs by January 31, 2022.

This bill would authorize any local agency, as defined, or combination of local agencies to elect to be a GSA and would require, within 30 days of electing to be or forming a GSA, said agency to inform the DWR of its election or formation and its intent to undertake sustainable groundwater management.

### ***SB 1319—Groundwater***

SB 1319 (Pavley) prohibits the SWRCB from establishing an interim plan to remedy a condition where the groundwater extractions result in significant depletions of interconnected surface waters until January 1,

2025. This provision delays the similar provision in AB 1739 from 2022 to 2025. The bill further requires the SWRCB to exclude any portion of a basin in compliance with groundwater management requirements from probationary status. This provision narrows the similar provision in AB 1739 to only apply to the portion of the basin that is out of compliance.

The bill requires the SWRCB to include any element of a GSP or the entire plan in its interim plan if SWRCB finds it would help meet the sustainability goal. This provision revises the similar provision in AB 1739 to allow for the inclusion of local plans when developing interim plans for basins with probationary status.

A GSP has not yet been adopted for the Santa Paula Basin pursuant to SGMA and is not required until 2022.

### **SB 1262 (Pavley)—Water Supply Planning**

In September 2016, Governor Brown signed SB 1262 (Pavley), which states that if a water supply for a proposed project includes groundwater from a basin that is not adjudicated and is designated as medium or high priority, the following additional information must be included in the WSA: whether DWR has identified the basin as being subject to critical conditions of overdraft; and if a GSA has adopted a (GSP) or approved an alternative plan under the SGMA, a copy of the GSP, or an alternative plan. For a basin that is not adjudicated and is designated by DWR as low or very low priority, the WSA must include information as to whether DWR has identified the basin as being overdrafted or projected that the basin will become overdrafted if present management conditions continue.

SB 1262 is not effective until January 1, 2017. However, as noted earlier, pursuant to SB 1262 and the amended Water Code Section 10910, the Santa Paula Basin is an adjudicated Basin of which the DWR has not indicated is in overdraft.<sup>35</sup>

### **Water Supply Availability and Reliability**

The City is required under California Water Code (Sections 10610 to 10656) to assess citywide water supply and demand over the next 20 years in 5-year increments in its UWMP. The City completed its most recent update in 2016~~0~~. The 2016~~0~~ update examines water planning, including recycled water, over a 20-year period in 5-year increments; identifies and quantifies adequate water supplies for existing and future water demands in normal, dry, and multiple dry years; identifies actions to prepare for and implement during a catastrophic interruption of water supplies; and implements conservation and efficient use of

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35 California's Groundwater Bulletin 118, Santa Clara River Valley Basin Santa Paula Subbasin, [http://www.water.ca.gov/pubs/groundwater/bulletin\\_118/basindescriptions/4-4.04.pdf](http://www.water.ca.gov/pubs/groundwater/bulletin_118/basindescriptions/4-4.04.pdf).

urban water supplies. The UWMP determined that the City's current water supplies are sufficient to meet proposed General Plan development levels to 2020.

### **Water Supply Assessment Study**

The California Water Code, Section 10912 requires that a detailed report regarding water availability and planning for additional water supplies be included for the following types of projects:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space
- A proposed hotel or motel, or both, having more than 500 rooms
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- A mixed-use project that includes one or more of the projects specified in this subdivision
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project

In addition, Government Code Section 66473.7 requires that adequate water supplies be demonstrated as available for the following:

- A proposed residential development of more than 500 dwelling units, if the public water system (PWS) has more than 5,000 service connections
- Any proposed development that increases connections by 10 percent or more, if the PWS has fewer than 5,000 connections

### **California Green Building Standards Code**

The purpose of the California Green Building Standards Code ("CALGreen") is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:

1. Planning and design
2. Energy efficiency
3. Water efficiency and conservation
4. Material conservation and resource efficiency
5. Environmental quality

The residential mandatory measures are provided in chapter 4 and the nonresidential ones in chapter 5 of the CALGreen Code.

In response to State of Emergency proclamations issued by Governor Brown in January and April of 2014, and most recently Executive Order B-29-15 (issued April 1, 2015), California Department of Housing and Community Development (HCD) proposed emergency building standard regulations pertaining to the reduction of potable water use for exterior landscape irrigation for newly constructed residential buildings. HCD, in coordination with the California Building Standards Commission (CBSC), Department of Water Resources (DWR), the Division of the State Architect, and other stakeholders, developed emergency regulations that amend the 2016 CALGreen Code.<sup>36</sup>

CALGreen provides mandatory residential measures, such as stormwater drainage and retention systems, which are thought to prevent flooding of adjacent properties and prevent pollution from stormwater runoff by retaining soil on site or by providing filtering to restrict sedimentation from reaching stormwater drainage systems and receiving streams or rivers. To comply, the retention basin must be sized and shown on the site plan, and water has to be filtered and routed to a public drainage system. The new residential structure also must comply with local stormwater ordinances. The drainage system must also be shown on the site plan (swales, drain piping, retention areas, and groundwater recharge).

The code also requires a 20 percent reduction of indoor water use, and it utilizes both a prescriptive and performance method. The prescriptive method provides some technical features that must be followed:

- Showerheads  $\leq$  2.0 gallons per minute (gpm) at 80 pounds per square inch (psi)
- Lavatory faucets  $\leq$  0.5 gpm at 60 psi
- Kitchen faucets  $\leq$  1.8 gpm at 60 psi
- Urinals  $\leq$  0.5 gal/flush
- Water closets  $\leq$  1.28 gallon/flush

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36 California Department of Housing and Community Development, Finding of Emergency Regarding the 2013 California Green Building Standards Code (CALGreen), California Code of Regulations, tit. 24, pt. 11.

CALGreen also specifies acceptable performance standards for plumbing fixtures with reduced water usage. Fixtures can be installed if they meet standards listed in the code.

Outdoor water usage is regulated. CALGreen requires irrigation controls to be weather or soil moisture based and to automatically adjust irrigation in response to changes in plants' needs as weather conditions change, or have rain sensors or communication systems that account for local rainfall.

## **Local**

### **2016~~0~~ Urban Water Management Plan Update**

Section 10610 et seq. of the California Water Code, known as the Urban Water Management Planning Act, calls for creation and periodic update of UWMPs by all urban water suppliers and sets forth the requirements for such plans, including definition of relevant terms.

Under the definition given in Section 10617, an urban water supplier is an entity “providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually.” Water for this development will be supplied from the City of Santa Paula’s existing water system, which is supplied via groundwater wells throughout the City.

In 2017~~4~~, the City of Santa Paula completed an UWMP update that included the portions of the East Area 2 Annexation Area located east of the City, south of the Ventura County Transportation Commission railroad, surrounds Hallock Drive area, but excluded the triangle area north of Hallock Drive.<sup>37</sup> This UWMP did not discuss the specific development and activities contemplated by the Santa Paula West Business Park, although it did discuss, in general terms, the nature and extent of the long-term water supply for the City for the West Area 2 and included an estimated 1,906,000 square feet of commercial/industrial/institutional uses on approximately 125 acres. Much of this general discussion is cited and paraphrased in this WSA. The UWMP contains an analysis of the factors required by Government Code section 66437.7 (a)(2), and such factors apply to this WSA.

Accordingly, ~~this WSA~~ the attached WSA, in concert with the UWMP prepared by the City, includes all necessary data and analyses required by California Water Code section 10910 et seq. and by Government Code section 66437.7 et seq.

~~The 2010 UWMP is currently being updated to meet the DWR’s requirements for the 5-year update for 2015; a revised update is anticipated in early 2017.~~

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37 City of Santa Paula, *General Plan*, “Land Use Element” (2011), LU-24.

### **Water In-Lieu Fee Ordinance**

In accordance with City of Santa Paula Municipal Code (SPMC) Section 52.021 (Water Resource In-Lieu Fee Ordinance No. 1058), landowners or developers are required to transfer their groundwater rights to the City as a condition of project approval. The intent of the Ordinance is to ensure that new urban land users provide sufficient water resources for their needs without taxing existing users. If the associated water rights are not sufficient to serve the proposed development's anticipated water use (as determined by the City), or if the water rights are held by another entity who cannot or will not dedicate those rights to the City, the developer must purchase additional water rights and dedicate them to the City or pay a water resource in-lieu fee to the City. This ordinance applies to water rights within City limits as well as parcels outside City limits who must receive service from the City Water Enterprise.

### **City Municipal Code—Ordinance Section 52.038, Water Waste**

"No person shall [un]lawfully or neglectfully waste water in any manner whatsoever. Continued wasting of water after mailing of [City] notice by registered mail to the customer of record at the mailing address of record by the [City] Director may result in discontinued water service." This Code is a beneficial tool to curb misuse and waste of potable water within the City. The provisions of the Code can be used during periods of normal water supply and supply deficiency. Violation of this Code is subject to City penalties.

### **City Municipal Code—Ordinance 1223, Chapter 59, Landscape Water Conservation Standards**

In accordance with Government Code 65565(c) for the purpose of complying with California law and promoting water conservation, the City maintains Ordinance 1223, Landscape Water Conservation Standards, to be utilized in conjunction with the City of Santa Paula Land Development Provisions for Landscaping and the Guidelines for Implementation of Water Efficient Landscape. Compliance with the guidelines and Landscape Water Conservation Standards is mandatory for all new development projects that are subject to discretionary review by the City of Santa Paula.

## **Wastewater**

### ***Federal***

#### **Clean Water Act**

As noted elsewhere, the federal Clean Water Act (CWA) Section 401 regulates the discharges of pollutants into Waters of the United States from any point or nonpoint source. Individual permits are issued for certain defined sources of discharge, while nonpoint source runoff from construction sites and urban development is regulated under a series of general permits. Construction that disturbs 1 acre or more is regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater program. In the State of California, the program is administered by the local RWQCB.

## Federal Pretreatment Regulations

Part 403 in the Code of Federal Regulations establishes the responsibilities of federal, state, and local government, industry and the public with respect to implementing National Pretreatment Standards to control pollutants that pass through or interfere with treatment processes in publicly owned treatment works (POTW) or that may contaminate sewage sludge.

## Title 22 Recycled Water

Title 22 sets bacteriological water quality standards based on the expected degree of public contact with recycled water.<sup>38</sup> Title 22 establishes the quality and/or treatment processes required for an effluent to be used for a specific nonpotable application. The following categories of recycled water are identified:

- Disinfected tertiary recycled water
- Disinfected secondary-2.2 recycled water
- Disinfected secondary-23 recycled water
- Un-disinfected secondary recycled water

In addition to recycled water uses and treatment requirements, Title 22 addresses sampling and analysis requirements at the treatment plant, preparation of an engineering report prior to production or use of recycled water, general treatment design requirements, reliability requirements, and alternative methods of treatment.

## State

The California Ocean Plan was originally adopted by the SWRCB and approved by the USEPA in June 1972, and is revised every three years. Among the California Ocean Plan requirements are the following water quality objectives (Chapter II):

### **General Provisions**

- a. *This chapter sets forth limits or levels of water quality characteristics for ocean waters to ensure the reasonable protection of beneficial uses and the prevention of nuisance. The discharge of waste shall not cause violation of these objectives.*
- b. *The Water Quality Objectives and Effluent Limitations are defined by a statistical distribution when appropriate. This method recognizes the normally occurring variations*

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38 20 CCR, sec. 1605.1 Federal and State Standards for Federally Regulated Appliances, and 1605.3, State Standards for Non-Federally Regulated Appliances.



*in treatment efficiency and sampling and analytical techniques and does not condone poor operating practices.*

c. *Physical Characteristics*

1. *Floating particulates and grease and oil shall not be visible.*
2. *The discharge of waste shall not cause aesthetically undesirable discoloration of the ocean surface.*
3. *Natural light shall not be significantly reduced at any point outside the initial dilution zone as the result of the discharge of waste.*
4. *The rate of deposition of inert solids and the characteristics of inert solids in ocean sediments shall not be changed such that benthic communities are degraded.*

d. *Chemical Characteristics*

1. *The dissolved oxygen concentration shall not at any time be depressed more than 10 percent from that which occurs naturally, as the result of the discharge of oxygen demanding waste materials.*
2. *The pH shall not be changed at any time more than 0.2 units from that which occurs naturally.*
3. *The dissolved sulfide concentration of waters in and near sediments shall not be significantly increased above that present under natural conditions.*
4. *The concentration of substances set forth in Chapter II, Table B, in marine sediments shall not be increased to levels which would degrade indigenous biota.*
5. *The concentration of organic materials in marine sediments shall not be increased to levels that would degrade marine life.*
6. *Nutrient materials shall not cause objectionable aquatic growths or degrade indigenous biota.*

e. *Biological Characteristics*

1. *\_\_\_\_\_ Marine communities, including vertebrate, invertebrate, and plant species, shall not be degraded.*

2. *The natural taste, odor, and color of fish, shellfish, or other marine resources used for human consumption shall not be altered.*
3. *The concentration of organic materials in fish, shellfish or other marine resources used for human consumption shall not bioaccumulate to levels that are harmful to human health.*

### **Local**

The Los Angeles RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The City is responsible for adhering to Los Angeles RWQCB regulations as they apply to wastewater generated and discharged by the WRF. The resulting effluent from the treatment process must meet the Waste Discharge Requirements (WDR) Order No. R4-2007-0028 as amended by WDR Order No. R4-2010-0074.

### **Solid Waste**

#### **Federal**

##### **Resource Conservation and Recovery Act**

The Resource Conservation and Recovery Act (RCRA) is the nation's primary law governing the disposal of solid and hazardous waste. The RCRA set national goals for reducing the amount of waste generated and ensuring that wastes are managed in an environmentally sound manner. The Solid Waste Program encourages states to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste, sets criteria for municipal solid waste landfills, and prohibits the open dumping of solid waste. RCRA regulations encourage source reduction and recycling, and promote the safe disposal of municipal waste.

#### **State**

##### **Assembly Bill 939**

Assembly Bill (AB) 939 (Chapter 1095, Statutes of 1989), the Integrated Waste Management Act, required, among other things, all cities and counties to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. In addition, AB 939 requires each county and incorporated cities to prepare a Source Reduction and Recycling Element for its jurisdiction, identifying waste characterization; source reduction; recycling; composting, solid waste facility capacity; education and public information; funding; special waste (asbestos, sewage sludge, etc.); and household hazardous waste, in addition to a countywide Siting Element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the jurisdiction that cannot be reduced or recycled for a 15-year period. Each city plan must demonstrate integration with the relevant county plan. The plans must

promote (in order of priority) source reduction, recycling and composting, and environmentally safe transformation and land disposal. Elements of the plans must be updated every 5 years.

### **California’s 75-Percent “Recycling” Goal**

On October 6, 2011, Governor Brown signed AB 341, establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. The bill also mandates that local jurisdictions implement commercial recycling by July 1, 2012.

### **Local**

#### **Santa Paula Municipal Code Chapter 50.015**

Per Santa Paula Municipal Code, responsible persons must arrange for solid waste collection service with the city or a franchisee.<sup>39</sup> Regulations regarding the use of containers stipulate the following:

- Responsible persons must keep in a suitable place one or more containers capable of holding, without spilling, leaking, or emitting odors, all solid waste that accumulates on the premises between the times of two successive collections.
- Responsible persons must deposit in containers or commercial bins provided by the city or franchisee all solid waste generated or accumulated on premises.
- It is unlawful for any person to place ashes that are not cold and free from fire in any container.

#### **Santa Paula Municipal Code Chapter 50.140**

In response to AB 393, the City adopted Santa Paula Municipal Code Section 50.140, which requires permit applicants working on construction, remodeling, and/or demolition projects within City limits to practice waste prevention; to reuse, recycle or salvage; and, least preferred, to deposit waste in landfills.

- Waste generators must complete a Certificate of Implementation and a Waste Reduction & Recycling Summary Report (WRRS). The thresholds for planning and reporting job site waste diversion are:
  - Commercial and residential additions or alterations that require a building permit and are greater than 500 square feet
  - Demolition of any structure requiring a permit, regardless of cost or value
  - All new construction (pursuant to the Green Building Code)

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<sup>39</sup> Santa Paula Municipal Code, tit. V, Public Works, ch. 50.015.

### 4.14.3 THRESHOLDS OF SIGNIFICANCE

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

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- 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?
- 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?
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- 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?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Comply with federal, state, and local statutes and regulations related to solid waste?

### 4.14.4 PROJECT IMPACTS

**Threshold:** **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

The City's Public Works Department oversees management of all water and wastewater issues for the City. The City recently constructed a new WRF in 2010 that treats the wastewater generated within City limits. The City is located within the jurisdiction of the Los Angeles RWQCB.

The Los Angeles RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The City is responsible for adhering to Los Angeles RWQCB regulations as they apply to wastewater generated and discharged by the WRF. The resulting effluent from the treatment process must meet WDR Order No. R4-2007-0028 as amended by WDR Order No. R4-2010-0074. 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 will generate wastewater that will be connected to the City's sewer system and conveyed through a series of pipelines to the WRF

for treatment. Effluent from the treatment plant must comply with the SPMC to meet the requirements of the WDR permit issued to the City by the Los Angeles RWQCB.

As a result, the treated effluent will not exceed applicable requirements, and the Project's potential impacts related to wastewater treatment are less than significant.

**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?**

## Water and Recycled Water System

The Specific Plan's domestic water system would receive water via proposed 10- and 12-inch water mains as identified in **Figure 2.0-11, Domestic and Recycled Water Master Plan**. The point of connections (POCs) for the Project would be along Faulkner Road and Telegraph Road. The existing 8-inch water line located beneath Beckwith Road would remain in place.

From the point of connections, a new 12-inch line would proceed north through the Project Site. The proposed distribution system will be comprised of 8-inch through 12-inch mains. The water mains located beneath Beckwith Road and Faulkner Road would be publicly owned and maintained, while the remaining on-site domestic and fire would be master metered.

Construction of the City's WRF was completed early 2010. The treatment capacity of the City WRF is 4.2 mgd, or 4,704 afy. The City WRF produces water that meets California Title 22 regulations for recycled water. At present, recycled water is not available within the City of Santa Paula area. Estimated recycled water urban demand within the City (and adjacent areas) will be approximately 1,622 AFY. The recycled water demand could be fully met with recycled water from the new WRF.

The City purchased the WRF in 2015; however, the City presently does not have the funds to distribute the water. According to the City's Potable Water System Master Plan, the City would, in the future, develop a recycled water system conveyance plan that would include a line in Telegraph Road. The Project includes an on-site recycled water distribution system to irrigate the greenbelt and other irrigation areas. This will allow the Specific Plan area to make use of recycled water when the City completes its planned recycled water plan and extends a line to the point of connection in the railroad right of way at Beckwith Road.

The Specific Plan's recycled water system would operate via a proposed 12-inch distribution main constructed beneath Telegraph Road, which is currently within City limits. The proposed recycled water distribution system will be comprised of 6-inch mains from the POC of the City's recycled water system.

This terminus would become the main POC for the proposed Project, in addition to a POC located beneath the Ventura County Transportation Commission (VCTC) railroad right-of-way.

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.

## Wastewater Collection System and Treatment

As previously described, there is no existing sewer system in the Specific Plan area. The City's Wastewater System Master Plan identifies and describes the improvements required to service the Project Site, such as a new off-site mainline that will need to be completed prior to implementation of the Specific Plan. The connection of the Project Site to the City's system would utilize a new lift station at the intersection of Beckwith Road and Faulkner Road at the southeast corner of the Specific Plan area. These improvements would bring the site's POC for sewer service to this proposed lift station and would require completion prior to implementation of Specific Plan. The Sewer System Master Plan for the Specific Plan is shown in **Figure 2.0-12, Sewer System Master Plan**.

Construction of these improvements would require temporary construction and lane closures where the sewer line is constructed within the road rights-of way. 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.

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 incremental addition of 0.029 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.

**Threshold:** **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

As provided in **Table 4.14-9, Estimated Wastewater Generation**, the estimated total wastewater generation for the full build-out of uses within the Specific Plan area is approximately 0.01 mgd.

**Table 4.14-9  
Estimated Wastewater Generation**

<b>Land Use</b>	<b>Building Square Footage</b>	<b>Wastewater Generation Rates</b>	<b>Total Daily Generation (mgd)</b>
Commercial/Light Industrial	442,743.8	41.1 gpd/ksf	0.018
Light Industrial	196,978.3	41.1 gpd/ksf	0.008
		<b>Total</b>	<b>0.026</b>

*Notes: gpd = gallons per day; ksf = thousand square feet; mgd = million gallons per day.  
Building square footage found by multiplying total area square footage by 0.35 FAR per the October 2016 Specific Plan.*

As noted previously, the 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 mgd, so there is unused capacity at the facility to accept the incremental addition of 0.026 mgd from occupancy of the Specific Plan. The West Area 2 Expansion Area was included in the City's Wastewater System Master Plan as projected development within the City, with an estimated wastewater generation of 0.0818 mgd. Thus, the Project's estimated daily wastewater generation would be approximately 32 percent of the projected development potential for the West Area 2 Expansion. As the Project would not exceed the City's Wastewater System Master Plan projected capacity of the WRF, impacts would be less than significant.

The proposed Project's physical constraints and point of connection at the sewer main in Todd Lane will not accommodate a gravity line using standard allowable design slopes and good design practices. Therefore, a lift station is proposed for the system at the southeast corner of the Project Site. The lift station will be designed to the City of Santa Paula standards being automated with redundant pumps and adequate alarm systems. Complete design will be done during the Project improvement plan preparation.

The Specific Plan is proposing the best-fit alignment to connect to the existing 42-inch sewer main in Todd Lane, leading to the City of Santa Paula WRF. On site, the sewer will drain through one new 8-inch main running east-west along the southerly property line in Faulkner Road. The gravity system will continue toward Faulkner Road, through a new 12-inch casing pipe under State Route (SR) 126, and then south along the Todd drainage channel to a new lift station located at the northwest of Todd Lane at the channel. The proposed lift station will pump flows through the existing 6-inch force main located in Todd Lane. The existing 6-inch force main travels east underneath the existing 9-by-6-foot concrete box culvert and discharges to the existing 8-inch sewer in Todd Lane. This existing 8-inch sewer connects to the existing 42-inch sewer located in Todd Lane, which discharges to the City of Santa Paula WRF.

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.

**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?**

The Project Site is currently developed with agricultural uses as well as two residences and ancillary facilities for on-site agricultural operations. Implementation of the Specific Plan would result in the conversion of agricultural uses with urban development on the site, thus altering existing stormwater drainage on the Project Site.

Treatment systems incorporated into the Project design will be based on the treatment volume calculation guidelines provided in the Ventura County Water Quality Manual. The treatment types will include bioswales, bioretention cells, infiltration trenches, permeable pavement and/or detention basins as needed based on the proposed site plan layout. As a basis for design, the proposed Project must meet or not exceed the storm drainage requirements of the US Army Corps of Engineers (USACE), Ventura County Watershed Protection District (VCWWD), and the City of Santa Paula (on-site drainage systems) where applicable.

Drainage for the Specific Plan is presented in **Figure 2.0-14, Grading and Drainage Master Plan;** and the Storm Drain Plan is shown in **Figure 2.0-15, Storm Drain Plan.** Storm drain facilities would be sized to meet City of Santa Paula standards and accommodate the increased runoff generated by the increase in impervious surfaces on the Project Site. It should also be noted the development of the Project Site would occur in phases, as market conditions allow. Thus, the Project Site's storm drain plan may change throughout build-out of the site and would subsequently be subject to City approval.

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 storm drain system includes a series of storm drain pipelines, detention basins, and a trapezoidal channel that will run along the Adams Barranca. One acre of land within the Project Site would be set



aside for detention basins totaling approximately 6 af of volume for detention and retention requirements. The basin along Adams Barranca would include debris catchment facilities to reduce debris from storm flows that have caused problems at the railroad culvert and the Caltrans culvert in this channel. These detention basins would serve dual roles of flood protection and water quality enhancement. The trapezoidal channel will be approximately 6 feet in depth, with a 15-foot bottom width and 2:1 side slopes that will accommodate flood waters in a large storm event and protect the buildings on site; in addition, the channel will remove a portion of the property from the floodplain through a LOMR (Letter of Map Revision) with the Federal Emergency Management Agency. The new channel would join with the existing Adams Barranca at the railroad crossing and the SR 126 crossing.

The detention basins will significantly reduce 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 USACE, VCWWD, or City. Impacts would be less than significant.

**Threshold:**                    **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

## Water Supply and Demand

At full build-out, the development under the Specific Plan would allow for the development of up to a total of approximately 1,264,982.4 square feet of commercial/light industrial uses and approximately 562,795.2 square feet of light industrial uses on the Project Site. Both of these land uses have a floor to area ratio (FAR) of 0.35 that would allow approximately 442,743.8 square feet of commercial/light industrial buildings and approximately 196,978.3 square feet of light industrial buildings. In addition, the boundary of the site adjacent to the Adams Barranca would be designated for approximately 4.9 acres of passive open space.

Demand for the proposed Project is approximately 39.8 afy (20.5 afy for Commercial/Light Industrial use, 1.5 afy for Light Industrial use, and 17.8 afy for landscape irrigation). The potable demand of 22 afy for the Commercial/Light Industrial and Light Industrial uses is 25 percent of the West Area 2 total supply allocation. The landscaped areas will be irrigated using reclaimed water to be delivered from the City's wastewater treatment plant.

The Project will replace existing agricultural uses on the site. As such, water currently used for agricultural irrigation will be used instead for Project consumption. Currently agricultural uses on the Project Site use approximately 281.1 afy (average over the past 5 years). As such, the Project's consumption will be a net reduction in total water use of 241.3 afy.

It should be noted that the West Area 2 Planning Area has been allocated a supply of ~~88.887.7~~ 87.7 afy based on future development.<sup>40</sup> The Project would use a portion of this allocation. However, with the removal of the agricultural uses currently on the Project Site, the Project can a portion of the existing water currently used for irrigation. It should be noted that that this portion of the pumped water will be pumped instead by the City from other wells, and not from the current well on site.

The Project will use reclaimed water (17.8 afy) that will be available from the City's wastewater treatment facility for irrigation; this will further reduce the demand on potable water supplies. The City forecasts having between 400 afy (~~2015~~2020) and 1,622,000 afy (204035) of reclaimed water available for use. The Project will require only a portion of the recycled water (~~2.94.4~~ 2.94 percent in 2017 and ~~1.10.9~~ 1.10 percent in 204035). As shown on **Table 4.14-10, Project Supply and Demand Comparison—Average Year (afy)**, shows the Project water demand as a percent of total supply throughout various milestones in the build-out schedule. By 2027 (build-out), the Project is estimated to demand 39.87 afy of water. Water demand from the Project based on the 2016 UWMP represents 0.61 percent of the City's total projected urban water demand in 2017, decreasing to 0.41 percent in 2037. The projected demand for the Project will account for only a small fraction of the projected demands.

~~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.~~

The 20160 UWMP Update projects total water demands for the Santa Paula Business Park through 2035 2040 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.

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<sup>40</sup> City of Santa Paula, Final 2016 UWMP Update (August 2017), Table 3-2, 46 (1,905,750 square feet of development at 15 gal/sq. ft./year is 87.7 afy).

**Table 4.14-10**  
**Project Supply and Demand Comparison—Average Year (afy)**

	2015	2017	2020	2025	2027	2030	2035	2037	2040
Total City supply <sup>a</sup>	6,637 <sup>b</sup> 7,037.0	6,462 <sup>c</sup> 7,419 <sup>b</sup>	6,9087,991.0	7,7558,945.0	8,0949,334.2 <sup>e</sup>	8,6039,918.0	9,4509,918.0	9,788 <sup>d</sup> 9,918.0 <sup>d</sup>	10,295
West Area 2 allocation <sup>e</sup>	87.788.8	87.788.8	87.788.8	87.788.8	87.788.8	87.788.8	87.788.8	87.788.8	87.7
Existing agricultural use <sup>f</sup>	281.1281.1	0.00.0	0.00.0	0.00.0	0.00.0	0.00.0	0.00.0	0.00.0	0.0
Project demand <sup>g</sup>	00	39.739.8	39.739.8	39.739.8	39.739.8	39.739.8	39.739.8	39.739.8	39.7
Percent of City's total supply	0%0%	0.61%0.84%	0.57%0.76%	0.51%0.70%	0.49%0.66%	0.46%0.66%	0.42%0.66%	0.41%0.66%	0.39%
Net change from agricultural use	00	(241.4)(241.3)	(241.4)(241.3)	(241.4)(241.3)	(241.4)(241.3)	(241.4)(241.3)	(241.4)(241.3)	(241.4)(241.3)	(241.4)
Available reclaimed water	0400	0600 <sup>b</sup>	400800	8001,200	9601,368.8 <sup>e</sup>	1,2001,622	1,6001,622	1,7601,622 <sup>d</sup>	2,000
Project demand for reclaimed water	00	017.8	17.817.8	17.817.8	17.817.8	17.817.8	17.817.8	17.817.8	17.8
Percent of available reclaimed water	0.00%0.00%	0.00%2.97%	4.45%2.23%	2.23%1.48%	1.85%1.33%	1.48%1.11%	1.11%1.11%	1.10%1.11%	0.89%

## Notes:

<sup>a</sup> City of Santa Paula, Final 2016 2010 Urban Water Management Plan UWMP (June 2011) August 2017) Table 4-4, p. 694.

<sup>b</sup> value extrapolated from 2015 and 2020 data.

<sup>c</sup> Value extrapolated from 2025 and 2030 data.

<sup>d</sup> Value carried over from 2035 data.

<sup>e</sup> City of Santa Paula, Final 2016 UWMP (August 2017) 2010 Urban Water Management Plan (June 2011) Table 2-4, p. 3916.

<sup>f</sup> See Table 3 of the Water Supply Assessment.

<sup>g</sup> See Table 2 of the Water Supply Assessment.

<sup>h</sup> City of Santa Paula, 2010 Urban Water Management Plan (June 2011), Table 4-6, p. 47.

**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?**

The Project would generate solid waste during construction. This waste would be generated as a result of the demolition of existing on-site structures, pavement, and agricultural waste as well as the construction of new commercial and light industrial development. Much of the solid waste generated from construction of the Project would be recyclable, such as wood and metal scrap and formed construction board (cement and drywall board). As provided by the SPMC, Section 50.140, Construction and Demolition Diversion, demolition and construction must divert 50 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.

All new development allowed within the Specific Plan will support recycling to reduce the amount of solid waste sent to the landfill. Waste carts for trash, recycling, and green waste would be provided. Estimates of the amount of solid waste that would be generated during operation have been calculated using the waste generation factors contained in the Ventura County Solid Waste Management Department Guidelines of Preparation of Environmental Assessments for Solid Waste Impacts, and are listed in **Table 4.14-11, Estimated Solid Waste Generation**.

**Table 4.14-11  
Estimated Solid Waste Generation**

<b>Land Use</b>	<b>Building Square Footage</b>	<b>Generation Rate</b>	<b>Solid Waste Generation (tons/year)</b>	<b>Solid Waste Generation (tons/day)</b>
Commercial/Light Industrial	442,743.8	0.0024 tons/sq. ft./yr.	1,062.58	2.91
Light Industrial	196,978.3	0.0108 tons/sq. ft./yr. <sup>a</sup>	2,127.37	5.83
<b>Total Solid Waste Generation</b>			<b>3,189.95</b>	<b>8.74</b>

Source: Ventura County Solid Waste Management Department. Guidelines of Preparation of Environmental Assessments for Solid Waste Impacts. May 1998.

<sup>a</sup> 0.0108 was used for Light Industrial since there is no generation rate for this type of use.

Notes: sq. ft. = square feet; yr. = year.

Building square footage found by multiplying total area square footage by 0.35 FAR per the October 2016 Specific Plan.

The Project Site currently generates approximately 4.08 tons of solid waste per year. Under the Specific Plan, future operations would generate approximately 3,189.95 tons of solid waste per year, which equates to approximately 8.74 tons of solid wastes per day that will be delivered to landfills.<sup>41</sup> As mentioned previously, the Toland Road Landfill, due to its location and capacity, is the primary provider of solid waste disposal to the City of Santa Paula; other landfills in the region are also used but to a lesser extent. The Toland Road Landfill is permitted to accept a maximum of 1,500 tons of solid waste per day, with a remaining capacity of 21,983,000 cubic yards. The proposed Project would account for less than 1 percent of the Toland Road Landfill permitted daily capacity.

Additionally, the next closest landfills to the Project Site are the Chiquita Canyon Sanitary Landfill and Simi Valley Landfill & Recycling Center. The proposed Project would account for less than 1 percent of the maximum permitted daily capacity for these two landfills. 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.

41 Toland Road Landfill is open 5 days per week, which is approximately 260 days per year. 3,189.95 tons/260 days = 12.27 tons/day.

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.

As previously mentioned, the proposed Project would comply with AB 939 and AB 231 and the City's Construction and Demolition Diversion section of the Municipal Code, which states that demolition, construction, and remodeling shall divert 50 percent of waste tonnage from landfills. However, given that future landfill capacity may not be ensured through the life of the development of the Specific Plan, for many years after occupancy, impacts to solid waste would be potentially significant.

#### 4.14.5 CUMULATIVE IMPACTS

##### Water

The 2016~~0~~ UWMP prepared for the City projects water demand within the City's service area through the year 2040~~35~~. The 2016~~0~~ UWMP analyzes future water demand at build-out conditions for normal, dry year, and multiple dry water years. As indicated in the analysis above, there is expected to be a surplus of water during normal, dry year, and multiple dry year scenarios. The Specific Plan's demand for water use would ~~meet~~ be consistent with 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.

##### Wastewater

In association with the related projects identified in **Section 3.0, Related Projects**, the Specific Plan and related projects would result in a cumulative increase in projected wastewater flow within the City of Santa Paula. As shown in **Table 4.14-12, Cumulative Wastewater Generation**, the development of related projects would result in a generation flow of 2.36~~472~~ mgd at build-out. Combined with the net increase of approximately 0.01 mgd from the Project, the cumulative wastewater generation by the Specific Plan and related projects would be approximately 2.38~~274~~ mgd.

**Table 4.14-12**  
**Cumulative Wastewater Generation**

Land Use	Unit	Wastewater Generation Rates	Total Daily Generation (mgd)
Residential	1,77086 units <sup>a</sup>	163 gpd/person <sup>b</sup>	1.0547
Commercial	2179,547298 sq. ft.	41.1 gpd/ksf <sup>b</sup>	0.009
Industrial	8957,474 sq. ft.	41.1 gpd/ksf <sup>b</sup>	0.0335
Adams Canyon <sup>c</sup>	—	—	0.499 <sup>b</sup>
Fagan Canyon <sup>d</sup>	—	—	0.178 <sup>b</sup>
East Area 2 (East Gateway) <sup>e</sup>	—	—	0.533 <sup>b</sup>
<b>West Area 2<sup>f</sup></b>	—	—	0.063 <sup>b</sup>
<b>Related Projects Total</b>			<b>2.36472</b>
<b>Project Net</b>			<b>0.01</b>
<b>Total Cumulative</b>			<b>2.37482</b>

Source: City of Santa Paula Planning Department (2014) and East Area 1 Amendment Supplemental EIR (September 2014).

Notes: sq. ft. = square feet; ksf = thousand square feet; gpd = gallons per day; and afy = acre feet per year.

<sup>a</sup> 3.63 persons/unit

<sup>b</sup> From East Area 1 Amendment Supplemental EIR. Generation rate derived from the assumption that 80 percent of water demand is returned as wastewater per the 2010 City of Santa Paula Wastewater Master Plan

<sup>c</sup> Blended per the 2016~~0~~ UWMP. Includes 495 residential units, 100,000 sq. ft. commercial/industrial/institutional, and 200 acres of parks and recreation land.

<sup>d</sup> Blended per the 2016~~0~~ UWMP. Includes 450 dwelling units and 100,000 sq. ft. of commercial/industrial/institutional space, and 7 acres of parks and recreation land.

<sup>e</sup> Blended per the 2016~~0~~ UWMP. Includes 1,602,000 sq. ft. of commercial/industrial/institutional space.

<sup>f</sup> West Area 2 accounts for the entire 125 acre expansion area.

East Area 1 is added into residential, commercial and industrial as appropriate.

Zone 2 of the wastewater treatment service area would undergo various infrastructure improvements to handle the future wastewater flows with the development the West Area 2 and other existing and proposed uses within the zone. Development of the Specific Plan includes construction of a new lift station at the intersection of Beckwith Road and Faulkner Road at the southeast corner of the Specific Plan area, north of SR 126. Completion of proposed Project improvements would convey most of the wastewater flow to the 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.

## Solid Waste

Development under the Specific Plan and the related projects would add incremental increases in solid waste disposal at landfills located within Ventura County. Approximately 12 years of capacity remain at the Toland Road Sanitary Landfill, 4 years at the Chiquita Canyon Sanitary Landfill, 37 years at the Simi

Valley Landfill & Recycling Center, 10 years at the Azusa Land Reclamation Co. Landfill, 27 years at Antelope Valley Public Landfills I and II, and 23 years at the Bakersfield Metropolitan (Bena) Solid Waste Landfill. .

Assuming that all of the expansion areas and other probable future developments are completely built out according to the City's General Plan, the cumulative solid waste generation would total ~~58,788,602~~ **58,788,602,216** tons per year, as shown in **Table 4.14-13, Estimated Cumulative Solid Waste Generation**. The Specific Plan would account for approximately ~~58~~ percent of the City's future estimated cumulative solid waste generation.

**Table 4.14-13**  
**Estimated Cumulative Solid Waste Generation**

Land Use	Unit	Solid Waste Generation Rates	Solid Waste Generation (tons/day)	Solid Waste Generation (tons/year)
Residential <sup>a</sup>	1,770 <del>86</del> units <sup>b</sup>	0.00612 tons/household/day	10.8 <del>93</del>	<del>2,842,3,953</del>
Commercial <sup>a</sup>	<del>219,547 sq. ft.</del> 217,298 sq. ft.	0.0025 tons /1000 sq. ft./day	0.5 <del>54</del>	141 <del>201</del>
Industrial <sup>a</sup>	<del>857,474 sq. ft.</del> 805,474 sq. ft.	0.0025 tons/1000 sq. ft./day	2.1 <del>401</del>	524 <del>781</del>
East Gateway Project <sup>c</sup>	-		39.5	10,275
Fagan Canyon <sup>d</sup>	-		6.9	1,798
Adams Canyon <sup>d</sup>	-		5.0	1,291
West Area 2 <sup>de</sup>	-		24.9	6,480
Existing City uses <sup>d</sup>	-		113.6	29,531
Other City build-out <sup>f</sup>	-		22.7	5,906
<b>Total</b>			<b>226.1<del>208</del></b>	<b>58,788<del>602</del>,216</b>

Source: Ventura County Solid Waste Management Department, *Estimated Solid Waste Generation Rates for Industrial/Commercial/Residential Establishments, Guidelines for Preparation of Environmental Assessments for Solid Waste Impacts*.  
<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

Note:

Tons per year were determined using the Toland Road Landfill number of operational days within a year (260 operational days).

<sup>a</sup> Land uses include development from East Area 1.

<sup>b</sup> 3.63 persons/unit

<sup>c</sup> East Gateway Project solid waste generation was determined by the East Gateway Draft EIR.

<sup>d</sup> Data from East Area 1 Specific Plan Amendment Supplemental EIR.

<sup>e</sup> West Area 2 includes entire 125 acre expansion area.

<sup>f</sup> Other build-out assumes 20 percent of solid waste generated by existing uses to account for all other probable future projects identified in the City's Development Activity List.

The City would continue to implement programs for source reduction and recycling and require that subsequent projects complete environmental review to minimize solid waste disposal at the six disposal facilities. Furthermore, the State has set a goal to recycle, source-reduce, or compost 75 percent of solid waste generated.

The City would utilize the Toland Road Sanitary Landfill until the landfill reaches capacity. At the time Toland Road Sanitary 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.

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.

#### **4.14.6 MITIGATION MEASURES**

The following measures have been identified to mitigate the identified solid waste impacts.

**SW-1** Before issuance of a demolition permit or construction permit, the applicant must implement waste reduction and recycling programs to divert construction solid 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.

#### **4.14.7 RESIDUAL IMPACTS AFTER MITIGATION**

Implementation of **Mitigation Measure SW-1** would reduce impacts to utilities and services to less than significant levels.