



The Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

Subsequent Environmental Impact Report
19EIR-00000-00002; SCH#2018031077

prepared by

County of Santa Barbara
Planning & Development
Development Review Division
624 West Foster Road, Suite C
Santa Maria, California 93455
Contact: Dana Eady, Planner

prepared with the assistance of

Rincon Consultants, Inc.
1530 Monterey Street, Suite D
San Luis Obispo, California 93401

June 2019



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Appendix B	Air Quality Analysis Technical Report
Appendix C	Biological Resources Reports
Appendix D	Archaeological Resources Investigation
Appendix E	Soils Engineering Report and Engineering Geology Investigation
Appendix F	Neighborhoods Specific Plan Environmental Documentation Report
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Executive Summary

This section summarizes the characteristics and environmental impacts of the proposed project, the project alternatives, and required and recommended mitigation measures.

Project Synopsis

Project Applicant

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Lead Agency Contact Person

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Project Description

The proposed project is a request by Orcutt Rancho, LLC, for approval of the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project, located on a portion of Key Site 21 in the OCP area. The proposed project involves a Specific Plan, two Vesting Tentative Tract Maps, two final Development Plans, two Minor Conditional Use Permits, Road Naming Application, and Comprehensive Plan Amendment entitlements to subdivide two existing parcels of approximately 107 gross acres and 70 gross acres into 148 lots for the development of 146 single-family residences. Approximately 96.7 acres (51%) of the site is proposed as undisturbed open space. The Specific Plan area also includes approximately 29.8 acres of privately managed open space that includes landscape, trailhead, trails, and fuel modification areas. The property is identified as Assessor's Parcel Numbers (APN) 113-250-015, -016, -017.

Alternatives

Seven alternatives to the proposed project have been analyzed in this SEIR. The future development of the Key Site 21 project under the Orcutt Community Plan (OCP) and three alternatives were previously analyzed in the OCP EIR (1995). This SEIR also addresses four additional alternatives to the currently-proposed Key Site 21 development project. The seven alternatives are:

OCP EIR Alternatives

- OCP EIR Alternative 1: No Project Alternative)
- OCP EIR Alternative 2: Low Buildout)
- OCP EIR Alternative 3: High Buildout)

Additional Alternatives Considered in this SEIR

- Alternative 1: No Project Alternative
- Alternative 2: Only Hidden Canyon Neighborhood Development
- Alternative 3: Only Willow Creek Neighborhood Development
- Alternative 4: Reduced Units in Willow Creek and Hidden Canyon Neighborhoods

The Only Hidden Canyon Neighborhood Development Alternative (Alternative 2) and Only Willow Creek Neighborhood Development Alternative (Alternative 3) would result in the fewest significant and unavoidable impacts as compared to both the proposed project and to the original alternatives analyzed in the OCP EIR. Between these two alternatives, the Only Hidden Canyon Neighborhood Development Alternative (Alternative 2) would result in reduced impacts to biological resources, because it would avoid more perennial rye grass grassland and purple needle grass grassland west of the public golf course. Therefore, Alternative 2 would be considered environmentally superior overall.

As described in the analysis of alternatives in this section, Alternative 2 would avoid the project's significant and unavoidable project-specific impact to visual character, with incorporation of mitigation, and reduce overall impacts associated with development on steep slopes, adverse effects on sensitive species, demand on public services, and transportation/circulation. In addition, this alternative would avoid or reduce impacts on native plant communities, such that the associated mitigation measures and ratios may be reduced under this alternative. Furthermore, Alternative 2 does not present any new significant impacts that were determined to be less than significant in the analysis of the proposed project nor would it increase the severity of impacts identified for the proposed project. For these reasons, the Only Hidden Canyon Neighborhood Development Alternative (Alternative 2) is identified as the Environmentally Superior Alternative.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the identified environmental impacts for each issue area studied in the EIR, required mitigation measures (if any), and the level of significance after mitigation. Table ES-1 contains the project-specific impacts organized by impact level, followed by the cumulative impacts. Class I impacts are defined as significant and unavoidable adverse impacts, which require a statement of overriding considerations to be made per Section 15093 of the State CEQA Guidelines if the project is approved. Class II impacts are significant, adverse impacts that can be feasibly mitigated to a less than significant level, and which require findings to be made under Section 15091 of the State CEQA Guidelines. Class III impacts are considered less than significant impacts. Potential project-specific and cumulative impacts are listed below in summary form.

Based on comments received during the public hearing and NOP comment period, the County of Santa Barbara determined that there was no substantial evidence that the project would cause or otherwise result in significant environmental effects in the resource areas of forest resources, hazards and hazardous materials, historic resources, mineral resources, and population and housing. The substantiation for determining that these issues would result in no impact or a less-than-significant impact is described in Section 4.15, *Effects Found Not to be Significant*, and in further detail in the NOP and Scoping Paper in Appendix A.

Class I – Significant and Unavoidable Impacts

- Visual quality and character
- Cumulative visual resources impacts
- Special status wildlife species
- Cumulative biological resources impacts
- Solid waste
- Cumulative public services impacts
- Cumulative traffic impacts

Class II – Significant Impacts that Can Be Mitigated to Less than Significant Levels

- Light and Glare
- Cumulative impacts to scenic views and light and glare
- Loss of sensitive habitat, incl. riparian vegetation
- Special status plant species
- Wetlands
- Wildlife movement
- Protected trees
- Sensitive vegetation
- Archaeological resources and human remains
- Tribal cultural resources
- Cumulative cultural resources impacts
- Steep slopes
- Long-term erosive runoff and sedimentation
- Expansive soils
- Paleontological resources
- Cumulative impacts to geologic hazards
- Temporary and long-term increases in GHG emissions
- Consistency with GHG reduction plans and regulations
- Cumulative GHG emissions
- Quality of life compatibility
- Construction noise impacts
- Water supply resources

Class III – Less than Significant Impacts

- Scenic vistas
- Scenic resources
- Cumulative impacts to visual quality and character
- Agricultural resources

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- Cumulative impacts to agricultural resources
- Clean Air Plan consistency
- Construction air quality emissions
- Operational air quality emissions
- Odor emissions
- Cumulative air quality impacts
- Energy impacts
- Cumulative energy impacts
- Wildland fire hazards
- Fire protection services and facilities
- Cumulative impacts to fire protection
- Groundshaking
- Ground failure and liquefaction
- Landslides
- Orcutt Community Plan consistency
- Cumulative land use impacts
- Noise sensitive receptor exposure
- Traffic noise
- Cumulative noise impacts
- Schools
- Wastewater
- Police protection services
- Recreational facilities
- Intersection operations
- Roadway segment operations
- Traffic safety hazards
- Water quality
- Flood and stormwater runoff
- Cumulative impacts to drainage, flooding, and sedimentation
- Cumulative impacts to water supply and groundwater resources

Table ES-1 Summary of Potentially Significant Environmental Impacts, Mitigation Measures and Significance After Mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
Class I Project-Specific Impacts (Significant and Unavoidable)		
Aesthetics		
<p>Impact AES-2. The project would convert semi-rural land uses to urban land uses, altering the visual quality and character of the project site, which serves as a gateway parcel to west Orcutt. This impact would be significant and unavoidable.</p>	<p>AES-2(a) Requirements for Development Near Open Space Overlay. All new development adjacent to areas within the open space overlay shall be sited and designed in such a manner to protect and enhance the visual character of the overlay area through use of landscape buffers, shielding of night lighting, screening of parking areas, and unit orientation. In semi-rural areas, natural building materials and colors compatible with surrounding terrain (i.e., earth tones and non-reflective paints) shall be used on exterior surfaces of all structures, including water tanks and fences. Understories and retaining walls higher than six (6) feet shall be in tones compatible with surrounding terrain using textured materials or construction methods which create a textured effect. Retaining walls shall be landscaped to provide screening from adjacent open space areas, using native species where appropriate.</p> <p>Plan Requirements and Timing. These requirements shall be reflected on building plans for review by Planning & Development prior to zoning clearance issuance. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Building inspectors and Planning & Development compliance monitoring staff shall ensure compliance in the field.</p> <p>AES- 2(b) Retention Basin Design (Implements OCP EIR Mitigation VIS-3). All public and private retardation basins shall be designed to permit additional uses including active and passive recreation in more developed areas and wildlife habitat in more rural and biologically sensitive areas. The use of perimeter fencing shall be avoided to the maximum extent feasible. Where required, perimeter fencing shall be of a decorative nature in urban areas or designed to minimize interference with wildlife in more undeveloped areas. Perimeter landscaping of basins in urban areas shall consist of low maintenance trees and shrubs, as well as turf, etc. to accommodate recreational uses. Native trees, shrubs and groundcover shall be used within basins in undeveloped areas. Maintenance shall be determined through implementation of the Landscape-Open Space Maintenance District.</p> <p>Plan Requirements and Timing. These requirements shall be reflected on landscaping plans for review by Planning & Development prior to zoning clearance issuance. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Planning & Development compliance monitoring staff shall ensure compliance in the field.</p> <p>AES-2(c) Median and Landscape Design (Implements OCP EIR Mitigation VIS-4). All medians and strips designated for landscaping shall utilize drought-tolerant species to the maximum extent feasible, consisting of low maintenance trees, shrubs, and groundcover which do not obstruct views [for] motorists, bicyclists, and pedestrians. Maintenance shall be determined through implementation of the Landscape-Open Space Maintenance District.</p> <p>Plan Requirements and Timing. These requirements shall be reflected on landscaping plans for review by Planning & Development prior to zoning clearance issuance. Monitoring. The Owner/Applicant shall</p>	<p>Implementation of Mitigation Measures AES-2(a) through AES-2(d) would reduce potential impacts to the project site’s visual character; however, the project would still constitute the conversion of open space and semi-rural space to urban space. No additional mitigation is required as no other mitigation would be feasible to prevent this conversion of land uses. After implementation of Mitigation Measures AES-2(a) through AES-2(d), this impact would remain significant and unavoidable</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>demonstrate that the submitted plans conform to the required conditions. Planning & Development compliance monitoring staff shall ensure compliance in the field.</p> <p>AES-2(d) Infrastructure Screening (Implements OCP EIR Mitigation VIS-5). All proposed infrastructure visible from gateway roads, including the Hidden Canyon and Willow Creek Neighborhood driveways, shall be screened from viewers passing on SR 1.</p> <p>Plan Requirements and Timing. These requirements shall be reflected on landscaping and building plans for review by Planning & Development prior to zoning clearance issuance. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Planning & Development compliance monitoring staff shall ensure compliance in the field.</p>	
Biological Resources		
<p>Impact BIO-2. Impacts to California tiger salamander would be Class I, significant and unavoidable.</p>	<p>BIO-2(a) USFWS/CDFW Consultation. Prior to zoning clearance issuance for grading, the applicant shall consult with USFWS and/or CDFW (depending on the species) regarding potential impacts to the California red-legged frog (CRLF) and the California tiger salamander (CTS). The applicant shall obtain all necessary permits and approvals and shall implement measures as required by these permits and approvals.</p> <p>Plan Requirements and Timing. The applicant shall submit copies of correspondence and/or permits (as applicable) with applicable agencies to Planning and Development prior to zoning clearance issuance for grading. Monitoring. Planning and Development permit processing planner shall confirm that the applicant has obtained all necessary permits and approvals. Planning and Development compliance monitoring and building and safety staff shall monitor and inspect to ensure that required.</p> <p>BIO-2(b) California Tiger Salamander (CTS) and California Red-legged Frog (CRLF) Habitat Avoidance. Development shall avoid impacting CTS and CRLF habitat to the greatest extent feasible. To protect habitat adjacent to and outside of the limits of disturbance of the proposed project, the Owner/Applicant shall install bright orange protective fencing to delineate the extent of disturbance areas associated with the project (including the proposed sewer line easement) under the direction of a County-approved qualified biologist. If CTS and CRLF habitat cannot be avoided, the Owner/Applicant shall provide Planning and Development with the total acreages for habitat that would be impacted prior to zoning clearance issuance for grading and implement Mitigation Measure BIO-2(c) below.</p> <p>Plan Requirements and Timing. Grading plans showing the location of CTS and CRLF habitat as well as protective fencing locations for review and approval prior to issuance of zoning clearance for grading. Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place.</p> <p>BIO-2(c) California Tiger Salamander (CTS) and California Red-legged Frog (CRLF) Compensatory Mitigation. If CTS and CRLF habitat cannot be avoided per Mitigation Measure BIO-2(b), the Owner/Applicant shall establish an off-site conservation easement(s) as compensatory mitigation to offset impacts to CTS and CRLF habitat. The compensatory mitigation shall incorporate the conditions and compensatory mitigation requirements specified</p>	<p>Potential impacts to CTS F, which require off-site compensatory mitigation (Mitigation Measure BIO-2[c]) may not be feasible due to lack of available off-site locations for CTS compensatory mitigation within the West Santa Maria/Orcutt metapopulation area. Therefore, potential impacts to CTS would remain significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>in the incidental take permit(s) and/or incidental take statement that could be issued by CDFW and USFWS for this project but shall meet the minimum standards specified in this measure. Compensatory mitigation shall be provided at a ratio of not less than 2:1 (area mitigated: area impacted) for upland habitat and 3:1 for aquatic habitat. Compensatory mitigation must occur off-site and shall not occur within the open space or other location on Key Site 21. Areas proposed for preservation must contain verified extant populations of CTS and/or CRLF depending on the species the preserved area is compensating for. These off-site locations for CTS compensatory mitigation must occur within the West Santa Maria/Orcutt metapopulation area (Appendix D of the Recovery Plan for the Santa Barbara County Distinct Population Segment of the California Tiger Salamander [<i>Ambystoma californiense</i>]; USFWS 2016).</p> <p>Compensatory mitigation areas shall have a restrictive covenant prohibiting future development/disturbance and shall be managed in perpetuity to encourage persistence and enhancement of the preserved target species. Compensatory mitigation lands cannot be located on land that is currently held publicly for resource protection. The compensatory mitigation areas shall be managed by a conservation lands management entity or other qualified easement holder.</p> <p>The CDFW and organizations approved by CDFW that meet the criteria below may be considered qualified easement holders for those species for which the CDFW has regulatory authority. To qualify as a “qualified easement holder” a private land trust must at a minimum have:</p> <ol style="list-style-type: none"> 1. Substantial experience managing conservation easements that are created to meet mitigation requirements for impacts to special-status species; 2. Adopted the Land Trust Alliance’s Standards and Practices; and; 3. A stewardship endowment fund to pay for its perpetual stewardship obligations. <p>Other specific conditions for qualified easement holders may be outlined in incidental take permit(s) and/or incidental take statement that could be issued by CDFW and USFWS for this project.</p> <p>The County shall determine whether a proposed easement holder meets these requirements. The owner/applicant shall also be responsible for donating to the conservation easement holder fees sufficient to cover administrative costs incurred in the creation of the conservation easement (appraisal, documenting baseline conditions, etc.) and funds in the form of a non-wasting endowment to cover the cost of monitoring and enforcing the terms of the conservation easement in perpetuity. The amount of these administrative and stewardship fees shall be determined by the conservation easement holder in consultation with the County.</p> <p>Conservation easement(s) shall be held in perpetuity by a qualified easement holder (as defined above), and be subject to a legally binding agreement that shall: (1) Be recorded with the County Recorder(s); and (2) Contain a succession clause for a qualified easement holder if the original holder is dissolved.</p> <p>The following factors shall be considered in assessing the quality of potential mitigation habitat: (1) current land use, (2) location (e.g., habitat corridor, part of a large block of existing habitat, adjacency to source populations, proximity to potential sources of disturbance), (3) vegetation composition and structure, (4) slope, (5) soil composition and drainage, and (6) level of occupancy or use by all relevant species.</p>	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>To meet the requirement that the mitigation habitat is of value equal to, or greater than, the habitat impacted on the project site, the mitigation habitat must be either “suitable habitat” or “enhanced habitat” as described below:</p> <p>Suitable Habitat. To meet the requirements for suitable habitat that provides equal or greater habitat value for listed animal species than the impacted habitat, the habitat must:</p> <ol style="list-style-type: none"> 1. Provide habitat for special status animal species, such that special status animal species populations can regenerate naturally when disturbances are removed; 2. Not be characterized by (or adjacent to areas characterized by) high densities of invasive species, such as yellow star-thistle, or species that might jeopardize habitat recovery and restoration; 3. Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat; and 4. Not be located on land that is currently publicly held for resource protection. <p>Enhanced Habitat. If suitable habitat is unavailable, or in lieu of acquiring already suitable special status animal species habitat, the applicant may enhance potential habitat that:</p> <ol style="list-style-type: none"> 1. Is within an area with potential to contribute to habitat connectivity and build linkages between populations; 2. Consists of actively farmed land or other land containing degraded habitat that will support enhancement; 3. Supports suitable soils, slope, and drainage patterns consistent with special status animal species requirements; 4. Cannot be located on land that is currently held publicly for resource protection; and 5. Does not contain hazardous wastes or structures that cannot be removed to the extent that the site could not provide suitable habitat. <p>Enhanced Habitat Standards. For enhanced habitat conditions to equal or exceed habitat conditions on the project site, the enhanced habitat shall meet the following habitat criteria: After five years, these sites must consist of suitable habitat or contain other habitat characteristics (e.g., small mammal burrows in upland habitat for CTS, wetlands, ponds, etc.) that are consistent with the known ecology of the special status animal species to which compensatory mitigation is being applied and the habitat components for which the mitigation is compensating for.</p> <p>Plan Requirements and Timing. The applicant shall calculate the total acreages required to meet all compensatory mitigation obligations and submit these totals to County Planning and Development prior to final map clearance. The applicant shall then obtain County approval of the location of mitigation lands, the holder of conservation easements, and the restrictions contained in the easement(s) created for the permanent protection of these lands. Documentation of recorded easement(s) shall be submitted to and approved by the County prior to map clearance. Verification of having met habitat mitigation requirements shall be reviewed and approved prior to final inspection. Monitoring: Planning and Development permit processing planner shall</p>	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>review and approve documentation of compensatory mitigation land acquisition and associated restrictive covenant for consistency with the conditions outlined in the measure. These lands may be identified through independent consultation with CDFW and/or USFWS. The Owner/Applicant shall provide evidence to Planning and Development permit processing planner of the establishment of a permanent conservation easement and maintenance endowment prior to final map clearance.</p> <p>BIO-2(d) Listed Species Habitat Mitigation and Monitoring Plan. The applicant shall retain a County-approved qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP) to ensure the success of compensatory mitigation sites required for compensation of habitat impacts to the California tiger salamander (CTS) and the California red-legged frog (CRLF) that are to be enhanced pursuant to Mitigation Measure BIO-2(c). The HMMP shall be submitted to the County prior to zoning clearance issuance for grading. The HMMP shall include, at a minimum, the following information:</p> <ul style="list-style-type: none"> a. A summary of habitat and species impacts and the proposed mitigation for each element; b. A description of the location and boundaries of the mitigation site(s) and description of existing site conditions; c. A description of any measures to be undertaken to enhance (e.g., through focused management) the mitigation site for special status species; d. Identification of an adequate funding mechanism for long-term management and identification of a conservation lands management entity to manage the conservation easement lands; e. A description of management and maintenance measures intended to maintain and enhance habitat for the target species (e.g., weed control, fencing maintenance); f. A description of habitat and species monitoring measures on the mitigation site, including specific, objective performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc.; monitoring shall document compliance with each element requiring habitat compensation or management; g. A contingency plan for mitigation elements that do not meet performance or final success criteria within described periods; the plan shall include specific triggers for remediation if performance criteria are not met and a description of the process by which remediation of problems with the mitigation site (e.g., presence of noxious weeds) shall occur; h. A requirement that the applicant shall be responsible for monitoring, as specified in the HMMP, for at least five years post-construction; during this period, regular reporting shall be provided to the County; i. Reporting shall include: <ul style="list-style-type: none"> 1. An annual monitoring report to be submitted to the County; and 2. Demonstration that the compensatory mitigation and management (1) will fully mitigate for any take of a CESA-listed species as defined by CESA, (2) minimize and mitigate any take of an FESA-listed species to the maximum extent practicable as defined by FESA, and (3) ensure that impacts from the project are not likely to jeopardize the listed species continued existence as defined by FESA. 	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>Plan Requirements and Timing. The HMMP shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance for grading. Proof of purchase or an easement controlling off-site acreage shall also be submitted to Planning and Development prior to zoning clearance issuance for grading.</p> <p>Monitoring. The restoration components shall be monitored by a County-approved qualified biologist for five years. Planning and Development permit processing planner shall ensure that the restoration requirements of the project included in this condition are addressed prior to issuance of zoning clearance for grading. Planning and Development permit compliance staff shall oversee implementation of the HMMP through periodic monitoring on-site during construction and a final restoration site inspection upon completion in accordance with the approved restoration plans. Monitoring shall continue for 5 years at a minimum and continue until the restoration requirements are achieved.</p> <p>BIO-2(e) California Tiger Salamander (CTS) and California Red-legged Frog (CRLF) Avoidance and Minimization. The following measures shall be implemented during grading and construction activities and implementation of the compensatory mitigation and fuel management program included in the Open Space Management Plan (OSMP).</p> <ol style="list-style-type: none"> a. Pre-construction surveys for CTS and CRLF shall be conducted where suitable habitat is present by a County-approved biologist not more than 48 hour prior to the start of construction activities. The survey area should include the proposed disturbance area and all proposed ingress/egress routes, plus a 100-foot buffer. If any life stage of CRLF or CTS is found within the survey area, the USFWS and/or CDFW should be consulted to determine the appropriate course of action or the appropriate measures implemented in accordance with the Biological Opinion issued or Habitat Conservation Plan approved by the USFWS (relevant to CRLF and CTS) and/or the Incidental Take Permit issued by the CDFW (relevant to CTS). b. Ground disturbance shall be limited to the minimum necessary to complete construction activities. Construction limits of disturbance shall be flagged. All equipment and material storage, parking, staging and other support areas shall be identified prior to issuance of a grading permit. Areas of special biological concern within or adjacent to construction limits shall have highly visible orange construction fencing installed between said area and the limits of disturbance. c. All development activities occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, to avoid impacts to sensitive aquatic species. d. To avoid encountering migrating CTS within range of potentially suitable aquatic habitat, construction within upland areas within the range of CTS should be limited to July 15 to October 15. Work should be postponed if chance of rain is greater than 70% based on the NOAA National Weather Service forecast or within 48 hours following a rain event greater than 0.1 inch. If work must occur during these conditions, a qualified biologist shall conduct a clearance sweep of work areas prior to the start of work. e. All work shall occur during daylight hours. f. All projects occurring within or adjacent to habitats that may support CTS or CRLF shall have a County approved biologist present during all initial ground disturbing/vegetation clearing activities. 	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<ul style="list-style-type: none"> g. No CTS or CRLF shall be captured and relocated without expressed permission from the CDFW and/or USFWS. h. If at any time during construction CTS or CRLF enters the construction site or otherwise may be impacted by the project, all construction activities shall cease. A County-approved biologist shall document the occurrence and consult with the CDFW and/or USFWS as appropriate. i. Upon completion of construction all excess materials and debris shall be removed from the project site and disposed of appropriately. j. The work area shall remain clean. All food-related trash items shall be enclosed in sealed containers and removed from the site regularly. k. Pets shall be prohibited at the construction site. l. All vehicle maintenance/fueling/staging shall occur not less than 60 feet from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies. m. All equipment operating within aquatic habitat shall be in good conditions and free of leaks. Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access. n. At the end of each work day, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment. o. All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling. p. If any CTS or CRLF are harmed, the County-approved biologist shall document the circumstances that led to harm and shall determine if project activities should cease or be altered in an effort to avoid additional harm to these species. Dead or injured special status species shall be disposed of at the discretion of the CDFW and USFWS. All incidences of harm shall be reported to the CDFW and USFWS within 48 hours. q. To ensure that diseases are not conveyed between work sites by the qualified biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force should be followed at all times. 	
	<p>Plan Requirements and Timing. These measures are to be implemented during grading and construction activities. Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The approved biologist shall submit monthly maintenance reports during construction to Planning and Development permit compliance staff.</p>	

Impact	Mitigation Measure (s)	Significance After Mitigation
Public Services and Recreation		
<p>Impact PS/R-3. The project would generate solid waste that would increase demand on the Santa Maria landfill. This impact would be significant and unavoidable.</p>	<p>PS/R-1 Source Reduction and Solid Waste Management Plan (SRWMP). The applicant shall prepare a Source Reduction and Solid Waste Management Plan (SRWMP) subject to County approval prior to issuance of grading permits. The SRWMP shall describe commitments to reduce the amount of waste generated during construction of the project and estimate the reduction in solid waste generated during each phase of project construction. The SRWMP shall include, at a minimum:</p> <ol style="list-style-type: none"> 1. Construction Source Reduction <ol style="list-style-type: none"> a. A description of how fill will be used on the construction site, instead of landfilling. b. A program to purchase materials that have recycled content for project construction. 2. Construction Solid Waste Reduction <ol style="list-style-type: none"> a. Prior to construction, the contractor will arrange for construction recycling service with a waste collection provider. Roll-off bins for the collection of recoverable construction materials will be located onsite. The applicant, or authorized agent thereof, shall arrange for pick-up of recycled materials with a waste collection provider or shall transport recycled materials to the appropriate service center. Wood, concrete, drywall, metal, cardboard, asphalt, soil, and land clearing debris may all be recycled. b. The contractor will designate a person to monitor recycling efforts and collect receipts for roll-off bins and/or construction waste recycling. All subcontractors will be informed of the recycling plan, including which materials are to be source-separated and placed in proper bins. c. Recycling and composting programs including separating excess construction materials on-site for reuse/recycling or proper disposal (e.g., concrete, asphalt, wood, brush). Provided separate on-site bins as needed for recycling. 3. Operation Solid Waste Reduction <ol style="list-style-type: none"> a. Provision of space and/or bins for storage of recyclable materials within common areas of the project site. b. Implementation of a green waste source reduction program for composting in open areas, and the use of mulching mowers in all common open space lawns. <p>Plan Requirements and Timing: The Owner/Applicant shall submit a Source Reduction and Solid Waste Management Plan to P&D for review and approval prior to approval of zoning clearance. The applicant shall implement all aspects of the Plan during construction and operation of the project in accordance with the above-described conditions. Monitoring: The applicant shall demonstrate to P&D compliance monitoring staff that all required source reduction and solid waste reduction measures are implemented during project construction and operational solid waste reduction measures are implemented prior to occupancy.</p>	<p>Although Mitigation Measure PS/R-1 would reduce solid waste generation during the construction phase of the project and during project operation, waste generated by the project may still exceed the County’s annual solid waste threshold of 196 tons per year. The project would result in the construction of more than 200,000 square feet of new residential buildings. Therefore, the project would exceed the County’s solid waste thresholds for construction and operation. Impacts related to solid waste would be significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Class I Cumulative Impacts (Significant and Unavoidable)		
Aesthetics		
Cumulative Impacts to Aesthetics (Scenic Resources)	Mitigation Measures AES-2(a) through AES -2(d) would apply.	The project would result in substantial degradation of scenic resources in the Orcutt area through the conversion of semi-rural land to urban land. As a result, the project’s contribution to cumulative conversion of semi-rural land to urban land would be cumulatively considerable.
Biological Resources		
Cumulative Impacts to Biological Resources (Sensitive Habitats)	Mitigation Measure BIO-2 would apply.	The project’s contribution to cumulative loss of sensitive habitats in general, and in particular to loss of upland and potentially suitable aquatic habitat for the federally and State listed California tiger salamander Santa Barbara County DPS and federally listed California red-legged frog in northern Santa Barbara County would be significant and unavoidable (Class I).

County of Santa Barbara
Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

Impact	Mitigation Measure (s)	Significance After Mitigation
Public Services and Recreation		
Cumulative Impacts to Public Services (Solid Waste)	Mitigation Measure PS/R-1 would apply.	Implementation of Mitigation Measure PS/R-1 would reduce solid waste generation during the construction phase of the project and during project operation. However, waste generated by the project would still exceed the County's 40 tons per year cumulative solid waste threshold. Therefore, the project would result in significant and unavoidable (Class I) contribution to cumulative solid waste impacts.
Transportation and Circulation		
Cumulative Impacts to Transportation and Circulation	<p>As discussed above, the project would contribute to significant cumulative impacts at the Foxenwood Lane/Clark Avenue intersection, which is forecast to operate at LOS F during the AM and PM peak traffic hours under both cumulative and cumulative + project conditions. To offset project contributions to cumulative traffic impacts, the project applicant shall contribute fair share transportation fees to mitigate impacts to the existing circulation system in the Orcutt Planning Area (OPA). The amount of the fee would be determined by the County Public Works/Transportation Division, based on adopted fee schedules at the time of payment.</p> <p>This potential cumulative impact would be reduced by payment of the transportation impact fee for transportation improvements identified in the Orcutt Transportation Improvement Plan (OTIP). The OTIP contains a listing of roadway and intersection improvements, neighborhood "traffic calming" measures and other roadway improvements (i.e., sidewalks, bus turn outs, etc.) that would mitigate future development while reducing travel times throughout the planning area. Installation of a traffic signal at the Foxenwood Lane/Clark Avenue intersection would result in a signalized corridor from Foxenwood Lane to Orcutt Road with coordinated traffic signals, and the intersection would operate at LOS C or better under cumulative conditions. However, the SR 135 ramps immediately east of the intersection and Orcutt Creek corridor west of the intersection have historically represented physical constraints that limit signalization options at this intersection. In addition, the cumulative traffic volumes do not satisfy traffic signal warrants. County Public Works/Transportation Division would be responsible for determining the appropriate intersection improvements at the time of implementation, but for the purpose of this analysis, signalization of the</p>	As a result of feasibility concerns associated with potential mitigation options at the Foxenwood Lane/Clark Avenue intersection, the project contribution to cumulative impacts would remain significant and unavoidable (Class I).

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Foxenwood Lane/Clark Avenue intersection is considered potentially infeasible.</p>		
<p>Class II Project Specific Impacts (Significant But Mitigable)</p>		
<p>Aesthetics</p>		
<p>Impact AES-3. The project would introduce new sources of light and glare. However, implementation of OCP development standards and OCP EIR Mitigation Measure VIS-2 would reduce this impact to a less than significant level.</p>	<p>AES-3 Exterior Lighting Requirements (Implements OCP EIR Mitigation VIS-2). In all developments adjacent to areas with the Open Space Overlay, exterior lighting shall be designed and constructed in such a manner to direct light overflow away from the open space areas. Essential security lighting within or adjacent to open space areas shall be hooded/shielded to minimize the spread of light. Night lighting shall not be permitted within or immediately adjacent to designated wildlife corridor areas unless essential for public safety.</p> <p>Plan Requirements and Timing. The owner/applicant shall develop a lighting plan for Board of Architectural Review and Planning and Development approval incorporating the above requirements. The lighting plan shall show the locations and height of all exterior lighting fixtures and the direction of light being cast by each fixture. This requirement shall be reflected on grading, zoning and building plans, subject to review and approval by the Planning and Development Department. Planning and Development and the Board of Architectural Review shall review the lighting plan for compliance with this condition prior to zoning clearance issuance. Lighting shall be installed in compliance with this condition prior to final building inspection clearance. Monitoring. Planning and Development permit compliance and building and safety staff shall site inspect upon installation to ensure that exterior lighting fixtures have been installed consistent with their depiction and specifications on the final lighting plan.</p>	<p>Implementation of Mitigation Measure AES-3 and compliance with OCP development standards would reduce this impact to less than significant (Class II).</p>
<p>Biological Resources</p>		
<p>Impact BIO-1. The project would result in impacts to special status plant species. This impact would be less than significant with implementation of mitigation.</p>	<p>BIO-1(a) Special Status Plant Species Pre-Construction Surveys. Updated surveys for special status plants (i.e., plants either state or federally listed or California Rare Plant Ranked) shall be completed by a County-approved biologist for all proposed disturbance areas prior to grading or construction activities associated with the project. The surveys shall be floristic in nature and shall be seasonally-timed to coincide with the flowering time for the target species. All plant surveys shall be conducted by a County-approved qualified biologist no more than two years prior to the start of grading or construction activities associated with the project. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map. Surveys shall be conducted in accordance with the most current protocols established by the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS). A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS as appropriate, for review and approval.</p> <p>Plan Requirements and Timing. A report of the special status plant survey results shall be submitted to Planning and Development for review prior to zoning clearance issuance for development including sewer line construction. Mapped locations of special status plants shall be shown on grading and zoning plans. Monitoring. Planning and Development permit processing planner shall ensure that the special status plant surveys have been completed prior to issuance of zoning clearance. Grading inspectors shall inspect as needed.</p> <p>BIO-1(b) Special Status Plant Species Avoidance, Minimization, and Mitigation (Implements OCP EIR</p>	<p>Implementation of the above mitigation measures would reduce impacts to special status plant species to a less than significant level (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>Mitigation BIO-29). If Federally or State listed or California Rare Plant Ranked species are identified during special status plant species pre-construction surveys (Mitigation Measure BIO-1[a]), development shall avoid impacting these plant species to the greatest extent feasible. Special status plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm during grading and construction activities.</p> <p>Where special status plant species cannot be feasibly avoided, impacts to special status plant species shall be mitigated at a minimum ratio of 2:1 (number of acres/individuals restored to number of acres/individuals impacted) for each species impacted. The Draft Open Space Management Plan (OSMP) shall be revised to include compensatory mitigation of impacted special status plant species. The Final OSMP shall be submitted to the County for approval (Note: if a state listed plant species will be impacted, the restoration plan shall also be submitted to the CDFW for approval and authorization for impacts must be obtained from CDFW). The compensatory mitigation component of the Draft OSMP shall be revised to include, at a minimum, the following components:</p> <ol style="list-style-type: none"> a. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type); b. Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved]; c. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values); d. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including species to be used, container sizes, seeding rates, etc.]); e. Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule); f. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports); g. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of the prescribed number of container plants and 30 percent relative cover by vegetation type; h. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria; i. Notification of completion of compensatory mitigation and agency confirmation; and j. Contingency measures (initiating procedures, alternative locations for contingency compensatory 	

Impact	Mitigation Measure (s) mitigation, funding mechanism).	Significance After Mitigation
	<p>Plan Requirements and Timing. The results of the survey shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance. Planning and Development shall inspect the site prior to initiation of ground disturbance activities to ensure the protective fencing is installed properly. If special status plants cannot be avoided, the applicant shall submit the Final OSMP to Planning and Development for review and approval prior to zoning clearance issuance. Monitoring. The protective fencing shall be monitored by Planning and Development permit compliance and building and safety staff until grading and construction activities are complete. Planning and Development shall ensure that the proposed development avoids impacts to special status plant species or impacts are mitigated for per the requirements of this measure.</p>	
<p>Impact BIO-2. The project would result in impacts to special status animal species. This impact would be Class II, significant but mitigable.</p>	<p>BIO-2(f) Western Spadefoot Toad Avoidance and Minimization. The following measures shall be implemented to reduce the potential for impacts with the final goal of no net loss of the species.</p> <ol style="list-style-type: none"> a. Not more than two weeks prior to initiation of ground disturbing activities and vegetation removal, a County-approved qualified biologist shall conduct a pre-construction survey for western spadefoot toads. The survey area should include the project site and all proposed ingress/egress routes, plus a 100-foot buffer, where legally accessible. If the project is phased, a clearance survey shall be required for each phase of construction and/or individual lot development. b. If this species is found and individuals are likely to be killed or injured by construction activities, a County-approved biologist shall capture and relocate the animals from the project site before construction activities begin. The County-approved qualified biologist shall relocate individuals the shortest distance possible to a location that contains suitable habitat not likely to be affected by activities associated with the proposed project. The biologist(s) should maintain sufficiently detailed records of any individual observed, captured, relocated, etc., including size, coloration, any distinguishing features and photographs to assist him or her in determining whether translocated animals are returning to the project site. c. To ensure that diseases are not conveyed between work sites by the qualified biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force shall be followed at all times. d. A County-approved biologist shall be present during all initial ground disturbing activities, including vegetation removal, to recover western spadefoot toads that may be unearthed by construction activities. Individuals that are unearthed during excavation, if in good health, shall be immediately relocated to a designated relocation area to be determined by a County-approved biologist in coordination with CDFW. Individuals shall be relocated the shortest distance possible in a location that contains suitable habitat not likely to be affected by activities associated with the proposed project. The biologist(s) shall maintain sufficiently detailed records of any individual observed, captured, relocated, etc., including size, coloration, any distinguishing features and photographs (preferably digital) to assist him or her in determining whether translocated animals are returning to the project site. If injured, a CDFW-approved specialist shall be contacted to determine if the animal can be rehabilitated for release into the designated release area or be deposited at an approved vertebrate museum. 	<p>Implementation of mitigation measures would reduce impacts to special status animal species to a less than significant level (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>Plan Requirements and Timing. Prior to zoning clearance issuance for ground-disturbing activities, the name, qualifications, scope, and contact information for the surveying biologist must be submitted to the Planning and Development permit processing planner for approval in advance of the surveys. Proposed relocation areas shall be identified and approved by Planning and Development prior to beginning the work. A report of the results of the surveys and any required capture and relocation efforts shall be submitted to the Planning and Development permit processing planner for review prior to zoning clearance issuance for ground-disturbing activities. Monitoring measures are to be implemented during construction. This measure shall be printed on all grading and construction plans. Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. Planning and Development permit processing planner shall receive and review the results of the surveys prior to zoning clearance issuance for ground-disturbing activities. Planning and Development compliance monitoring and building and safety staff shall monitor on-site throughout grading and construction activities for compliance.</p> <p>BIO-2(g) Preconstruction Surveys for Nesting Birds and Raptors. For grading and/or construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds and raptors covered by the California Fish and Game Code and the Migratory Bird Treaty Act shall be conducted by a County-approved qualified biologist no more than 14 days prior to vegetation and tree removal activities. The survey area for nesting birds and raptor species shall include the disturbance footprint plus a 300-foot and 500-foot buffer, respectively. If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer ranging from 50 to 300 feet based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest. The objective of the buffer shall be to reduce disturbances to nesting birds. All buffers shall be marked using high-visibility flagging or fencing, and, unless approved by the qualified biologist, no construction activities shall be allowed within the buffers until the adults and young have fledged from the nest and are no longer reliant on the nest site. The qualified biologist shall confirm that breeding/nesting is completed and that the young have fledged prior to the removal of the buffer.</p> <p>Plan Requirements and Timing. The surveys shall be conducted no more than 30 days prior to the initiation of vegetation and/or tree removal activities. A report of the nesting bird survey results shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance for grading or construction activities which involve tree or vegetation removal. These measures are to be implemented during grading and construction activities. Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. Planning and Development compliance monitoring and building and safety staff shall review the report for compliance and inspect the site during construction activities to ensure compliance. Active nests shall be monitored periodically by the County-approved biologist until it has been determined that the nest is no longer being used by either the young or adults.</p> <p>BIO-2(h) Burrowing Owl Avoidance and Minimization Measures. The following measures shall be implemented in order to avoid and minimize impacts to burrowing owl.</p>	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>a. Ground-disturbance activities associated with construction of the project shall begin outside of the burrowing owl nesting season (nesting season is typically February 1 through September 15).</p> <p>b. Not more than 30 days prior to initiation of ground-disturbing activities, and again within 24-hours of the initiation of ground-disturbing activities associated with construction, a County-approved biologist shall conduct a take avoidance survey of the project site and surrounding areas to a distance of 150 meters, in accordance with the methods outlined in the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012). The pre-construction survey will cover all areas within 150 meters of the portion of the site where construction is scheduled to start. Areas within 150 meters that are not accessible due to property access restrictions shall be surveyed using binoculars. Surveys will be phased, based on the grading and construction schedule, such that they are conducted not more than 30 days before the start of ground disturbing activities in new areas. If grading and/or construction activities in portions of the site cease for a period of 14 days, those portions of the site will be resurveyed for burrowing owls prior to the resumption of grading and/or construction activities. If no occupied (breeding or wintering) burrowing owl burrows are identified, no further mitigation would be required. If occupied burrows are identified on the site or within 150 meters of the Project disturbance area, one of the following actions shall be taken: 1) permanent avoidance of the burrow or 2) establishment of a temporary avoidance buffer followed by passive relocation and compensatory mitigation for loss of habitat in conjunction with the measures below:</p> <ol style="list-style-type: none"> 1. Site-specific, no-disturbance buffer zones shall be established and maintained between Project activities and occupied burrows, using the distances recommended in the CDFW guidelines (CDFG 2012) or as otherwise determined appropriate by the County-approved biologist in consultation with CDFW. 2. During the non-breeding season, if an occupied burrow cannot be avoided, and the burrow is not actively in use as a nest, the burrowing owls can be excluded from burrows in accordance with an approved Burrowing Owl Exclusion Plan, which shall be prepared and submitted for approval by CDFW prior to passive relocation of any burrowing owls. The Burrowing Owl Exclusion Plan shall be based on the recommendations made in the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012) and shall include the following information for each proposed passive relocation: <ol style="list-style-type: none"> a. Confirmation by site surveillance that the burrow(s) is empty of burrowing owls and other species; b. Identification of type of scope to be used and appropriate timing of scoping; c. Occupancy factors to look for and what shall guide determination of vacancy and excavation timing; d. Methods for burrow excavation; e. Removal of other potential owl burrow surrogates or refugia on site; f. Methods for photographic documentation of the excavation and closure of the burrow; g. Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use to avoid take; h. Methods for assuring the impacted site shall continually be made inhospitable to burrowing owls and fossorial mammals; and 	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p data-bbox="577 289 1150 313">i. Method(s) for compensatory mitigation for burrow loss</p> <p data-bbox="508 337 1600 708">Plan Requirements and Timing. The name, qualifications, scope, and contact information for the County-approved qualified surveying biologist must be submitted to Planning and Development in advance of the surveys. The biologist implementing the above mitigation measure must also submit documentation of coordinating this effort with Planning and Development prior to implementation. The above impact avoidance measure shall be included on all grading and construction plans prior to the issuance of zoning clearance for grading. A report on the implementation of impact avoidance measures used shall be included on all grading and construction plans prior to zoning clearance issuance for grading. A report on the implementation of impact avoidance measures implemented shall be submitted to Planning and Development permit compliance staff and CDFW upon completion of the construction project. If passive relocation is required, the Burrowing Owl Exclusion Plan must be submitted and approved by Planning and Development prior to conducting exclusion activities. Monitoring. The applicant shall retain a qualified County- and CDFW-approved biologist to monitor all construction activities as warranted to ensure compliance. The approved biologist shall submit monitoring reports to Planning and Development and CDFW for review and approval.</p> <p data-bbox="508 721 1600 1065">BIO-2(i) Vernal Pool Branchiopod Surveys and Mitigation. Prior to the issuance of zoning clearance for grading, protocol surveys for listed branchiopods (i.e., vernal pool fairy shrimp) shall occur within suitable habitat within the project site impact footprint and a 250-foot buffer. The protocol surveys shall be consistent with the Survey Guidelines for the Listed Large Branchiopods (USFWS 2015) or the current protocol established by the USFWS at the time surveys are conducted. If vernal pool fairy shrimp are detected and occupied habitat will be impacted, compensatory mitigation shall be provided at a ratio of not less than 3:1 for impacted vernal pool fairy shrimp impacted habitat. Compensatory mitigation and agency consultation shall be consistent with mitigation measure BIO-2(a). Compensatory mitigation shall be located off-site and the establishment of conservation easements and criteria for determining habitat value shall be consistent with the processes described in Mitigation Measure BIO-2(c). If enhancement of off-site mitigation areas will occur, a Habitat Mitigation and Monitoring Plan shall also be prepared and implemented consistent with Mitigation Measure BIO-2(d). If protocol surveys result in negative findings, no further action is required.</p> <p data-bbox="508 1084 1600 1227">Plan Requirements and Timing. The applicant shall submit the results of the protocol surveys to Planning and Development permit processing planner and to USFWS for review and approval prior to zoning clearance issuance for grading. Monitoring. Planning and Development shall ensure that documentation is received prior to zoning clearance issuance for grading. Planning and Development compliance monitoring and building and safety staff shall oversee implementation of mitigation plans if compensatory mitigation is required.</p> <p data-bbox="508 1237 1600 1377">BIO-2(j) Worker Environmental Awareness Program (WEAP). Prior to the initiation of grading or construction activities (including staging and mobilization), a County-approved qualified biologist shall conduct a WEAP training to be attended by all personnel associated with project construction. The purpose of the WEAP is to aid personnel in recognizing special status resources that may occur in the project site area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status</p>	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. In addition, personnel will be briefed on the reporting process in the event of an unintended occurrence or inadvertent injury to a special status species during construction or operations. All employees shall sign a form provided by the trainer documenting that they have attended the WEAP and understand the information presented to them.</p> <p>Monitoring. Planning and Development compliance monitoring staff shall be notified by the owner/applicant of the date and time the training is scheduled so that they may attend. Fact sheets shall be reviewed and approved by Planning and Development prior to conducting the training. The required notification and an attendance log that includes the names and signatures of all personnel that have received the training shall be provided to Planning and Development compliance monitoring staff prior to the start of grading or construction activities.</p> <p>BIO-2(k) Incorporation of Species Protection Measures into the Open Space Management Plan (OSMP). Prior to zoning clearance issuance for grading, the applicant shall revise the OSMP to incorporate applicable species protections measures described in Mitigation Measures BIO-1(a) through BIO-1(b) and BIO-2(a) through BIO-2(j) of the SEIR to ensure that impacts to special status plants and animals from restoration and fuel management activities are avoided or minimized within the open space areas. Requirements from the Incidental Take Permit and/or incidental take statement that may be issued by the USFWS and/or CDFW shall also be incorporated, as applicable relevant to federal and/or state listed species.</p> <p>Plan Requirements and Timing. The owner/applicant shall submit the revised OSMP to Planning and Development as well as the USFWS and/or CDFW (as applicable to permits that may be issued for impacts to federal and state listed species) for review and approval prior to zoning clearance issuance for grading as well as the proposed sewer line construction. Monitoring. The applicant shall retain a qualified County-approved biologist to monitor restoration and fuel management activities as warranted to ensure compliance. The approved biologist shall submit monitoring reports to Planning and Development compliance monitoring staff.</p>	
<p>Impact BIO-3. The project would result in impacts to sensitive habitats, including riparian areas. This impact would be significant but mitigable (Class II).</p>	<p>BIO-3(a) Sensitive Community Avoidance. Impacts to sensitive communities shall be avoided to the maximum extent feasible. Bright orange construction fencing shall be placed to delineate the extent of disturbance areas associated with the project (including the proposed sewer line easement) under the direction of a County-approved qualified biologist in order to protect sensitive communities that will not be impacted by the project. The fencing shall be installed prior to the start of any initiation of ground disturbance activities and shall remain in place until grading and construction activities are complete. No vehicles, person, materials, or equipment will be allowed in protected areas. Grading plans shall show the location of these habitats and protective fencing. If sensitive communities cannot be avoided, Mitigation Measure BIO-3(b) below shall be implemented.</p> <p>Plan Requirements and Timing. Grading plans showing the location of sensitive communities as well as protective fencing locations for review and approval prior to issuance of zoning clearance for grading.</p> <p>Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the</p>	<p>Implementation of the above mitigation measures would reduce impacts to sensitive communities to a less than significant level through compensation for sensitive natural communities and riparian habitat (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place.</p> <p>BIO-3(b) Sensitive Community Mitigation (implements OCP EIR Mitigation Measure BIO-3). Where sensitive communities cannot be avoided, impacts shall be offset through habitat restoration within the open space area (as delineated in the Final OSMP) and/or an off-site location at a ratio of 2:1 for impacted sensitive communities (habitat restored to habitat impacted). The location of restoration shall be determined by a County-approved biologist. On-site restoration is preferable, however off-site habitat acquisition and off-site restoration and/or enhancement may be considered if on site restoration is determined as unachievable to the satisfaction of Planning and Development, as long as the off-site approach results in equal compensatory value. The restoration shall include locally native species approved by the County. The restoration shall be incorporated into the final OSMP and/or be incorporated into an Off-Site Habitat Restoration Plan to be developed by a County-approved biologist pursuant to the requirements listed below.</p> <p>Upon final design, the County-approved biologist shall determine the final impacts to sensitive communities and the subsequent amount of acreage needed for restoration for the project. The restoration shall be implemented for a period of not less than five years, or until restoration has been completed successfully as determined by a County-approved biologist in coordination with Planning and Development. Replacement ratios for off-site mitigation may be different than those required for on-site mitigation. The restoration program incorporated into the OSMP and/or the Off-Site Habitat Restoration Plan shall include, at a minimum, the following components:</p> <ol style="list-style-type: none"> a. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type); b. Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved]; c. Description of the proposed compensatory mitigation-site (location and size, ownership status, existing functions and values of the compensatory mitigation-site); d. Implementation plan for the compensatory mitigation-site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including plant species to be used, container sizes, seeding rates, etc.]); e. Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule); f. Monitoring plan for the compensatory mitigation-site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports); g. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type; 	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<ul style="list-style-type: none"> h. An adaptive management program and remedial measures to address negative impacts to restoration efforts; i. Notification of completion of compensatory mitigation and agency confirmation; and j. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism). <p>Plan Requirements and Timing. Grading plans showing the location of sensitive communities, as well as the revised OSMP and or Off-Site Habitat Restoration Plan shall be submitted to Planning and Development for review and approval prior to issuance of zoning clearance for grading. Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place. Planning and Development shall review and approve the Final OSMP and/or Off-Site Habitat Restoration Plan.</p> <p>BIO-3(c) Invasive Weed Prevention Best Management Practices. The following weed prevention best management practices shall be implemented to prevent the introduction of invasive weed species.</p> <ul style="list-style-type: none"> a. During grading and construction, the project owner/applicant will make all reasonable efforts to limit the use of imported soils for fill. Soils currently existing on site should be used for fill material. If the use of imported fill material is necessary, the imported material must be obtained from a source that is known to be free of invasive plant species; or the material must consist of purchased clean material such as crushed aggregate, sorted rock, or other similar substances. b. To avoid the spread of invasive species, the contractor shall stockpile topsoil and redeposit the stockpiled soil after construction or transport the topsoil to a certified landfill for disposal. c. The erosion control/ restoration plans for the project must emphasize the use of native species that are expected to occur in the area and that are considered suitable for use at the project site. d. All erosion control materials including straw bales, straw wattles, or mulch used on-site must be free of invasive species seed. e. Exotic and invasive plant species will be excluded from any erosion control seed mixes and/or landscaping plant palettes associated with the proposed project. <p>Plan Requirements and Timing. This measure shall be printed on grading plans and are to be implemented during grading and construction activities. Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above weed prevention measures.</p> <p>BIO-3(d) Biologist Review of Landscape Plans</p> <p>Landscape plans for future development shall be reviewed and approved by Planning and Development in coordination with a County-approved biologist. All landscaping shall be with native, locally collected plant species. The use of non-native invasive species shall be prohibited.</p>	

County of Santa Barbara
Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Impact BIO-4. The project would impact state and federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. This impact would be significant but mitigable (Class II).</p>	<p>Plan Requirements and Timing. The Owner/Applicant shall incorporate this requirement into landscaping plans to be reviewed and approved by Planning and Development in coordination with a County-approved biologist prior to zoning clearance issuance for the construction of single family dwellings or common area landscaping. Landscaping shall be installed prior to Final Building Inspection Clearance. Monitoring. Planning and Development compliance monitoring staff shall monitor implementation in the field.</p> <p>BIO-4(a) Agency Coordination. Impacts to drainages and wetlands as a result of the project may require permits from U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. The owner/applicant shall obtain and produce for the County correspondence from applicable state and federal agencies regarding compliance of the proposed development with state and federal laws.</p> <p>Plan Requirements and Timing. The applicant shall submit copies of correspondence and/or permits (as applicable) with applicable agencies to Planning and Development prior to zoning clearance issuance for grading. Monitoring. Planning and Development permit processing planner shall review agency correspondence prior to zoning clearance issuance for grading. Planning and Development compliance monitoring and building and safety staff shall monitor and site inspect to ensure that the project meets any requirements outlined by the agencies.</p> <p>BIO-4(b) Wetland and Drainage Avoidance. Impacts to wetlands and drainages shall be avoided to the maximum extent feasible. Bright orange construction fencing shall be placed to delineate the extent of disturbance areas associated with the project (including the proposed sewer line easement) under the direction of a County-approved qualified biologist in order to protect wetlands and drainages that will not be impacted by the project. The fencing shall be installed prior to the start of any initiation of ground disturbance activities and shall remain in place until grading and construction activities are complete. No vehicles, person, materials, or equipment will be allowed in protected areas. Grading plans shall show the location of these areas and protective fencing. If wetlands and drainages cannot be avoided, Mitigation Measure BIO-4(c) below shall be implemented.</p> <p>Plan Requirements and Timing. Grading plans showing the location of wetlands and drainages as well as protective fencing locations for review and approval prior to issuance of zoning clearance for grading. Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place.</p> <p>BIO-4(c) Wetland and Drainage Mitigation. Impacts to wetland and drainages shall be mitigated at a minimum ratio of 2:1 (acres of habitat restored to acres impacted). Upon final design, the County-approved biologist shall determine the final impacts to wetlands and the subsequent amount of acreage needed for restoration for the project. Restoration on the project site is preferable. However, the County may approve off-site restoration at a location in the same watershed as the project (Upper Orcutt Creek; HUC180600080501) that results in equal compensatory value if the applicant can demonstrate to the County's satisfaction that restoration on the project site cannot be achieved. The Draft OSMP shall be revised or an Off-Site Restoration Plan developed by a County-approved biologist in accordance with Mitigation Measure BIO-3(a) above and shall be implemented for</p>	<p>Implementation of the above mitigation measures would reduce impacts to jurisdictional areas to a less than significant level (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>no less than five years after construction, or until the local jurisdiction and/or the permitting authority (e.g., USACE) has determined that restoration has been successful.</p> <p>Plan Requirements and Timing. The applicant shall submit the revised OSMP or off-site Restoration Plan to Planning and Development for review and approval prior to issuance of grading permits. Monitoring. Planning and Development shall ensure that impacts to wetlands from the proposed development are properly mitigated for.</p> <p>BIO-4(d) Jurisdictional Areas Best Management Practices During Construction. The following best management practices shall be required for grading and construction within or 100 feet from jurisdictional areas or wetlands.</p> <ol style="list-style-type: none"> a. Access routes, staging, and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to other waters (federal and state) including locating access routes and ancillary construction areas outside of jurisdictional areas. b. To control erosion and sediment runoff during and after project implementation, appropriate erosion control materials shall be deployed and maintained to minimize adverse effects on jurisdictional areas in the vicinity of the project. c. Project activities within the jurisdictional areas should occur during the dry season (typically between May 1 and September 30) in any given year, or as otherwise directed by the regulatory agencies. Deviations from this work window can be made with permission from the relevant regulatory agencies. d. During construction, no litter or construction debris shall be placed within jurisdictional areas. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site. e. All project-generated debris, building materials, and rubbish shall be removed from jurisdictional areas and from areas where such materials could be washed into them. f. Raw cement, concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic species resulting from project-related activities, shall be prevented from contaminating the soil and/or entering jurisdictional areas. g. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan must be in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should an accidental spill occur. <p>Plan Requirements and Timing. These measures shall be implemented during grading and construction and shall be included on all land use, grading, and building plans. Monitoring. The applicant shall retain a County-approved biologist to monitor compliance with the above measures. Planning and Development compliance monitoring and building and safety staff shall periodically inspect for compliance.</p>	
<p>Impact BIO-5. The project</p>	<p>BIO-5(a) Wildlife Impact Avoidance. The project shall incorporate the following design measures to reduce</p>	<p>Implementation of the</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>would impact wildlife movement. This impact would be significant but mitigable (Class II).</p>	<p>impacts to wildlife:</p> <ol style="list-style-type: none"> Roadway widths adjacent to open space areas shall be the minimum width possible while maintaining Fire Department requirements for emergency access. Appropriate signage warning residents of the potential presence of wild animals on roadways and bike paths shall be installed along roads adjacent to open space areas. Interpretative educational signage discussing sensitive resources on site (oak woodland, rare plants and animals etc.) shall be installed along all bike paths, hiking trails and rest areas. Information on educational signage shall be developed by a County-approved biologist. Such signage shall be maintained by the developer or HOA. Utilities, such as electrical, water and sewer, shall be installed under paved roads and sidewalks wherever possible. Informational brochures shall be provided to potential buyers and included as an attachment to the subdivision’s CC&Rs outlining the impacts associated with non-native animals, (especially feral cats and dogs), impacts associated with introduction of invasive landscaping plants, and impacts associated with use of pesticides. The informational brochures shall also inform potential buyers of the potential for wild animals, such as coyotes, to prey upon domestic animals. <p>Plan Requirements and Timing. Grading and building plans shall include the above measures and shall be submitted to Planning and Development for review and approval prior to issuance of zoning clearance for grading and subdivision improvements. The informational brochure shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance for the first residence. Signage shall be installed prior to occupancy clearance of the first residence. Monitoring. Planning and Development compliance monitoring and building and safety staff shall site inspect upon completion of construction.</p> <p>BIO-5(b) Fence Design. Project fencing for accessory components (i.e., roads, trail, etc.) shall be designed to minimize impacts to wildlife. Fencing shall not block wildlife movement. Where fencing is required for public safety concerns, the fence shall be designed to permit wildlife movement by incorporating design features such as:</p> <ol style="list-style-type: none"> A minimum 18 inches between the ground and the bottom of the fence to provide clearance for small animals; A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement. <p>Plan Requirements and Timing. Grading and building plans shall include the above measures and shall be submitted to Planning and Development for review and approval prior to issuance of zoning clearance for grading and subdivision improvements. Monitoring. Planning and Development shall site inspect upon completion of construction.</p>	<p>required mitigation measures would reduce indirect impacts to wildlife movement to a less than significant level (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>BIO-5(c) Lighting Plan. The owner/applicant shall develop a lighting plan for the project to reduce light pollution in open space habitat areas, subject to review and approval by the Board of Architectural Review and Planning and Development. All lighting shall be dark sky compliant to reduce impacts on nocturnal ecosystems and the night sky. All lighting fixtures shall be fully shielded and fully cut-off. Lighting shall be low intensity, the minimum wattage required and of minimum height. The use of high-intensity floodlights on residential lots shall be restricted and all exterior lighting features within 100 feet of open space shall be fully shielded and fully cut-off to prevent “spill-over” into adjacent habitat. Night lighting of public areas shall be kept at the minimum necessary for safety purposes. All exterior lighting is to be turned off or dimmed after 10:00 p.m.</p> <p>Plan Requirements and Timing. The owner/applicant shall develop the lighting plan for Board of Architectural Review and Planning and Development approval incorporating the above requirements. The lighting plan shall show the locations and height of all exterior lighting fixtures and the direction of light being cast by each fixture. This requirement shall be reflected on grading, zoning and building plans. Planning and Development and the Board of Architectural Review shall review the lighting plan for compliance with this condition prior to zoning clearance issuance. Light fixtures shall be installed in compliance with this condition prior to final building inspection clearance. Monitoring. Planning and Development permit compliance and building and safety staff shall site inspect upon installation to ensure that exterior light fixtures have been installed consistent with their depiction and specifications on the final lighting plan.</p> <p>BIO-5(d) Wildlife Passage. Soft-bottomed culverts or similar passageway crossing structures shall be incorporated into the roadway design for the access road to the Willow Creek Neighborhood to encourage and permit small animals such as the California tiger salamander to pass underneath the roadway. Passageways shall be installed at 200-foot intervals along the roadway. Passageway shall be designed in a way that encourages use by the target species.</p> <p>Plan Requirements and Timing. This requirement shall be reflected on grading, zoning and building plans. Planning and Development shall review and approve the crossing design prior to zoning clearance issuance. Planning and Development shall seek input from the CDFW and USFWS, as necessary, regarding the adequacy of the crossing design prior to approval. Crossing structures shall be installed in compliance with this condition and the approved plans prior to final building inspection clearance. Monitoring. Planning and Development permit compliance staff shall inspect the completed roadway to ensure that wildlife crossing structures have been installed consistent with their depiction and specifications on the design plans.</p>	
<p>Impact BIO-6. The project would result in impacts to protected trees. This impact would be significant but mitigable (Class II).</p>	<p>BIO-6(a) Tree Protection Plan. The applicant shall submit a Tree Protection Plan (TPP) prepared by a County-approved biologist and/or arborist designed to avoid impacts to protected trees that are not planned for removal. The TPP shall include the following components:</p> <ol style="list-style-type: none"> a. Prior to the onset of any construction activities, high visibility orange construction fencing shall be installed around existing stands and individuals that are to be retained at a buffer/extent radius of six feet beyond the canopy dripline, wherever the topography allows for such fencing or otherwise marked in the field to protect them from harm during grading and construction. 	<p>Implementation of the above mitigation measures would reduce impacts to protected trees to a less than significant level (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<ul style="list-style-type: none"> b. No construction equipment shall be parked, stored, or operated within 25 feet of any protected tree dripline. c. No fill soil, rocks, or construction materials shall be stored or placed within 25 feet of the dripline of a protected tree. d. No artificial surface, pervious or impervious, shall be placed within 25 feet of the dripline of any protected tree, except for County-approved project access roads. e. Any roots encountered that are one inch in diameter or greater shall be cleanly cut. This shall be done under the direction of a County-approved arborist/biologist. f. Any construction activity required within three feet of a protected tree's dripline shall be done with hand tools. g. No permanent irrigation shall occur within the dripline of any existing protected tree. h. Only designated trees shall be removed. All grading and construction plans shall clearly delineate those trees to be removed and those to remain. <p>Plan Requirements and Timing. The owner/applicant shall: (1) submit the TPP; (2) Include all applicable components in the Tree Replacement Plan and/or Landscape and Irrigation Plans if these are required; and (3) include as notes or depictions all plan components listed above, graphically depicting all those related to earth movement, construction, and temporarily and/or permanently installed protection measures. The owner/applicant shall comply with this measure prior to zoning clearance issuance for grading and tract improvements. The owner/applicant shall install tree protection measures on site prior to the issuance of grading/building permits and pre-construction meeting. Monitoring. The owner/applicant shall demonstrate to Planning and Development compliance monitoring and building and safety staff that trees identified for protection were not damaged or removed or, if damage or removal occurred, that replacement is completed as required by the TPP prior to final building inspection clearance.</p> <p>BIO-6(b) Tree Replacement Plan. For protected trees that require removal, a Tree Replacement Plan shall be prepared and/or incorporated into the Final OSMP (depending upon on site and/or off-site replacement) by a certified arborist or landscape architect. The tree replacement plan shall be designed to replace native trees removed by the proposed project at a ratio of 10:1 (trees planted: trees impacted) for oak trees, 3:1 (trees planted: trees impacted) for arroyo willow, and 1:1 (native trees planted: non-native trees impacted) for non-native trees. Upon final design, the applicant's biologist shall determine the final impacts to protected trees and the subsequent number of replacement plantings needed for restoration for the project. Replacement trees shall be installed on-site. Monitoring of planted trees shall be for a minimum of seven years or until stasis has been determined by a certified arborist. The plan shall include the following components at a minimum:</p> <ul style="list-style-type: none"> a. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type); b. Goal(s) of the compensatory mitigation project; 	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<ul style="list-style-type: none"> c. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values); d. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including species to be used and container sizes]); e. Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule); f. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports); g. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants; h. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria; i. Notification of completion of compensatory mitigation; and j. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism). <p>Plan Requirements and Timing. The Tree Replacement Plan and/or revised OSMP shall be submitted to Planning and Development for review and approval prior zoning clearance issuance for grading for tract improvements. Plan components shall be included on grading and landscaping plans. Prior to zoning clearance issuance, the owner/applicant shall post a performance security to ensure the installation and maintenance of replacement trees for a minimum of five years. Monitoring. The applicant shall demonstrate to Planning and Development compliance monitoring staff that all required components of the approved tree replacement plan (or revised OSMP) are in place as required prior to final inspection clearance and maintained throughout maintenance period. Planning and Development compliance monitoring staff signature is required to release the installation security upon satisfactory installation of all items in approved plans and maintenance security upon successful implementation of the replacement plan.</p>	
<p>Impact BIO-7. The project would result in removal and degradation of environmentally sensitive vegetation for fuel management purposes. This impact would be significant but mitigable (Class II).</p>	<p>BIO-7 Fuel Management Plan. The applicant shall prepare a Fuel Management Plan to be incorporated into the Final OSMP. The Fuel Management Plan shall include the following:</p> <ul style="list-style-type: none"> a. The goal of the plan would be to meet the dual goals of public safety and protection of special-status plant species habitat and sensitive plant communities. b. The plan shall depict fuel management zones (i.e., zone 1, 2, and 3) wherever required and shall include specific special-status species habitat or sensitive plant communities protection and fuel management measures to be used in each fuel management zone for each plant community. On-site vegetation management shall be limited to the zones and clearance requirements/percentages conceptually described. 	<p>Implementation of the above mitigation measures would reduce special status species, sensitive communities and wetlands impacts from fuel management activities to a less than significant level</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>c. Depending on the resource(s) to be encountered within fuel management zones, the Fuel Management Plan shall incorporate mitigation actions from the resource-specific Mitigation Measures BIO-1(a) through BIO-1(b), BIO-2(a) through BIO-2(k), BIO-3(a) through BIO-3(d), and BIO-4(a) through BIO-4(d) to avoid, minimize or compensate for significant impacts to special status species. If compensatory mitigation is required for fuel management activities, the mitigation actions from the resource-specific Mitigation Measures BIO-1(b), BIO-2(c), BIO-3(b), and BIO-4(c) shall be incorporated into the Final OSMP (or Off-Site Habitat Restoration Plan, if applicable).</p> <p>Plan Requirements and Timing. The Fuel Management Plan shall be reviewed and approved by Planning and Development prior to zoning clearance issuance for grading. Site plans shall show any proposed fuel management zones and measures to protect any special-status species habitat occurring within the zones. Vegetation clearance within the fuel management zones shall be conducted in compliance with the Fuel Management Plan. Planning and Development shall also verify that the contents of the fuel management plan are also incorporated into the revised OSMP. Monitoring. Planning and Development permit compliance staff shall monitor implementation of the Fuel Management Plan and respond to complaints.</p>	<p>(Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Cultural and Tribal Resources		
<p>Impact CUL-1. Ground disturbing activities associated with project construction could cause a substantial adverse change to previously undiscovered archaeological resources, pursuant to State CEQA Guidelines Section 15064.4. This impact would be less than significant with implementation of mitigation.</p>	<p>CUL-1(a) Avoidance of Site CA-SBA-1169/H. CA-SBA-1169/H currently is protected by dense natural vegetation which serves as a barrier and discourages entry. To protect the site, this vegetation shall not be cleared at any time. Additionally, hiking or riding trails shall not be routed within 100 feet of the site, and its presence and location shall not be publicized in print or signage.</p> <p>Plan Requirements and Timing. Final site plans for the Specific Plan (Case No. 16SPP-00000-00001) shall demonstrate avoidance of Site CA-SBA-1169/H. Planning & Development staff shall ensure that project features are designed to avoid cultural resources entirely. Monitoring. Planning & Development staff shall ensure receipt of the revised site plan and distribution of the plan to the County Historic Landmarks Advisory Commission. Permit Compliance shall ensure that the plan is implemented prior to construction. To mitigate potential direct and indirect impacts to undiscovered archaeological resources the following mitigation measures, which implement OCP EIR Mitigation Measures ARCH-5 and ARCH-10, would apply.</p> <p>CUL-1(b) Archaeological Monitoring. All initial earth disturbances, including grading, grubbing, scarification and placement of fill, shall be monitored by a P&D approved archaeologist in compliance with the provisions of the County Cultural Resource Guidelines.</p> <p>Plan Requirements and Timing: Prior to issuance of a land use permit for grading and subdivision improvements, the applicant shall submit for P&D review and approval, a contract or Letter of Commitment between the applicant and the archaeologist, consisting of a project description and scope of work, and once approved, shall execute the contract. Monitoring: The applicant shall provide P&D compliance monitoring staff with the name and contact information for the assigned onsite monitor(s) prior to grading permit issuance and pre-construction meeting. P&D compliance monitoring staff shall confirm monitoring by the archaeologist and P&D grading inspectors shall spot check field work.</p> <p>CUL-1(c) Stop Work at Encounter. In the event cultural remains are encountered during grading, construction, landscaping or other construction-related activity (incorporates OCP EIR Mitigation Measure ARCH-10), the applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately. Cultural resource remains may include artifacts, shell, bone, features, foundations, and trash pits, etc. The applicant shall retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with County Cultural Resource Guidelines provisions for Phase 2 and Phase 3 investigations. All work shall be funded by the applicant (incorporates OCP EIR Mitigation Measures ARCH-1 through ARCH-8).</p> <p>Plan Requirements and Timing: This condition shall be printed on all building and grading plans. Monitoring: P&D permit processing planner shall check plans prior to issuance of land use permit for grading and subdivision improvements, and P&D compliance monitoring staff shall spot check in the field throughout grading and construction.</p>	<p>Implementation of the Mitigation Measures CUL-1(a) through CUL-1(c) would reduce impacts associated with the potential to unearth previously undiscovered cultural resources during grading and construction to a less than significant level.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Impact CUL-2. Ground disturbing activities associated with the project could cause a substantial adverse change to previously undiscovered tribal cultural resources. This impact would be less than significant with implementation of mitigation.</p>	<p>CUL-2 Continued Tribal Cultural Resources Consultation and Preservation. In the event that previously unidentified tribal cultural resources are identified by a Native American representative during the implementation of the project, the County shall contact California Native American tribe(s) that have expressed interest and begin or continue consultation procedures with that tribe(s). If, as a result of the consultation, the County determines that the resource is a tribal cultural resource and the proposed project will have a potentially significant impact, additional mitigation measures as discussed with the tribe to avoid or reduce impacts to the resource shall be required and implemented where feasible.</p> <p>Plan Requirements and Timing. This condition shall be printed on all building and grading plans. Monitoring. A County Planning & Development permit processing planner shall check plans prior to issuance of zoning clearance for grading and subdivision improvements, and Planning & Development compliance monitoring staff shall spot check in the field throughout grading and construction.</p>	<p>Implementation Mitigation Measure CUL-2 would reduce potential impacts to tribal cultural resources to a less than significant level (Class III) by providing for the identification of tribal cultural resources and by requiring continued consultation efforts with local California Native American tribes.</p>
<p>Geologic Processes</p>		
<p>Impact GEO-2. The project would involve grading activities on slopes which exceed 20 to 30 percent gradients, which exceeds the allowable slopes for development under the Orcutt Community Plan. This impact would be less than significant with mitigation (Class II).</p>	<p>GEO-2. Soils Engineering Report Measures for Slope Stability. On-site development shall require, and comply with, all recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions in June 2016 (Appendix E), including, but not limited to the following measures intended to reduce impacts from development on steep slopes and slope stability:</p> <ul style="list-style-type: none"> ▪ Use engineered fill for building pads. ▪ Cut benches every four feet within any fill areas constructed on slopes greater than 10:1 (horizontal to vertical). Each bench shall be a minimum of 10 feet wide, with a minimum of two percent slope gradient. ▪ The construction contractor shall ensure that no continuous cut slopes exceed 15 feet in height as measured from the lowest finished grade. ▪ Exterior continuous footings shall be founded at a minimum depth of 12 inches below the lowest adjacent final grade for single-story structures and 18 inches below the lowest adjacent final grade for two-story structures. Foundations shall be designed in accordance to Section 1808.6.1, 2016 California Building Code. ▪ The minimum footing and grade beam sizes and depths in engineered fill shall be reviewed and approved by County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant. ▪ All foundation excavations shall be observed and approved by County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant. For foundation excavations for required embedment depth, County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant shall observe and approve excavation activities prior to the placement of reinforcing steel and/or concrete. ▪ Concrete slabs-on-grade and flatwork shall not be placed directly on unprepared native materials. Floor slabs shall be a minimum of 4 inches thick and reinforced with a minimum of #3 bars spaced at a maximum of 18 inches on-center, each way. Where lapping of the slab steel is required, laps in adjacent bars shall be staggered a minimum of every five feet. If floor loads exceed 200 pounds per square foot, County of Santa 	<p>Mitigation Measure GEO 2 would reduce impacts from potential hazards of slope failure to a less than significant level.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Impact GEO-3. The location and fill requirements of the project could result in long-term erosive runoff and sedimentation in nearby waterways. Compliance with existing County best management practices, as well as OCP policies and development standards, would reduce erosion potential. Nevertheless, long-term erosive runoff and sedimentation may result in potentially significant hazards associated with long-term erosive runoff and sedimentation. This impact would be less than significant with mitigation.</p>	<p>Barbara Public Works Department staff or a County-approved geotechnical consultant shall review and approve the slab design.</p> <p>These requirements shall be identified on project grading plan and development plans. Planning & Development staff shall review and approve all final plans prior to issuance of grading permits.</p> <p>Plan Requirements and Timing. All recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions in June 2016 (Appendix E) shall be reflected on grading and building plans. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Planning & Development staff will review grading plans for compliance prior to issuance of grading permits. Grading and building inspectors shall ensure compliance in the field.</p> <p>GEO-2 Fill Compaction. Fill depths exceeding 4-feet deep shall be compacted to a minimum relative density of 95 percent (ASTM D1557-07) to reduce long-term sedimentation resulting from proposed filling of topographic depressions within the project site. Plan Requirements and Timing. This requirement shall be reflected on grading and building plans. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Grading and building inspectors shall ensure compliance in the field.</p>	<p>Implementation of Mitigation Measures GEO-1 and GEO-3 and implementation of applicable Santa Barbara County erosion control BMPs, as well as OCP policies and development standards, would reduce impacts associated with the short-term exposure of graded soils and potential for soil erosion and sedimentation into drainages resulting from buildout of the project to as less than significant level.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Impact GEO-4. The project would be located on potentially expansive soils that pose a risk for settlement. Compliance with California Building Code requirements would reduce the risk of potential hazards associated with expansive soils. Nevertheless, long-term development on soils with a high potential for expansion or settlement may result in potentially significant hazards. This impact would be less than significant with mitigation.</p>	<p>GEO-3 Soil Engineering Report Measures for Expansive/Liquefiable Soils. On-site development shall require, and comply with, all recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions (Appendix E), including, but not limited to the following measures intended to reduce impacts from expansive and/or liquefiable soils:</p> <ul style="list-style-type: none"> ▪ Isolated pad footings shall be a minimum of two square feet in size and are permitted for single floor loads only. Foundations shall be designed in accordance to Section 1808.6.2, 2013 CBC, Foundations on Expansive Soils. ▪ The minimum footing and grade beam sizes and depths in engineered fill shall be reviewed and approved by County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant. ▪ All foundation excavations shall be observed and approved by County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant. For foundation excavations for required embedment depth, County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant shall observe and approve excavation activities prior to the placement of reinforcing steel and/or concrete. ▪ The base of all grade beams and footings shall be level and stepped as required to accommodate any change in grade while maintaining the minimum required footing embedment and slope setback distance. ▪ Concrete slabs-on-grade and flatwork shall not be placed directly on unprepared native materials and shall be a minimum of four inches in thickness. Reinforcing shall be placed on-center both ways at or slightly above the center of the structural section, and reinforcing bars shall be #3 bars at 18 inches on-center each way with a minimum clear cover of 1.5 inches. Where lapping of the slab steel is required, laps in adjacent bars shall be staggered a minimum of every five feet. If floor loads exceed 200 pounds per square foot, County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant shall review and approve the slab design. <p>All on-site structures shall comply with applicable provisions of the California Building Code. These requirements shall be identified on project grading plan and development plans. The County of Santa Barbara Public Works Department shall review and approve all final plans for the removal of expansive and/or liquefiable soils prior to issuance of grading permits. Compliance with these requirements shall be verified by the County of Santa Barbara Public Works Department prior to issuance of grading permits.</p> <p>Plan Requirements and Timing. Prior to zoning clearance issuance for grading, the owner/applicant shall include all recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions in June 2016 (Appendix E) shall be reflected on grading and building plans. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Grading and building inspectors shall ensure compliance in the field.</p>	<p>Implementation of Mitigation Measures GEO-1, GEO-3, and GEO-4 would ensure that impacts associated with expansive and liquefiable soils would be reduced to a less than significant level (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Impact GEO-5. Ground disturbance during project construction could potentially destroy a unique paleontological resource or site; however, implementation of recommended best management practices would minimize potential impacts to less than significant.</p>	<p>GEO-5(a) Worker Paleontological Resource Awareness Session. The Permittee, or consultant selected by the Permittee, shall develop a worker awareness program to educate all workers regarding the protection of any paleontological resources that may be discovered during project development, as well as appropriate procedures to enact should paleontological resources be discovered. The Permittee, or consultant selected by the Permittee, shall develop appropriate training materials including a summary of geologic units present at the development site, potential paleontological resources that may be encountered during development, and worker attendance sheets to record workers’ completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to project development, and as new employees are added to the project site workforce. The Permittee shall provide awareness session sign-in sheets documenting employee attendance to the County as requested.</p> <p>Plan Requirements and Timing. The worker awareness program shall be reviewed and approved by Planning & Development prior to grading/building permit issuance. The Owner/Applicant shall provide Planning & Development compliance monitoring staff with the name and contact information for the qualified consultant prior to grading/building permit issuance and pre-construction meeting. Monitoring. The Owner/Applicant shall demonstrate that the worker awareness program conforms to the required conditions.</p> <p>GEO-4(b) Paleontological Resources Inadvertently Discovered During Grading. If any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the Permittee shall:</p> <ul style="list-style-type: none"> ▪ Temporarily cease grading within 50 feet of the finds and redirect activity elsewhere to ensure the preservation of the resource in which the discovery was made; ▪ Immediately notify the Santa Barbara County Planning and Development and Public Works Departments regarding the resource and redirected grading activity; ▪ Obtain the services of a professional paleontologist who shall assess the significance of the find and provide recommendations as necessary for its proper disposition for review and approval by Santa Barbara County Planning and Development; and ▪ Complete all significance assessment and mitigation of impacts to the paleontological resource and verification reviewed and approved by Santa Barbara County Planning and Development prior to resuming grading in the area of the find. <p>Upon discovery of potentially significant paleontological resources and completion of the above measures, the Permittee shall submit to Santa Barbara County Planning and Development a report prepared by the qualified paleontologist documenting all actions taken. Additional documentation may be required to demonstrate that all recommendations have been completed in a paleontological report.</p> <p>Plan Requirements and Timing. This condition shall be printed on all building and grading plans. Monitoring. Planning & Development compliance monitoring staff shall confirm monitoring by the qualified consultant and grading inspectors shall spot check field work.</p>	<p>With incorporation of Mitigation Measures GEO-5(a) and GEO-5(b), the project would result in less than significant impacts to paleontological resources in the project area.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Greenhouse Gas Emissions		
<p>Impact GHG-1. Project construction and operation would generate temporary and long-term increases in GHG emissions. These emissions would result in a potentially significant contribution to global climate change. This impact would be less than significant with mitigation (Class II).</p>	<p>GHG-1 GHG Emissions Reduction Plan. The project developer shall prepare and implement a plan to reduce operational GHG emissions through implementation of one or more of the following measures:</p> <ul style="list-style-type: none"> a. Prior to zoning clearance issuance, the project applicant shall develop a project Greenhouse Gas Reduction Program (GGRP) that reduces annual GHG emissions from the project by a minimum of 246.2 MT of CO₂e per year (0.6 MT of CO₂e per person per year) over the operational life of the project. The plan shall be implemented on-site by the project applicant and may include, but not be limited to, the following components: <ul style="list-style-type: none"> 1. Installation of renewable energy facilities (e.g., solar photovoltaics) 2. Construction of residences that achieve energy and water efficiencies beyond those specified in the California Code of Regulations, Title 24 requirements 3. Implementation of energy efficient building design exceeding California Building Code requirements 4. Installation of energy-efficient equipment and appliances exceeding California Green Building Code standards 5. Installation of outdoor water conservation and recycling features, such as smart irrigation controllers and reclaimed water usage 6. Installation of low-flow bathroom and kitchen fixtures and fittings 7. Installation of light emitting diode (LED) lights 8. Provision of incentives and outreach for future residents to promote alternative transportation and transit use 9. Promotion of alternative fuel vehicles 10. Implementation of carbon sequestration measures; <p>OR</p> <ul style="list-style-type: none"> b. If GHG emissions cannot be reduced through implementation of the GGRP, the project applicant shall purchase carbon offsets to reduce GHG emissions below threshold levels. Carbon offsets shall be purchased from a validated source¹ to offset annual GHG emissions or to offset one-time carbon stock GHG emissions. <p>Plan Requirements and Timing. The GGRP shall be submitted by the project developer and reviewed and approved by the County Planning & Development Department as being in compliance with this measure prior to zoning clearance. Applicable elements of the approved GGRP shall be reflected on project site plans prior to</p>	<p>Implementation of Mitigation Measure GHG-1 would reduce the project’s GHG emissions to approximately 3.3 MT of CO₂e per person per year, which would not exceed the locally-appropriate, project-specific 2024 efficiency threshold of 3.3 MT of CO₂e per person per year. Therefore, with Mitigation Measure GHG-1, the project’s GHG emissions would be not impede substantial progress toward meeting the State’s 2030 and 2045 GHG reduction goals, and impacts related to GHG emissions would be reduced to a less than significant level (Class II).</p>

¹ Validated sources are carbon offset sources that follow approved protocols and use third-party verification. At this time, appropriate offset providers include only those that have been validated using the protocols of the Climate Action Registry, the Gold Standard, or the Clean Development Mechanism (CDM) of the Kyoto Protocol. Credits from other sources will not be allowed unless they are shown to be validated by protocols and methods equivalent to or more stringent than the CDM standards.

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Impact GHG-2. The project would be consistent with the emissions-reduction goals of the County's ECAP and the SBCAG 2040 RTP-SCS; however, it would be inconsistent with the GHG reduction targets in the 2017 Scoping Plan. This impact would be less than significant with mitigation (Class II).</p>	<p>permit approval. If GHG emissions cannot be reduced through compliance with such a plan, purchased carbon offsets shall be approved by Planning & Development staff prior to permit approval. Monitoring. Condition compliance shall monitor and verify implementation of measures included in the GGRP to ensure implementation of mitigation measures included in the plan.</p> <p>Implementation of Mitigation Measure GHG-1 would be required to reduce the project's GHG emissions to a level that is consistent with the GHG reduction targets contained in the 2017 Scoping Plan and EO B-55-18.</p>	<p>Implementation of Mitigation Measure GHG-1 would ensure that the project is consistent with the GHG reduction targets contained in the 2017 Scoping Plan and EO B-55-18. Therefore, with Mitigation Measure GHG-1, the project would be consistent with applicable GHG reduction plans, policies, and regulations, and impacts would be less than significant with mitigation (Class II).</p>
Land Use		
<p>Impact LU-1. The project would result in a change in character of the site and the scale of development on the site. This would present potential quality of life compatibility issues. This impact would be less than significant with mitigation.</p>	<p>Mitigation measures and OCP development standards related to long-term compatibility conflicts are discussed in Section 4.1, <i>Aesthetics</i>. Mitigation Measures AES-2(a) through AES-2(d), and AES-3 would apply. No additional mitigation measures are required, as no additional significant impacts were identified.</p>	<p>With implementation of Mitigation Measures AES-2(a) through AES-2(d), and AES-3, impacts associated with long-term compatibility impacts related to nuisance noise and visual compatibility would be adverse, but less than significant (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Noise		
<p>Impact N-1. Project construction could intermittently generate high noise levels on and adjacent to the project site. Project construction would take place adjacent to the RMGC fairways, thereby temporarily exposing sensitive receptors to noise levels exceeding County thresholds.</p>	<p>N-1(a) Construction Hours Limitations (Modification of OCP EIR Mitigation Measure NSE-5). Noise-generating construction activity for site preparation and for future project development shall be limited to the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. No construction shall occur on weekends or State or County holidays (e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall also be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.</p> <p>Plan Requirements and Timing. The Owner/Applicant shall provide and post signs stating these restrictions at all construction site entries. Signs shall be posted prior to commencement of construction and maintained throughout construction. Monitoring. The Owner/Applicant shall demonstrate to Planning & Development permit compliance monitoring staff that signs are posted prior to grading/building issuance and pre-construction meeting. Building inspectors and permit compliance staff shall spot check and respond to complaints.</p> <p>N-1(b) Construction Noise Control Measures. The following noise attenuation measures shall be implemented during project construction:</p> <ul style="list-style-type: none"> ▪ Mufflers. During all project site excavation and grading, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers’ standards. ▪ Stationary Equipment. All stationary construction equipment shall be located and oriented so that emitted noise is directed away from the nearest noise sensitive receptors. ▪ Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise sensitive receptors. ▪ Electrically-Powered Tools and Facilities. Where available, electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities. ▪ Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction. ▪ Additional Noise Attenuation Techniques <p>Plan Requirements and Timing. These measures shall be reflected on grading and building plans. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions prior to zoning clearance issuance. Planning & Development compliance monitoring staff and Grading and building inspectors shall ensure compliance in the field during construction activities.</p>	<p>Implementation of Mitigation Measures N-1(a) and N-1(b) would ensure that construction activities only occur during normal daytime hours and on weekdays, when people are less likely to be disturbed by noise and would reduce sound levels from the loudest individual pieces of construction equipment. These measures would reduce overall construction noise and prevent nighttime construction noise, which would ensure that average daily construction noise levels would not exceed the County of Santa Barbara’s maximum acceptable level of 65 dBA CNEL. Therefore, with implementation of these mitigation measures, construction noise impacts would be less than significant (Class II).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Water Resources and Flooding		
<p>Impact WR-3. Specific Plan development would result in a projected net increase in water demand. The use of groundwater to serve the development would not result in further overdraft of the Santa Maria Groundwater Basin. However, groundwater wells in Key Site 21 may produce groundwater with a total dissolved solids concentration that would exceed the Orcutt Community Plan’s 425 mg/L standard per Policy WAT-O-5. This impact would be less than significant with mitigation (Class II).</p>	<p>WR-3 Modern Drilling, Analysis, and Well Construction Techniques. Using geologic, geophysical, and water quality data, wells shall be designed using modern drilling, analysis, and well construction methods, including, but not limited to:</p> <ul style="list-style-type: none"> ▪ Discrete perforation intervals adjacent to the best quality aquifer materials (should zones between perforations indicate poor quality groundwater, intermediate cement or clay seals shall be installed to prevent poorer quality water from entering the production stream); ▪ After development, step-drawdown and constant-rate pumping tests shall be conducted at the wells, with water quality samples collected at various rates and durations to optimize the blend of water quality; ▪ If produced water quality exceeds the 425 mg/L standard a reverse-osmosis (RO) above-ground treatment facility shall be implemented. The RO facility would divert high-quality stream to residential uses. The resulting brine solution may be disposed at a discharge facility approved by Planning & Development, or other method approved by the Central Coast Regional Water Quality Control Board. <p>Plan Requirements and Timing. Prior to zoning clearance issuance the owner/applicant shall submit proof of water system permits to Planning and Development. These requirements shall be reflected on the water system plans. Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Santa Barbara County Environmental Health Services shall permit the water system and review plans to ensure compliance. Planning & Development staff will review building plans for compliance prior to issuance of building permits. Building inspectors shall ensure compliance in the field.</p>	<p>The project would not result in significant impacts to existing well users, and the residual impact related to water resources would be adverse, but less than significant (Class III). Impacts to the overdrafted SMGB would be adverse, but less than significant without mitigation (Class III). Implementation of Mitigation Measure WR-3 would ensure new wells would meet the OCP Policy WAT-O-5 standard for TDS concentrations of 425 mg/L (Appendix L). Therefore, Mitigation Measure WR-3 would reduce impacts related to groundwater quality to a less than significant level (Class II).</p>

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Impact	Mitigation Measure (s)	Significance After Mitigation
Class II Cumulative Impacts (Significant but Mitigable)		
Aesthetics		
Cumulative Impacts to Aesthetics (Scenic Views and Light and Glare)	Mitigation Measure AES-3 would apply.	Implementation of Mitigation Measure AES-3 would reduce potential cumulative impacts to a less than significant level.
Biological Resources		
Cumulative Impacts to Biological Resources	Mitigation Measures BIO-1 through BIO-7 would apply.	Implementation of Mitigation Measures BIO-1 through BIO-7 would reduce potential cumulative impacts to a less than significant level.
Cultural and Tribal Cultural Resources		
Cumulative Impacts to Cultural and Tribal Cultural Resources	Mitigation Measures CUL-1 through CUL-2 and OCP EIR Mitigation Measures ARCH-1 through ARCH-8, and ARCH-10 would apply.	Cumulative impacts to cultural resources and tribal resources in the Orcutt area would be adverse, but less than significant.
Geologic Processes		
Cumulative Impacts to Geologic Hazards	Mitigation Measures GEO-1, GEO-3, GEO-4, GEO-5(a), and GEO-5(b), where applicable) would apply.	Compliance with County regulations and policies (including compliance with County development standards; OCP development standards; CBC requirements; OCP EIR mitigation; and Mitigation Measures GEO-1, GEO-3, GEO-4, GEO-5(a), and GEO-5(b), where applicable) would reduce seismic and geologic hazards. Seismic

Impact	Mitigation Measure (s)	Significance After Mitigation
Greenhouse Gas Emissions		
Cumulative Impacts to Greenhouse Gas Emissions	Mitigation Measure GHG-1 would apply.	<p>and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Cumulative geologic hazard impacts would be adverse, but less than significant with mitigation (Class II).</p> <p>GHG emissions associated with the project would be less than significant with implementation of Mitigation Measure GHG-1 and the project would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions with implementation of Mitigation Measure GHG-1. Therefore, the project's contribution to significant cumulative impacts related to GHG emissions is not cumulatively considerable with implementation of required mitigation (Class II).</p>

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Impact	Mitigation Measure (s)	Significance After Mitigation
Transportation and Circulation		
Cumulative Impacts to Transportation and Circulation	Mitigation Measure T-1 would apply.	Implementation of Mitigation Measure T-1, which would require payment of fair-share fees toward transportation improvements, retain the existing geometry of two eastbound travel lanes on Clark Avenue, and result in a signalized corridor from Foxenwood Lane to Orcutt Road with coordinated traffic signals, would ultimately reduce delays at the Foxenwood Lane/Clark Avenue intersection. With Mitigation Measure T-1 potential cumulative impacts would be reduced to a less than significant level.
Class III Project Specific Impacts (Less than Significant)		
Aesthetics		
Impact AES-1. The project would impact views of nearby scenic vistas from the Rancho Maria Golf Club and State Route 1. However, implementation of development standards contained in the OCP would ensure this impact remains less than significant.	No mitigation measures are required.	Class III (less than significant).

Impact	Mitigation Measure (s)	Significance After Mitigation
Agricultural Resources		
<p>Impact AG-1. The project would not convert FMMP-designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), would not conflict with existing zoning for agricultural use or a Williamson Act contract, and would not involve any other changes that would convert farmland to non-agricultural use. Impacts to agricultural resources would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
Air Quality		
<p>Impact AQ-1. The project would accommodate new residents in unincorporated Santa Barbara County, but this increase in population would not exceed the SBCAG growth forecasts used to prepare the 2016 Ozone Plan. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact AQ-2. Project construction activity would generate temporary increases in criteria air pollutant emissions of ozone precursors, CO, SO₂, PM₁₀, and PM_{2.5}, but these</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

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Impact	Mitigation Measure (s)	Significance After Mitigation
<p>emissions would not significantly degrade regional and local air quality. This impact would be less than significant.</p>		
<p>Impact AQ-3. The project would generate criteria air pollutant emissions, but these emissions would not significantly degrade regional and local air quality or significantly contribute to the area’s nonattainment-transitional designation for ozone and nonattainment designation for PM10. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact AQ-4. Construction and operation of the project would generate emissions of carbon monoxide and toxic air contaminants, which can contribute to human health hazards. However, sensitive receptors would not be exposed to substantial concentrations of these pollutants. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact AQ-5. Short-term project construction may result in temporary odors, but Specific Plan development would not include land uses that would</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>result in long-term odor emissions that would adversely affect a substantial number of people. This impact would be less than significant.</p>		
<p>Energy</p>		
<p>Impact E-1. Project construction and operation would require temporary and long-term consumption of energy resources, which would result in emissions of air pollutants and GHGs that would impact the environment. However, project construction and operation would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact E-2. The project would fall within the plan area for the Santa Barbara County ECAP and SB 100. The project would be consistent with these plans and would therefore not conflict with or obstruct a state or local plan for renewable energy of energy efficiency. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

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Impact	Mitigation Measure (s)	Significance After Mitigation
Fire Protection		
<p>Impact FP-1. The project would create additional sources and increased risk of wildland fires in a high fire hazard area. Compliance with SBCFD requirements, applicable OCP development standards, and Conditions of Approval pertaining to fire management would ensure that potential impacts associated with wildland fire hazards would be less than significant (Class III).</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact FP-2. The project would increase demand on the Santa Barbara County Fire Department, resulting in a reduction in the fire protection service ratio. The project would be subject to the Orcutt Planning Area fire mitigation fee, which provides funding for new fire stations and acquisition of new equipment and apparatus required to serve new development. Therefore, this impact would be less than significant (Class III).</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Geologic Processes		
<p>Impact GEO-1. The project site may be subject to strong groundshaking, which has the potential to cause fill material to settle, destabilize slopes, and/or cause physical damage to structures, property, utilities, road access, and people. Compliance with OCP EIR mitigation measures, OCP development standards, and existing local, State, and federal regulations would ensure that impacts related to groundshaking remain less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
Land Use		
<p>Impact LU-2. The project would be consistent with the applicable policies and development standards in the Orcutt Community Plan. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

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Impact	Mitigation Measure (s)	Significance After Mitigation
Noise		
<p>Impact N-2. The project would not expose sensitive receptors on the project site, including the proposed residences of the Willow Creek and Hidden Canyon neighborhoods, to noise in excess of County standards. This impact would be less than significant (class III).</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact N-3. Project-generated traffic would not increase noise levels on area roadways in excess of County standards. This impact would be less than significant (Class III).</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
Public Services and Recreation		
<p>Impact PS/R-1. The project would increase the demand for schools. Through the required payment of State-mandated impact mitigation fees, potential impacts to public schools would be adverse, but less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact PS/R-2. The project would not substantially diminish the LCSD's wastewater treatment capacity. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Impact PS/R-4. Buildout of the project would increase demand on the Santa Barbara county sheriff's department (SBCSD). The project would be subject to police protection service mitigation fees, which provide funding for capital facilities and related equipment associated with hiring new Sheriff deputies required to serve new development. Therefore, this impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Impact PS/R-5. The project would not significantly increase the demand for recreational facilities or require the construction or expansion of recreational facilities that may have an adverse physical effect on the environment. This impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>
<p>Transportation and Circulation</p>		
<p>Impact T-1. The project would add new vehicle trips to study area intersections. All study area intersections would continue to operate at acceptable levels of service with implementation of the project. The project would result in less than</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

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Impact	Mitigation Measure (s)	Significance After Mitigation
significant project-specific intersection impacts (Class III).		
Impact T-2. The project would add new vehicle trips to study area roadways. All study area roadway segments are forecast to operate within the County's acceptable capacity with implementation of the project. This impact would be less than significant (Class III).	No mitigation measures are required.	Class III (less than significant).
Impact T-3. The project includes two new full-access connections and one new secondary access connection to State Route 1. Project access and design would not result in new or exacerbated safety issues at these locations. This impact would be less than significant (Class III).	No mitigation measures are required.	Class III (less than significant).
Water Resources and Flooding		
Impact WR-1. Construction activities associated with Specific Plan development could degrade water quality through increased rates of erosion and sedimentation. Compliance with NPDES permit requirements, the required SWPPP and applicable BMPs, and the	No mitigation measures are required.	Class III (less than significant).

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>County’s grading ordinance and applicable OCP development standards would ensure that potential water quality impacts during project construction would be less than significant (Class III).</p>		
<p>Impact WR-2. New impervious surfaces would alter existing drainage patterns and increase stormwater runoff. Compliance with applicable programmatic mitigation measures from the OCP EIR, design guidelines, applicable SBCFCD requirements for post-development peak stormwater flows and BMPs and maintenance requirements described in the proposed project’s Stormwater Control Plans would ensure that potential flooding impacts and impacts to on-site and off-site drainage would be less than significant (Class III).</p>	<p>No mitigation measures are required.</p>	<p>Class III (less than significant).</p>

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Impact	Mitigation Measure (s)	Significance After Mitigation
Class III Cumulative Impacts (Less than Significant)		
Aesthetics		
Cumulative Impacts to Visual Quality and Character	No mitigation measures are required.	Class III (less than significant).
Agricultural Resources		
Cumulative Impacts to Agricultural Resources	No mitigation measures are required.	Class III (less than significant).
Air Quality		
Cumulative Impacts to Air Quality	No mitigation measures are required.	Class III (less than significant).
Energy		
Cumulative Impacts to Energy	No mitigation measures are required.	Class III (less than significant).
Fire Protection		
Cumulative Impacts to Fire Protection	No mitigation measures are required.	Class III (less than significant).
Land Use		
Cumulative Impacts to Land Use	No mitigation measures are required.	Class III (less than significant).
Noise		
Cumulative Impacts to Noise	No mitigation measures are required.	Class III (less than significant).
Public Services and Recreation		
Cumulative Impacts to Schools	No mitigation measures are required.	Class III (less than significant).
Cumulative Impacts to Wastewater Services	No mitigation measures are required.	Class III (less than significant).
Cumulative Impacts to Police Protection	No mitigation measures are required.	Class III (less than significant).
Cumulative Impacts to Recreational Facilities	No mitigation measures are required.	Class III (less than significant).

Impact	Mitigation Measure (s)	Significance After Mitigation
Water Resources		
Cumulative Impacts to Drainage, Flooding, and Sedimentation	No mitigation measures are required.	Class III (less than significant).
Cumulative Impacts to Water Demand/Water Quality	No mitigation measures are required.	Class III (less than significant).

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1 Introduction

This document is a Subsequent Environmental Impact Report (SEIR) that examines the potential effects of implementing the proposed Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project on an approximately 341-acre site in northern Santa Barbara County. The project is described in detail in Section 2, *Project Description*. This section describes: (1) the general background of the project; (2) the purpose of and legal authority for the SEIR; (3) the scope and content of the SEIR; (4) lead, responsible and trustee agencies; and (5) the environmental review process required under the California Environmental Quality Act (CEQA).

1.1 Project Background

1.1.1 Summary of the Project

The proposed project includes a Specific Plan, two Vesting Tentative Tract Maps (VTTM), two Final Development Plans, two Minor Conditional Use Permits, road naming, and a Comprehensive Plan Amendment to develop 146 residential units in two residential neighborhoods on Key Site 21. Each of these components of the project is described in detail in Section 2, *Project Description*. The properties included in the project are identified by Assessor's Parcel Numbers (APN) 113-250-015 through 113-250-017.

1.1.2 Relationship of the Project to the Orcutt Community Plan

The project site is located within the Orcutt Community Plan (OCP) area. The OCP provides a blueprint for the future development of the Orcutt community located in northern Santa Barbara County. The OCP EIR (95-EIR-01) was prepared as a programmatic EIR that programmatically analyzed the general environmental effects of the OCP as a whole. The OCP EIR identified significant and unavoidable (Class I) impacts with full buildout under the OCP in the areas of Land Use, Biology, Agriculture, Geology, Flooding and Drainage, Water Supply/Groundwater Resources, Archaeology, Historical Resources, Traffic and Circulation, Noise, Air Quality, Risk of Upset/Polluting Sources, Wastewater, Fire Protection, Police Protection, Solid Waste, Library Services, Visual/Aesthetics, Parks Recreation and Trails, and Schools. Mitigation measures identified to minimize impacts were incorporated as Policies and Development Standards in the adopted OCP. The OCP EIR also evaluated more specific impacts pertaining to 45 designated "Key Sites," including Key Site 21, that were identified in the OCP as areas where future development would occur in the community.

The OCP EIR analyzed the development of up to 150 units and designated the areas along the southern and western boundaries of the site as subject to the Open Space Overlay. The OCP EIR identified and evaluated site-specific impacts to Biological Resources associated with the loss of vegetation and habitat, and impacts to wildlife, that could occur if the site were developed. The OCP EIR also identified and evaluated site-specific impacts to Visual Resources/Open Space regarding changes in the visual character of Key Site 21 and impacts to the State Route (SR) 1 scenic corridor. The OCP EIR also discussed both general and site-specific mitigation measures for each environmental issue identified. Impacts associated with the loss of vegetation and habitat were

found to be less than significant with mitigation (Class II). Impacts to wildlife and impacts related to Visual Resources/Open Space were found to be significant and unavoidable (Class I).

Pursuant to Section 15162 of the *CEQA Guidelines* this document has been prepared as a SEIR to the OCP EIR. Insofar as the project being reviewed herein could result in new or more severe significant environmental impacts than those identified in the OCP EIR, a SEIR must be prepared to analyze impacts in accordance with Section 15168 of the *CEQA Guidelines*, as well as Article V, Section E, 4 of the County of Santa Barbara Guidelines for the Implementation of CEQA (2010). To the extent that the OCP EIR adequately analyzed environmental impacts from the development of Key Site 21, the SEIR may rely on that analysis and/or incorporate it by reference, focusing on project-specific effects not analyzed adequately in the OCP EIR.

A summary of impacts identified in the OCP EIR and applicable mitigation from the OCP EIR is included under the heading of Previous Environmental Review in the discussion of each environmental issue area in Section 4, *Environmental Impact Analysis*.

1.1.3 Areas of Known Public Controversy

Section 15123 of the *CEQA Guidelines* states that an EIR shall identify areas of controversy known to the lead agency, including issues raised by the agency and the public. In accordance with the *CEQA Guidelines*, a Notice of Preparation (NOP) and Environmental Scoping Document (Scoping Paper) for this SEIR was distributed for review by affected agencies and the public on March 27, 2018. The NOP, responses received during the NOP comment period, and Scoping Paper are presented in Appendix A of this report. Based on comments received during the public hearing and NOP comment period, the following issues are known to be of concern and may be controversial. Each issue is further evaluated in the SEIR.

- Public services, including fire and public safety;
- Aesthetics/visual resources;
- Traffic, circulation, and access;
- Water supply and groundwater resources;
- Existing recreational facilities, including Rancho Maria Golf Course;
- Biological resources, wildlife, and wildlife habitat;
- Safety hazards;
- Construction and operational (long-term) noise, and adjacent noise sensitive receptors;
- Air quality issues;
- Land use compatibility;
- Tribal Cultural Resources, Assembly Bill 52 and Senate Bill 18 requirements;
- Runoff, drainage, and flooding; and
- Cumulative wastewater generation, and new sewer line placement/sizing.

1.2 Purpose and Legal Authority

Several of the project's proposed actions including implementation of the Specific Plan, two VTTMs, and two Development plans, a Comprehensive Plan amendment, road naming, and Minor Conditional Use permits are discretionary actions requiring approval of the Board of Supervisors. Therefore, the project is subject to the requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines*, the purpose of this EIR is to serve as an informational document that:

“...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

As discussed above, this document is a SEIR to the OCP EIR pursuant to Section 15162 of the *CEQA Guidelines*. An SEIR is appropriate when “substantial changes are proposed in the project which will require major revisions of the previous EIR.”

This SEIR is to serve as an informational document for the public and County of Santa Barbara decision-makers. The process will culminate with Planning Commission and Board of Supervisors hearings to consider certification of a Final SEIR as well as the project's requested approvals.

Although the project includes a specific plan and development plans, this SEIR contains a project-level environmental review that fulfills the requirement of a project-level SEIR. As defined in *CEQA Guidelines* Section 15161, a project-level EIR:

“...examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.”

Pursuant to *CEQA Guidelines* Section 15182, “where a public agency has prepared an EIR on a specific plan after January 1, 1980, no EIR or negative declaration need be prepared for a residential project undertaken pursuant to and in conformity to that specific plan [...],” as long as the residential project is within the scope of the EIR, no new environmental effects are anticipated to occur, and no new mitigation measures are required for the residential project.

1.3 Scope and Content

Through the NOP and SEIR scoping process, the County of Santa Barbara determined that there was no substantial evidence that the project would cause or otherwise result in significant environmental effects in the areas of forest resources, hazards and hazardous materials, historic resources, mineral resources, and population and housing. No further environmental review of these issues is necessary for the reasons summarized in the Section 4.15, *Effects Found Not to be Significant*. The substantiation for determining that these issues would result in no impact, or a less-than-significant impact is described in further detail in the NOP and Scoping Paper in Appendix A, pursuant to Section 15128 of the *CEQA Guidelines*.

Based on those issues identified during the NOP and scoping process as issues of concern and potentially controversial, the SEIR contains the following detailed environmental impact analysis sections:

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- Aesthetics/Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Fire Protection
- Geologic Processes
- Greenhouse Gas Emissions
- Land Use
- Noise
- Public Services and Recreation
- Transportation/Circulation
- Water Resources/Flooding

This SEIR builds upon the programmatic analysis performed in the OCP EIR and addresses the issues referenced above and identifies potentially significant environmental impacts, including site-specific and cumulative effects of the project in accordance with the provisions set forth in CEQA and the *CEQA Guidelines*. In addition, the SEIR recommends feasible mitigation measures, where possible, that would reduce or eliminate adverse environmental effects.

A summary of cumulative impacts, which gives consideration to other projects in the vicinity, are described in each resource section within Section 4, *Environmental Impact Analysis*. Cumulative project analyses represent a comprehensive assessment of potential impacts on County resources using a list of past, present, and probable future projects capable of producing related or cumulative impacts.

Alternatives to the project consistent with CEQA requirements are considered to examine a reasonable range of approaches to minimize environmental impacts while achieving most of the project objectives. The alternatives to the project are evaluated in Section 6, *Alternatives*, of this SEIR.

In preparing the SEIR, use was made of pertinent County policies and guidelines, existing EIRs and background documents prepared by the County, and documents that guide land use in the neighboring City of Santa Maria. A full reference list is contained in Section 7, *References*, of this SEIR.

The level of detail contained throughout this SEIR is consistent with the requirements of CEQA and applicable court decisions. The *CEQA Guidelines* provide the standard of adequacy on which this document is based. The Guidelines state:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure. (Section 15151).

1.4 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define “lead,” “responsible” and “trustee” agencies. The County of Santa Barbara is the lead agency for the project because it has the principal responsibility for approving the project. Discretionary approval of the project is vested with the County of Santa Barbara Board of Supervisors.

A “responsible agency” refers to public agencies other than the “lead agency” that have discretionary approval over the project. The California Department of Transportation (Caltrans) will be a responsible agency for frontage improvements within Caltrans right-of-way along SR 1. Other responsible agencies include the Regional Water Quality Control Board (RWQCB) for review of National Pollutant Discharge Elimination System (NPDES) permit requests, and the County Flood Control District for review of the proposed detention basin system.

A “trustee agency” refers to a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. The California Department of Fish and Wildlife (CDFW) has jurisdiction over biological resources, including waters of the State and rare and endangered plant species, which may be affected by project development, and is, therefore, a trustee agency.

1.5 Environmental Review Process

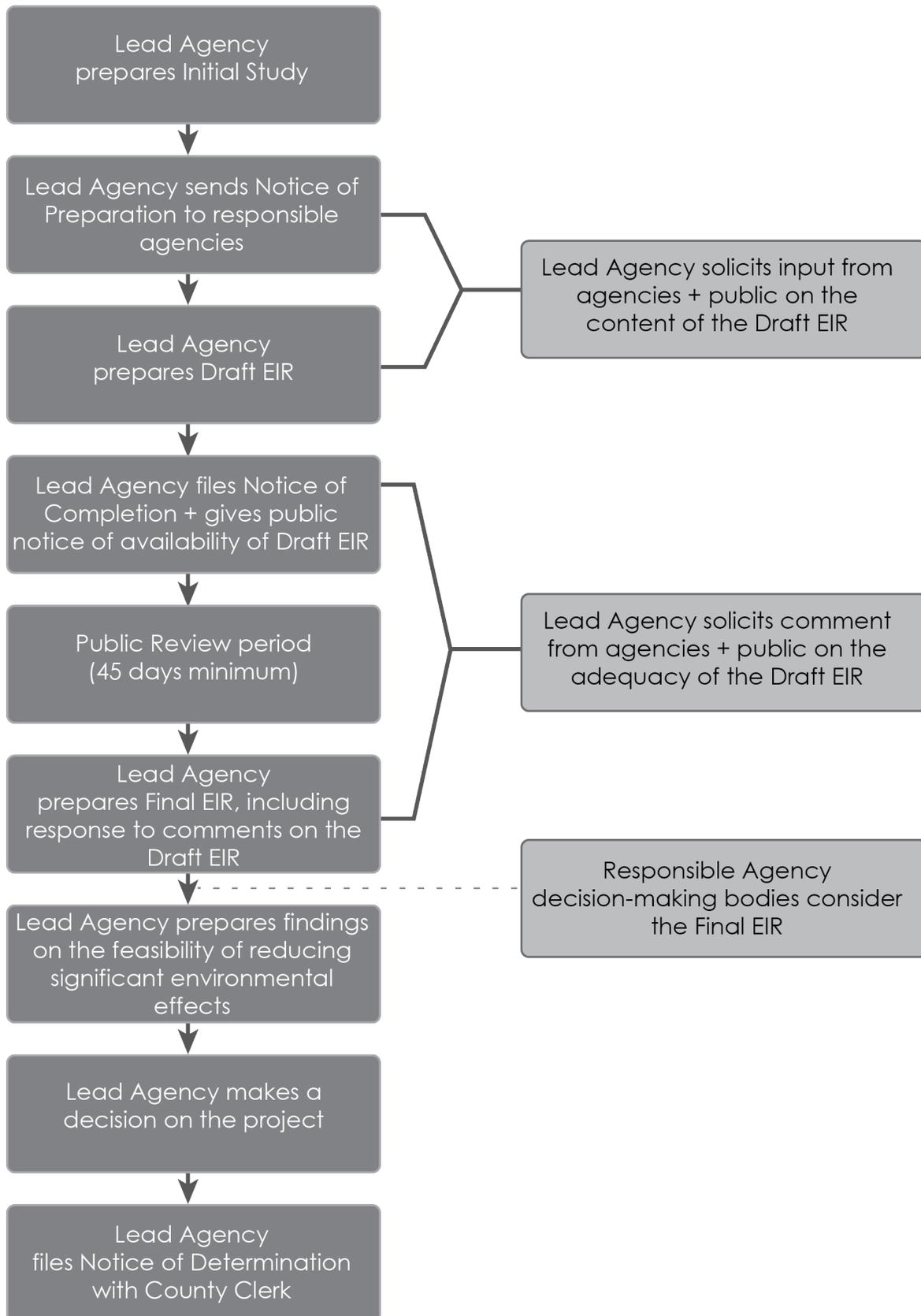
The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP).** Immediately after deciding that an EIR is required, the lead agency must file a NOP soliciting input on the EIR scope to “responsible,” “trustee,” and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days.
2. **Draft Environmental Impact Report.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) alternatives; g) mitigation measures; and h) irreversible changes.
3. **Public Notice and Review.** A lead agency must prepare a Notice of Availability of an EIR. The Notice must be placed in the County Clerk's office for 30 days (Public Resources Code Section 21092). The lead agency must send a copy of its Notice to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of DEIR availability must be given through at least one of the following procedures: (a) publication in a newspaper of general circulation; (b) posting on and off of the project site; or (c) direct mailing to owners and occupants of contiguous properties. The lead agency must consult with and request comments on the Draft EIR from responsible and trustee agencies, and adjacent cities and counties (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a DEIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless a shorter period is approved by the Clearinghouse (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include: (a) the DEIR; (b) copies of comments received during public review; (c) a list of persons and entities commenting; and (d) responses to comments.

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5. **Final EIR Certification.** Prior to approving a project, the lead agency must certify that: (a) the Final EIR has been completed in compliance with CEQA; (b) the Final EIR was presented to the decision-making body of the lead agency and that the lead agency considered the information in the Final EIR; and c) the Final EIR reflects the lead agency's independent judgment and analysis (*CEQA Guidelines* Section 15090).
6. **Lead Agency Decision.** A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidably significant environmental effects, it must prepare a written Statement of Overriding Considerations that set forth the specific social, economic or other reasons supporting the agency's decision.
8. **Mitigation Monitoring/Reporting Program.** When a lead agency makes findings on significant effects identified in a Final EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination.** The lead agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice starts a 30-day statute of limitations on CEQA challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



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2 Project Description

This section describes the proposed project, including the project applicant, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Project Applicant

Orcutt Rancho, LLC
c/o HWM Group, Ltd
124 West Main Street Suite G
Santa Maria, California 93458

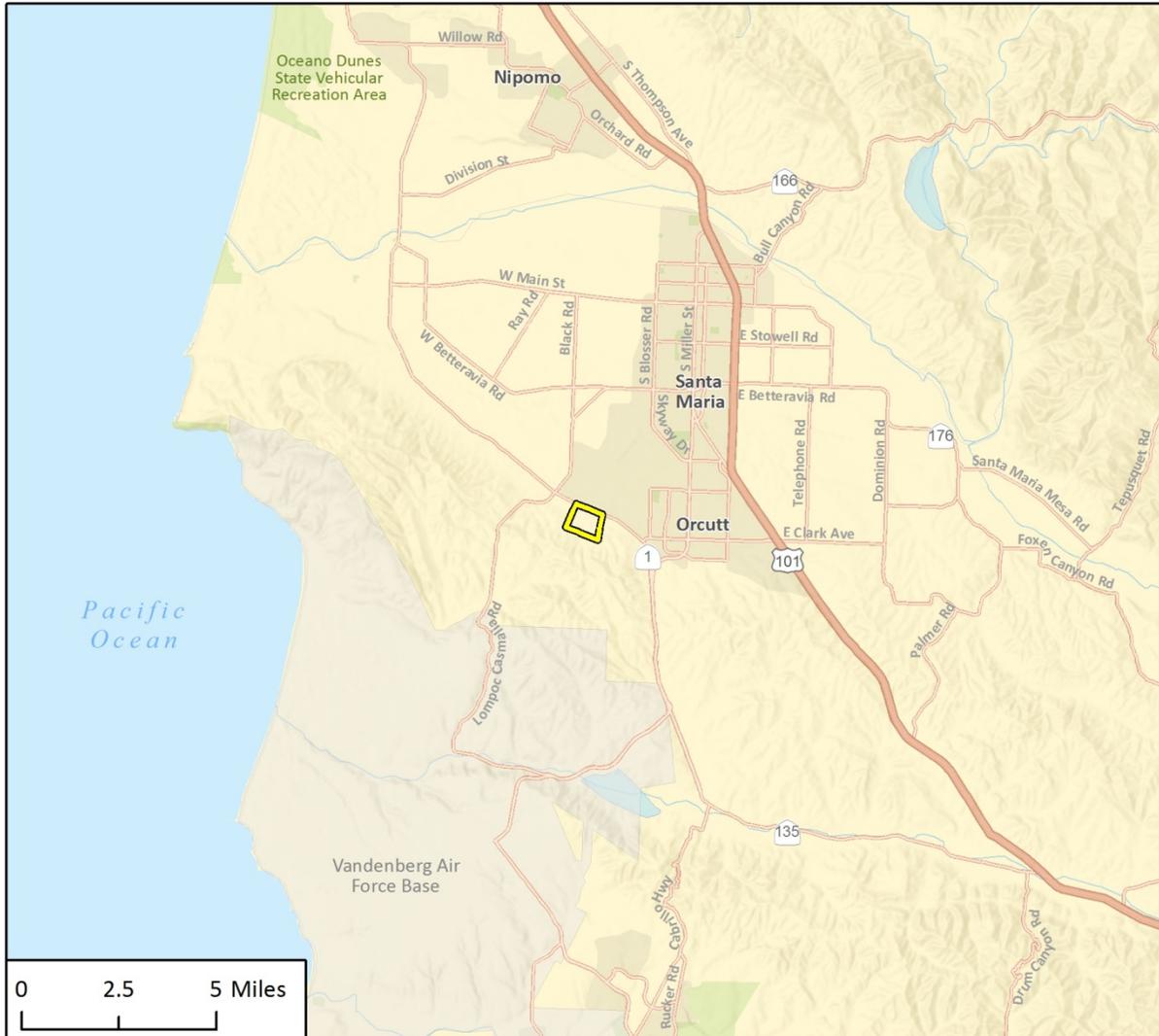
2.2 Lead Agency Contact Person

Dana Eady, Senior Planner
Santa Barbara County
Planning and Development
624 West Foster Road, Suite C
Santa Maria, California 93455

2.3 Project Location

The project site is located on Key Site 21 in the Orcutt Community Plan (OCP) area in the community of Orcutt in northern Santa Barbara County. Key Site 21 is located on the south side of State Route (SR) 1 between Solomon Road and Black Road, approximately ½ mile west of the SR 1/Solomon Road intersection. Key Site 21 includes a total of seven parcels, consisting of approximately 340.7 acres. The Rancho Maria Golf Club, a public 18-hole golf course, is located on the central parcel of Key Site 21, occupying 130 acres of the site. The project site is comprised of three undeveloped parcels (APNs 113-250-015, -016, -017), totaling approximately 190 acres and situated on the eastern and western portions of Key Site 21 at the outer edges of the golf course and between the fairways. Rural agricultural lands surround Key Site 21, including the project site, to the east, west, and south. Figure 2-1 shows the regional location of the project site, while Figure 2-2 shows the site in its local context.

Figure 2-1 Regional Location



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 Key Site 21

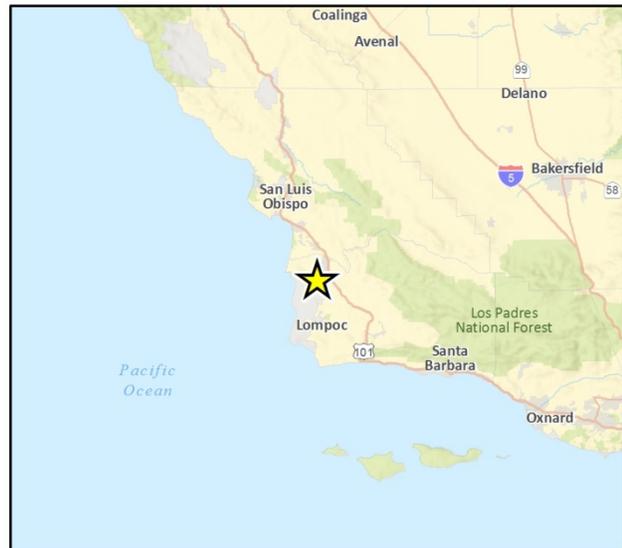
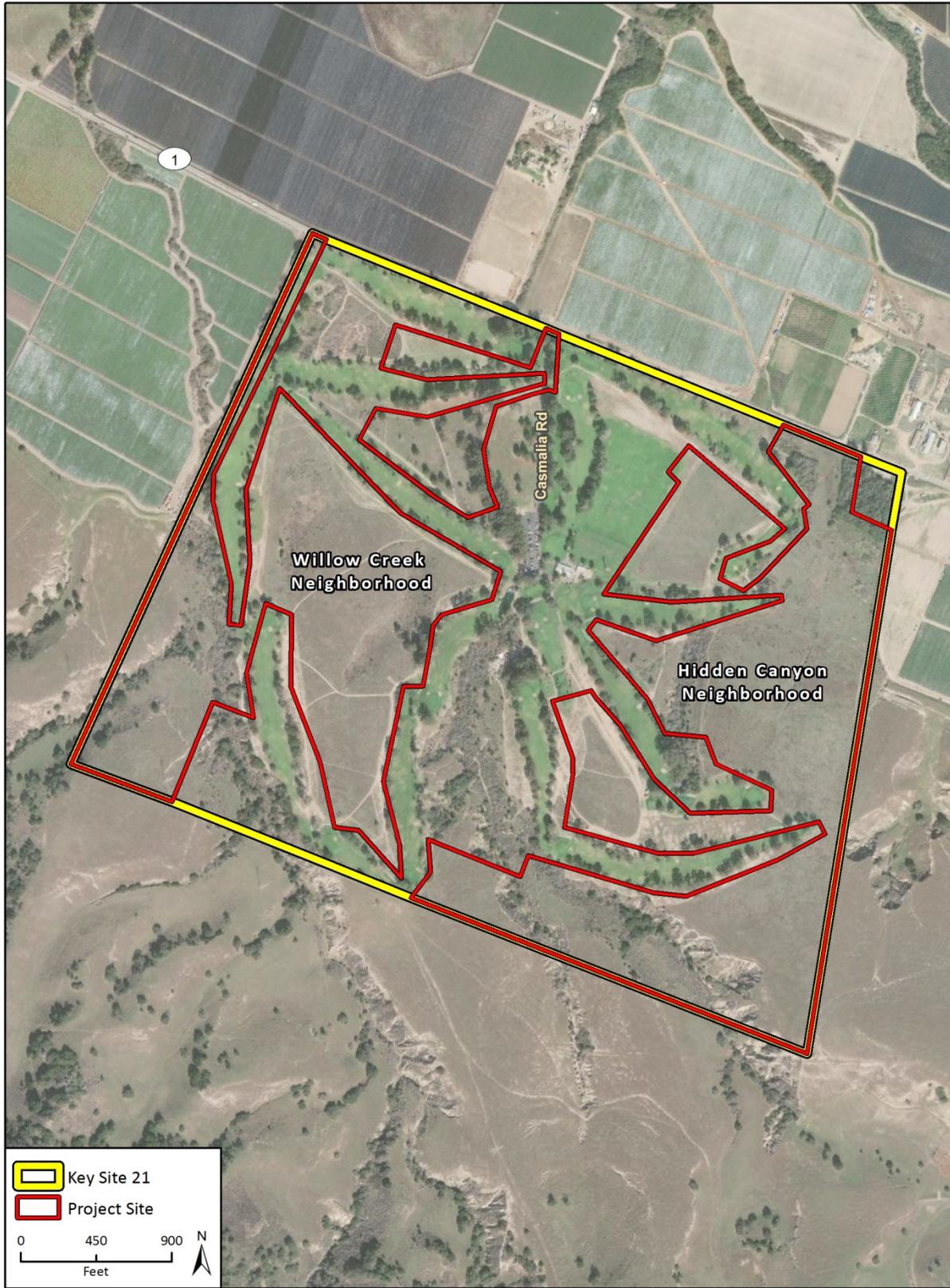


Fig 1 Regional Location

Figure 2-2 Project Site Location



Imagery provided by Microsoft Bing and its licensors © 2018.

Fig 2 Project Location

2.4 Existing Project Site Characteristics

2.4.1 Current Land Use Designation and Zoning

The project site is currently vacant and undeveloped and has an existing land use designation of Planned Development (PD), 150 units maximum/Visitor Serving Commercial. The PD designation is intended for large areas within urban boundaries that are appropriate for residential development but require comprehensive site planning to account for existing opportunities and constraints on the site, such as existing visitor-serving activities, biology, view corridors, slopes, and flood and fire hazards. The PD designation also promotes flexibility and innovative design to provide desirable aesthetic and efficient use of space while preserving important natural and scenic resources of the site.

As discussed in Section 1, *Introduction*, the OCP provides a blueprint for the future development of the Orcutt community, and the OCP EIR (95-EIR-01) evaluated specific impacts pertaining to 45 designated “Key Sites” that were identified in the OCP as areas where future development would likely occur in the community. The entire Key Site 21, including the project site, is designated as an Existing Developed Rural Neighborhood (EDRN) in the OCP. As described in the Santa Barbara County Land Use & Development Code (LUDC) an EDRN is an area shown on the County’s Comprehensive Plan maps within which development has occurred historically with lots smaller than those found in the surrounding Rural or Inner Rural Areas (County of Santa Barbara 2019).

The project site is zoned Planned Residential Development (PRD). The purpose of this zone district is to ensure comprehensively planned development of large acreage within designated urban areas intended primarily for residential use. The intent, in part, is to promote innovative residential design, allow a diversity of housing types, and provide recreational opportunities for both residents of the site and the public (LUDC Section 35.23.020, Santa Barbara County 2019).

2.4.2 Surrounding Land Uses

The project site is located on a portion of Key Site 21 in the OCP area and includes parcels immediately to the west and east of the Rancho Maria Golf Club (refer to Figure 2-2). Land uses and zoning surrounding Key Site 21 are as follows:

- North: Cultivated Agriculture/RR-20 (Residential Ranchette)
- South: Vacant, Grazing/RMZ-320 (Resource Management)
- East: Cultivated Agriculture, Grazing, Vacant/AG-II-320
- West: Cultivated Agriculture, grazing, vacant/AG-II-320

2.5 Project Characteristics

The proposed project is a request by Orcutt Rancho, LLC, for approval of the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project, located on a portion of Key Site 21 in the OCP area. The project includes the seven planning and entitlement requests detailed in this section.

2.5.1 Specific Plan

The project includes a Specific Plan (Case No. 16SPP-00000-00001) that provides for the design and regulatory framework to provide for orderly development including housing, a public trail, open space, and biological protection measures. The Specific Plan includes the following:

- A mix of lot sizes to be responsive to market trends;
- Design Guidelines to provide standards and guidance for architectural design, development, and landscaping;
- Lot standards per the provisions of the Specific Plan and PRD zone district;
- Incorporates the current Santa Barbara County Inclusionary Housing Ordinance specifications to pay in-lieu fees for the entire Affordable Housing project requirement;
- Public trails; and
- Provides SR 1 frontage improvements to include two paved 12-foot travel lanes, deceleration/turn lanes located at the new entrances to the Willow Creek and Hidden Canyon neighborhoods, and two paved 8-foot shoulders that would also serve as Class 3 bike lanes.

2.5.2 Vesting Tentative Tract Maps

The project proposes two Vesting Tentative Tract Maps (VTTM) to subdivide two lots of approximately 107 gross acres and 70 gross acres, as shown in Table 2-1.

Table 2-1 VTTM Proposed Subdivisions

Name and VTTM	Hidden Canyon Neighborhood (16TRM-00000-00003/TM 14,822)	Willow Creek Neighborhood (16TRM-00000-00004/TM 14,823)
APN	113-250-016	113-250-017
Total Area	107 acres	70 acres
Residential Development Area	56 single family lots (39.3 acres)	90 single family lots (37.2 acres)
Other Uses	One (1) open space/private roadway lot	One (1) open space/private roadway lot

The residential lots in the Hidden Canyon neighborhood would range in size from 10,351 square feet (sf) to 40,091 sf. The residential lots in the Willow Creek neighborhood would range in size from 8,000 sf to 27,706 sf.

2.5.3 Development Plans

The project proposes two Final Development Plans (Case Nos. 16DVP-00000-00008 and 17DVP-00000-00011) for the development of 146 single family residences and associated infrastructure including landscaping, fencing, lighting, access ways, open space areas and onsite detention basins in the proposed Willow Creek and Hidden Canyon neighborhoods.

The Willow Creek neighborhood would include residential areas on 37.2 acres, and would provide 90 single family lots with an average residential lot size of 11,400 sf, a maximum building height of 35 feet, and a single story restriction on lots immediately adjacent to the golf course fairway. The Willow Creek neighborhood improvements also include gated secondary access at the golf course parking lot for emergency personnel and residents, installation of a golf course safety net, and landscaping and screening vegetation.

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

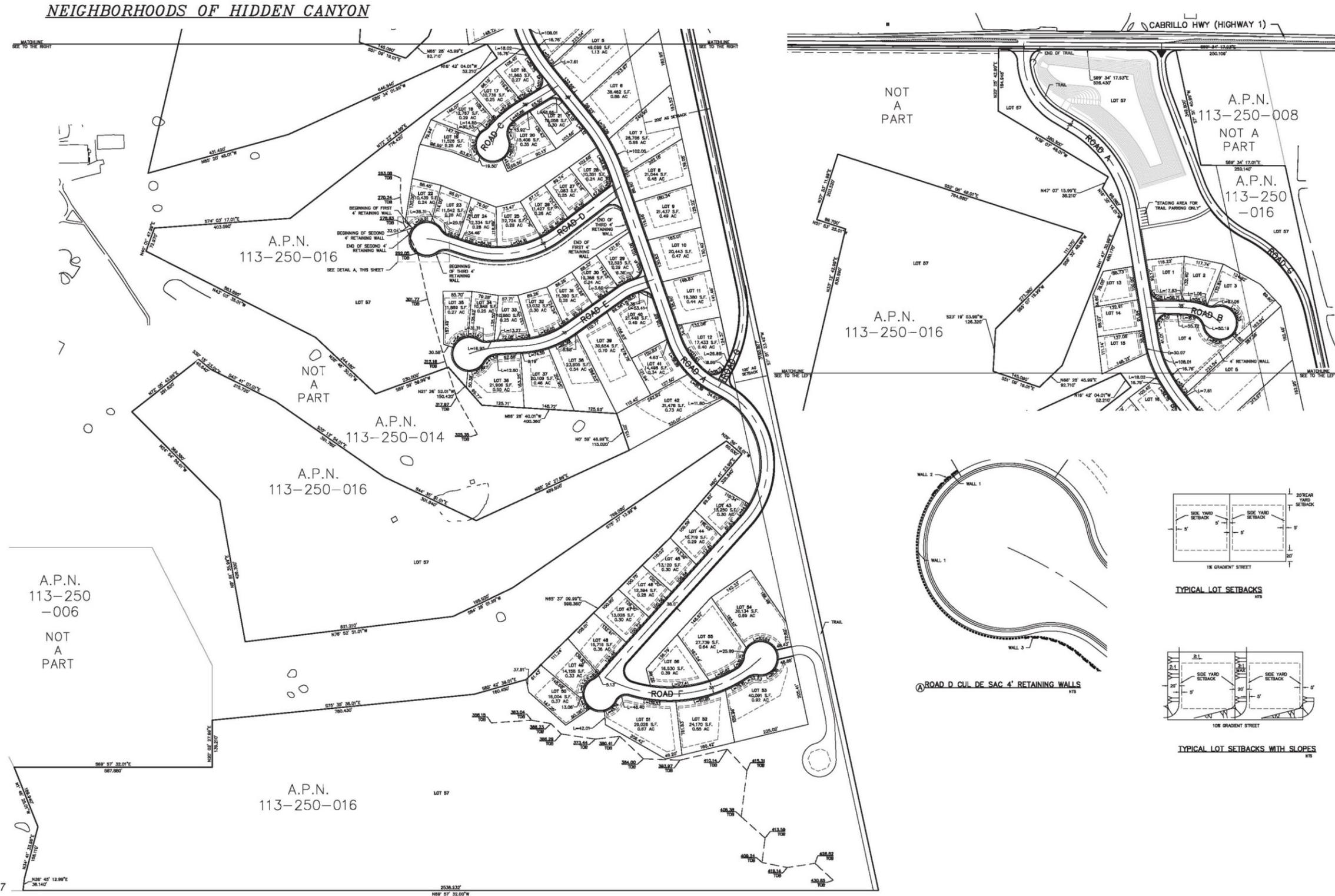
The Hidden Canyon neighborhood would include residential areas on 39.3 acres, and would provide 56 single family lots with an average residential lot size of 18,000 sf, a maximum building height of 35 feet, and a single-story restriction on lots immediately adjacent to the golf course fairway. The Hidden Canyon neighborhood improvements also include a public hiking trail connection, hiking trail, and trailhead staging area with parking for up to six (6) vehicles.

Figure 2-3 shows the Development Plan for the proposed Hidden Canyon neighborhood and Figure 2-4 shows the Development Plan for the proposed Willow Creek neighborhood.

Common characteristics of the Willow Creek and Hidden Canyon neighborhood developments plans include:

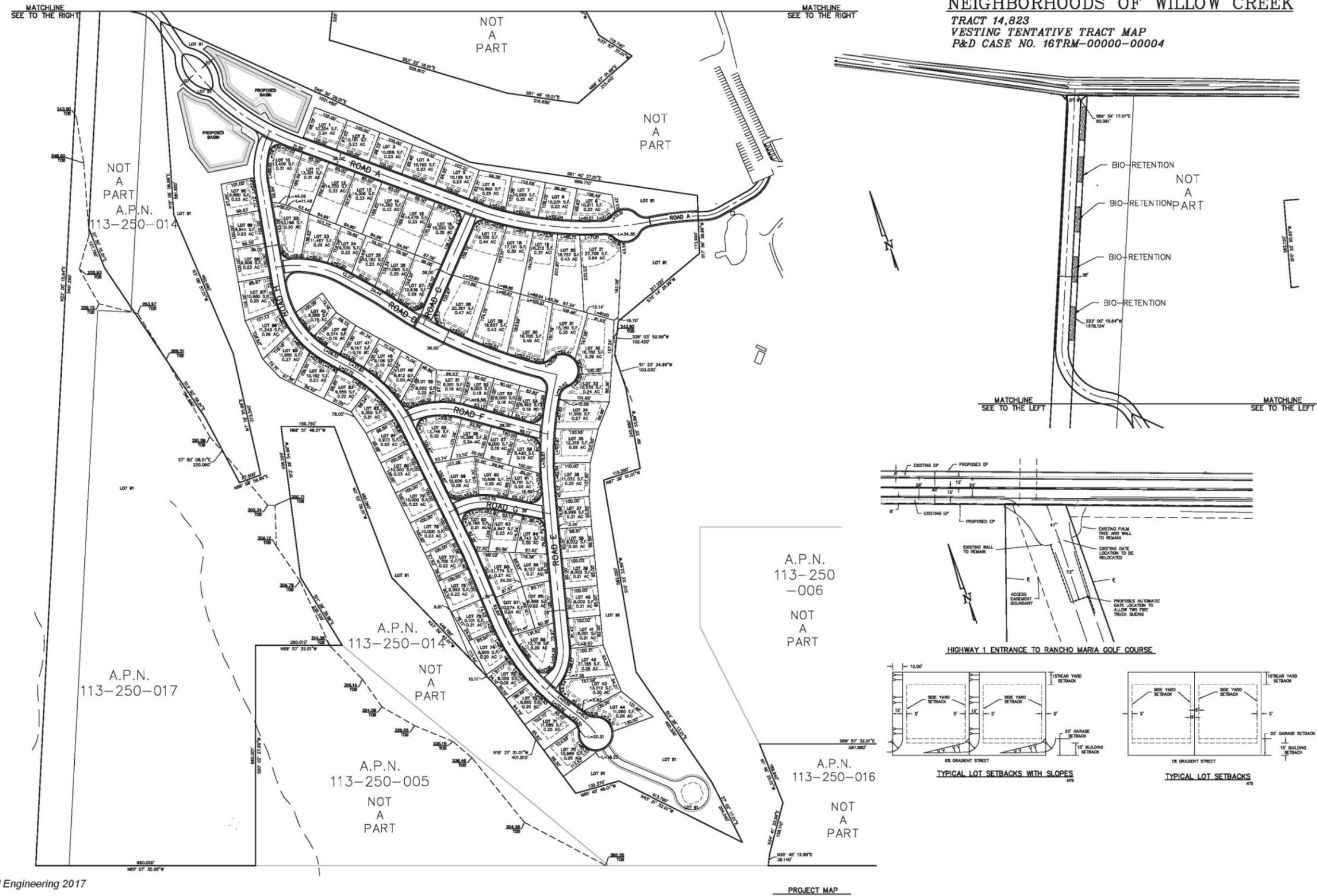
- **Architecture.** The proposed Specific Plan includes design standards and guidelines for architectural development. Houses are proposed to be built in various architectural styles including Traditional California Bungalow, Mediterranean, California Ranch, and Modern styles. Subdivisions would provide pedestrian walkways through the Specific Plan area that connect with the proposed trail system. Where possible, cul-de-sac streets and adjacent lots in new residential subdivisions would be designed to provide pedestrian links between the end of the cul-de-sac and the adjacent cul-de-sac, or between the cul-de-sac and a larger pedestrian pathway system.
- **Landscaping.** The proposed Specific Plan would provide specific planting guidelines for the proposed neighborhoods as a whole, adjacent to streets, in parks, in the proposed neighborhoods, and adjacent to the golf course in Homeowner Association-owned and maintained open space areas, providing a buffer to the golf course. The planting guidelines would include specific plants to be used.
- **Lighting.** Project lighting would be installed in accordance with the Specific Plan and would be compliant with the ordinance requirements of the International Dark Sky Association, which provides guidelines for outdoor lighting depending on specific uses and conditions. Street lighting would be shielded so that it does not intrude into residences or open space areas. Neighborhood entry lighting would be limited to the immediate vicinity of the entry and associated directional signage for the proposed neighborhoods. No trail lighting is proposed.
- **Fencing.** Fencing would be installed in accordance with the Specific Plan. Rear and side yard fences would be constructed of wood fence panels, vinyl, or composite fencing. Rear and side yard fences on residential home sites adjoining the golf course or open space areas may be constructed of wrought iron, tubular steel, wood rail, or similar open fencing.
- **Lot Standards.** The minimum setbacks for single family residential units in the Willow Creek and Hidden Canyon neighborhoods are 15-foot front yard with 20-foot minimum to the garage door where it faces the street, 10-foot rear and five-foot side yard setbacks.
- **Access & Circulation.** Access to the project site would be provided from three new entry drives off SR 1. The Willow Creek neighborhood would include a new private road constructed approximately 1,200 feet west of the main entrance to the golf course. This road would serve as primary access to the 90 home sites at the Willow Creek neighborhood. A private secondary access road from the Willow Creek neighborhood through the golf course and out to SR 1 would be provided with gated egress. Exiting through the gate would be unrestricted and automatic. The Hidden Canyon neighborhood would include two new private roads constructed approximately 1,100 and 1,900 feet east of the existing golf course entry. These roads would provide primary and secondary access to the 56 home sites in the Hidden Canyon neighborhood.

Figure 2-3 Development Plan for Hidden Canyon Neighborhood



Source: Bethel Engineering 2017

Figure 2-4 Development Plan for Willow Creek Neighborhood



Proposed frontage improvements include widening SR 1 at the two full-access intersections to provide 12-foot travel lanes, a 12-foot westbound left-turn lane, and 8-foot shoulders. Because SR 1 is a State facility, intersection design, including left-turn channelization and deceleration, would conform to the design criteria contained in Topic 405 – Intersection Design Standards of the California Department of Transportation (Caltrans) Highway Design Manual.

The primary private access roads would be 38 feet wide, with parking allowed on both sides of the roadway. The secondary private roads would be 24 feet wide, with no parking allowed. Frontage improvements to SR 1 would include two paved 12-foot travel lanes, deceleration/turn lanes located at the new entrances to the Willow Creek and Hidden Canyon neighborhoods, and two paved eight-foot shoulders that would also serve as Class 3 bike lanes.

- **Emergency Access.** The County Fire Department has identified acceptable road locations and widths to provide for full, private, secondary access that includes a driveway and a roadway at the eastern edge of the Hidden Canyon neighborhood providing a right turn egress onto SR 1. A raised median island and right-turn-only signage would be installed at the driveway to discourage left turns onto SR 1, but would allow access for emergency personnel. The secondary egress for the Willow Creek neighborhood would be through the existing emergency vehicular access (EVA) easement through the golf course parking lot and through the existing golf course entrance.
- **Parking Standards.** Single family residences would have a minimum of two off-street parking spaces. The trailhead area would provide for a total of six parking spaces.
- **Sustainable Design Features.** The proposed Specific Plan would incorporate the following sustainable design features: 1) providing homes with wiring for future access to solar power for electrical energy use; 2) energy efficiency improvements (achieving the California Energy Commission Title 24 Building Energy Efficiency Standards); 3) water conservation improvements to reduce indoor and outdoor water use by 20 percent; and, 4) architectural and site design features to increase building efficiency and encourage pedestrian circulation including pedestrian network improvements and traffic calming measures.
- **Grading and Drainage.** Grading amounts for the proposed neighborhoods, including roadways and building pads for the proposed residences, are shown in Table 2-2. The grading was designed to result in a balance of cut and fill between the two neighborhoods. No fill material would be imported to or exported from Key Site 21, and no fill material would be placed in the undeveloped natural open space areas.

Table 2-2 Grading Details

Hidden Canyon TM 14,822 (East Side)	Willow Creek TM 14,823 (West Side)
Cut: 335,516 cubic yards ¹	Cut: 197,110 cubic yards ¹
Fill: 251,149 cubic yards	Fill: 224,141 cubic yards
Net Cut: 84,367 cubic yards ¹	Net Fill: 27,031 cubic yards ¹

¹ Anticipated shrinkage from cut soil is approximately 10%, resulting in an imbalance of approximately 4,000 cubic yards between both tracts. This soil imbalance would be distributed over the disturbed portions of the project site.

The Specific Plan would be subject to a Storm Water Pollution Prevention Plan (SWPPP), which requires implementation of erosion control measures and minimizes water quality degradation through stormwater monitoring. In both proposed neighborhoods, slopes would be contoured to the extent possible to provide smooth transitions between the graded areas and the adjacent

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

natural land contours. Retaining walls outside of the building footprints would not exceed four feet in height as a result of the neighborhood configurations.

Runoff from the proposed lots and roadways would be directed to bio-retention facilities where feasible, with overflow captured in de-silting/retention basins. Drainage from the Willow Creek neighborhood would be directed to two on-site retardation basins and five bio-retention basins totaling 1.6 acres, designed to contain a 100-year storm event, while utilizing Low Impact Design (LID) features including diversion of drainage to landscaped areas to promote infiltration.

Drainage from the Hidden Canyon neighborhood would be directed to one on-site detention basin totaling 1.9 acres. This basin would be designed to contain a 100-year storm event and provide an overland escape to the natural drainage course near the northeast corner of the project site, while utilizing LID features. The proposed developments would include improvements such as roof drains to promote infiltration and low flow swales and a detention basin to promote infiltration of the runoff from the 1.2-inch storm event. Excess runoff would follow the historical drainage course that runs south-to-north along the center of the project site, between the two neighborhoods.

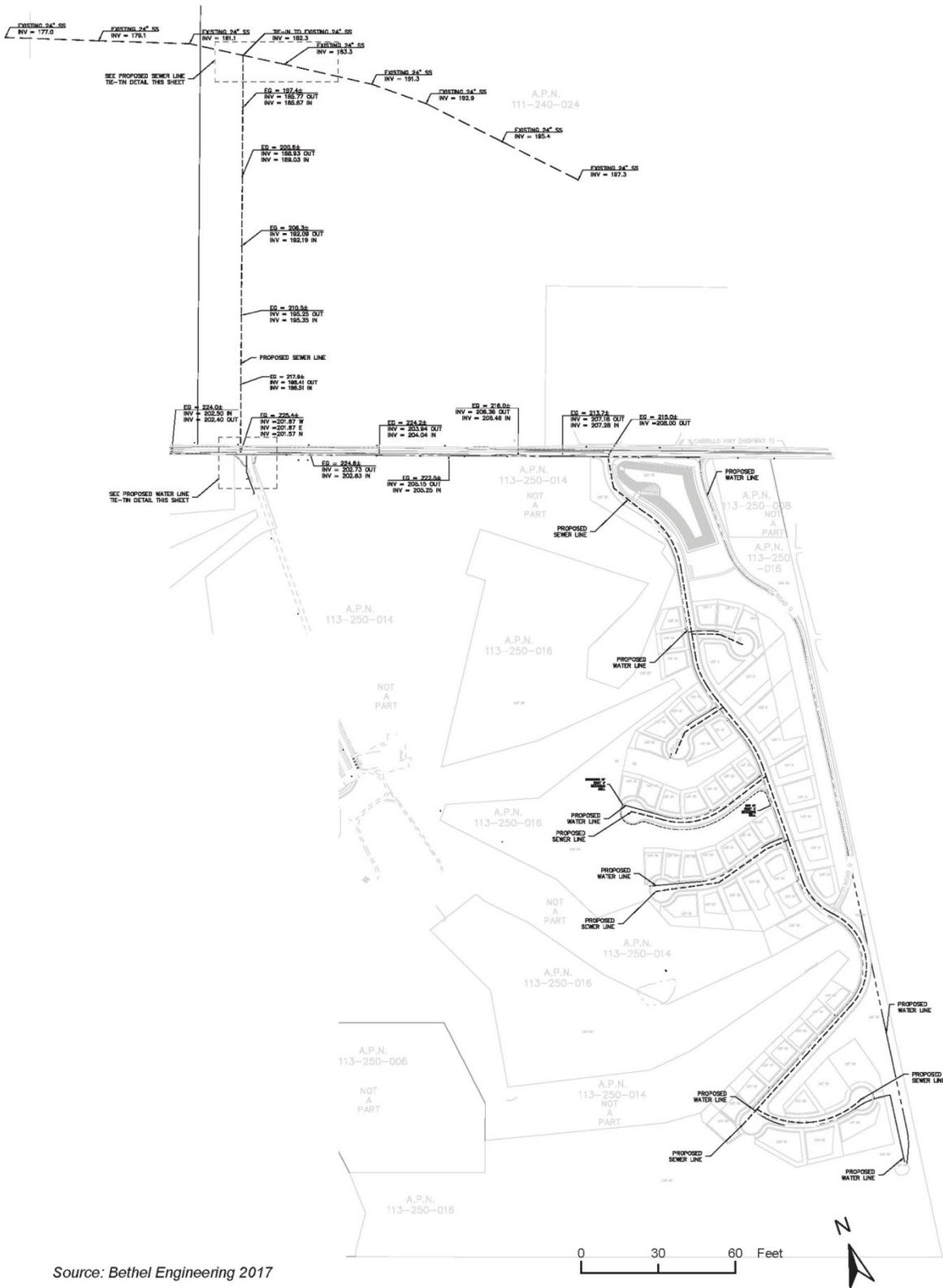
- **Open Space Areas.** The Specific Plan includes 96.7 acres of private, undisturbed open space in the two neighborhoods (12.5 acres of natural open space would be located on APN 113-250-015, which is included in the Specific Plan, but is not a part of either of the proposed VTTMs). These undisturbed open spaces comprise approximately 51 percent of the overall Specific Plan area. The Specific Plan area also includes approximately 29.8 acres of privately managed open space that includes landscape, trailhead, trails, and fuel modification areas.
- **Public Trail.** The Hidden Canyon neighborhood would include a public hiking trail to provide access from the residential development and SR 1 to neighboring foothills as well as the Orcutt regional trail system, as required by the OCP Key Site 21 Design Standard KS 21-5.
- **Affordable Housing.** The project applicant would pay in-lieu fees for affordable housing to comply with the County's Inclusionary Housing Ordinance.
- **Water and Sewer Services.** Water for the Specific Plan area would be provided through a newly formed mutual water company for the project. The project proposes a community water system that would include two new water wells. Waterlines would be installed from the water system to each of the neighborhoods. A hydro-pneumatic tank system and a storage tank facility would be installed as a part of the water system.

Sewer service for Specific Plan area would be provided by the Laguna County Sanitation District. The proposed onsite collection system would be comprised of a network of gravity sewer lines located in the private roads serving the individual units that will meet at SR 1 and tie into a recorded easement for a 24-inch sewer main to the north.

The proposed water and sewer connections for the two neighborhoods are shown on Figure 2-5 and Figure 2-6.

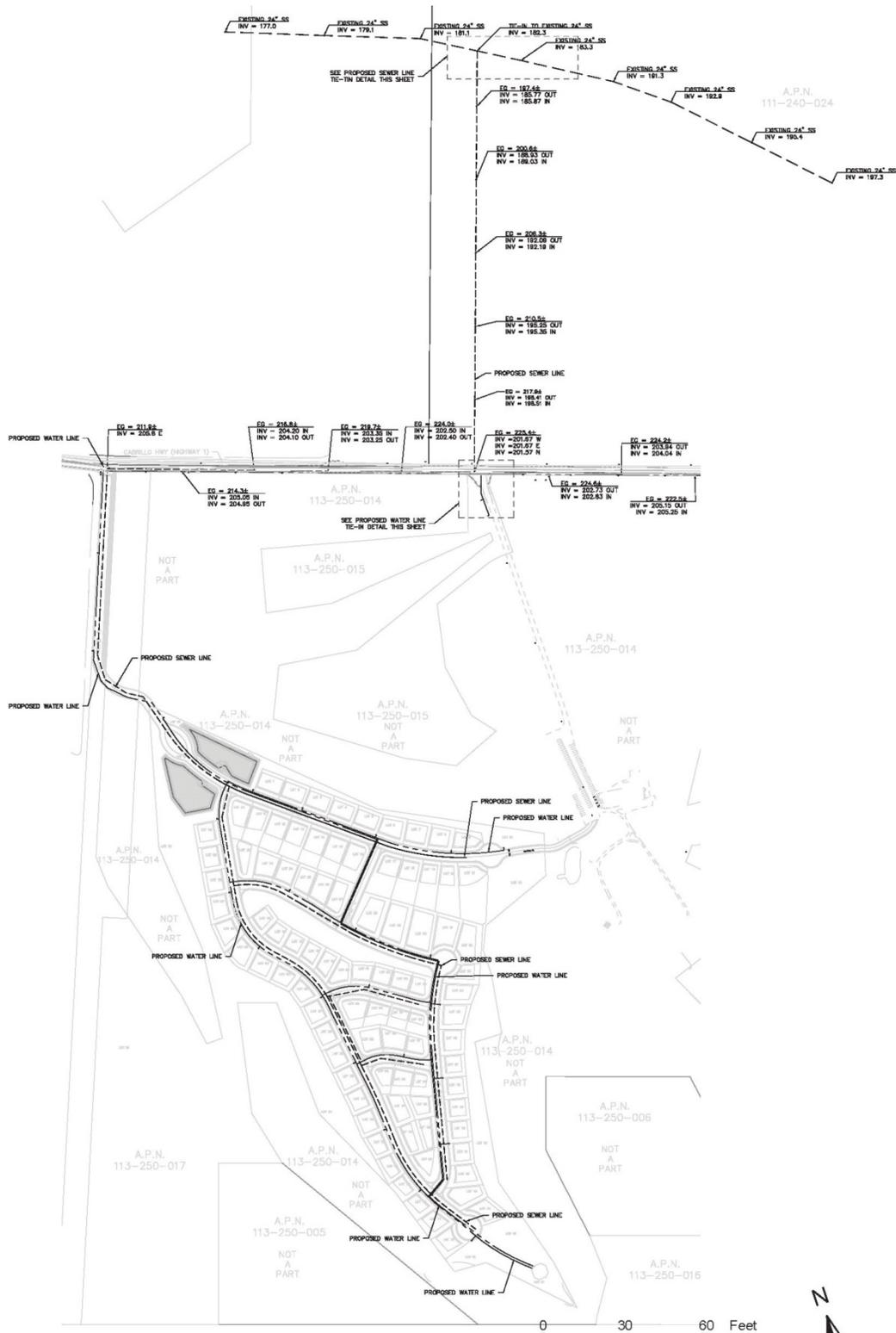
- **Agricultural Buffer.** A 200-foot wide agricultural buffer would be provided along the eastern and western edges of the Specific Plan area between the planned residential development and existing cultivated agricultural fields located on adjacent parcels to the east and west. A 100-foot buffer would be provided along the eastern, western, and southern edges of the Specific Plan area between the planned residential development and existing grazing lands. No buildings or structures would be permitted in the agricultural buffer areas. Only access roadways, private backyards, public trails, and open space areas would be located in the agricultural buffer areas.

Figure 2-5 Water and Sewer Connections for Hidden Canyon Neighborhood



Source: Bethel Engineering 2017

Figure 2-6 Water and Sewer Connections for Willow Creek Neighborhood



2.5.4 Minor Conditional Use Permit – Community Water System

The project would require a Minor Conditional Use Permit (Case No. 17CUP-00000-00030) for the development of a new community water system to serve the Hidden Canyon and Willow Creek neighborhoods. The water system would include two new water wells, a hydro-pneumatic tank system and a storage tank. Waterlines would be installed from the water system to each of the neighborhoods.

2.5.5 Minor Conditional Use Permit – Entrance Monument Signs

The project would require a Minor Conditional Use Permit (Case No. 16CUP-00000-00033) for two entrance monument signs (one for the Willow Creek neighborhood and one for the Hidden Canyon neighborhood), each with a maximum size of 20 sf.

2.5.6 Road Naming Application

The project proposes a road naming application (Case No. 17RDN-00000-00002) to name the proposed private roads in the proposed Willow Creek and Hidden Canyon neighborhoods in compliance with Chapter 35.76 of the County Land Use and Development Code.

2.5.7 Comprehensive Plan Amendment

The project includes a Comprehensive Plan Amendment (Case No. 17GPA-00000-00005) to relocate the proposed trail staging area from the location shown in OCP Figure KS 21-1 (adjacent to SR 1) to the project site. The project also includes a text amendment to OCP Key Site 21 Development Standard DevStd KS21-1 as follows:

- DevStd KS21-1: No applications for development shall be ~~accepted~~ approved prior to approval of a Specific Plan for the entire site.

2.6 Project Objectives

The primary objectives for the Key Site 21 project are as follows:

- To develop the site consistent with the Orcutt Community Plan designation as one of the major residential Key Sites identified for future development.
- To develop the site in a manner that is responsive to and consistent with the County Housing element, current environmental requirements, and the physical characteristics of the site.
- To provide single family homes to meet the needs of the Orcutt Community, the County of Santa Barbara, and the State of California by constructing up to 146 homes to help meet the demand to construct 350,000 homes annually for the next seven years to address the current State-wide housing shortage of two million units.
- Payment of in-lieu fees to meet Santa Barbara County Affordable Housing requirements to build much-needed affordable units in the Orcutt/Santa Maria housing area.
- To provide development that is compatible with the existing Rancho Maria Golf Club on Key Site 21.
- To provide a public hiking trail with access to the Orcutt regional trail system.

- To preserve approximately 51 percent of the overall Specific Plan area in private and privately managed open space, including landscape, trailhead, trails, fuel modification areas, and undisturbed, natural open space.

2.7 Required Approvals

Implementation of the project would require the following discretionary approvals from the County of Santa Barbara:

- Specific Plan
- Two VTTMs subdivide the project parcels
- Two final Development Plans to allow for development of 146 residences and associated improvements
- Two Minor Conditional Use Permits
- Road Naming Application
- Comprehensive Plan Amendment

In addition, the Regional Water Quality Control Board (RWQCB) will be a responsible agency for review of National Pollutant Discharge Elimination System (NPDES) permit requests. The County Flood Control District will be a responsible agency for review of the proposed detention basin system. Caltrans will be a responsible agency for frontage improvements within Caltrans right-of-way along SR 1. The California Department of Fish and Wildlife (CDFW) will be a responsible agency for administering the California Endangered Species Act and would authorize “take” of state listed species by reviewing application for and issuance of an Incidental Take Permit subject to Sections 2081(b) and 2081(c) of the California Fish and Game Code. The United States Fish and Wildlife Service (USFWS) will be a responsible agency for implementing the Federal Endangered Species Act and would authorize incidental “take” of federally listed species through Section 7 or Section 10 of the federal Endangered Species Act.

3 Environmental Setting

This section provides a general overview of the environmental setting for the project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4.0, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is located in the Santa Maria Valley, a roughly east-west trending valley in northern Santa Barbara County. The Valley is bound by the Nipomo Mesa and Sierra Madre Mountains on the north and east, by the Solomon Hills and Casmalia Hills on the south, and by the Guadalupe Dunes and Pacific Ocean on the west.

The Santa Maria Valley is a flat coastal plain whose native vegetation consists primarily of coastal dune sage. The edges of the valley are characterized by rolling hills with oak woodlands, native and non-native grasses, and chaparral. Much of the area is rural in nature, characterized by such uses as grazing, crude oil production, open space, and cultivated agriculture, which is the dominant land use due to the valley's fertile alluvial soils and exceptional climate for crop production.

Important water features in the Santa Maria Valley include Twitchell Reservoir, Betteravia Lakes (also known as Guadalupe Lake), the Santa Maria River, and Orcutt/Solomon, Pine, Graciosa, and San Antonio Canyon Creeks. The Santa Maria River is the principal drainage for the Valley. It is formed at the confluence of the Cuyama and Sisquoc Rivers and ultimately drains into the Pacific Ocean near the Santa Barbara County/San Luis Obispo County border.

The Santa Maria Valley's Mediterranean climate is characterized by warm, dry summers and cool, damp winters with occasional rainy periods. Annual rainfall typically ranges from about 13 to 18 inches, with nearly all precipitation occurring between October and April. Light to moderate sea breezes generally predominate during the day, while land breezes from the east dominate during night and early morning hours.

3.2 Project Site Setting

The project site is located on Key Site 21 in the Orcutt Community Plan (OCP) area in the community of Orcutt in northern Santa Barbara County. Key Site 21 is located on the south side of State Route (SR) 1 between Solomon Road and Black Road, approximately ½ mile west of the SR 1/Solomon Road intersection. Key Site 21 includes a total of seven parcels, consisting of approximately 340.7 acres. The Rancho Maria Golf Club, a public 18-hole golf course, is located on the central parcel of Key Site 21, occupying 130 acres of the site. The project site is comprised of three undeveloped parcels (APNs 113-250-015, -016, -017), totaling approximately 190 acres and situated on the eastern and western portions of Key Site 21 at the outer edges of the golf course and between the fairways. Rural agricultural lands surround Key Site 21, including the project site, to the east, west, and south.

The project site is located at the base of the northern edge of the east-west trending Casmalia Hills. The topography consists of gentle slopes from 220 feet in elevation at the northwest corner of the

property to 420 feet in elevation along the southern perimeter. Three unnamed drainages, which are tributaries to Orcutt Creek located to the north, flow in a northwesterly direction through the site. Various other small ravines and gullies bisect portions of the site, eventually draining toward Orcutt Creek.

A variety of native and non-native communities are found within and in the immediate area surrounding the project site, including arroyo willow thickets, coast live oak woodland, California sagebrush scrub, coyote brush scrub, purple needlegrass grassland, perennial rye grass grassland, cattail marshes, California annual grassland and eucalyptus groves. California annual grasslands cover the majority of the project site. Along with natural vegetation, seasonal ponds and drainages provide habitat for wildlife and plant species, such as the California tiger salamander (*Ambystoma californiense*), on the site.

3.3 Cumulative Development

A project's cumulative impacts are the possible environmental effects that may be cumulatively considerable when considered with other reasonably foreseeable projects (*CEQA Guidelines* Section 15065[a][3]). Cumulatively considerable impacts occur when the incremental effects of a particular project or program are significant when viewed in connection with the effects of other past, current, or probable future projects or programs that are not incorporated into baseline or existing conditions.

As defined in Section 15355 of the *CEQA Guidelines*, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. According to Section 15130 of the *CEQA Guidelines*, the discussion of cumulative impacts must reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact. Impacts that do not result in part from the project evaluated in an EIR need not be discussed.

The impact subsections of Section 4.0 of this SEIR discuss the potential cumulative environmental impacts resulting from the project in association with other planned, pending, and reasonably foreseeable projects in the vicinity of the project area. Other cumulative development in the northern part of Santa Barbara County includes 1,259 new residential units and 279 commercial residential units that are currently proposed, in process, approved, or under construction, in addition to 650,000 square feet of commercial and institutional development and approximately 50,000 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Table 3-1 lists the projects included in the cumulative impact analyses.

Table 3-1 Northern Santa Barbara County Cumulative Projects List

Project Name/APNs	Use Type	# of Units, Square Footage, or Misc.
Approved		
Stoker Development Plan 097-730-021	Residential	14 units
Pence Ranch Winery (Tier II) 099-220-013	Wineries	19,979 sq. ft.
Orcutt Union Plaza Phase II Amendment 105-121-006	Commercial	19 units and 16,880 sf
Terrace Villas Tract Map 14,770 129-300-001 to -020	Residential	16 units
Inn At Mattei's Tavern 135-064-002 135-064-011 135-064-020 135-064-021 135-073-003 135-073-005	Commercial	37,200 sf
The Golden Inn & Village 141-380-014	Institutional (schools, churches, etc.)	36,991 sf (Assisted living/memory care facility)
Larner Tier II Winery 137-100-001	Wineries	4,702 sf
Addamo Winery/Diamante [TM 14,616] 129-151-042	Residential	5 units
Santa Rosa Road Tier II Winery 083-170-015	Wineries	17,300 sf
Spear Winery Tier II	Wineries	19,775 sf
Pence Ranch Winery Development Plan Amendment 099-220-013	Wineries	
Sagebrush Junction 101-260-006 101-260-007	Commercial	5,600 sf and 8 units
Skytt Family Lot Split (TPM 14,745) 099-190-039 099-190-040	Parcel Map	4 units
Under Construction		
North County Jail General Plan Amendment 113-210-004 113-210-013	Institutional (schools, churches, etc.)	250,465 sf
Clark Avenue Commercial 103-750-038	Commercial	12,875 sf
Clubhouse Estates Tract Map (TM 14,629) 097-371-008	Residential	52 units

County of Santa Barbara
Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

Project Name/APNs	Use Type	# of Units, Square Footage, or Misc.
Rice Ranch Development Plan 101-010-013 101-020-004 105-140-016	Residential	725 units
Key Site 30 MR-O Apartments and Fine Grading 107-250-008	Residential	214 units
Nojoqui Ranch Tier II Winery 081-020-024	Commercial	12,500 sf
Key Site 30 Development Plan 107-250-008	Residential	69 units
In Process		
Sepulveda Building Materials Mining Rev to 90- Rp-001 083-060-009 083-060-015 083-070-010 083-070-018	Mines	2,000 tons/year
PCEC Solar Photovoltaic System Grading 101-020-074	Alternative Energy	20 acres of solar development
ERG Oil & Gas Pipeline Development Plan 129-080-006 129-080-007 129-090-016 129-090-021 129-090-032 129-090-033 129-090-037 129-090-038 129-100-014 129-100-015 129-100-025 129-100-034 129-100-035 129-100-036 129-180-007 129-180-008 129-180-013 129-180-015	Oil and Gas	2.9-mile oil pipeline
Key Site 3 Development Plan and Tract Map 129-151-026	Residential	125 units
Oasis General Plan Amendment 105-020-063 105-020-064	Commercial	15,333 sf

Project Name/APNs	Use Type	# of Units, Square Footage, or Misc.
Orcutt Gateway Retail Center (Key Site 2) 129-280-001	Commercial	49,921 sf
Key Site 3 New Multi-Family Residential Project	Residential	160 units
Granite Gardner Ranch Mining Revisions Project 137-270-015 137-270-032	Mines	250,000 tons/year
Bridlewood Development Plan Revision 135-051-019	Wineries	7,662 sf comm. and 1,595 sf ag. dev.
Orcutt Public Marketplace 129-120-024	Commercial	252 units and 211,264 sf
Source: County of Santa Barbara 2018		

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the project for the specific issue areas that were identified through the Notice of Preparation (NOP)/Scoping process as having the potential to result in significant effects.

“Significant effect” is defined by the *CEQA Guidelines* Section 15382 as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment but may be considered in determining whether the physical change is significant.”

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. Within the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the County, other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text, with the discussion of the effect and its significance following. Each bolded impact listing also contains a statement of the significance determination for the environmental impact as follows:

- **Class I. Significant and Unavoidable:** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Class II. Significant but Mitigable:** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings to be made under Section 15091 of the *CEQA Guidelines*.
- **Class III. Not Significant:** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures.
- **Class IV. Beneficial:** An effect that would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a listing of mitigation measures (if required) and the residual effects or level of significance remaining after the implementation of the measures. If the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the project in conjunction with other future development in the area.

Section 15065 of the *CEQA Guidelines* also requires the following specific issues be addressed as part of the environmental review for the project:

- The potential for the project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community,

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory;

- Project impacts that are individually limited, but cumulatively considerable. (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects); and
- Environmental effects of the project which will cause substantial adverse effects on human beings, either directly or indirectly.

Section 4.4, *Biological Resources*, describes the project’s potential effects of the project on plant and animal species populations, habitats, communities, and migratory patterns. Section 4.5, *Cultural and Tribal Cultural Resources*, describes the project’s potential effects on important historical and prehistorical cultural and tribal cultural resources on the project site. Potential adverse environmental effects to human beings are discussed in Section 4.3, *Air Quality*, Section 4.7, *Fire Protection*, Section 4.8, *Geologic Processes*, Section 4.10, *Land Use*, Section 4.11, *Noise*, and Section 4.14, *Water Resources and Flooding*. Furthermore, as discussed above, each environmental analysis section of the EIR concludes with a discussion of the project’s contribution to cumulative effects.

Also refer to the Executive Summary of this EIR, which summarizes all impacts and mitigation measures that apply to the project.

4.1 Aesthetics/Visual Resources

4.1.1 Setting

a. Project Site Setting

The proposed project site is located in the Santa Maria Valley at the base of the northern flanks of the east-west trending Casmalia Hills. The Santa Maria Valley is primarily a flat coastal plain bordered by the Nipomo Mesa and Sierra Madre Mountains on the north and east, by the Solomon Hills and Casmalia Hills on the south, and by the Guadalupe Dunes and Pacific Ocean on the west. Outside of the Santa Maria/Orcutt urban areas, typical views throughout the valley consist of long-range vistas of the surrounding mountains and foothills, open grazing lands and agricultural fields. The visual character of the region surrounding the Santa Maria and Orcutt urban areas is primarily rural in nature, characterized by such uses as grazing, open space, crude oil production, and cultivated agriculture, which is the dominant land use due to the valley's fertile alluvial soils and exceptional climate for crop production. The Solomon Hills southeast of Key Site 21 and the Orcutt Creek corridor, which runs through the Key Site 21, are heavily vegetated with a variety of trees and shrubs.

The City of Santa Maria and the community of Orcutt are more urban in nature. The character of urban development varies with denser, more urban areas in Old Town Orcutt and the downtown area of Santa Maria, surrounded by lower-density suburban development. Overall, the Santa Maria Valley is characterized as a low-density urban center, with supporting suburban residential development in unincorporated Orcutt.

U.S. Highway 101 (US-101) and State Route 1 (SR 1) provide the primary travel corridors in the Santa Maria Valley and Santa Maria/Orcutt area. Throughout Santa Barbara County, US-101 is eligible for designation as a scenic highway (Caltrans 2018). SR 1 has been designated as a scenic highway between US-101 at Las Cruces and SR 246 near Lompoc, but is not eligible for designation elsewhere in the County.

b. Scenic Views and Visual Character of the Project Site

The project site is located on Key Site 21 in the Orcutt Community Plan (OCP, County of Santa Barbara 2004) area in the community of Orcutt in northern Santa Barbara County. Key Site 21 is located on the south side of SR 1 between Solomon Road and Black Road, approximately 0.5 mile west of the SR 1/Solomon Road intersection. Key Site 21 is surrounded by Agricultural lands north of SR 1 and to the northwest and east. Key Site 22, north of the project site, is zoned for residential uses but is currently utilized for cultivated agriculture. Key Site 21 is bound to the south and southwest by open space and the Casmalia Hills, respectively. Key Site 21 includes a total of seven parcels, consisting of approximately 340.7 acres. The Rancho Maria Golf Club (RMGC), a 130-acre public 18-hole golf course, is located on the central parcel of Key Site 21. The project site consists of three undeveloped parcels totaling approximately 190 acres on the eastern and western portions of Key Site 21 at the outer edges of the golf course and between the fairways (refer to Figure 2-2 in Section 2, *Project Description*). The public golf course provides views of the Casmalia Hills immediately south of the site and is surrounded by undeveloped open space that provides scenic views. Refer to the existing site photos included in the visual simulations provided in Figure 4.1-1 through Figure 4.1-4, below. While the County does not specifically identify the Casmalia Hills as a scenic or visual resource, the Scenic Value maps in the County's Comprehensive Plan Open Space

Element illustrate the area immediately surrounding Key Site 21 as having moderate scenic value (Santa Barbara County 2009). In addition, the County's Comprehensive Plan Open Space Element identifies parks and recreational areas as significant visual resources with aesthetic value. As such, the RMGC public golf course is considered a visual resource and is visible from the SR 1 corridor.

Key Site 21 serves as a visual gateway to west Orcutt for eastbound travelers on SR 1. Views to the southeast across the site include expanses of rolling grasslands, agriculture, eucalyptus windrows along the central drainage, and the RMGC public golf course. The site currently has no street lighting, lighted nighttime activity, or structures that produce glare. Receptors in the immediate vicinity that may be sensitive to visual changes, increased levels of night lighting, or new sources of daytime glare, include existing single-family residences located north of SR 1 immediately across the roadway from Key Site 21, and travelers along SR 1.

c. Regulatory Setting

Santa Barbara County regulates the design of the built environment through its Comprehensive Plan and Land Use and Development Code (LUDC, County of Santa Barbara 2019). New development is required to be consistent with the Comprehensive Plan visual resource policies and development standards, as well as the applicable policies of the OCP. The Land Use and Open Space elements include policies pertaining to design of development and preservation of scenic resources. Pertinent policies from the Land Use Element that would be applied to this project include the following:

- Visual Resource Policy 1, which requires all commercial, industrial, and planned developments to submit a landscaping plan to the County for approval;
- Visual Resource Policy 2, which requires signage to be of a size, location and appearance so as to not detract from scenic areas or views from public roads and other viewing points;
- Visual Resource Policy 3, which requires utilities to be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service;
- Visual Resource Policy 4, which requires plans for development to minimize cut and fill operations; and
- Visual Resource Policy 5, which requires all development be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to a minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible.

The LUDC contains height and size limits, including guidelines for hillside development that regulate the design of future development, in some cases, through review of project plans by the regional (North County) Board of Architectural Review (NBAR). The NBAR has review authority over the northern portion of Santa Barbara County, including the project site, and the project will be subject to review by the NBAR. The purpose of the NBAR is to encourage "development which exemplifies the best professional design practices so as to enhance the visual quality of the environment, benefit surrounding property values, and prevent poor quality of design" (County of Santa Barbara 2018c). The NBAR reviews project plans and NBAR applications and evaluates the project design to ensure that impacts on visual resources are minimized. These evaluations include reviewing the structure's shape, scale, layout, location, and orientation; mechanical and electrical equipment integration; material, color, and composition; harmony with existing and proposed adjoining properties; and landscaping, signage, and lighting.

In addition, the OCP includes visual resources protection policies and development standards. Applicable OCP policies and development standards are listed below. Consistency with these and other OCP policies are addressed in Section 4.10, *Land Use*.

- Policy VIS-O-1, which requires the protection of significant scenic and visual natural resources in Orcutt to preserve the semi-rural character of the Orcutt Planning Area;
- DevStd VIS-O-1.1, which requires all development, including buildings, understories, fences, water tanks, and retaining walls, adjacent to natural open space areas be sited and designed to protect the visual character of these areas;
- Policy VIS-O-2, which requires the protection of prominent public view corridors and public viewsheds;
- DevStd VIS-O-2.1, which requires development to be sited and designed to minimize the disruption of important public view corridors and viewsheds through building orientation, minimization of grading on slopes, landscaping, and minimization of sound walls;
- Policy VIS-O-3, which requires parcels along primary entryways into Orcutt be developed in a manner that preserves the semi-rural character and provides an inviting and visually pleasing entrance to the community;
- DevStd VIS-O-3.1, which requires development be sited and designed with adequate street frontage building setbacks to allow an average 35-foot landscaped buffer containing sufficient plantings of major trees and shrubs to obscure parking areas from public view;
- DevStd VIS-O-3.3, which requires sound wall construction to be minimized through the alternative use of landscaped berms for noise reduction;
- DevStd VIS-O-3.4, which requires trash enclosures be located outside of public view to the maximum extent feasible;
- DevStd VIS-O-3.6, which requires developers of gateway parcels fund and construct median strips along designated gateway roads that include landscaping with low maintenance trees, shrubs, and groundcover designed to minimize the obstruction of views by motorists, bicyclists, and pedestrians;
- DevStd VIS-O-3.7, which requires development on gateway parcels be subject to review of the Santa Barbara County BAR and/or the Orcutt BAR;
- Policy VIS-O-4, which requires public and private stormwater systems be designed and maintained to be visually attractive;
- DevStd VIS-O-4.1, which requires basins be engineered so that perimeter fencing is minimized;
- Policy VIS-O-6, which requires outdoor lighting in Orcutt be designed and placed to minimize impacts on neighboring properties and the community in general;
- DevStd VIS-O-6.1, which requires low pressure sodium lighting or other alternative methods use for street lighting, parking lot lighting, and security lighting be investigated by the Public Works Department to reduce off-site impacts from night lighting;
- DevStd VIS-O-6.3, which requires night lighting fixtures adjacent to residential areas be of the minimum height and intensity required for security and safety purposes;
- DevStd KS21-4, which requires that open space areas designated in Figure KS21-1 of the Orcutt Community Plan (OCP) remain undeveloped open space, and that no development except trails or roadways to parcel 113-250-17 be permitted within the open space and no structures be permitted within 50 feet of the top of the creek bank;

- DevStd KS21-5, which requires that the developer dedicate an easement for and construct a public staging area and hiking trail along the east side of the site boundary;
- DevStd KS21-6, which requires development along SR 1 include installation and maintenance of an average 50-foot wide landscaped buffer along the highway with trees that would exceed 50 feet in height at maturity planted in clusters a maximum of every 100 feet. This development standard additionally requires that the buffer be landscaped with a sufficient density of trees and shrubs to screen views of all parking areas and to break up and screen views of development of SR 1;
- DevStd KS21-8, which requires all development be sited to preserve the natural landforms of the site and minimize grading; and
- DevStd KS21-11, which requires development to minimize visual impacts to SR 1 and the surrounding rural area using low-profile design, earth tone colors, and vegetated setbacks.

4.1.2 Previous Environmental Review

The OCP EIR examined potential impacts to visual and aesthetic resources that would result from development under the OCP. The OCP EIR determined that buildout of the OCP would result in significant and unavoidable (Class I) impacts to visual resources associated with conversion of open space and rural landscape to low density housing at full buildout of the OCP including Key Site 21. The OCP EIR also identified a Class I impact to visual resources associated with impacting the scenic view corridor on the southern side of SR 1 between Black Road and Solomon Road by interrupting the views of the rolling hills with low density housing.

The OCP EIR identified seven potentially significant visual impacts that pertain to development in the Orcutt Planning Area in general, including: transformation from semi-rural to urban land uses (VIS-1), increased night lighting (VIS-2), degradation of views along gateway roads to communities (VIS-5), removal of scenic natural resources (VIS-7), elimination of existing open space (VIS-14), expansion of urban activities into existing rural open space (VIS-17), and degradation of views to designated scenic corridors (VIS-18). The OCP EIR determined that implementation of feasible mitigation measures would reduce impacts associated with project siting and design to a less than significant level (Class II).

The mitigation measures included in the OCP EIR to reduce visual impacts associated with project design include adoption of an Open Space Overlay by the County (VIS-1a), adoption of an Open Space Plan by the County (VIS-1b), formation of a Landscape-Open Space Maintenance District by the County (VIS-1c), designing of lighting fixtures to direct light overflow away from open space areas (VIS-2), designing of public and private retention basins to permit additional uses including active and passive recreation in more developed areas and wildlife habitat in more rural and biologically sensitive areas (VIS-3), inclusion of measures to protect and enhance public views in the County's Land Use designations (VIS-5), and establishment of building design standards for development adjacent to open space (VIS-7). The OCP EIR also includes two mitigation measures intended to mitigate potentially significant impacts specifically at Key Site 21. These measures include KS21-VIS-1, which requires the Open Space Overlay to be applied to the area extending along the central drainage corridor and the drainage corridor crossing the southwest corner of the site, and KS21-VIS-2, which requires development of the site to include vegetated buffers of a minimum of 50 feet in width along SR 1 that include trees exceeding 50 feet in height at maturity in clusters at a maximum of every 100 feet.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Assessing the visual impacts of a project involves two steps. First, the visual resources of the project site must be evaluated. Important factors in this evaluation include the physical attributes of the site, its visibility, and its uniqueness. The visibility of an area refers to the public's ability to access views of and through that area. The Santa Barbara County Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2018b) identifies four types of areas as especially important in terms of visibility: coastal areas, mountainous areas, the urban fringe, and travel corridors. Next, the potential impact of the project on visual resources located on-site and on views in the project vicinity which may be partially or fully obstructed by the project must be determined. Determining compliance with local and State policies regarding visual resources is also an important part of visual impact assessment. All views discussed herein refer to public views, not private views.

The County's Comprehensive Plan Open Space Element (Santa Barbara County 2009) identifies the following potentially significant visual resources:

- Scenic highway corridors;
- Parks and recreational areas;
- Views of coastal bluffs, streams, lakes, estuaries, rivers, watersheds, mountains, and cultural resource sites; and
- Scenic areas.

Significance Thresholds

Appendix G of the CEQA guidelines considers a project to have a significant visual impact if the project would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
3. Substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The following questions from the Santa Barbara County Environmental Thresholds and Guidelines Manual are intended to provide information to address the Appendix G criteria in the CEQA Guidelines. Affirmative answers to the following questions indicate potentially significant impacts to visual resources (Santa Barbara County 2009).

- 1a. Does the project site have significant visual resources by virtue of surface waters, vegetation, elevation, slope, or other natural or man-made features which are publicly visible?
- 1b. If so, does the proposed project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?

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- 2a. Does the project have the potential to impact visual resources of the Coastal Zone or other visually important area (i.e., mountainous area, public park, urban fringe, or scenic travel corridor)?
- 2b. If so, does the project have the potential to conflict with the policies set forth in the Coastal Land Use Plan, the Comprehensive Plan, or any applicable community plan to protect the identified views?
- 3. Does the project have the potential to create a significantly adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

b. Project Impacts

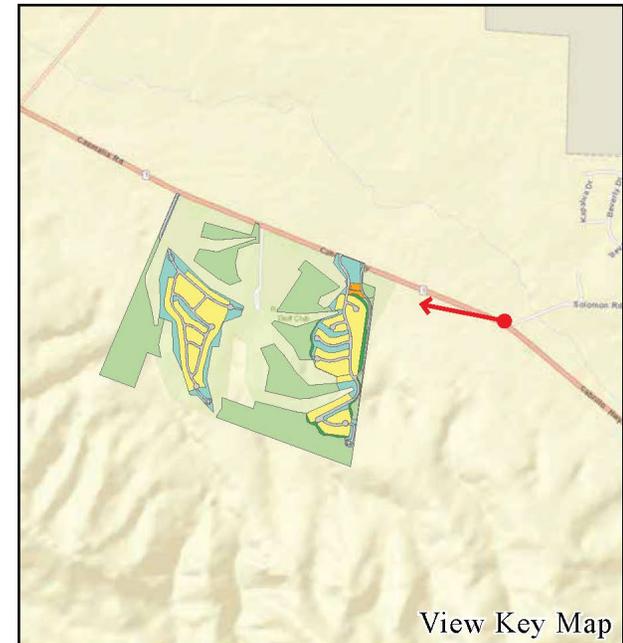
Threshold:	Would the project have a substantial adverse effect on a scenic vista?
Threshold:	Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-1 THE PROJECT WOULD ALTER VIEWS FROM THE RANCHO MARIA GOLF CLUB PUBLIC GOLF COURSE AND STATE ROUTE 1 BUT WOULD NOT SUBSTANTIALLY IMPACT NEARBY SCENIC VISTAS OR DAMAGE SCENIC RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The project would alter views of the Casmalia Hills and the surrounding scenic vistas from the RMGC public golf course and SR 1 by developing residential units in existing viewsheds that are currently dominated by open space. The Casmalia Hills, which are the dominant visual feature in the project site vicinity, present a gradual climb in elevation leading away to the south from Key Site 21. Views of the hills from SR 1 and the public golf course are occasionally limited by the scattered layout of trees varying in height and species.

The nearest single family residences to SR 1 would be approximately 650 feet (in the Hidden Canyon Neighborhood) to 1,200 feet (in the Willow Creek Neighborhood) from SR 1. The nearest structures to the public golf course would be adjacent to the existing fairways. The project would result in approximately 80 feet of roadway and easement development where the Willow Creek neighborhood connects with SR 1 and approximately 500 feet of roadway, easement, trail, and retention basin development where the Hidden Canyon neighborhood connects with SR 1. The Specific Plan area would include approximately 97 acres of undisturbed open space and approximately 30 acres of managed open space with landscaped areas, trailhead, trails, and fuel modification areas. The project also includes a 200-foot-wide agricultural buffer along the eastern and western edges of the project site where residential development would border existing cultivated agricultural fields and a 100-foot-wide buffer along the eastern, western, and southern edges of the Specific Plan area where residential development would border existing grazing land. Figure 4.1-1 through Figure 4.1-4 show public views of Key Site 21 as seen from SR 1, including simulated views of the project site with the proposed development with and without planned landscaping. Figure 4.1-5 through Figure 4.1-8 show views of Key Site 21 as seen from the RMGC public golf course, including simulated views of the project site with the proposed development with and without planned landscaping.

Figure 4.1-1 View 1 Toward the Proposed Hidden Canyon Neighborhood from SR 1 Looking Southeast



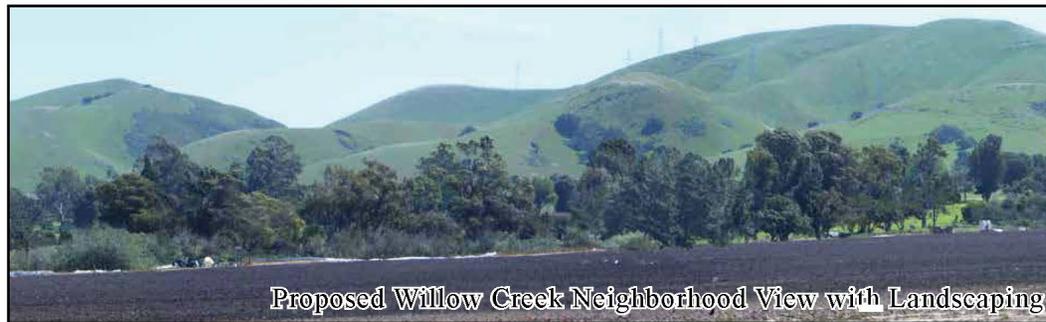
Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentation Report, 2018.

Figure 4.1-2 View 2 Toward the Proposed Hidden Canyon Neighborhood from SR 1 Looking Southeast



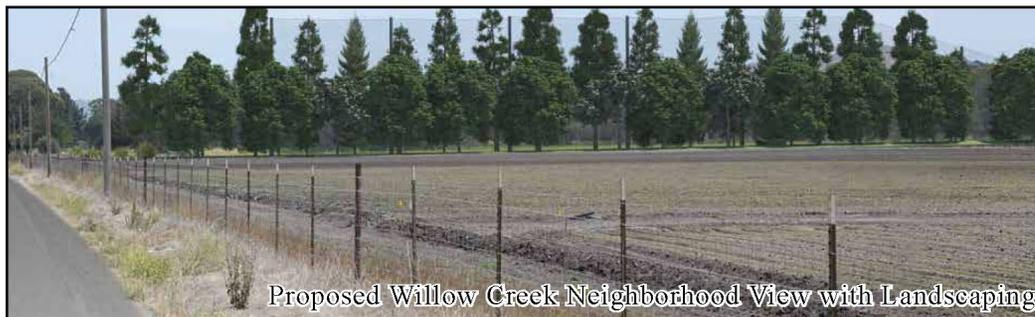
Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentation Report, 2018.

Figure 4.1-3 View 1 Toward the Proposed Willow Creeks Neighborhood from SR 1 Looking Southwest



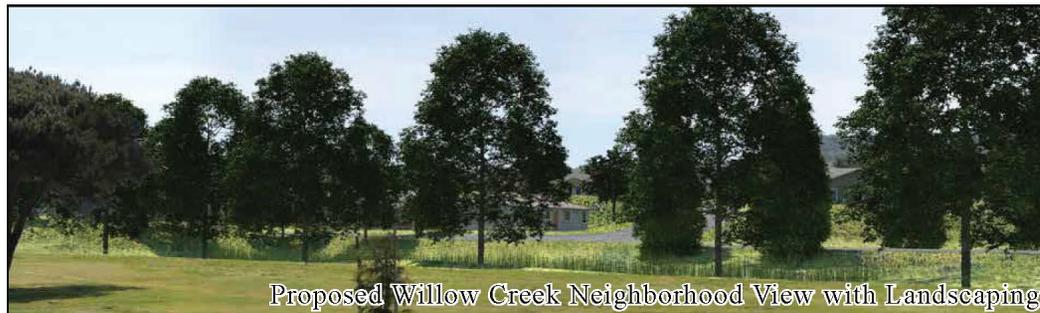
Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentation Report, 2018.

Figure 4.1-4 View 2 Toward the Proposed Willow Creeks Neighborhood from SR 1 Looking Southwest



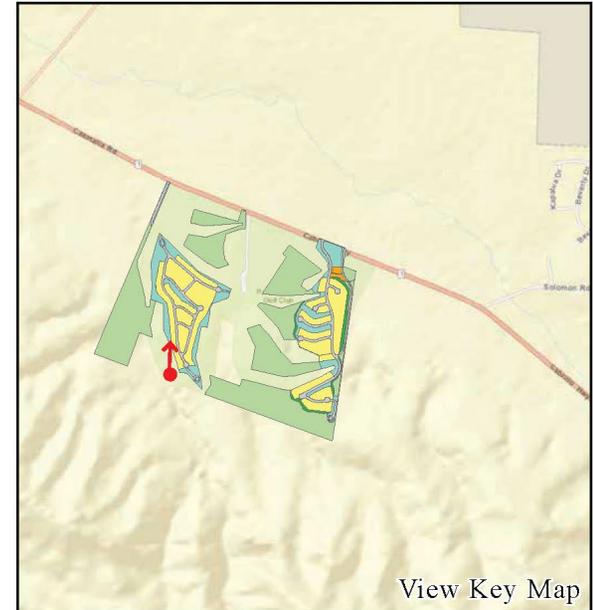
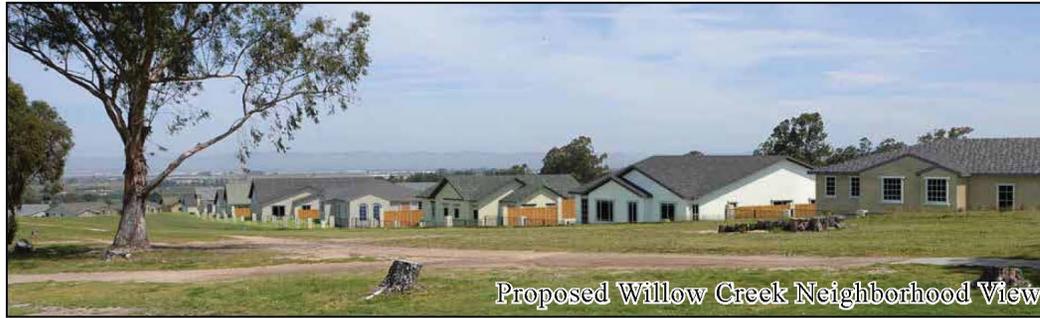
Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentation Report, 2018.

Figure 4.1-5 View Toward the Proposed Hidden Canyon Neighborhood from Public Golf Course Hole 6 Looking East



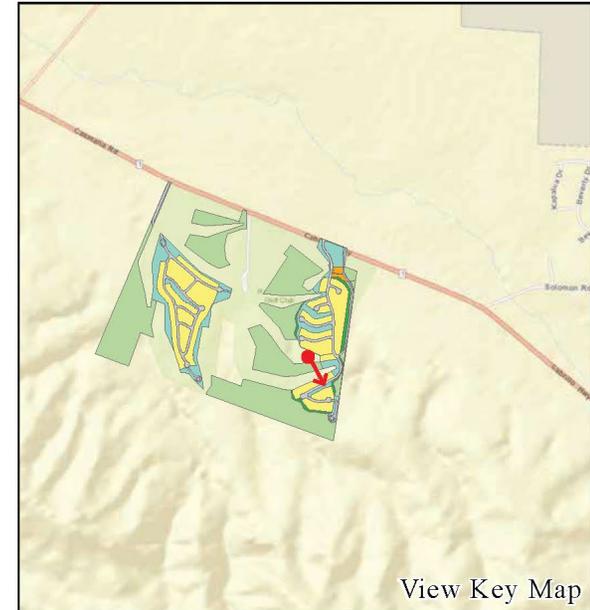
Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentation Report, 2018.

Figure 4.1-6 View Toward the Proposed Hidden Canyon Neighborhood from Public Golf Course Hole 6 Looking Southeast



Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentation Report, 2018.

Figure 4.1-7 View Toward the Proposed Willow Creeks Neighborhood from Public Golf Course Hole 13 Looking North



Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentation Report, 2018.

Figure 4.1-8 View Toward the Proposed Willow Creeks Neighborhood from Public Golf Course Hole 18 Looking South



Source: Created by Videoscapes for the Neighborhoods Specific Plan Environmental Documentaton Report, 2018.

While the County does not specifically identify the Casmalia Hills as a scenic or visual resource, the Scenic Value maps in the County's Comprehensive Plan Open Space Element illustrate the area immediately surrounding Key Site 21 as having moderate scenic value (Santa Barbara County 2009).

As discussed in Section 4.1.3(a), *Methodology and Significance Thresholds*, the County's Comprehensive Plan Open Space Element identifies parks and recreational areas as significant visual resources with aesthetic value. As such, the RMGC public golf course is identified by the County as a visual resource and is visible from the SR 1 corridor. As shown in Figure 4.1-1 through Figure 4.1-4, motorists traveling along SR 1 have views beyond Key Site 21 of the Casmalia Hills to the south. The Casmalia Hills would remain the dominant background visual feature in the majority of views from SR 1 with development of the proposed residences on the project site. The proposed residences would be visible in the middle ground from vantage points along SR 1, with higher visibility from westbound views, with eastbound views being substantially screened by existing and planned buffer trees. As shown in Figure 4.1-4, the project also includes safety netting along the western primary access road to the Willow Creek Neighborhood, which would be visible from vantage points along SR 1. The project includes landscaping that would screen views of the proposed safety netting. Although SR 1 is not a designated or eligible State scenic highway, project development would substantially impact scenic vistas or damage scenic resources visible from the SR 1 corridor.

As shown in Figure 4.1-5 through Figure 4.1-8, users of the public golf course have limited views beyond Key Site 21 of the Casmalia Hills to the south, with existing on-site trees and landscaping providing some screening of existing views through the site. The proposed residences would be visible in the foreground and middle ground from vantage points on the public golf course, with higher visibility of structures in the Willow Creek Neighborhood. The proposed residential structures would be limited to a maximum building height of 35 feet, with a single-story restriction on lots immediately adjacent to the golf course fairway and would generally not obstruct the horizon line of the Casmalia Hills. Proposed landscaping would provide screening for views of the proposed residential structures from the public golf course. Overall, the proposed project would not substantially obstruct scenic vistas or damage scenic resources for motorists on SR 1 or users of the public golf course.

Mitigation Measures

No mitigation is required because the project would not have a substantial adverse effect on a scenic vista or damage scenic resources. This impact would be less than significant (Class III).

Threshold: Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
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Impact AES-2 THE PROJECT WOULD CONVERT SEMI-RURAL LAND USES TO URBAN LAND USES, ALTERING THE VISUAL QUALITY AND OPEN SPACE CHARACTER OF THE PROJECT SITE, WHICH SERVES AS A GATEWAY PARCEL TO WEST ORCUTT. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE (CLASS I).

The existing visual character of the project site is semi-rural. As discussed in Section 4.1.1(b), *Scenic Views and Visual Character of the Project Site*, Key Site 21 serves as a visual gateway to west Orcutt for southbound travelers on SR 1. As discussed in Section 4.1.3(a), *Methodology and Significance Thresholds*, the County's Comprehensive Plan Open Space Element identifies parks and recreational areas as significant visual resources with aesthetic value. The RMGC public golf course is visible from

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the SR 1 corridor and acts as a foreground element to unobstructed background views of the Casmalia Hills. The project would convert 189 acres of open space within Key Site 21 to residential development, substantially altering the visual quality and character of these visual resources by converting existing open space to low density residential housing.

As discussed in Section 4.1.2, Previous Environmental Review, the OCP EIR identified residential buildout of Key Site 21 as a substantial change in the open space character of the project site, particularly experienced from public view corridors, resulting in a significant and unavoidable impact. The OCP assumed buildout of 150 units, whereas the proposed project would result in 146 units.

The proposed project would include approximately 97 acres of undisturbed open space and approximately 30 acres of managed open space with landscaped areas, trailhead, public trails, and fuel modification areas. The project also includes a 200-foot-wide agricultural buffer along the eastern and western edges of the project site where residential development would border existing cultivated agricultural fields and a 100-foot-wide buffer along the eastern, western, and southern edges of the Specific Plan area where residential development would border existing grazing land. The agricultural buffers and open space would offer a transition from rural to urban visual character.

The proposed project includes the development of three retention basins. One basin would be located along the Hidden Canyon neighborhood's connection with SR 1, and two basins would be located on either side of the western access point to the Willow Creek neighborhood. Development of these retention basins would be required to comply with OCP Policy VIS-O-4 and DevStd VIS-O-4.1, which require public and private stormwater systems be designed and maintained to be visually attractive and that basins be engineered to minimize perimeter fencing. The Specific Plan Design Guidelines for the proposed project identify that these basins would be landscaped with native grasses and sedges and would not be fenced.

The reduced residential buildout of the project in comparison to the OCP, combined with the proposed open space areas and agricultural buffers included in the project, would incrementally reduce potential impacts to the visual quality and open space character of the site. Nonetheless, buildout of the project would convert 189 acres of existing open space to low density residential housing. Overall, the change in open space character resulting from buildout of the project would be potentially significant, consistent with the impacts identified in the OCP EIR.

Mitigation Measures

The project would be required to implement OCP EIR Mitigation Measures VIS-3 and VIS-4. These measures shall be implemented through the following mitigation measures:

AES-2(a) Requirements for Development Near Open Space Overlay

All new development adjacent to areas within the open space overlay shall be sited and designed in such a manner to protect and enhance the visual character of the overlay area through use of landscape buffers, shielding of night lighting, screening of parking areas, and unit orientation. In semi-rural areas, natural building materials and colors compatible with surrounding terrain (i.e., earth tones and non-reflective paints) shall be used on exterior surfaces of all structures, including water tanks and fences. Understories and retaining walls higher than six (6) feet shall be in tones compatible with surrounding terrain using textured materials or construction methods which create

a textured effect. Retaining walls shall be landscaped to provide screening from adjacent open space areas, using native species where appropriate.

Plan Requirements and Timing. These requirements shall be reflected on building plans for review by Planning & Development prior to zoning clearance issuance.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Building inspectors and Planning & Development compliance monitoring staff shall ensure compliance in the field.

AES-2(b) Retention Basin Design (Implements OCP EIR Mitigation VIS-3)

All public and private retention basins shall be designed to permit additional uses including active and passive recreation in more developed areas and wildlife habitat in more rural and biologically sensitive areas. The use of perimeter fencing shall be avoided to the maximum extent feasible. Where required, perimeter fencing shall be of a decorative nature in urban areas or designed to minimize interference with wildlife in more undeveloped areas. Perimeter landscaping of basins in urban areas shall consist of low maintenance trees and shrubs, as well as turf, etc. to accommodate recreational uses. Native trees, shrubs and groundcover shall be used within basins in undeveloped areas. Maintenance shall be determined through implementation of the Landscape-Open Space Maintenance District.

Plan Requirements and Timing. These requirements shall be reflected on landscaping plans for review by Planning & Development prior to zoning clearance issuance.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Planning & Development compliance monitoring staff shall ensure compliance in the field.

AES-2(c) Median and Landscape Design (Implements OCP EIR Mitigation VIS-4)

All medians and strips designated for landscaping shall utilize drought-tolerant species to the maximum extent feasible, consisting of low maintenance trees, shrubs, and groundcover which do not obstruct views [for] motorists, bicyclists, and pedestrians. Maintenance shall be determined through implementation of the Landscape-Open Space Maintenance District.

Plan Requirements and Timing. These requirements shall be reflected on landscaping plans for review by Planning & Development prior to zoning clearance issuance.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Planning & Development compliance monitoring staff shall ensure compliance in the field.

AES-2(d) Infrastructure Screening (Implements OCP EIR Mitigation VIS-5)

All proposed infrastructure visible from gateway roads, including the Hidden Canyon and Willow Creek Neighborhood driveways, shall be screened from viewers passing on SR 1.

Plan Requirements and Timing. These requirements shall be reflected on landscaping and building plans for review by Planning & Development prior to zoning clearance issuance.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Planning & Development compliance monitoring staff shall ensure compliance in the field.

Significance After Mitigation

Compliance with these required mitigation measures would reduce potential impacts to the project site's visual character to the maximum extent feasible. Nevertheless, the project would result in the elimination and fragmentation of existing open space, alteration of identified scenic resources, and conversion of semi-rural land uses to urban land uses. No additional mitigation is available that would prevent the conversion of semi-rural land uses to urban land uses. Therefore, this impact would remain significant and unavoidable (Class I), consistent with the impact identified in the OCP EIR.

Threshold: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
--

Impact AES-3 THE PROJECT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE. HOWEVER, IMPLEMENTATION OF OCP DEVELOPMENT STANDARDS AND OCP EIR MITIGATION MEASURE VIS-2 WOULD REDUCE THIS IMPACT TO A LESS THAN SIGNIFICANT LEVEL (CLASS II).

The proposed project would introduce ambient nighttime lighting on undeveloped portions of the project site. Additional lighting from streetlights, entry lights, interior lights, and landscape lighting have the potential to disrupt views of the night sky, impact low density residential development located north of the project site, and impact views for motorists on SR 1. In addition, new sources of glare would be introduced as a result of building materials, such as windows and reflective roofing materials, and an increase in vehicle trips to and from the project site. Consistent with the Specific Plan's Design Guidelines, roofing materials would be of concrete tile, fire flat or barrel clay tiles, slate, or triple laminate (Class A firing rating materials).

Project lighting is proposed to comply with the ordinance requirements of the International Dark Sky Association, which provides guidelines for outdoor lighting depending on specific uses and conditions. Consistent with the Specific Plan's Community Lighting Plan, street lighting would be shielded so that it does not intrude into residences or open space areas. Neighborhood entry lighting would be limited to the immediate vicinity of the entry and associated directional signage for the proposed neighborhoods. No nighttime trail lighting is proposed.

The proposed project would be required to comply with applicable OCP policies and development standards to reduce potential visual impacts from lighting and glare, including DevStd-VIS-O-1.1, DevStd VIS-O-6.1 through 6.3, which require outdoor lighting in Orcutt be designed and placed in a manner that minimizes impacts on neighboring properties and the community and the use of alternative methods for street lighting, parking lot lighting, and security lighting to reduce off-site impacts from night lighting. Moreover, the OCP EIR identified Mitigation Measure VIS-2 as sufficient supplementary mitigation for lighting and glare impacts. OCP EIR Mitigation Measure VIS-2 requires all development adjacent to areas with the Open Space Overlay, including the project site, to design and construct exterior lighting in a manner to direct light overflow away from open space areas. According to OCP EIR Mitigation Measure VIS-2, essential security lighting within or adjacent to open space areas shall be hooded or shielded to minimize the spread of light and night lighting shall not be permitted within or immediately adjacent to designated wildlife corridor areas unless essential for public safety. The OCP EIR concluded that implementation of the OCP policies and development standards and OCP EIR Mitigation Measure VIS-2 would be sufficient to reduce this potentially significant impact to less than significant (Class II).

Mitigation Measures

AES-3 Exterior Lighting Requirements (Implements OCP EIR Mitigation VIS-2)

In all developments adjacent to the designated Open Space areas, exterior lighting shall be designed and constructed in such a manner to direct light overflow away from the open space areas. All lighting shall be dark sky compliant to reduce impacts on nocturnal ecosystems and the night sky. All lighting fixtures shall be fully shielded and fully cut-off. Lighting shall be of low intensity, the minimum wattage required and of minimum height. Night lighting shall not be permitted within or immediately adjacent to designated wildlife corridor areas unless essential for public safety. All exterior lighting is to be turned off or dimmed after 10:00 p.m.

Plan Requirements and Timing. The owner/applicant shall develop a lighting plan for Board of Architectural Review and Planning and Development approval incorporating the above requirements. The lighting plan shall show the locations and height of all exterior lighting fixtures and the direction of light being cast by each fixture. This requirement shall be reflected on grading, zoning and building plans, subject to review and approval by the Planning and Development Department. Planning and Development and the Board of Architectural Review shall review the lighting plan for compliance with this condition prior to zoning clearance issuance. Lighting shall be installed in compliance with this condition prior to final building inspection clearance.

Monitoring. Planning and Development permit compliance and building and safety staff shall site inspect upon installation to ensure that exterior lighting fixtures have been installed consistent with their depiction and specifications on the final lighting plan.

Significance After Mitigation

Implementation of Mitigation Measure AES-3, in addition to Mitigation Measures AES-2 (which includes lighting and glare requirements for development near the open space overlay) and compliance with OCP development standards would reduce this impact to less than significant (Class II).

c. Cumulative Impacts

Cumulative development in the Orcutt area would gradually alter the visual makeup of the vicinity from rural, semi-rural, or suburban to a more suburban or urban condition. As discussed in Section 3.0, *Environmental Setting*, 1,260 residential units and 280 units of commercial development are currently proposed, in process, approved, or under construction in the Santa Maria Valley. Additional development would be located on infill sites throughout the community, as well as large tracts of undeveloped open spaces along the area's urban perimeters. Although much of the new development will generally be of a type and intensity similar to existing urban uses, cumulative development in the Orcutt area will result in a perceptible transformation of the visual character of the community through increased urbanization that would be cumulatively significant. The proposed project would result in substantial degradation of scenic resources in the Orcutt area through the conversion of semi-rural land to urban land. As a result, the project's contribution to cumulative conversion of semi-rural land to urban land would be cumulatively considerable (Class I).

The OCP EIR identified significant impacts to the scenic view corridor on the southern side of SR 1 between Black Road and Solomon Road by interrupting the views of the rolling hills with low density housing. However, the project would not substantially obstruct scenic vistas or damage scenic resources from SR 1, and potential impacts from other projects in the Santa Maria Valley would be

Willow Creek and Hidden Canyon Residential Project (Key Site 21)

evaluated on a case-by-case basis based on conditions and views associated with individual sites. Cumulative impacts to scenic vistas and scenic resources would be adverse, but less than significant (Class III).

The OCP EIR included mitigation to address potential impacts associated with new sources of lighting and glare. The project would not substantially contribute to significant cumulative impacts related to the introduction of new sources of light and glare with incorporation of Mitigation Measure AES-3, which implements OCP EIR Mitigation VIS-2. Potential cumulative impacts from other projects in the Santa Maria Valley would be evaluated on a case-by-case basis based on conditions and views associated with individual sites and the planned design of specific projects. Cumulative impacts associated with new sources of lighting and glare would be less than significant with mitigation (Class II).

4.2 Agricultural Resources

4.2.1 Setting

a. Regional Agricultural Resources

In 2017, agriculture was the largest industry in Santa Barbara County by revenue. Agricultural operations in the County provide 25,370 jobs (Santa Barbara County Agricultural Production Report 2017). Table 4.2-1 summarizes agricultural productivity by crop type in Santa Barbara County for 2017, including harvested acreage and total gross values.

Table 4.2-1 Santa Barbara County Agricultural Summary

Crop Types	Harvested Area	Total Gross Value
Vegetable Crops	66,587 acres	\$588,662,957
Fruit and Nut Crops	17,956 acres	\$605,447,793
Seed Crops	1,401 acres	\$7,916,288
Wine Grapes	21,572 acres	\$146,129,595
Cut Flowers	807 acres/ 9,023,517 greenhouse square feet	\$85,548,067
Cut Foliage	6,001 greenhouse square feet	\$101,397
Nursery Products	373 acres/ 5,667,132 greenhouse square feet	\$100,654,079
Livestock	n/a	36,807,327
Dairy and Apiary	n/a	\$7,430,595
Rangeland and Field Crops	584,855 acres	\$11,652,493
Total	693,551 acres/ 14,696,650 greenhouse square feet	\$1,590,350,591

Source: Santa Barbara County 2017

Rising land values and cost of inputs (water, fuel, fertilizer, etc.) have contributed to an increase in the conversion of agricultural land to non-agricultural uses throughout California as well as the intensification of agricultural land uses, whereby lower value products are replaced by high-value crops (e.g., grazing or dry farming replaced with row crops, orchards, or vineyards). Between 1984 and 2012, nearly 1.4 million acres of agricultural land in California were converted to non-agricultural purposes. From the 2010 to 2012, the State experienced no net loss or gain of farmland due to conversion. Consistent with the statewide trend relative to the conversion of farmland, the County experienced no net loss or gain of farmland between 2010 and 2012 (California Department of Conservation 2015).

b. Important Farmland

The Department of Conservation (DOC) Division of Land Resource Protection implements the Farmland Mapping and Monitoring Program (FMMP), which identifies the suitability of land for

agricultural production. The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of Important Farmlands and consistent and impartial data to decision-makers for use in assessing status, reviewing trends, and planning for the future of California's agricultural land resources. The program does not necessarily reflect local General Plan actions, urban needs, changing economic conditions, proximity to market, and other factors, which may be taken into consideration when government considers agricultural land use policies. The FMMP produces Important Farmland Maps, which depict resource quality (soils), irrigation status, and land use information.

The DOC divides land into seven general categories, with Important Farmland comprising the following four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The remaining three FMMP categories include Grazing Lands, Urban and Built-up Land, and Other Lands. The best quality land is Prime Farmland.

Figure 4.2-1 shows the mapped FMMP designations on Key Site 21. As shown on Figure 4.2-1, the project site consists of Grazing Land and Urban and Built-up Land. The remaining FMMP designations, including the Important Farmland designations, do not occur on the project site.

c. Agricultural Resources in the Project Vicinity

The project site is undeveloped and is designated Planned Development (PD), 150 units maximum/Visitor Serving Commercial. The project site is zoned Planned Residential Development (PRD). The entire Key Site 21, including the project site, is designated as an Existing Developed Rural Neighborhood (EDRN) in the Orcutt Community Plan (OCP, County of Santa Barbara 2004). Although an approximately 40-acre portion of the project site (APN 113-250-016) was previously used for row crop agriculture and cattle grazing, no agricultural uses or operations have occurred on the site since 2005.

Land uses and zoning surrounding Key Site 21 and the project site include:

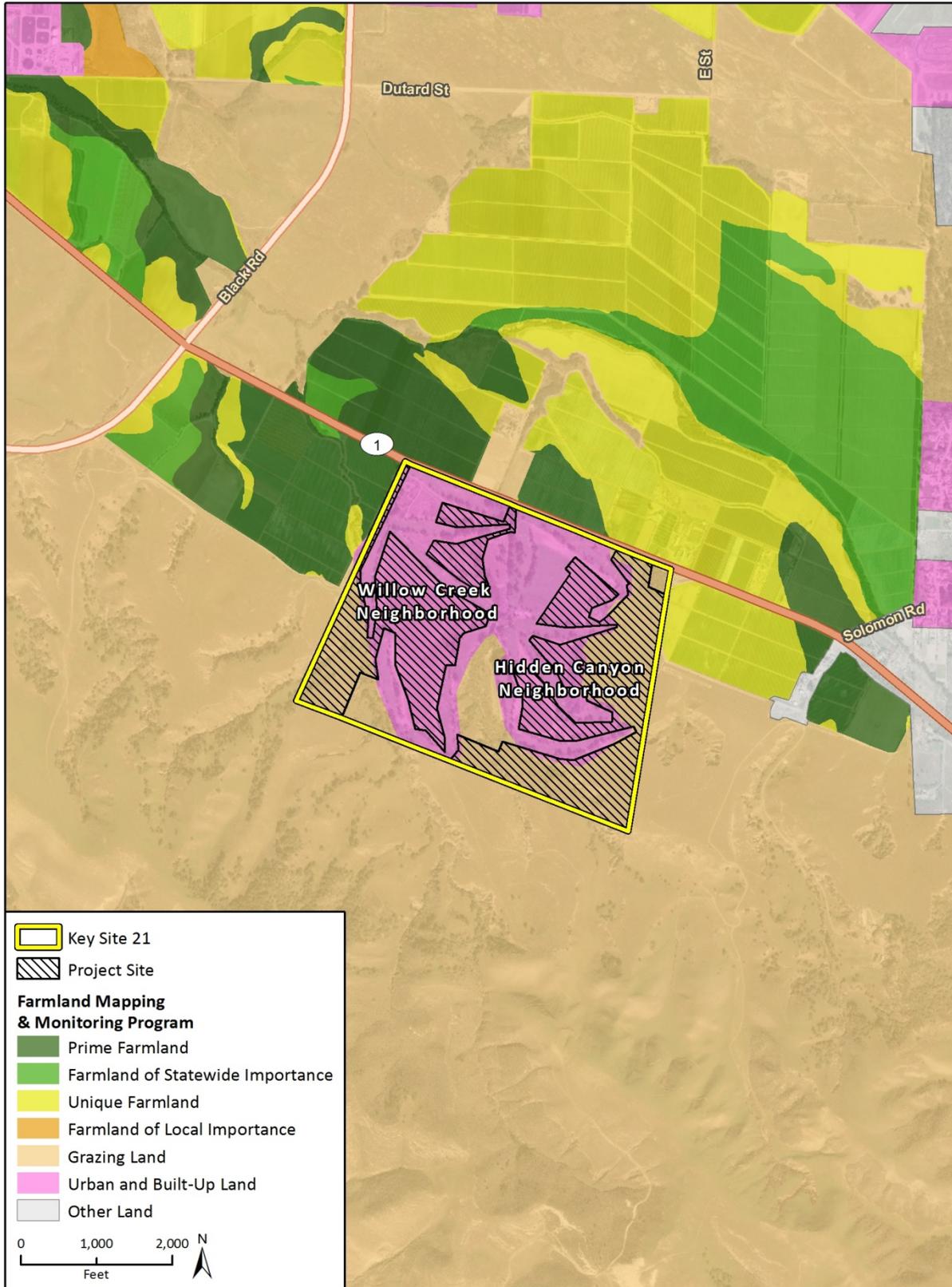
- **North:** Cultivated Agriculture/RR-20 (Residential Ranchette)
- **South:** Vacant, Grazing/RMZ-320 (Resource Management)
- **East:** Cultivated Agriculture, Grazing, Vacant/AG-II-320
- **West:** Cultivated Agriculture, grazing, vacant/AG-II-320

d. Soil Quality

The Natural Resource Conservation Service (NRCS) has developed a land capability classification system to describe soils types, their physical characteristics and limitations, and their suitability for agriculture and other uses. The NRCS groups soils according to their suitability for most kinds of field crops. The capability class is designated by Roman numerals I through VIII. The numbers indicate progressively greater limitations and narrower choices for practical use as follows:

- **Classes I and II** – Soils with few limitations that restrict their use for agriculture are placed in Capability Classes I and II and are considered “prime agricultural soils” because almost all crops can be grown successfully on these soils.
- **Class III and IV** – Soils with agricultural limitations, which would affect management or choice of crop, are placed in Capability Classes III and IV either because fewer crops can be grown on these soils or special conservation and production measures are required.

Figure 4.2-1 Farmland Mapping and Monitoring Program Map



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 Additional data provided by California Department of Conservation, 2016.

Fig 4.2-1 FMMMP

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

- **Class V** – Soils with little or no hazard of erosion but have other limitations, impractical to remove, that limit their use to pasture, range, forestland, or wildlife food and cover. There are no soils of Class V in the County.
- **Class VI and VII** – Soils that fall into these classes are suited primarily for rangeland.
- **Class VIII** – Soils and landforms that are unsuitable for agricultural use are placed in Class VIII.

Figure 4.7-1 in Section 4.8, *Geologic Processes*, shows the soil types on Key Site 21 and the project site. Table 4.2-2 shows the approximate area of each soil type on Key Site 21 and the project site as well as the capability classifications of these soils (only the irrigated capability class is shown). Soils that meet the criteria for Class I or II are considered prime agricultural soils, if irrigated, and are shown in bold.

Table 4.2-2 Land Capability Class of Soils on Key Site 21 and the Project Site

Name	Map Name	Land Capability Class	Acres on Key Site 21	Acres on the Project Site
Betteravia loamy sand, 2-9 % slopes	BmC	IV	4.7	2.7
Betteravia loamy sand, dark variant, 0-5 % slopes, eroded	BnB2	III	40.3	7.7
Botella loam, 2-15 % slopes, eroded	BoD2	III	6.3	6.2
Botella clay loam, 2-9 % slopes, MLRA 14	BtC	II	12.9	3.7
Chamise shaly loam, 15-45 % slopes	ChF	VI	6.8	6.2
Chamise shaly loam, 30-75 % slopes, eroded	ChG2	VII	0.3	0.3
Corralitos sand, 0-2 % slopes	CtA	IV	17.1	11.9
Corralitos loamy sand, 2-9 % slopes	CuC	III	22.4	12.0
Corralitos loamy sand, 9-15 % slopes	CuD	III	5.1	3.3
Elder sandy loam, 2-9 % slopes, eroded	EdC2	II	15.6	3.6
Gullied land	GuE	VIII	29.9	17.2
Pleasanton sandy loam, 2-9 % slopes	PnC	II	21.1	9.9
Rough broken land	RuG	VII	0.2	0.2
Tierra sandy loam, 2-9 % slopes, MLRA 14	TnC	III	4.4	4.4
Tierra sandy loam, 9-15 % slopes, eroded	TnD2	IV	2.9	2.8
Tierra loam, 5-30 % slopes, severely eroded	TrE3	VII	146.2	94.0
Total			336.2	186.1

Note: Areas are approximate based on map data and total may vary slightly from total acreage of Key Site 21.

Soils that meet the criteria for Class I or II are considered prime agricultural soils, if irrigated, and are shown in **bold**.

As shown in Table 4.2-2, approximately 50 acres on Key Site 21 and approximately 17 acres on the project site include Class II soils. The soils on the project site are not irrigated and do not qualify as prime agricultural soils. The predominant soil on Key Site 21 and the project site is Tierra loam (Class VII).

e. Regulatory Setting

Land Conservation Act

The California Land Conservation Act of 1965, also known as the Williamson Act (California Administrative Code Section 51200 et seq.), creates a legal arrangement whereby private landowners contract with local governments to voluntarily restrict land to agricultural and open space uses. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year.

Existing Williamson Act contracted lands in the project site vicinity are shown in Figure 4.2-2. There are no Williamson Act contracted lands on Key Site 21.

Agricultural Nuisances and Consumer Information Ordinance

Chapter 3, Article V, Section 3-23 of the County Code is the County's "Right-to-Farm" Ordinance. The purpose of the ordinance is to protect agricultural land uses on land designated for agriculture from conflicts with non-agricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation. Under this ordinance, no agricultural activity, operation or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, is to be considered a public or private nuisance, due to any changed condition in or about the locality, after the same has been in operation for more than three years if it was not a nuisance at the time it began.

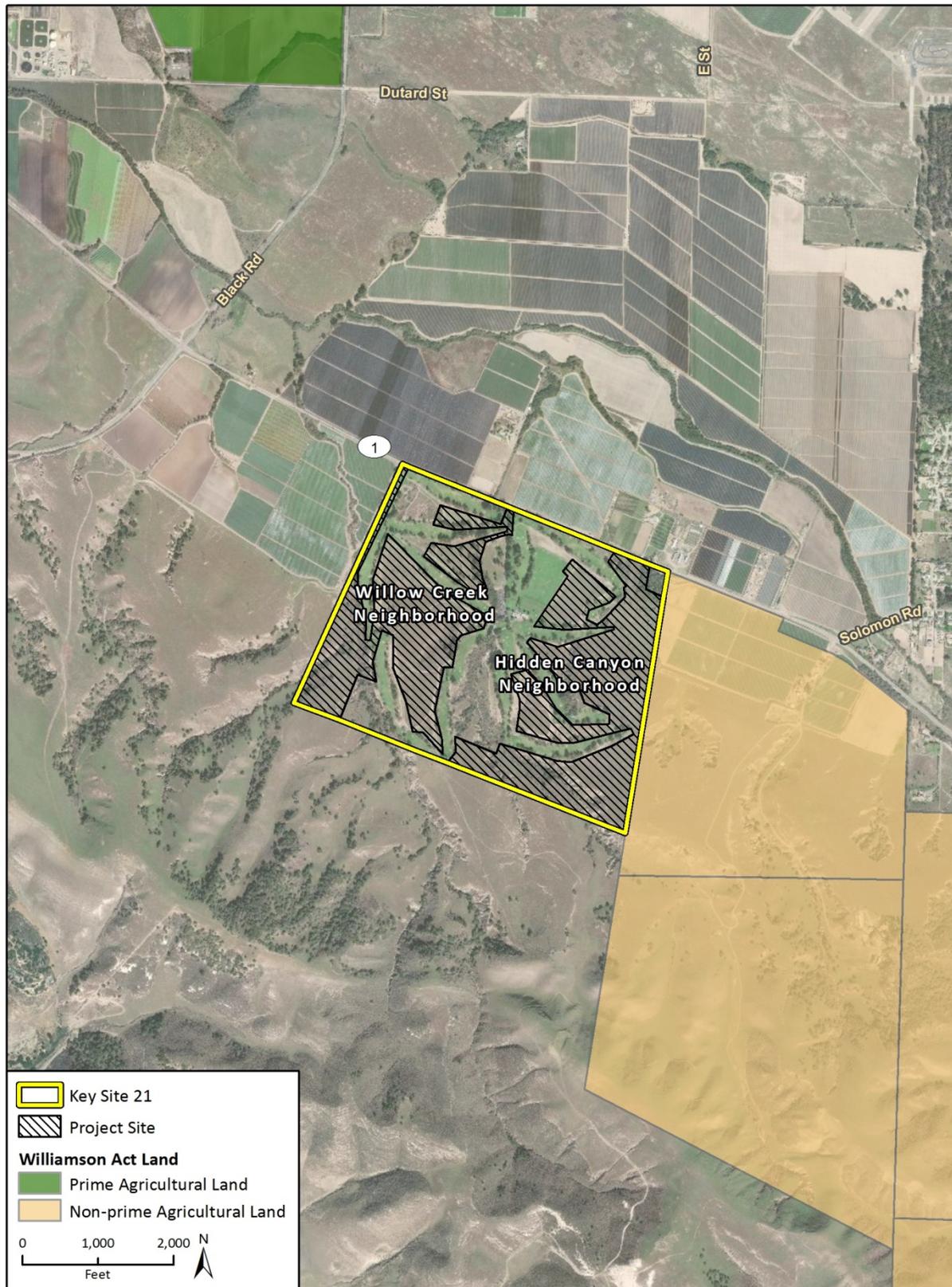
The Right to Farm Ordinance also requires purchasers and residents of property adjacent to or near agricultural operations be advised of the inherent potential problems associated with such purchase or residence including, but not limited to, the sounds, odors, dust and chemicals that may accompany agricultural operations so that such purchasers and residents will understand the inconveniences that accompany living adjacent to agriculture and are prepared to accept such problems as the natural result of living in or near agricultural areas.

Ordinance 4851 Agricultural Buffer Ordinance

The Agricultural Buffer Ordinance (Section 35.30.025 of the Land Use and Development Code [LUDC], County of Santa Barbara 2019), adopted in 2013 and updated in 2019, implements Comprehensive Plan policies by establishing development standards between agricultural uses and new non-agricultural development and uses in inland portions of the County. Buffers are used to minimize potential conflicts between agricultural and adjacent land uses that result from noise, dust, light, and odor incidental to normal agricultural operations as well as potential conflicts originating from residential and other non-agricultural uses such as domestic pets, insect pests, and invasive weeds. The agricultural buffer width can range from 100 to 400 feet depending on the type of agriculture and proposed non-agricultural use or development. The buffer is required to be located on the lot which contains the non-agricultural project, adjacent to the common lot line between the project site and the adjacent agricultural lot.

This ordinance applies to inland areas of the County when there is a discretionary application for non-agricultural development which: (1) is located in an Urban or Inner Rural Area, on an EDRN, or located on property zoned industrial that is located in the Rural Areas, and (2) is located

Figure 4.2-2 Williamson Act Contracted Lands in the Project Vicinity



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Additional data provided by California Department of Conservation, 2016.

Fig. 4.2-2 Williamson Act

immediately adjacent to agriculturally zoned land that is located in a Rural Area. The ordinance does not apply to single-family dwellings. The project site is designated as an EDRN in the OCP, but the project would allow for the development of single-family dwelling units on the site. Therefore, the Agricultural Buffer Ordinance does not apply to the project.

County of Santa Barbara Environmental Thresholds and Guidelines Manual

The Agricultural Resource Guidelines in the County's Environmental Thresholds and Guidelines Manual include a weighted point allocation system ("weighted point system" or WPS) to assign values to characteristics of a site's agricultural productivity. The WPS is a preliminary screening tool, which examines a site's agricultural suitability and productivity to determine whether the project's impact on loss or impairment of agricultural resources would be a potentially significant impact. The WPS assigns relative values to characteristics of a site's agricultural productivity (e.g., soil type, water supply, parcel size). The Environmental Thresholds and Guidelines Manual states:

"As a general guideline, an agricultural parcel of land should be considered to be viable if it is of sufficient size and capability to support an agricultural enterprise independent of any other parcel. To qualify as agriculturally viable, the area of land in question need only be of sufficient size and/or productive capability to be economically attractive to an agricultural lessee. This productivity standard should take into consideration the cultural practices and leasehold production units in the area, as well as soil type and water availability."

The WPS is further described as it relates to the project in Section 4.2.3(a), *Methodology and Significance Thresholds*.

Comprehensive Plan Goals and Policies

The County Comprehensive Plan includes several elements which contain goals and policies relevant to agricultural resources. These elements are discussed as follows:

Agricultural Element

The Agricultural Element contains goals encouraging protection and enhancement of agricultural resources. Goals I and II discourage incompatible uses and adverse urban influences, promote freedom of agricultural methods, and encourage agricultural land improvement programs. Goal III calls for the preservation of remaining agricultural lands by discouraging expansion of urban uses into the Rural Area. Goal IV recognizes that agriculture can enhance and protect natural resources and encourages resource protection techniques such as range improvements, erosion control and fire reduction programs, and the prevention of grading and brush clearing on steep slopes and hillsides. Goals V and VI allow for supporting agricultural uses and installations as well as access roads compatible with agricultural machinery. The Comprehensive Plan contains various policies that support Goals I through VI. For example, Policy III.A states that urban expansion into active agricultural lands outside of urban limits is to be discouraged so long as infill development is available.

Environmental Resource Management Element

The Environmental Resource Management Element states that existing croplands on prime soils should be preserved. Agricultural lands on less than prime soil should be preserved when possible. Under Category A, urbanization should be prohibited where existing croplands have a high agricultural suitability rating (within study areas), a Class I or II soil capability classification, or where

agricultural preserves are subject to Williamson Act agreements. Under Category B, urbanization should be prohibited except where existing croplands have a moderate or low agricultural suitability rating (in I in the Urban Area), a Class III or IV soil capability classification, or with lands highly suitable for expansion of cultivated agriculture. It is noted that agricultural preserves, although not subject to environmental constraints, are included in Category A. The reason is that in entering into Williamson Act agreements, the County has made a legal commitment that the land will remain in agricultural use for a minimum of 10 years, subject to automatic annual renewal. As shown in Table 4.2-2, approximately 17 acres on the project site include Class II soils and would fall under Category A. However, the Class II soils on the project site are not irrigated and do not qualify as prime agricultural soils.

Land Use Element

The Land Use Element also contains goals and policies pertaining to agricultural resources. This element states that “In the rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Land with both prime and non-prime soil shall be reserved for agricultural uses.”

Orcutt Community Plan

The OCP incorporates policies and development standards to provide compatibility between agricultural lands and other development in the OCP area. OCP policies and development standards applicable to sites adjacent to agricultural lands include:

- Policy LUA-O-2 which requires development in Orcutt to be compatible with adjacent or nearby agricultural lands;
- DevStd LUA-O-2.1 which requires that fencing, berming and/or landscaping be installed along property lines or across ends of street stubs adjacent to agricultural operations unless a waiver to the satisfaction of Planning & Development is obtained from the adjacent property owner(s) and/or operators;
- DevStd LUA-O-2.2 which requires a buyer beware notification be recorded on a separate information sheet with the final tract and/or parcel maps of properties within 1,000 feet of agriculturally zoned land, consistent with the County's adopted Right to Farm Ordinance.; and
- DevStd LUA-O-2.3 which requires that all new urban and EDRN development which borders agriculturally designated lands include a minimum 100-foot buffer between structures and agricultural land and include appropriate landscaping to reduce noise, odor, dust or chemical effects associated with the agricultural operations. This buffer is a minimum adjacent to lighter agricultural uses (such as grazing) and should be adjusted upward for more intensive agricultural operations (such as strawberry cultivation).

4.2.2 Previous Environmental Review

The OCP EIR examined potential impacts to agricultural resources and determined that buildout of the OCP would result in a significant and unavoidable (Class I) impact to agricultural resources associated with increased urban-rural conflicts and loss of agricultural land. The Key Site 21 site specific analysis in the OCP EIR did not include an evaluation of agricultural resources at Key Site 21. The programmatic analysis in the OCP EIR identified two potentially significant agricultural impacts that applied to development on Key Site 21 at the time the EIR was prepared when a portion of the site was still in use for agricultural purposes. These potential agricultural impacts included:

conversion of agricultural land (AG-1) and land use conflicts (AG-2). The OCP EIR identified measures that would minimize potential agricultural impacts, including: establishment of higher density zone districts (AG-1), installation of fencing (AG-2), required buyer beware notifications (AG-3), and implementation of setbacks and screening measures (AG-4). The residual impact on agricultural resources after mitigation was identified as significant and unavoidable (Class I).

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The County's Environmental Thresholds and Guidelines Manual WPS provides a preliminary screening of a project's agricultural impacts. The WPS is used to assign values to characteristics of a site's agricultural productivity and suitability to determine if a project may have a significant impact on agricultural resources. Factors included in the analysis are: parcel size, soil classification, water availability, agricultural suitability, existing and historic land use, comprehensive plan designation, adjacent land uses, agricultural preserve potential, and combined farming operations.

The WPS is weighted toward physical environmental resources rather than economics. This emphasis is in keeping with CEQA's emphasis on physical environmental impacts (State CEQA Guidelines Section 15131).

Significance Thresholds

Based on the County Environmental Thresholds and Guidelines Manual, agricultural resource impacts would be considered significant if the project:

- Results in the conversion of prime agricultural land to non-agricultural use, impairment of agricultural land productivity (whether prime or non-prime), or conflict with agricultural preserve programs; or
- Results in any effect [potentially significant adverse effect] upon any unique or other farmland of State or Local Importance.

The project site is not zoned for agricultural use, is not in use for agricultural purposes, does not contain prime agricultural soils, and is not enrolled in an agricultural preserve program. Therefore, the project would not result in the conversion of prime agricultural land to non-agricultural use, impairment of agricultural land productivity (whether prime or non-prime), or conflict with agricultural preserve programs, and the first County threshold, does not require further analysis, including evaluation under the County's WPS. For the second threshold, the FMMP Important Farmlands Map is used to evaluate the impact.

Appendix G of the CEQA Guidelines considers a project to have a significant impact on agricultural resources if the project would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

Potential impacts to forest resources are discussed in Section 4.15, *Effects Found Not to be Significant*.

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Neighborhoods of Willow Creek and Hidden Canyon Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the project.

Threshold:	Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
Threshold:	Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?
Threshold:	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

Impact AG-1 THE PROJECT WOULD NOT CONVERT FMMP-DESIGNATED PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE (FARMLAND), WOULD NOT CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE OR A WILLIAMSON ACT CONTRACT, AND WOULD NOT INVOLVE ANY OTHER CHANGES THAT WOULD CONVERT FARMLAND TO NON-AGRICULTURAL USE. IMPACTS TO AGRICULTURAL RESOURCES WOULD BE LESS THAN SIGNIFICANT (CLASS III).

As discussed in Section 4.2.3(a), the project site is not zoned for agricultural use, is not in use for agricultural purposes, does not contain prime agricultural soils, and is not enrolled in an agricultural preserve program. Accordingly, the project does not require evaluation under the County's WPS.

As shown in Figure 4.2-1, the project site is designated as Grazing Land and Urban and Built-up Land under the FMMP. The project site is undeveloped and zoned for residential development. As shown in Figure 4.2-2, the project site does not contain any land enrolled in a Williamson Act contract. The property immediately east of Key Site 21 is designated as Non-Prime Agricultural Land under a Williamson Act contract and the properties surrounding Key Site 21 are zoned for agricultural use. The project would require earthwork, which would result in fugitive dust that could impact off-site crops and other agricultural activities. As discussed in Section 4.3, *Air Quality*, project construction activities would be subject to the County's grading ordinance to minimize fugitive dust emissions. The County of Santa Barbara and the Santa Barbara Air Pollution Control District (SBCAPCD) also require implementation of standard dust control measures for all discretionary projects to reduce PM₁₀ emissions. Implementation of required dust control measures during earthmoving activities would minimize PM₁₀ emissions during construction, mitigating fugitive dust emissions and ensuring adjacent agricultural operations are not impacted by ongoing construction.

The increase in the number of residents in the area and new accessible pedestrian pathways, bike paths, and roadways would increase public access near existing agricultural areas, increasing the potential for conflicts, such as vandalism to farm equipment or fencing, and theft of crops at adjacent agricultural uses. These effects can result in direct economic impacts to agricultural operations, potentially impacting the overall economic viability of continued agricultural operations.

OCP DevStd LUA-O-2.3 requires all new urban development bordering agriculturally designated lands to include a minimum 100-foot buffer between structures and agricultural land. As described in Section 2, *Project Description*, and in compliance with OCP DevStd LUA-O-2.3, the project includes a 200-foot wide agricultural buffer along the eastern and western edges of the proposed development area between the planned residential development and existing cultivated agricultural fields located on adjacent parcels to the east and west. The project also includes a 100-foot buffer along the eastern, western, and southern edges of the proposed development area between the planned residential development and existing grazing lands. No buildings or structures would be permitted in the agricultural buffer areas. These buffers would reduce and/ or avoid noise, dust, light impacts, odors, chemical use, and pesticide drift to new residential uses on the project site as well limit public access that may result in vandalism to farm equipment or fencing, and theft of crops at adjacent agricultural uses. Ultimately, these buffers would serve to limit potential conflicts between residential development on the project site and the adjacent lands zoned for agricultural use and under Williamson Act contract that may impact the overall economic viability of continued agricultural operations. Development on the project site would also be required to comply with the County's Right to Farm Ordinance, to protect agricultural land uses from conflicts with non-agricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation by notifying prospective purchasers and residents of property adjacent to or near agricultural operations of the inherent problems, including sounds, odors, dust, and chemicals associated with such purchases or residing in such areas.

As shown in Table 4.2-2, 13.6 acres within the Willow Creek neighborhood development area and 3.6 acres within the Hidden Canyon neighborhood development area, totaling approximately 17 acres on the project site, contain Class II soils. These soils are not currently irrigated and, thus, do not qualify as prime agricultural soils. The project would not result in conversion of FMMP-designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), would not conflict with existing zoning for agricultural use or a Williamson Act contract, and would involve any other changes that would convert farmland to non-agricultural use. Therefore, impacts to agricultural resources would be less than significant (Class III).

Mitigation Measures

No mitigation is required because impacts are less than disclosed in the OCP EIR and would be less than significant (Class III).

c. Cumulative Impacts

The project would not result in conversion of any prime agricultural land or soils. However, cumulative development in the northern part of Santa Barbara County would increase urban-rural conflicts and loss of agricultural land in Orcutt and the surrounding areas. These issues were identified as potentially significant impacts to agricultural resources in the OCP EIR.

Implementation of the policies and development standards in the OCP related to agricultural resources, compliance with applicable Santa Barbara County policies, and implementation of SBCAPCD dust control measures and proposed agricultural buffers in compliance with the requirements of OCP DevStd LUA-O-2.3, would minimize these potential cumulative impacts. Accordingly, the project would not contribute to the increased conversion of agricultural lands or urban-rural conflicts. Therefore, the project's contribution to cumulative impacts to agricultural resources would be less than significant (Class III).

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4.3 Air Quality

This section analyzes the potential for the project to cause significant impacts to regional and local air quality. The analysis in this section is based on an Air Quality Analysis Technical Report prepared for the project by Dudek in January 2019, and peer reviewed by Rincon Consultants, Inc. (Dudek 2019a) The full study is provided in Appendix B.

4.3.1 Setting

a. Project Site Setting

The project site is located within the South Central Coast Air Basin (SCCAB), which includes all of San Luis Obispo, Santa Barbara, and Ventura counties. The Santa Barbara County portion of the SCCAB is under the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD).

b. Air Quality Background

Climate and Topography

The climate of the SCCAB is strongly influenced by its proximity to the Pacific Ocean and the location of the high-pressure cell in the northeastern Pacific. With a Mediterranean-type climate, the project area is characterized by warm, dry summers and cool winters with occasional rainy periods.

Cool, humid marine air causes frequent fog and low clouds along the coast, generally during the night and morning hours in the late spring and early summer months. The project area is subject to a diurnal cycle in which daily onshore winds from the west and northwest are replaced by mild offshore breezes flowing from warm inland valleys during night and early morning hours. This alternating cycle can create a situation where suspended pollutants are swept offshore at night, and then carried back onshore the following day. Dispersion of pollutants is further degraded when the wind velocity for both day and nighttime breezes is low. The region is also subject to seasonal "Santa Ana" winds. These are typically hot, dry northerly winds which blow offshore at 15 to 20 miles per hour (mph), but can reach speeds in excess of 60 mph.

Two types of temperature inversions (warmer air on top of cooler air) are created in the area: subsidence and radiational. The subsidence inversion is a regional effect created by the Pacific high in which air is heated as it is compressed when it flows from the high-pressure area to the low pressure areas inland. This type of inversion generally forms at about 1,000 to 2,000 feet and can occur throughout the year, but it is most evident during the summer months. Radiational, or surface, inversions are formed by the more rapid cooling of air near the ground during the night, especially during winter. This type of inversion is typically lower (0 to 500 feet at Vandenberg Air Force Base, for example) and is generally accompanied by stable air. Both types of inversions limit the dispersal of air pollutants within the regional airshed, with the more stable the air (low wind speeds, uniform temperatures), the lower the amount of pollutant dispersion.

Air Pollutants of Primary Concern

The general characteristics of the six criteria pollutants regulated by the federal Clean Air Act and California Clean Air Act are described below.

Ozone

Ozone (O₃) is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_x) and reactive organic compounds (ROC).¹ NO_x are formed during the combustion of fuels, while ROC is formed during combustion and evaporation of organic solvents. Because O₃ requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans, including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to O₃ include children, the elderly, persons with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide (CO) is a localized pollutant that is found in high concentrations only near its source. The major source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Carbon monoxide health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity, and impaired mental abilities.

Nitrogen Dioxide

Nitrogen dioxide (NO₂) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of NO₂ produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. Nitrogen dioxide is an acute irritant. A relationship between NO₂ and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility. It can also contribute to the formation of small particulate matter (PM₁₀) and acid rain.

Suspended Particulates

Small particulate matter measuring no more than 10 microns in diameter is considered PM₁₀, while PM_{2.5} is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates, and sulfates. Both PM₁₀ and PM_{2.5} are by-products of fuel combustion and wind erosion of soil and unpaved roads and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with small particulates (PM₁₀) and fine particulates (PM_{2.5}) can be very different. PM₁₀ generally comes from windblown dust and dust kicked up from mobile sources. PM_{2.5} is generally associated with combustion processes, as well as formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{2.5} is more likely to penetrate deeply into the lungs and poses a

¹ Organic compound precursors of ozone are routinely described by a number of variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), TOG (total organic gases), ROG (reactive organic gases), TOC (total organic compounds), ROC (reactive organic compounds), and VOC (volatile organic compounds). While most of these differ in some significant way from a chemical perspective, two groups are important from an air quality perspective: non-photochemically reactive in the lower atmosphere, or photochemically reactive in the lower atmosphere (HC, RHC, ROG, ROC, and VOC). SBCAPCD uses the term ROC to denote organic precursors.

health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Sulfur Dioxide

Sulfur dioxide (SO₂) is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of SO₂ emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of SO₂ emissions include industrial processes such as extracting metal from ore and the burning of fuels with a high sulfur content by locomotives, large ships, and non-road equipment. Sulfur dioxide is linked with a number of adverse effects on the respiratory system.

Lead

Lead (Pb) is a toxic metal that can be emitted from industrial sources, leaded aviation gasoline, and lead-based paint. Lead may cause a range of health effects, from behavioral problems and learning disabilities to seizures and death.

Toxic Air Contaminants

Toxic air contaminants (TAC) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as diesel particulate matter (DPM, CARB 2019). TACs are different than the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Sensitive Receptors

Certain population groups are considered more sensitive to air pollution than others, particularly children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases. Sensitive land uses include those locations where such individuals are concentrated, such as hospitals, schools, residences, and parks with active recreational uses. Sensitive receptors most likely to be affected by the proposed project include rural residences located north of the project site. Although the existing golf course is a recreational use, it is not considered a sensitive receptor because individuals are not concentrated for extended periods of time at any location along the golf course.

c. Regulatory Setting

Federal and State Standards for Criteria Pollutants

The federal and State Clean Air Acts regulate the emission of airborne pollutants from various mobile and stationary sources. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent within the California Environmental Protection Agency (CalEPA). These agencies have established ambient air quality standards for the protection of public health. Local air quality management control and planning is provided through regional Air Pollution Control Districts (APCDs) established by CARB for the 14 statewide air basins. The CARB is responsible for control of mobile emission sources, while the local APCDs are responsible for control of stationary sources and enforcing regulations. As stated above, the County is located in the SCCAB, and is under the jurisdiction of the SBCAPCD.

The CARB and the USEPA establish ambient air quality standards for major pollutants at thresholds intended to protect public health. Federal and State standards have been established for O₃, CO, NO₂, SO₂, lead, PM₁₀, and PM_{2.5}. Table 4.3-1 summarizes the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS) for each of these pollutants. California standards are more restrictive than federal standards for each of these pollutants, except for lead, the eight-hour average for CO, and the eight-hour average for O₃. Local APCDs are required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in “attainment” or “nonattainment.” The Santa Barbara County portion of the SCCAB is currently designated nonattainment-transitional for the State eight-hour ozone standard and nonattainment for the State PM₁₀ standard but is in attainment for all other federal and state standards (CARB 2018, USEPA 2018).²

² Areas are designated as nonattainment-transitional for ozone if no monitoring location in the nonattainment area has recorded more than three exceedance days during the previous calendar year (California Code Section 70303.5).

Table 4.3-1 Current Federal and State Ambient Air Quality Standards

Pollutant	Federal Standard	California Standard
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg) 0.14 ppm (24-hr avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 µg/m ³ (3-month avg)	1.5 µg/m ³ (30-day avg)
Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hr avg)	50 µg/m ³ (24-hr avg) 20 µg/m ³ (annual avg)
Particulate Matter (PM _{2.5})	35 µg/m ³ (24-hr avg) 12 µg/m ³ (annual avg)	12 µg/m ³ (annual avg)

ppm= parts per million

µg/m³ = micrograms per cubic meter

Source: CARB 2016

Regional

Under State law, the SBCAPCD is required to prepare a plan for air quality improvement for pollutants for which the District is in nonattainment. The SBCAPCD regulates air quality in the portion of the SCCAB that is in Santa Barbara County and is responsible for attainment planning related to criteria air pollutants and for district rule development and enforcement.

The 2016 Ozone Plan was adopted by the SBCAPCD Board on October 20, 2016 and is the most recent applicable air quality plan. The 2016 Ozone Plan is the triennial update required by the State to demonstrate how the SBCAPCD plans to meet the State eight-hour ozone standard. The 2016 Ozone Plan incorporates and builds upon the prior Clean Air Plans and predominantly focuses on achieving attainment of the State ozone standards, in addition to the federal ozone standard. The 2016 Ozone Plan focuses on reducing ozone precursor emissions through implementation of transportation control measures, which would serve to reduce mobile source emissions, which are the primary source of ROC and NO_x emissions in the County. In addition, the 2016 Ozone Plan utilizes SBCAG's Regional Growth Forecast and CARB on-road emissions forecasts to project population growth and associated air pollutant emissions within Santa Barbara County (SBCAPCD 2016).

Orcutt Community Plan

The Orcutt Community Plan (OCP) incorporates policies and development standards aimed at limiting air pollution emissions from construction and operation of new and existing development in the OCP area. A summary of the OCP policies and development standards that would apply to the project is provided below. Policies and Development Standards for air quality include:

- Policy AQ-O-1, Program AQ-O-1.1, Program AQ-O-1.2, and Action AQ-O-1.3, which encourage land use planning and development design that reduce air pollution through development of

transportation infrastructure supportive of alternative modes of transportation and pedestrian oriented developments;

- Policy AQ-O-2, which encourages implementation of appropriate construction restrictions and control measures to reduce significant fugitive dust and PM₁₀ emissions; and
- Policy AQ-O-3, which promotes the use of alternative fuels, solar energy systems, and use of construction techniques to conserve energy and minimize pollution.

OCP Policies and Development Standards for transportation that would contribute to improved air quality include:

- Policy CIRC-O-1 and Action CIRC-O-1.1, which encourage implementation of long-term improvements to roadways and alternative transportation facilities, such as transit and alternative modes of transportation (e.g., bikeways and pedestrian paths);
- Policy CIRC-O-6, Action CIRC-O-6.1, and Action CIRC-O-6.2, which encourage development of all feasible forms of alternative transportation, including transit services and park-and-ride facilities;
- Policy CIRC-O-7, which encourages Caltrans to accommodate planned bicycle facilities in highway overpasses; and
- Policy CIRC-O-9, which requires development to be sited and designed to provide maximum access to non-motor vehicle forms of transportation where feasible.

d. Current Air Quality

The SBCAPCD and USEPA monitor air pollutant concentrations throughout the SCCAB at various monitoring stations. The monitoring station closest to the project site is the Santa Maria Monitoring Station, located approximately five miles northeast of the project site at 906 South Broadway, and its air quality trends are representative of the ambient air quality in the project area. The pollutants monitored at this station are O₃, NO₂, CO, PM₁₀, and PM_{2.5}. Data for SO₂ was sourced from the Vandenberg Air Force Base Monitoring Station, located approximately 8.5 miles southwest of the project site, which is the closest monitoring station with available SO₂ data. Table 4.3-2 summarizes the ambient air quality data measured at these stations between 2015 and 2017.

Table 4.3-2 Ambient Air Quality Data

Pollutant	2015	2016	2017
Ozone (ppm), Worst Hour ¹	0.066	0.062	0.068
Number of days of state exceedances (>0.09 ppm)	0	0	0
Number of days of federal exceedances (>0.12 ppm)	0	0	0
Ozone (ppm), 8-Hour Average ¹	0.056	0.057	0.063
Number of days of state and federal exceedances (>0.07 ppm)	0	0	0
NO ₂ (ppm), Worst Hour ¹	0.046	0.036	0.044
Number of days of state exceedances (>0.18 ppm)	0	0	0
Number of days of federal exceedances (>0.10 ppm)	0	0	0
CO (ppm), Worst Hour ¹	2.9	3.6	1.0
Number of days of state exceedances (>20 ppm)	0	0	0
Number of days of federal exceedances (>35 ppm)	0	0	0
SO ₂ (ppm), Worst Hour ²	0.03	0.03	0.02
Number of days of federal exceedances (>0.075 ppm)	0	0	0
PM ₁₀ (µg/m ³), Worst 24 Hours ¹	66.4	78.6	106.9
Number of days of state exceedances (>50 µg/m ³)	10	16	22
Number of days of federal exceedances (>150 µg/m ³)	0	0	0
PM _{2.5} (µg/m ³), Worst 24 Hours ²	19.2	19.4	19.9
Number of days of federal exceedances (>35 µg/m ³)	0	0	0

¹Data from Santa Maria Monitoring Station
²Data from Vandenberg Air Force Base Monitoring Station

As shown in Table 4.3-2, ambient air quality data indicates that the State PM₁₀ standard was exceeded 10 days in 2015, 16 days in 2016, and 22 days in 2017. No other State or federal standards were exceeded at these monitoring stations.

4.3.2 Previous Environmental Review

The OCP EIR examined potential impacts to air quality that would result from development under the OCP. The OCP EIR determined that buildout of the OCP would result in potentially significant air quality impacts associated with generation of fugitive dust and PM₁₀ during construction-related activities. The EIR identified dust control measures for earthmoving activities (AQ-10) that would minimize potential construction-related air quality impacts. The OCP EIR determined that implementation of feasible mitigation measures would reduce the identified construction-related air quality impacts to a less than significant level (Class II).

The OCR EIR also identified two significant and unavoidable (Class I) impacts, including: emissions of ozone precursors from long-term planned growth and development activities and inconsistency with the then current 1994 Clean Air Plan as a result of allowing residential development at a rate higher than that anticipated by the Clean Air Plan. The EIR identified measures that would reduce air quality impacts from emissions of ozone precursors, including NO_x and VOC control measures for stationary and mobile sources and construction equipment (AQ-1 and AQ-2); coordination to

expand the Santa Maria Area Transit network (AQ-3); land use planning that encourages the use of public transit and alternative transportation (AQ-4, AQ-9, and AQ-9.1); coordination with the California Department of Transportation (Caltrans) to incorporate park-and-ride facilities into freeway interchange improvement projects (AQ-5); development of a transportation demand management (TDM) program (AQ-6); institution of a Transportation Impact fee (AQ-7); and provision of funding for park-and-ride facilities and long-distance commuter services (AQ-8). However, the analysis found that emissions of NO_x and ROC would still contribute substantial ozone precursor emissions to an area designated as nonattainment for ozone. Therefore, impacts related to ozone precursor emissions were identified as significant and unavoidable (Class I). No feasible mitigation measures were identified that would reduce impacts from inconsistency with the Clean Air Plan. Therefore, impacts related to consistency with the applicable air quality management plan were identified as significant and unavoidable (Class I). Site specific analysis was not performed for air quality at Key Site 21.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Air pollutant emissions from construction and operation of the project were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 based on information provided by the project applicant and CalEEMod default values for projects in Santa Barbara County when project specifics were not known. The trip generation rates calculated in the project Traffic and Circulation Study (Stantec 2019, Appendix K) were used as inputs in CalEEMod. See Appendix B for a detailed discussion of methodology and modeling assumptions.

The evaluation of whether a project would conflict with or obstruct implementation of the applicable air quality plan is based on the project's consistency with the land use and population forecasts that underlie the air pollutant emissions forecasts contained in the plan. Therefore, consistency with the 2016 Ozone Plan was evaluated based on whether the population growth accommodated by the project was accounted for in SBCAG's Regional Growth Forecasts.

Significance Thresholds

Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, air quality impacts would be considered significant if the project:

- Interferes with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NO_x and ROC; or
- Equals or exceeds the State or federal ambient air quality standards for any criteria pollutant (as determined by modeling).

According to the SBCAPCD, a residential project in an area not regulated by a residential growth management ordinance would be inconsistent with the 2016 Ozone Plan if it would accommodate an increase in dwelling units that is above the projections contained in the Ozone Plan (SBCAPCD 2017).

The Santa Barbara County Environmental Thresholds and Guidelines Manual and the SBCAPCD do not provide thresholds for short-term construction emissions. However, SBCAPCD recommends

quantification of construction-related emissions from construction activities and uses 25 tons per year for ROC or NO_x as a guideline for determining the significance of construction impacts. In addition, under SBCAPCD Rule 202.F.3, if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct have the potential to exceed 25 tons of any pollutant, except carbon monoxide, in a 12-month period, the owner of the stationary source shall provide offsets under the provisions of Rule 804 and shall demonstrate that no ambient air quality standard would be violated. Therefore, this analysis uses 25 tons per year as a significance threshold for construction-related emissions of ROC, NO_x, SO₂, PM₁₀, and PM_{2.5}.

SBCAPCD requires dust mitigation measures for all discretionary construction activities that involve earth-moving activities regardless of project size or duration because the Santa Barbara County region is designated nonattainment for the state PM₁₀ standard (County of Santa Barbara 2018b; SBCAPCD 2017).

The Santa Barbara County Environmental Thresholds and Guidelines Manual provides operational emission thresholds, which state that operational air quality impacts would be considered significant if the project:

- Emits (from all project sources, mobile and stationary), more than the daily trigger for offsets of any pollutant, which is currently 55 pounds per day (lbs/day) for NO_x and ROC and 80 lbs/day for PM₁₀
- Emits 25 lbs/day or more of NO_x or ROC from motor vehicle trips only;
- Causes or contributes to a violation of a California or National Ambient Air Quality Standard (except ozone);
- Exceeds the SBCAPCD's health risk public notification thresholds adopted by the SBCAPCD board; or
- Is inconsistent with the adopted federal and State Air Quality Plans.

The Santa Barbara County Environmental Thresholds and Guidelines Manual also states that a project will have a significant air quality impact if it causes a CO "hotspot" by adding emissions to existing background CO levels that exceed the California one-hour standard of 20 parts per million, which typically occurs at severely congested intersections. The County provides the following screening criteria for CO impacts:

- If a project contributes less than 800 peak hour trips, then CO modeling is not required.
- Projects contributing more than 800 peak hour trips to an existing congested intersection at level of service (LOS) D or below, or that will cause an intersection to reach LOS D or below, may be required to model for CO impacts. However, projects that will incorporate intersection modifications to ease traffic congestion are not required to perform modeling to determine potential CO impacts.

The Santa Barbara County Environmental Thresholds and Guidelines Manual recommends discussing the following issues if they are applicable to the project:

- Emissions which may affect sensitive receptors (e.g., children, elderly, or acutely ill);
- Toxic or hazardous air pollutants in amounts which may increase cancer risk for the affected population; or
- Odor or another air quality nuisance problems impacting a considerable number of people.

Appendix G of the CEQA Guidelines considers a project to have a significant air quality impact if the project would:

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

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Willow Creek and Hidden Canyon Residential Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed Willow Creek and Hidden Canyon Residential Project.

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?
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Impact AQ-1 THE PROJECT WOULD ACCOMMODATE NEW RESIDENTS IN UNINCORPORATED SANTA BARBARA COUNTY, BUT THIS INCREASE IN POPULATION WOULD NOT EXCEED THE SBCAG GROWTH FORECASTS USED TO PREPARE THE 2016 OZONE PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

In order to be determined to be consistent with the 2016 Ozone Plan, a project's direct and indirect emissions must be accounted for in the growth assumptions of the Ozone Plan and the project must be consistent with the policies in the Ozone Plan (SBCAPCD 2017). In addition, in order to be consistent with Ozone Plan, all projects involving earthmoving activities must implement the standard dust control measures. The project would be required to implement Mitigation Measure AQ-10 from the OCP EIR, which includes the standard dust control measures required by the SBCAPCD for all discretionary projects.

As described in Section 4.3.3(a), *Methodology and Significance Thresholds*, a residential project would be inconsistent with the 2016 Ozone Plan if it would accommodate population growth above the amount forecast for unincorporated Santa Barbara County. Vehicle use and emissions are directly related to population, as additional residents would result in more vehicular use. Populations that remain within Clean Air Plan and SBCAG forecasts are accounted for with regard to SBCAPCD emissions inventories. When population growth exceeds these forecasts, emission inventories could be surpassed, affecting attainment status. The 2016 Ozone Plan is based on land use and population projections provided by SBCAG, which are shown in Table 4.3-3. Residential projects that exceed the amount of forecast growth for the specific jurisdiction or sub-region would be considered inconsistent with the 2016 Ozone Plan. The project would result in fewer homes being built on Key Site 21 than assumed for the site under buildout of the OCP. With less residential development, the Specific Plan would accommodate fewer new residents. The project would construct 146 residences by 2024, which would accommodate approximately 431 residents.

Table 4.3-3 SBCAG Housing Projections for Santa Maria Unincorporated Sub-Regional Area within Unincorporated Santa Barbara County

Year	Population Forecast	Households
2010	32,737	11,642
2020	32,751	11,647
2035	39,244	13,917
2040	39,829	14,123

Source: SBCAG 2012

Planned and pending projects would add approximately 884 units to the Santa Maria sub-regional area of unincorporated Santa Barbara County (County of Santa Barbara 2018a). The total number of housing units generated by the project, in combination with other reasonably foreseeable residential development in the unincorporated County near Santa Maria, would be 1,030 units, which would not exceed the forecasted increase of 2,270 housing units between 2020 and 2035 in the Santa Maria sub-regional area of unincorporated Santa Barbara County. The increase of 146 residences would comprise approximately 6.5 percent of the projected growth in the Santa Maria sub-regional area of unincorporated Santa Barbara County, which would be consistent with growth forecast assumptions used in the 2016 Ozone Plan.

The OCP EIR determined that the OCP would conflict with the then current 1994 Clean Air Plan due to an increased rate of population growth that was not anticipated by the Clean Air Plan. However, implementation of the proposed project would not result in more development than anticipated by SBCAG and the current 2016 Ozone Plan. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan, and this impact would be less than significant (Class III).

Mitigation Measures

No mitigation is required because impacts would be adverse, but less than significant (Class III).

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-2 PROJECT CONSTRUCTION ACTIVITY WOULD GENERATE TEMPORARY INCREASES IN CRITERIA AIR POLLUTANT EMISSIONS OF OZONE PRECURSORS, CO, SO₂, PM₁₀, AND PM_{2.5}, BUT THESE EMISSIONS WOULD NOT SIGNIFICANTLY DEGRADE REGIONAL AND LOCAL AIR QUALITY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The project would result in fewer homes being built on Key Site 21 than under buildout of the OCP. With less site disturbance and development, overall construction activity would be less for the proposed Specific Plan than construction required for buildout under the OCP. Nevertheless, project construction activity would emit ozone precursors NO_x and ROC as well as CO, SO₂, PM₁₀, and PM_{2.5}. The majority of construction-related emissions would result from grading due to the use of heavy-duty construction equipment. Other emissions would result from building construction and the evaporation of ROC from architectural coatings (paint).

Willow Creek and Hidden Canyon Residential Project (Key Site 21)

Construction emissions modeling assumed that construction would occur over the course of 55 months, beginning in June 2019 and ending in January 2024, with construction occurring concurrently at both the Willow Creek and Hidden Canyon locations. The construction equipment mix was based on CalEEMod default values for the SBCAPCD region. Soil material would be balanced on-site between the two locations. Estimated maximum annual construction emissions are shown in Table 4.3-4.

Table 4.3-4 Project Construction Emissions

	Maximum Annual Emissions (lbs/day)					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction Year 2019 ¹	0.7	7.4	3.6	<0.1	1.5	0.9
Construction Year 2020 ¹	1.0	10.7	6.7	<0.1	1.3	0.8
Construction Year 2021 ¹	2.5	7.5	6.9	<0.1	0.9	0.4
Construction Year 2022 ¹	2.4	6.8	6.5	<0.1	0.9	0.4
Construction Year 2023	1.0	3.1	3.2	<0.1	0.5	0.2
Construction Year 2024	0.3	<0.1	<0.1	<0.1	<0.1	<0.1
Maximum Annual Emissions	2.7	10.8	7.0	<0.1	3.8	1.9
SBCAPCD Threshold	25	25	n/a	25	25	25
Threshold Exceeded?	No	No	n/a	No	No	No

¹ From 2019 through 2022, construction activities would be occurring simultaneously at both the Willow Creek and Hidden Canyon locations; therefore, maximum annual emissions are the sum of modeled emissions from construction activities at both locations.

Notes: All emissions modeling was completed using CalEEMod. See Appendix B for modeling results. Some numbers may not sum exactly due to rounding. Emission data shown is from “mitigated” results, which account for compliance with regulations and project design features. Emissions presented are the highest of the winter and summer modeled emissions.

As shown in Table 4.3-4, project construction would generate up to approximately 3 tons per year of ROC emissions, 11 tons per year of NO_x emissions, and 4 tons per year of PM₁₀ emissions. Construction emissions would not exceed the SBCAPCD threshold of 25 tons per year for ROC, NO_x, SO₂, PM₁₀, and PM_{2.5}. Furthermore, the County of Santa Barbara considers short-term construction emissions of NO_x to be less than significant because countywide emissions of NO_x from construction equipment is insignificant compared to regional NO_x emissions from other sources, such as vehicles (County of Santa Barbara 2018b).

Project construction activities would be subject to the County’s grading ordinance to minimize fugitive dust emissions and associated impacts to air quality. The grading ordinance requires a grading permit and an Erosion and Sediment Control Plan for all new grading, excavations, fills, cuts, borrow pits, stockpiling, compaction of fill, and land reclamation projects on privately owned land where the transported amount of materials exceeds 50 cubic yards or the cut or fill exceeds three feet in vertical distance to the natural contour of the land.³ The County of Santa Barbara and the SBCAPCD also require implementation of standard dust control measures for all discretionary

³ The County accepts a Stormwater Pollution Prevention Plan (SWPPP) in lieu of an Erosion and Sediment Control Plan, as long as the SWPPP contains the requirements of the County’s Erosion and Sediment Control Plan.

projects to reduce PM₁₀ emissions. Although PM₁₀ emissions from project construction activities would not exceed the SBCAPCD thresholds, the project would still be required to implement these standard dust control measures, consistent with Mitigation Measure AQ-10 of the OCP EIR and Policy AQ-O-2 of the OCP. Implementation of required dust control measures during earthmoving activities would minimize PM₁₀ emissions during construction, mitigating fugitive dust emissions (SBCAPCD 2017). Therefore, construction-related air quality impacts would be adverse, but less than significant (Class III).

Mitigation Measures

No mitigation is required. Compliance with standard dust control measures required by the County of Santa Barbara and SBCAPCD and the County's grading ordinance would ensure that potential air quality impacts during project construction would be adverse, but less than significant (Class III).

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
--

Impact AQ-3 THE PROJECT WOULD GENERATE CRITERIA AIR POLLUTANT EMISSIONS, BUT THESE EMISSIONS WOULD NOT SIGNIFICANTLY DEGRADE REGIONAL AND LOCAL AIR QUALITY OR SIGNIFICANTLY CONTRIBUTE TO THE AREA'S NONATTAINMENT-TRANSITIONAL DESIGNATION FOR OZONE AND NONATTAINMENT DESIGNATION FOR PM₁₀. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The project would generate long-term emissions from new vehicle trips (mobile emissions), combustion of natural gas (energy emissions), and consumer products, architectural coatings, and landscaping equipment (area emissions). Table 4.2-7 summarizes estimated operational emissions associated with the project.

Table 4.3-5 Project Operational Emissions

Emission Source	Maximum Daily Emissions (lbs/day)					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	9.4	0.6	12.0	< 0.1	0.1	0.1
Energy	0.1	1.1	0.5	< 0.1	0.1	0.1
Mobile	2.1	7.1	20.6	0.1	5.7	1.6
Total Emissions	11.6	8.8	33.1	0.1	5.9	1.8
County of Santa Barbara Vehicle Source Emission Thresholds	25	25	N/A	N/A	N/A	N/A
Vehicle Source Emission Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A
County of Santa Barbara Area + Vehicle Sources Emission Thresholds	55	55	N/A	N/A	80	N/A
Area + Vehicle Sources Emission Threshold Exceeded?	No	No	N/A	N/A	No	N/A

Notes: All emissions modeling was completed using CalEEMod. See Appendix B for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from “mitigated” results that include compliance with SBCAPCD Rule 323 (Architectural Coatings) and project design features that will be included in the project. Emissions presented are the highest of the winter and summer modeled emissions.

The County of Santa Barbara is designated nonattainment-transitional for the State eight-hour ozone standard and nonattainment for the State PM₁₀ standard; therefore, emissions of ROC, NO_x, and PM₁₀ would contribute to the area’s current nonattainment status. However, as shown in Table 4.2-7, emissions would not exceed SBCAPCD operational thresholds for ROC, NO_x, or PM₁₀. Therefore, project operation would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment, and this impact would be adverse, but less than significant (Class III).

Mitigation Measures

No mitigation is required because this impact would be adverse, but less than significant (Class III).

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-4 CONSTRUCTION AND OPERATION OF THE PROJECT WOULD GENERATE EMISSIONS OF CARBON MONOXIDE AND TOXIC AIR CONTAMINANTS, WHICH CAN CONTRIBUTE TO HUMAN HEALTH HAZARDS. HOWEVER, SENSITIVE RECEPTORS WOULD NOT BE EXPOSED TO SUBSTANTIAL CONCENTRATIONS OF THESE POLLUTANTS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

Carbon Monoxide Hotspots

Localized CO “hotspots” can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local

CO concentration exceeds the federal AAQS of 35.0 parts per million (ppm) or the State AAQS of 20.0 ppm.

SBCAPCD recommends a local CO hotspot analysis if the project contributes more than 800 peak hour trips to an existing congested intersection at LOS D or below. According to the Traffic and Circulation Study (Stantec 2019, Appendix K), the project would generate approximately 104 AM peak hour trips and 145 PM peak hour trips, which would be distributed at several intersections in the project area. Therefore, project-generated traffic would not exceed the screening criteria of adding 800 peak hour trips to an existing congested intersection, and a local CO hotspot analysis is not warranted. Impacts related to CO hotspots would be adverse, but less than significant (Class III).

Toxic Air Contaminants

Project construction would result in emissions of Toxic Air Contaminants (TACs), primarily in the form of DPM emissions from heavy equipment operations and heavy-duty trucks during project construction. The following measures are required by State law to reduce DPM emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-Use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, Section 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to 5 minutes; electric auxiliary power units should be used whenever possible.

As discussed in Section 4.3.1, *Setting*, sensitive receptors include schools, daycare facilities, hospitals, and adult/elderly care facilities. The closest existing sensitive receptor is a single-family residence located approximately 50 feet to the north of the project site's boundary.

The Air Quality Analysis Technical Report prepared for the project determined that project construction would not result in significant emissions of TACs as a result of the short duration of construction and the recommendation of the SBCAPCD to not include construction emissions in health risk assessments within the County.

Project operation would not include stationary sources that would emit air pollutants or TACs. Examples of projects that emit pollutants include oil and gas processing, gasoline dispensing, dry cleaning, electronic and parts manufacturing medical equipment sterilization, freeways, and rail yards. Therefore, operation of the proposed project would not result in substantial TAC emissions. Accordingly, neither construction nor operation of the project would result in substantial TAC emissions that would pose a significant health risk to nearby sensitive receptors. This impact would be adverse, but less than significant (Class III).

Mitigation Measures

No mitigation is required because this impact would be adverse, but less than significant (Class III).

Threshold: Would the project result in other emissions (such as those leading to odor) adversely affecting a substantial number of people?

Impact AQ-5 SHORT-TERM PROJECT CONSTRUCTION MAY RESULT IN TEMPORARY ODORS, BUT SPECIFIC PLAN DEVELOPMENT WOULD NOT INCLUDE LAND USES THAT WOULD RESULT IN LONG-TERM ODOR EMISSIONS THAT WOULD ADVERSELY AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

During construction activities, temporary odors from diesel equipment, gasoline fumes, and solvents would occur. Odors from these sources would be localized and generally confined to the project site. The closest sensitive receptor to the project site is a single-family residence located approximately 50 feet to the north of the project site across State Route 1. Construction activities would generally be during the workday when many residents would not be at home. Construction-related odors would be short-term, would cease upon completion, and would not generally occur at magnitudes that would affect a substantial number of people.

Land uses that typically produce objectionable odors include landfills, rendering plants, chemical plants, agricultural uses, wastewater treatment plants, refineries, fast food restaurants, bakeries, and coffee roasting facilities (CARB 2005; SBCAPCD 2017). The proposed residential uses are not considered odor-generating land uses. Therefore, odor impacts would be adverse, but less than significant (Class III).

Mitigation Measures

No mitigation is required because this impact would be adverse, but less than significant (Class III).

c. Cumulative Impacts

Growth within Santa Barbara County contributes to existing exceedances of ambient air quality standards. However, as discussed in the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents*, the cumulative contribution of project emissions to regional levels should be compared with existing programs and plans, including the most recent Clean Air Plan (SBCAPCD 2017). As discussed under Impact AQ-1, the project would not conflict with the 2016 Ozone Plan (Class III).

In analyzing cumulative impacts of the proposed project, an assessment must evaluate a project's contribution to the cumulative increase in pollutants for which the County is designated as nonattainment for the NAAQS or CAAQS. The County is currently in attainment of all NAAQS and is in attainment for all CAAQS with the exception of the State eight-hour ozone standard and the State PM₁₀ standard. Construction and operation of the project would generate emissions of ozone precursors as well as emissions of PM₁₀. As discussed under Impact AQ-2, the project would be required to comply with the County's grading ordinance and implement standard dust control measures required by the County of Santa Barbara and SBCAPCD, which would reduce PM₁₀ emissions during construction, and annual operational emissions of PM₁₀ would not exceed the SBCAPCD annual operational emission threshold. Therefore, the project's contribution to the County's nonattainment status for the State PM₁₀ standard would not be cumulatively considerable (Class III).

The OCP EIR determined that buildout of the OCP would result in a significant and unavoidable impact related to emissions of ozone precursors from long-term planned growth and development activities. As a result, the OCP EIR required implementation of several mitigation measures (AQ-3

through AQ-9.1) at the County-level that would reduce this impact (see Section 4.3.2, *Previous Environmental Review*, for more information). These measures were incorporated into the OCP as Policy AQ-O-1, Program AQ-O-1.1, Program AQ-O-1.2, Action AQ-O-1.3, Action CIRC-O-6.1, Action CIRC-O-6.2, Policy CIRC-O-9, DevStd CIRC-O-11, and Policy CIRC-O-7. However, the OCP EIR determined that this impact would remain significant and unavoidable; therefore, operational emissions of ozone precursors by buildout of the OCP was identified as a significant cumulative impact. Nevertheless, as discussed under Impact AQ-3, operational emissions generated by the project would not exceed SBCAPCD annual operational emission thresholds for ozone precursors ROC and NO_x. Therefore, the project's contribution to the County's nonattainment status for the State eight-hour ozone standard and the cumulative impact related to ozone precursor emissions identified by the OCP EIR would not be cumulatively considerable (Class III).

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4.4 Biological Resources

This section evaluates potentially significant impacts to biological resources associated with the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project in the Orcutt Community Plan (OCP) area in northern Santa Barbara County. The analysis in this section evaluates development of the proposed Willow Creek neighborhood, Hidden Canyon neighborhood, and tie-in to the recorded sewer line easement on Key Site 22 north of the site (collectively referred to as “the project”). This section outlines the results of biological resources analyses prepared by Dudek and Storrer Environmental Services and peer reviewed by Rincon Consultants, Inc. (Appendix C). These documents include:

- Biological Resources Assessment Report for The Neighborhoods of Willow Creek & Hidden Canyon (2019 BRA) (Dudek Environmental Planning [Dudek] 2019b)
- Wetland Delineation and Jurisdictional Determination for The Neighborhoods of Willow Creek & Hidden Canyon (2018 JD) (Dudek 2018)
- Draft Open Space Management Plan for The Neighborhoods of Willow Creek & Hidden Canyon (Draft OSMP) (Dudek 2019c)
- California Tiger Salamander Aquatic Survey Results Rancho Maria Golf Course (Storrer Environmental Services [Storrer] 2017)

4.4.1 Setting

a. Environmental Setting

Vegetation Communities

Ten naturally occurring vegetation communities and three man-made vegetation land cover types occur on Key Site 21 and the proposed sewer line easement, which is located north of Key Site 21 on Key Site 22. Table 4.4-1 shows vegetation communities/land cover types within the proposed Willow Creek and Hidden Canyon neighborhoods. These vegetation communities and land cover types are described below based on descriptions provided in the 2019 BRA (Appendix C) and are shown in Figure 4.4-1.

Table 4.4-1 Vegetation Summary on Key Site 21 and the Sewer Line Easement

Vegetation Community/ Land Cover Type	Key Site 21			Sewer Line Easement
	Total Acres	Occurs in Willow Creek	Occurs in Hidden Canyon	Total Acres
California annual grassland	157.19	Yes	Yes	0.02
Purple needlegrass grassland	1.86 ¹	Yes	Yes	0
Perennial rye grass grassland	0.73 ¹	Yes	No	0
Bristly ox-tongue	0.92	No	Yes	0
Cattail marshes	0.13	No	Yes	0
Coyote brush scrub	20.10	Yes	Yes	0
California sagebrush scrub	5.91	Yes	Yes	0
Arroyo willow thickets	3.79	No	Yes	0.11
Eucalyptus grove	5.08	Yes	Yes	0
Coast live oak woodland	25.20 ²	Yes	Yes	0
Developed	112.72	Yes	Yes	0.01
Debris	0.74	No	No	0
Fallow agriculture	0	No	No	0.66

¹ Mapped by Dudek within project site only

² 15.17 acres consists of the sensitive Coast Live Oak Woodland-Arroyo Willow Thicket Association.

California Annual Grassland

Vegetation in this habitat type is composed primarily of non-native short to tall annual grasses and native and non-native broad-leafed forbs. Noxious weeds are also present in disturbed areas adjacent to this habitat type. Dominant grasses include ripgut brome (*Bromus diandrus*), red brome (*Bromus madritensis*), wild oat (*Avena fatua*), Italian ryegrass (*Festuca perennis*), rat-tail fescue (*Festuca myuros*), and dove weed (*Croton setiger*). Flowering herbs include western vervain (*Verbena lasiostachys*), scarlet pimpernel (*Lysimachia arvensis*), common catchfly (*Silene gallica*), and island false bindweed (*Calystegia macrostegia* ssp. *cyclostegia*). No vegetation associations or alliances in A Manual of California Vegetation, Second Edition (MCV2; Sawyer et al. 2009) appropriately characterize this type of vegetation within Key Site 21, however, it is generally consistent with the California annual grassland as described in A Manual of California Vegetation, First Edition (MCV1; Sawyer and Keeler-Wolf 1995). California annual grassland is abundant throughout the both the proposed Willow Creek and Hidden Canyon neighborhoods (refer to Figure 4.4-1 and Table 4.4-1).

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Native Grasslands

The County of Santa Barbara Environmental Thresholds and Guidelines Manual discusses native grasslands as follows:

“For purposes of resource evaluation in Santa Barbara County, a native grassland is defined as an area where native grassland species comprise 10 percent or more of the total relative cover.

Removal or severe disturbance to a patch or patches of native grasses less than one-quarter acre, which is clearly isolated and is not a part of a significant native grassland or an integral component of a larger ecosystem, is usually considered insignificant. ...Native grasslands which are dominated by perennial bunch grasses such as purple needlegrass (*Stipa pulchra*) tend to be patchy (the individual plants and groups of plants tend to be distributed in patches). Therefore, for example, where a high density of small patches occurs in an area of one acre, the whole acre should be delineated if native grassland species comprise 10 percent or more of the total relative cover, rather than merely delineating the patches that would sum to less than one acre.”

Native grasslands were evaluated on the project site to determine whether areas meet the County of Santa Barbara criteria for native grasslands, a sensitive community, in those locations where combined cover of native grassland patches totals at least 0.25 acre within 1.0 acre of land. All patches of native grasses, regardless of size, were evaluated for percent cover of species and extent of grassland (Appendix C).

As described in the County’s definition, perennial bunchgrass dominated grasslands tend to be patchy and, therefore, evaluation of these native vegetation communities included all patches encountered during field surveys. Several smaller patches of purple needlegrass occur on the project site; however, these patches did not meet the County criteria of 0.25-acre patch size. Those areas that were mapped have diagnostic presence of native herbs and grasses, and at least 10 percent cover of native grassland species. Native grasslands mapped on the project site were consistent with the Purple Needlegrass Grasslands (*Stipa* [=*Nassella*] *pulchra*) Herbaceous Alliance and Creeping Rye Grass Turf (*Leymus triticoides*) Herbaceous Alliance membership rules (Sawyer et al. 2009) and County native grassland definition. These native grasslands are discussed below.

Purple Needle Grass Grassland

Purple needle grass grassland occurs in patches on site, particularly in the central portion of the proposed Willow Creek neighborhood and southeastern portions of the proposed Hidden Canyon neighborhood (refer to Figure 4.4-1 and Table 4.4-1). Species occurring on the project site that are associated in the purple needle grass grassland alliance include ripgut grass, soft brome (*Bromus hordeaceus*), wild oat, and Italian ryegrass. Native flowering herbs include scarlet pimpernel, common catchfly, common sandaster (*Corethrogyne filaginifolia*), and island false bindweed (Appendix C).

Perennial Rye Grass Grassland

One patch of perennial rye grass grassland occurs in the central-western portion of the proposed Willow Creek neighborhood surrounded by annual brome grasslands and coyote brush scrub (refer to Figure 4.4-1 and Table 4.4-1). This vegetation community is dominated largely by beardless wildrye (*Leymus triticoides*) and also includes wild oat and Italian ryegrass in the herbaceous layer.

Bristly Ox-Tongue

The bristly ox-tongue vegetation community is dominated by bristly ox-tongue (*Helminthotheca echioides*). These patches occur most commonly in seasonally wet places near the coast of southern California. Bristly ox-tongue often occurs in waste places, roadsides, pastures, fields, crop fields, vineyards, orchards, gardens, landscaped areas, and other disturbed open places. Bristly ox-tongue patches occur in the slightly depressed area in the northeast corner of the proposed Hidden Canyon neighborhood (refer to Figure 4.4-1 and Table 4.4-1). This vegetation community is not described in MCV2 (Sawyer et al. 2009).

Cattail Marshes

This vegetation community is dominated by broadleaf cattail (*Typha latifolia*) and occurs in a wetland area located in the northwest corner of the proposed Hidden Canyon neighborhood (refer to Figure 4.4-1 and Table 4.4-1). Cattail marsh corresponds to the *Typha latifolia* Herbaceous Alliance (Sawyer et al. 2009).

Coyote Brush Scrub

Coyote brush scrub includes coyote brush (*Baccharis pilularis*) as the dominant or co-dominant shrub in the canopy. Coyote brush scrub has a variable shrub canopy less than 10 feet in height with a variable ground layer. Species associated with coyote brush scrub on site include California sagebrush (*Artemisia californica*), poison oak (*Toxicodendron diversilobum*), and California figwort (*Scrophularia californica*). Herbaceous species found in association with this community on-site include bromes, wild oat, and black mustard (*Brassica nigra*). This vegetation community occurs in the southern portions of the proposed Willow Creek and Hidden Canyon neighborhoods (refer to Figure 4.4-1 and Table 4.4-1). This vegetation community corresponds to the *Baccharis pilularis* Shrubland Alliance (Sawyer et al. 2009). In addition, coyote brush scrub as it is characterized on site would also be considered as coastal scrub by the OCP (County of Santa Barbara 2004).

California Sagebrush Scrub

California sagebrush scrub contains California sagebrush as the sole or dominant shrub species. It has a continuous or intermittent shrub canopy of less than seven feet in height with a variable ground layer. Stands of this vegetation community are located on the upper slopes of the canyon features associated with the ephemeral waterways that traverse the southern portions of the proposed Willow Creek and Hidden Canyon neighborhoods (refer to Figure 4.4-1 and Table 4.4-1). Species associated with the California sagebrush scrub include Menzies' goldenbush (*Isocoma menziesii*), ladies' tobacco (*Pseudognaphalium californicum*), coyote brush, black sage (*Salvia mellifera*), and poison oak. The herbaceous understory includes a sparse cover of various brome species, as well as scarlet pimpernel and redstem stork's bill (*Erodium cicutarium*). This vegetation community corresponds to the *Artemisia californica* Shrubland Alliance (Sawyer et al. 2009). In addition, California sagebrush scrub as it is characterized on site would also be considered as central coastal sage scrub and coastal scrub under the OCP (County of Santa Barbara 2004).

Arroyo Willow Thickets

Arroyo willow thickets consist of arroyo willow (*Salix lasiolepis*) as the dominant or co-dominant shrub or tree in the canopy. Arroyo willow thickets have an open to continuous canopy less than 33 feet in height with a variable ground layer. These stands are generally located within the canyon bottoms associated with the ephemeral waterways and other drainages and wetlands within the

project site (refer to Figure 4.4-1 and Table 4.4-1). This community is dominated by arroyo willow and sometimes includes a low cover of coyote brush, poison hemlock (*Conium maculatum*), poison oak, and coast live oak (*Quercus agrifolia*). This vegetation community corresponds to the *Salix lasiolepis* Shrubland Alliance (Sawyer et al. 2009).

Eucalyptus Grove

Eucalyptus groves on the project site consist of Tasmanian bluegum (*Eucalyptus globulus*) and red ironbark (*Eucalyptus sideroxylon*) as the dominant species. Eucalyptus groves have an intermittent to continuous canopy less than 164 feet in height with a sparse to intermittent shrub and herbaceous layer. On site the shrub and herbaceous layers are largely absent. Eucalyptus groves on the project site occur in three patches (in the central, central-northern, and central eastern portions) (refer to Figure 4.4-1 and Table 4.4-1). Two of these stands are located within the canyon bottoms associated with ephemeral waterways. This vegetation community corresponds to the *Eucalyptus* spp. Woodland Semi-Natural Alliance (Sawyer et al. 2009).

Coast Live Oak Woodland

Coast live oak woodland includes stands of coast live oak as the dominant or co-dominant species in the tree canopy. This vegetation community has an open to continuous canopy less than 98 feet in height with a sparse to intermittent shrub layer and a sparse or grassy the herbaceous layer. Coast live oak woodland vegetation occurs in several linear patches in the southwestern, central-southern and southeastern portions of the proposed Willow Creek and Hidden Canyon neighborhoods (refer to Figure 4.4-1 and Table 4.4-1). This vegetation community corresponds to the *Quercus agrifolia* Woodland Alliance (Sawyer et al. 2009).

In addition, a unique association of coast live oak woodland occurs within the proposed Willow Creek and Hidden Canyon neighborhoods, Coast Live Oak Woodland-Arroyo Willow Thicket (*Quercus agrifolia*-*Salix lasiolepis* [Sawyer et al. 2009]). This association consists of coast live oak and arroyo willow as co-dominant species in the tree canopy.

This association occurs in several linear patches within the canyon bottoms associated with the on-site ephemeral waterways (refer to Figure 4.4-1 and Table 4.4-1). Understory vegetation consists of intermittent cover of Pacific poison oak and coyote brush.

Developed

Developed is a land cover type not recognized in MCV2. These areas are characterized as currently built environments related to the Rancho Maria Golf Club (RMGC) public golf course, including an abundance of open space largely made up of turf grass and row trees. Vegetation present within the developed land that provides habitat for wildlife species largely consists of tree species including Tasmanian blue gum, Aleppo pine (*Pinus halapensis*), Italian stone pine (*Pinus pinea*), Monterey pine (*Pinus radiata*) and shrub species including myoporum (*Myoporum laetum*). Herbaceous species cover is generally very low within the developed land due to regular maintenance associated with the golf course operations. In addition, paved roadway occurs where the sewer line easement crosses State Route 1 occurs.

Debris

Debris is a land cover type not recognized in MCV2. One area classified as this cover type occurs within Key Site 21, but is not found within project site and is entirely man-made consisting of

stockpiled landscape material including wood chips and tree trimmings associated with the public golf course.

Fallow Agriculture

Fallow agriculture is not recognized in MCV2. Fallow agriculture comprises approximately 0.66 acre exclusively within the sewer line easement. These areas are characterized by areas previously under agricultural cultivation.

Drainages and Wetlands

Drainages

Drainages and wetlands on Key Site 21 are shown on Figure 4.4-2. Two major unnamed drainages occur on Key Site 21, both of which are tributary to Orcutt Creek. One is located in the southeastern corner while the other is in the central portion of Key Site 21. The latter also occurs within the sewer line easement and supports hydrophytic vegetation, hydric soils, and wetland hydrology indicators within the stream channel. Vegetation associated with these drainages consists of a combination of eucalyptus grove, coast live oak woodland, and arroyo willow thicket communities. In addition, three ephemeral drainages occur on Key Site 21, two of which occur within the development footprints of the proposed Willow Creek and Hidden Canyon neighborhoods. The third occurs within the northern portion of the proposed Willow Creek neighborhood (within an area designated as open space per the Draft OSMP) as well as extends north and intersects the end of the proposed sewer easement.

Wetlands

Wetlands are regarded as important biological resources both because of their rarity and because they serve a variety of functional values. Several types of wetlands exist in Santa Barbara County, including freshwater marshes, vernal pools, and riparian habitats. According to the County of Santa Barbara Environmental Thresholds and Guidelines Manual, wetlands must have one or more of the following attributes (County of Santa Barbara 2008):

- At least periodically, the land supports predominantly hydrophytes, that is plants adapted to moist areas,
- The substrate is predominantly un-drained hydric soil, and
- The substrate is non soil and is saturated with water or covered by shallow water at some time during the growing season of each year. (County of Santa Barbara 2009)

A wetland feature occurs within the northern portion of the proposed Hidden Canyon neighborhood that supports hydrophytic vegetation, hydric soils, and wetland hydrology, and therefore, constitutes a three-parameter wetland (refer to Figure 4.4-2 and Figure 4.4-3). This feature consists of herbaceous, largely non-native wetland species including bristly ox-tongue and curly dock (*Rumex crispus*), though native wetland species including pale spikerush (*Eleocharis macrostachya*) are present in varying concentrations and in relatively isolated areas. Additional potential County two-parameter wetlands, consisting of mature stands arroyo willow and hydric soil indicators, were also identified within the proposed Hidden Canyon neighborhood surrounding the three-parameter wetland. Riparian areas within the project site consisting of hydrophytic vegetation (such as arroyo willow thickets [Figure 4.4-1]) would also constitute as potential County wetlands.

Figure 4.4-2 Drainages and Wetlands on Key Site 21

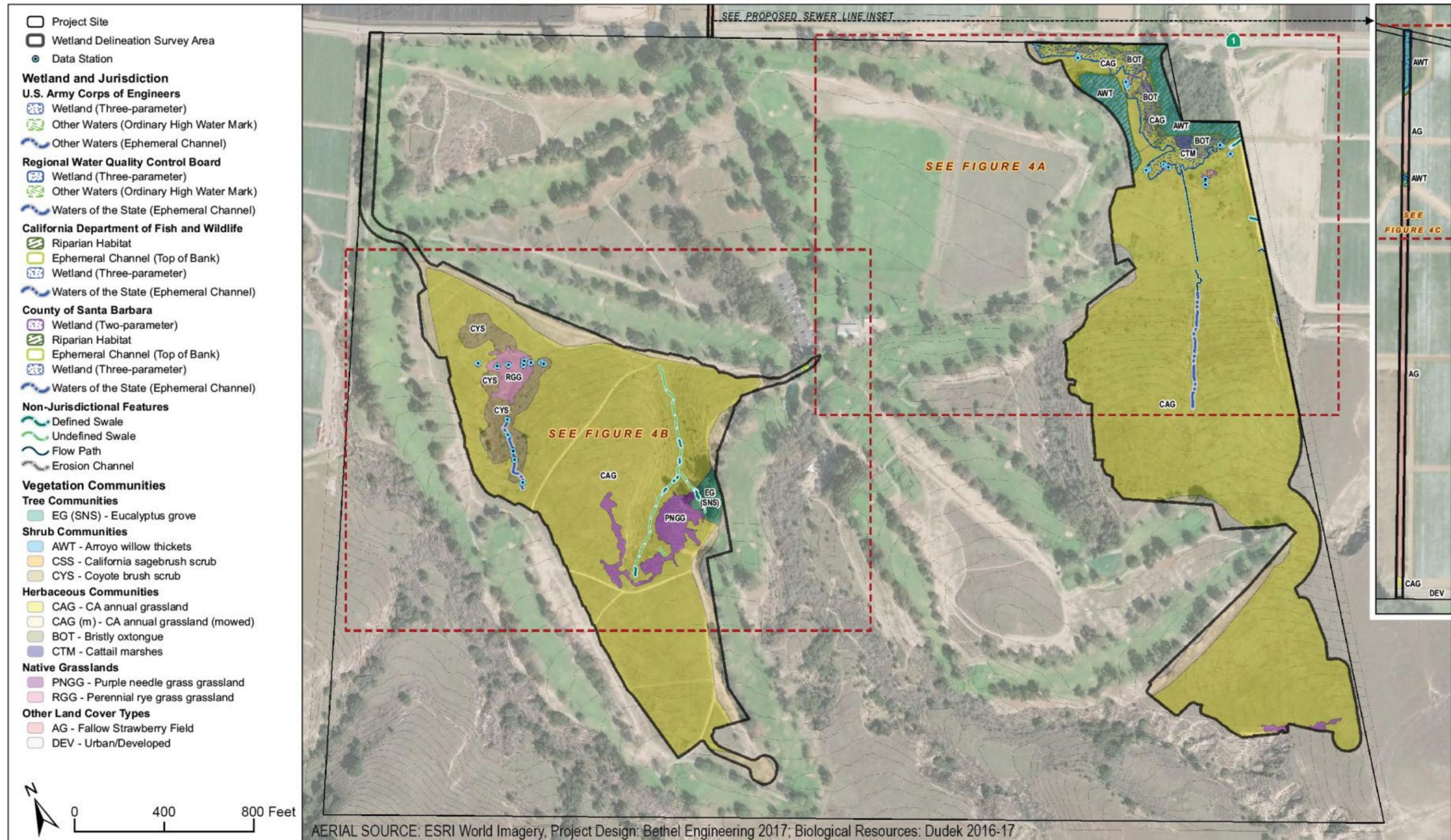


Figure 4.4-3 Drainages and Wetlands – Hidden Canyon Neighborhood



Special Status Species

For the purpose of this analysis, special status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the United States Fish and Wildlife Service (USFWS) under the federal Endangered Species Act; those listed or proposed for listing, or candidates for listing as rare, threatened, or endangered by the California Department of Fish and Wildlife (CDFW) under the state Endangered Species Act; animals designated as “Fully Protected,” “Species of Special Concern,” “Rare,” or “Watch List” by the CDFW, and plants recognized on the California Rare Plant Rank (CRPR) lists. Those plants ranked as CRPR 1, 2, 3, or 4 are considered special status species in this EIR, per the following code definitions:

- Rank 1A = Plants presumed extirpated in California, and either rare or extinct elsewhere;
- Rank 1B.1 = Rare or endangered in California and elsewhere; seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat);
- Rank 1B.2 = Rare or endangered in California and elsewhere; fairly threatened in California (20-80% occurrences threatened);
- Rank 1B.3 = Rare or endangered in California and elsewhere, not very threatened in California (<20% of occurrences threatened or no current threats known);
- Rank 2A = Plants presumed extirpated in California, but more common elsewhere;
- Rank 2B = Rare, threatened or endangered in California, but more common elsewhere;
- Rank 3 = Plants about which more information is needed (most are species that are taxonomically unresolved; some species on this list meet the definitions of rarity under California Native Plant Society and California Endangered Species Act);
- Rank 4.2 = Plants of limited distribution (watch list), fairly threatened in California (20-80% occurrences threatened); and
- Rank 4.3 = Plants of limited distribution (watch list), not very threatened in California (<20% occurrences threatened or no current threats known).

CRPR List 4 species have limited distribution globally but are fairly common within their range. CRPR List 3 and List 4 plant species are typically not considered for analysis under CEQA except where they are designated as locally rare or otherwise protected by local government as is the case for those projects located under the jurisdiction of the County of Santa Barbara. In 1988, the County prepared a list of species considered to be of “local concern” because of local or regional scarcity (Wiskowski 1988). Although this list is outdated, plants occurring on this list may meet the definition of a locally designated special status species. An updated list was prepared in 2005 and updated in 2007 by the Santa Barbara Botanic Garden (Central Coast Center for Plant Conservation 2007) and includes species the County may consider special status.

Queries of the following databases were conducted to assess regionally occurring special status species:

- Query of the CDFW California Natural Diversity Database (CNDDDB) occurrences of special-status species documented within the *Orcutt, California* USGS 7.5-minute topographic quadrangle and the eight surrounding quadrangles (Appendix C)
- Rincon conducted a query of the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California, which included records from the *Orcutt, California* USGS 7.5-minute topographic quadrangle and the eight surrounding quadrangles (Table 1 in Appendix

C [note that plant species already evaluated in the 2019 BRA (Appendix C) were not included in the evaluation table])

Focused special status plant surveys were conducted between December 2015 and June 2016 to evaluate the potential for special status species to occur within the project area. The methodology and results of the focused botanical surveys are included in the 2019 BRA (Appendix C). The results of these queries and discussion of those special status plant and wildlife species present or with potential to occur on the project site are discussed below. Those species determined to not occur on the project site are evaluated in Appendix C.

SPECIAL STATUS PLANT SPECIES

Based on the database and literature review, 63 special status plant species documented in the *Orcutt, California* USGS 7.5-minute topographic quadrangle; the eight surrounding quadrangles were assessed for their potential to occur in the project site. Of those 37 special status plant species have potential to occur within the project site based on the geographic range of each species and the presence of potentially suitable habitat. These species include:

- Beach layia (*Layia carnosa*)
- Beach spectaclepod (*Dithyrea maritima*)
- Black-flowered figwort (*Scrophularia atrata*)
- Blochman's dudleya (*Dudleya blochmaniae* ssp. *blockmaniae*)
- California adder's-tongue (*Ophioglossum californicum*)
- California spineflower (*Mucronea californica*)
- Cambria morning-glory (*Calystegia subacaulis* ssp. *episcopalis*)
- Chaparral ragwort (*Senecio aphanactis*)
- Crisp monardella (*Monardella undulata* ssp. *crispa*)
- Davidson's salkscale (*Atriplex serenana* var. *davidsonii*)
- Douglas' fiddleneck (*Amsinckia douglasiana*)
- Elegant wild buckwheat (*Eriogonum elegans*)
- Gaviota tarplant (*Deinandra increscens* ssp. *villosa*)
- Hoover's bent grass (*Agrostis hooveri*)
- Hubby's phacelia (*Phacelia hubbyi*)
- Jones' bush-mallow (*Malacothamnus jonesii*)
- Kellogg's horkelia (*Horkelia cuneata* var. *sericea*)
- La Graciosa thistle (*Cirsium scariosum* var. *loncholepis*)
- La Purisima manzanita (*Arctostaphylos purissima*)
- Mesa horkelia (*Horkelia cuneata* var. *puperula*)
- Palmer's spineflower (*Chorizanthe palmeri*)
- paniculate tarplant (*Deinandra paniculata*)
- Pecho manzanita (*Arctostaphylos pechoensis*)
- Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)
- Saints' daisy (*Erigeron sanctarum*)

- San Bernardino aster (*Symphyotrichum defoliatum*)
- San Luis Obispo monardella (*Monardella undulata* ssp. *undulata*)
- San Luis Obispo wallflower (*Erysimum capitatum* var. *lompocense*)
- Sand almond (*Prunus fasciculata* var. *punctate*)
- Sand mesa manzanita (*Arctostaphylos rudis*)
- Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*)
- Seaside bird's-beak (*Cordylanthus rigidus* ssp. *littoralis*)
- Short-lobed broomrape (*Orobanche parishii* ssp. *brachyloba*)
- Small-flowered morning-glory (*Convolvulus simulans*)
- South coast branching phacelia (*Phacelia ramosissima* var. *austrolitoralis*)
- Southern curly-leaved monardella (*Monardella sinuate* ssp. *sinuate*)
- Straight-awned spineflower (*Chorizanthe rectispina*)

Of these, two special status plant species have been observed and verified to occur on the project site during surveys conducted LFR in 2004/2005 and by Dudek in 2016, Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*; CRPR 1B.1) and Kellogg's horkelia (*Horkelia cuneata* var. *sericea*; 1B.1). This species was observed within the southwest corner of Key Site 21. In addition, one other special status plant species was potentially observed, blackflowered figwort (*Scrophularia atrata*; CRPR 1B.2). The specimen observed was not blooming or identifiable and therefore was documented as *Scrophularia* sp. (Appendix C). The remaining species that have potential to occur within the project site are those that generally occur in woodland, grassland or coastal scrub habitats as well as those that are associated with wetlands. The project site is located within federally designated critical habitat for La Graciosa thistle.

SPECIAL STATUS WILDLIFE SPECIES

Thirty-six special status animal species were reported to occur regionally, based on the database search and literature review (Appendix C). Of these, 13 species were eliminated from further analysis due to the absence of suitable habitat at the project site, or the occurrence of the project site outside of the species' known range. Several previous focused and reconnaissance survey efforts have been conducted on the project site in the past, and four special status animal species have been documented on the project site: California red-legged frog (CRLF; *Rana draytonii*), California tiger salamander (CTS; *Ambystoma californiense*), northern harrier (*Circus cyaneus*) (not documented by the CNDDDB in the database query), and Monarch butterfly (*Danaus plexippus*). In addition to these species twenty other special status animal species were determined to have potential to occur based on the presence of suitable habitat. Following is a list of all 24 species and discussions of their potential to occur:

- American badger (*Taxidea taxus*)
- Blainville's horned lizard (*Phrynosoma blainvilli*)
- Burrowing owl (*Athene cunicularia*)
- California red-legged frog
- California tiger salamander
- Coast patch-nosed snake (*Salvadora hexalepis virgultea*)
- Golden eagle (*Aquila chrysaetos*)

- Grasshopper sparrow (*Ammodramus savannarum*)
- Loggerhead shrike (*Lanius ludovicianus*)
- Monarch butterfly
- Northern harrier
- Pallid bat (*Antrozous pallidus*)
- San Diego desert woodrat (*Neotoma lepida intermedia*)
- Silvery legless lizard (*Anniella pulchra pulchra*)
- Townsend's big-eared bat (*Corynorhinus townsendii*)
- Tricolored blackbird (*Agelaius tricolor*)
- Two-striped garter snake (*Thamnophis hammondi*)
- Vernal pool fairy shrimp (*Branchinecta lynchi*)
- Western pond turtle (*Actinemys marmorata*)
- Western red bat (*Lasiurus blossevillii*)
- Western spadefoot (*Spea hammondi*)
- White-tailed kite (*Elanus leucurus*)
- Yellow warbler (*Setophaga petechia*)
- Yellow-breasted chat (*Icteria virens*)

Federal and State Listed

California Tiger Salamander

The CTS consists of three distinct population segments (DPSs): the Santa Barbara County DPS, the Sonoma County DPS, and the Central DPS. The Santa Barbara County DPS and Sonoma County DPS are both federally listed as endangered while the Central DPS is federally listed as threatened. The CTS is state listed as threatened throughout its range. CTS breed in long-lasting rain pools (e.g., seasonal ponds, vernal pools, slow-moving streams) that are often turbid, and occasionally in permanent ponds lacking fish predators. During the non-breeding season, adults occur in upland habitats and occupy ground squirrel (*Otospermophilus beecheyi*) or pocket gopher (*Thomomys bottae*) burrows. They migrate nocturnally to aquatic sites to breed during relatively warm winter or spring rains. Juveniles emigrate at night from the drying pools to upland refuge sites, such as rodent burrows and cracks in the soil. Following breeding, adults move 9 to 518 feet (3 to 158 m) away from breeding ponds within the first night (Loredo et al., 1996; Trenham 2001). Most salamanders continue to move to different burrow systems further from the pond over the next one to four months, with an average distance of 374 feet (114 m) from the pond (Trenham 2001). The CTS utilize upland habitat within 1.24 miles of breeding ponds as noted in the Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander (USFWS, 2003).

The project site is located within the West Santa Maria/Orcutt Metapopulation Area as defined in the Recovery Plan for CTS (USFWS 2016). Critical habitat designated in the Draft Recovery Plan (Critical Habitat Unit 1) for this metapopulation includes 15 known breeding ponds. No critical habitat for this species is designated at the project site.

Prior focused surveys for CTS found the species throughout the northern portion of Key Site 21. These previous focused surveys consisted of a drift fence study conducted in the winter of 2004-2005 within the project site. Results of this survey included the detection of 10 CTS in pitfall traps

(Appendix C). The basin in the northwest corner of the Key Site 21 (refer to Figure 4.4-1) is identified as SAMA-21, a known breeding pond, by the USFWS (2010). In April 2004, aquatic surveys of the breeding pond in the northwestern portion of Key Site 21 were conducted in which no CTS larvae were found (LFR 2004). In April 2017 aquatic surveys were conducted at SAMA-21 as well as two historic irrigation ponds and two irrigation reservoirs located on Key Site 21 within the RMGC (Appendix C). Twenty one CTS larvae were captured at SAMA-21. CTS were not detected at the other irrigation ponds and reservoirs sampled. Overall, the available aquatic habitat appears to be largely unchanged and wetland and ponded areas within Key Site 21 are potentially suitable breeding habitat for this species (refer to Figure 4.4-2). In addition, the entirety of the project site provides suitable upland habitat for the species due to proximity from potential and known breeding habitat.

The removal of agricultural operations has increased the amount of available upland habitat for the CTS and has improved the movement and dispersal habitat for the species. The upland habitat supports numerous small mammal burrows; however, the majority of these burrows appear to be associated with Botta's pocket gopher and only a small number of California ground squirrel burrows were observed. In addition, potential breeding ponds outside of Key Site 21 are located within the dispersal range of the species and the available upland habitat is suitable for movement and dispersal between breeding ponds. Presence of these habitat features, along with the previous observations of the species during focused surveys, show that the species is likely still present within the project site.

California Red-legged Frog

The CRLF is federally listed as threatened and a state species of special concern throughout its range. The historic range of the CRLF extended along the California coast from the vicinity of Point Reyes National Seashore, Marin County, and inland from the vicinity of Redding, Shasta County, southward to northwestern Baja California, Mexico. The species has lost approximately 70 percent of its former range; CRLF are locally abundant in the San Francisco Bay area and the central coast, but only isolated populations have been documented in the Sierra Nevada, northern Coast, and northern Transverse ranges.

The CRLF inhabits quiet pools of streams, marshes, and ponds. All life history stages are most likely to be encountered in and around breeding sites, which include coastal lagoons, marshes, springs, permanent and semi-permanent natural ponds, and ponded and backwater portions of streams, as well as artificial impoundments such as stock ponds, irrigation ponds, and siltation ponds. Eggs are typically deposited in permanent pools, attached to emergent vegetation.

The project site is located within Santa Maria River-Santa Ynez River Core Area, as defined in the Recovery Plan for the species (USFWS 2002). Designated critical habitat for the species borders the east, west, and south boundaries of Key Site 21. The CNDDDB identifies several occurrences of the CRLF, on and near the project site. Additionally, a protocol-level survey for CRLF was completed in 2004 following the USFWS protocol survey guidelines for the species (USFWS 1997), which has since been updated (USFWS 2005). Results of the previous survey included the observation of nine CRLF individuals at a man-made pond immediately west of the RMGC clubhouse during a nighttime spotlighting survey (LFR 2004). No CRLF were observed at this or any other location during the daytime portion of the 2004 surveys (LFR 2004). During CTS aquatic surveys conducted in 2017 by Storrer, CRLF tadpoles were captured within an irrigation reservoir in the southeastern portion of the RMGC (Appendix C).

The man-made pond identified to support CRLF in 2004 is situated outside of the development footprint; however, the project site does provide suitable movement habitat for this species. Although no other ponds were identified to support CRLF in 2004, this species may traverse the project site during dispersal periods in search of suitable breeding ponds in the vicinity of the project site as well as utilize drainages on the project site. Presence of these habitat features, along with the previous observations of the species during focused surveys, indicate that the species may still be present on Key Site 21, and may utilize the habitat within the project site.

Vernal Pool Fairy Shrimp

Vernal pool fairy shrimp is a federally threatened species. No definitive surveys focused on determining presence of vernal pool fairy shrimp within the project site have been conducted; however, the seasonally ponded features detected on the site (Appendix C) may be suitable habitat for vernal pool fairy shrimp. The time to maturity and reproduction for vernal pool fairy shrimp is temperature dependent, varying between 18 days and 147 days, with a mean of 39.7 days (Helm 1998). At this point in time, there is currently not enough information to determine the typical hydroperiod of the seasonally ponded features on Key Site 21, and specifically on the proposed Hidden Canyon neighborhood (refer to Figure 4.4-2 and Figure 4.4-3) and consequently whether these features hold water for durations suitable for vernal pool fairy shrimp to complete their life cycle. Vernal pool fairy shrimp are documented by the CNDDDB regionally, but not on the project site. Cysts of vernal pool fairy shrimp are most commonly transported from one pool to another from the deposition of feces from water fowl and mammals that may have ingested cysts as well as muds containing cysts also attached to these animals (Belk 1999). As such, inoculation of the seasonally ponded areas of the project site could occur and based on the species habitat requirements, known occurrences in the vicinity of the project site and potentially suitable habitat found within the project site, this species has potential to occur.

Species of Special Concern

Monarch Butterfly

Monarch butterflies are protected by County of Santa Barbara local policies. The central coast of California is within the migratory route for the species, and there are several known autumnal and over-wintering sites on the central coast, including a known autumnal site at the public golf course (Appendix C). The project site provides suitable roosting habitat in the form of mature stands of eucalyptus trees, and the species has potential to occur during migration and over-wintering.

Reptiles (western pond turtle, silvery legless lizard, Blainville's horned lizard, coast patch-nosed snake, and two-striped garter snake)

Several reptiles designated as Species of Special Concern have potential to occur within the Key Site 21 based on the availability of suitable habitat. These species include western pond turtle, silvery legless lizard, Blainville's horned lizard, coast patched-nose snake, and two-striped garter snake. Western pond turtle and two-striped garter snake could potentially occur within the available seasonal or perennial ponds within Key Site 21 and the project site (including the proposed Willow Creek and Hidden Canyon neighborhoods). However, upland habitat in the vicinity of these features can also support these species. Suitable habitat for silvery legless lizard and Blainville's horned lizard is also present within Key Site 21 and the project site (including the proposed Willow Creek and Hidden Canyon neighborhoods) consisting of grasslands, shrub lands and oak woodlands. Suitable habitat for the coast patch-nosed snake occurs in the areas of Key Site 21 and the project site

(including the proposed Willow Creek and Hidden Canyon neighborhoods) that consist of shrub lands. These reptile species can also be found within the ephemeral waterways traversing the site and the seasonal/perennial ponds. No reptile Species of Special Concern were identified during the 2015-2016 field surveys (Appendix C).

Amphibians (western spadefoot)

The western spadefoot toad is almost completely terrestrial, entering water only to breed. Pools that are suitable for breeding are those which do not contain bullfrogs, fish, or crayfish and that pond for at least thirty (30) days for successful completion of larval development (Morey and Reznick, 2004). Outside the breeding season, the western spadefoot toad spends the majority of the time underground to avoid desiccation and prefer open areas with sandy or gravelly soils in a variety of habitats in the vicinity of a suitable breeding pond, including chaparral. Breeding (i.e., aquatic) and upland habitat is present within Key Site 21. Specifically, potential breeding habitat occurs within the seasonal or perennial ponds within Key Site 21 including those found in the northern portion of the proposed Hidden Canyon neighborhood. Suitable upland habitat consists of grassland, shrub lands and woodlands in close proximity to potential breeding habitat. Western spadefoot were not observed during surveys of Key Site 21.

Mammals (American badger, San Diego desert woodrat, western red bat, Townsends's big-eared bat, and pallid bat)

Suitable foraging habitat for Townsend's big-eared bat, western red bat, and pallid bat is present throughout the project site and surrounding area. Roosting habitat for western red bat and pallid bat is largely confined to the canyon features associated with the ephemeral waterways traversing the site as well as in the native and non-native woodlands associated with the public golf course and adjacent properties. No suitable roosting habitat for Townsend's big-eared bat is present within the project site or surrounding area (Appendix C), as this species preferred roosting habitat consists of rocky areas that are protected from high temperatures.

The San Diego desert woodrat is a subspecies of the desert woodrat that occurs from San Diego north to San Luis Obispo County. Nests that are constructed by this species are typically located within scrub habitats and often in rocky areas that can be found on Key Site 21 (including the proposed Willow Creek and Hidden Canyon neighborhoods).

No American badgers or burrows suitable to support the species were detected during previous field surveys; however, American badgers have been documented regionally by the CNDDDB. This species utilizes a wide variety of scrub, forest and grassland habitats with friable soils and is expected to occur in the region. Key Site 21 provides suitable habitat for this species. Based on the habitat requirements, known occurrences in the vicinity and presence of suitable habitat, this species has potential to occur.

Special Status Birds, Nesting birds, and Raptors (including tri-colored blackbird, grasshopper sparrow, yellow-breasted chat, loggerhead shrike, burrowing owl, yellow warbler, white-tailed kite and golden eagle, northern harrier)

Several birds species protected by the California Fish and Game Code (CFG) and Bald and Golden Eagle Protection Act may also nest in trees and shrubs on site. Two fully protected bird species (golden eagle and white-tailed kite), one state candidate Endangered/Species of Special Concern (tri-colored blackbird), and six state Species of Special Concern bird species (burrowing owl, yellow

warbler, grasshopper sparrow, yellow-breasted chat, loggerhead shrike, and northern harrier) have potential to occur or are known to occur on the project site.

The tri-colored blackbird requires open water, protected nesting substrate, and foraging areas with insect prey within a few miles of the colony. A small amount of emergent vegetation (i.e., cattails) and dense willow thickets are present within the northern portion of the proposed Hidden Canyon neighborhood that can provide potential nesting habitat for this species.

The burrowing owl is a Species of Special Concern that requires underground burrows or occasionally, other cavities, for nesting, roosting, and cover. Burrows used by the owls are usually dug by other species, termed host burrowers. In California, California ground squirrel burrows are frequently used by burrowing owls, but they may use dens or holes dug by other fossorial species including American badger and canid species. In some instances, owls have been known to excavate their own burrows. Natural rock cavities, debris piles, culverts, and pipes also are used for nesting and roosting (CDFG 2012). This species has been documented regionally by the CNDDDB. No suitable burrows to support the species were detected during field surveys (Appendix C), however suitable vegetation communities that are known to support this species occur on Key Site 21. Therefore, this species has potential to occur.

Several species of raptors are known to utilize the project site for foraging and perching (Appendix C), and have the potential to nest in and immediately adjacent to the project site. During the 2015-2016 field surveys, nine inactive raptor nests were identified within the project site and surrounding area. Raptor nesting surveys completed in 2016 found no active raptor nests within the study area (Appendix C). However, several raptor species were identified including red-tailed hawk, white-tailed kite, northern harrier, golden eagle (*Aquila chrysaetos*), Cooper's hawk (*Accipiter cooperi*), red-shouldered hawk (*Buteo lineatus*), turkey vulture (*Cathartes aura*), great horned owl (*Bubo virginianus*), and American kestrel (*Falco sparverius*). Of these raptor species observed during the survey, red-tailed hawk, red-shouldered hawk, Cooper's hawk, great horned owl, and American kestrel were observed perched within the woodland areas within the project site. The remaining species were only observed soaring and/ or foraging over the project site. Northern harrier was observed on multiple occasions foraging within the project site and golden eagle was observed on one occasion soaring over and to the south of the project site. Based on the available suitable habitat, red-tailed hawk, red-shouldered hawk, Cooper's hawk, great horned owl, white-tailed kite, and American kestrel have potential to nest within the project site and surrounding areas. Key Site 21 does not provide suitable nesting habitat for golden eagle, but the project site does contain foraging habitat.

Sensitive Natural Communities

Nine sensitive natural communities are identified by the CNDDDB as occurring in the regional vicinity of Key Site 21 and include central coast arroyo willow riparian, central dune scrub, central foredunes, central maritime chaparral, coastal and valley freshwater marsh, southern California coastal lagoon, southern cottonwood willow riparian, southern vernal pool, and southern willow scrub. None of these communities are mapped by the CNDDDB within Key Site 21 or the sewer line easement. The Sensitive Natural Communities List in the CNDDDB is not currently maintained and no new information has been added. Therefore, vegetation types on site were also compared with the List of Vegetation Alliances and Associations (CDFW 2018). According to the CDFW's Vegetation Program, Alliances with State ranks of S1-S3 are considered to be imperiled, and thus, potentially of special concern. Three additional vegetation types with rank S1-S3 or otherwise designated as high priority or potentially rare in the hierarchical list are present in the project site and include Purple

Needlegrass Grasslands (*Stipa* [=*Nassella*] *pulchra*) Herbaceous Alliance, Creeping Rye Grass Turf (*Leymus triticoides*) Herbaceous Alliance, and Oak Woodland-Arroyo Willow Thicket (*Quercus agrifolia*-*Salix lasiolepis*) Association (refer to Figure 4.4-1 and Table 4.4-1). In addition, Coastal scrub (in the form of coyote brush scrub and California sagebrush scrub on the site) as well as California sagebrush scrub alone are considered sensitive under the OCP (County of Santa Barbara 2004). As noted above, California sage brush scrub would be considered as central coastal sage scrub under the OCP. The County of Santa Barbara Environmental Thresholds and Guidelines Manual also considers California sagebrush scrub as locally sensitive (2008). In addition, coast live oak woodlands on the project site are considered locally sensitive by the County of Santa Barbara. See Figure 4.4-1 for the locations of these natural communities.

Protected Trees

In 1998 the County's Board of Supervisors initiated a collaborative public process to develop recommendations for oak protection. By July 2001 the County adopted the Oak Tree Protection and Regeneration Program (County of Santa Barbara 2009b). An outcome of this program was the Santa Barbara County Comprehensive Plan Conservation Element Oak Tree Protection in the Inland Rural Areas of Santa Barbara County as adopted in 2003, and republished in 2009. This document outlined protection goals, development standards, policies and implementing actions to promote the conservation, protection, and regeneration of native oak populations and oak woodlands.

- Oak Tree Protection Policy 1 states that "native oak trees, native oak woodlands and native oak savannas shall be protected to the maximum extent feasible in the County's rural and/or agricultural lands. Regeneration of oak trees shall be encouraged."
- Development Standard 1 (Protection of all species of mature oak trees) states that "development shall avoid removal of or damage to mature oak trees, to the maximum extent feasible." Mature oak trees are defined as live oak trees six inches or greater in diameter at breast height (DBH). "Native oak trees that cannot be avoided shall be replanted on site or on a receiver site known to be capable of supporting the particular oak tree species. Replanting shall conform to the County's Standard Conditions and Mitigation Measures."

The County's Environmental Thresholds and Guidelines Manual (October 2008, revised July 2015) states that individual native specimen trees (mature trees that are healthy and structurally sound and have grown into the natural stature particular to the species) are potentially significant. In general, the loss of 10 percent or more of the trees (by number or by canopy cover) of biological value on a project site is considered potentially significant.

In addition, the OCP (County of Santa Barbara 2004) protects native trees that are considered established and protected if they are six feet in height. Protected non-native trees are those with a DBH of 25 inches or greater (County of Santa Barbara 2004).

Ten tree species occur on the project site. These include: eucalyptus (*Eucalyptus* sp.), myoprum (*Myoporum laetum*), Monterey pine (*Pinus radiata*), coast redwood (*Sequoia sempervirens*), arroyo willow, Monterey cypress (*Cupressus macrocarpa*), Mexican fan palm (*Washingtonia robusta*), coast live oak, Modesto ash (*Fraxinus velutina*), and olive (*Olea* sp.) (see Appendix C for the full inventory of trees).

Wildlife Movement Corridors

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal

populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The habitats within the link do not necessarily need to be the same as the habitats that are being linked. Rather, the link merely needs to contain sufficient cover and forage to allow temporary inhabitation by ground-dwelling species. Typically habitat linkages are contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Depending upon the species using a corridor, specific physical resources (such as rock outcroppings, vernal pools, or oak trees) may need to be located within the habitat link at certain intervals to allow slower-moving species to traverse the link. For highly mobile or aerial species, habitat linkages may be discontinuous patches of suitable resources spaced sufficiently close together to permit travel along a route in a short period of time.

Corridors usually connect one large habitat area with another, and while there is no pre-defined size limit for such areas, they most often are on the scale of mountain ranges, valleys, rivers and creeks, or clearly delimited ecological situations (e.g., vernal pools). The *Missing Linkages: Restoring Connectivity to California Landscape* (Penrod et al., 2001) conference refers to such corridors as “landscape linkages.” These are specifically defined in that report as:

“large, regional connections between habitat blocks (“core areas”) meant to facilitate animal movement and other essential flows between different sections of a landscape (taken from Soulé and Terborgh 1999). These linkages are not necessarily constricted, but are essential to maintain connectivity function in the ecoregion.”

Wildlife movement corridors can be both large and small scale. The project site is not located within a landscape linkage identified by the above reference. Regionally, the project site is not located within an Essential Connectivity Area (ECA) as mapped in the report, *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (2010). ECAs represent principle connections between Natural Landscape Blocks. ECAs are regions in which land conservation and management actions should be prioritized to maintain and enhance ecological connectivity. ECAs are mapped based on coarse ecological condition indicators, rather than the needs of particular species and thus serve the majority of species in each region. Small scale habitat corridors are also present on site and include drainages and other topographic features that facilitate movement. The drainages found within Key Site 21 and the sewer line easement, may provide opportunities for small scale regional connections for a number of species including, but not limited to the American badger, California mule deer (*Odocoileus hemeonus californicus*), and coyote (*Canis latrans*).

b. Regulatory Setting

Federal, state, and local authorities under a variety of statutes and guidelines share regulatory authority over biological resources. The primary authority under CEQA for general biological resources lies within the land use control and planning authority of local jurisdictions, which in this instance is the County of Santa Barbara. The CDFW is a trustee agency for biological resources throughout the State under the CEQA and also has direct jurisdiction under the CFGC, which includes, but is not limited to, resources protected by the State of California under the California Endangered Species Act (CESA). Below are discussions of the federal, state, and local regulations that form the regulatory basis for the impact analysis in Section 4.4.3.

Federal

Federal Endangered Species Act

Under the federal Endangered Species Act (FESA), authorization is required to “take” a listed species. Take is defined under FESA Section 3 as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Under federal regulation (50 Code of Federal Regulations Sections 17.3, 222.102); “harm” is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. FESA Section 7 outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat.

Section 7(a)(2) of FESA and its implementing regulations require federal agencies to consult with USFWS or National Marine Fisheries Service to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under FESA Section 10(a). Section 10(a) allows USFWS to permit the incidental take of listed species if such take is accompanied by a Habitat Conservation Plan that includes components to minimize and mitigate impacts associated with the take.

The USFWS and National Marine Fisheries Service share responsibility and regulatory authority for implementing FESA (7 United States Code [USC] Section 136, 16 USC Section 1531 et seq.).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the Migratory Bird Treaty Act (16 USC Section 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Act’s Eagle Permit Rule (50 Code of Federal Regulations 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

State

California Endangered Species Act (California Fish and Game Code Section 2050 et seq.)

CESA establishes the policy of the state to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that state agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. For projects that would affect a listed species under both CESA and FESA, compliance with the FESA would satisfy the CESA, if CDFW determines that the federal incidental take authorization is “consistent” with CESA under California Fish and Game Code Section 2080.1. Before a project results in take of a species listed under the CESA, a take permit must be issued under Section 2081(b).

California State Fish and Game Code Sections 2080, 2081

Section 2080 of the CFGC states, “No person shall import into this state [California], export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission [State Fish and Game Commission] determines to be an endangered species or threatened species, or attempt any of those acts, except as otherwise provided in this chapter, or the Native Plant Protection Act, or the California Desert Native Plants Act.” Pursuant to Section 2081, CDFW may authorize individuals or public agencies to import, export, take, or possess state listed endangered, threatened, or candidate species. These otherwise prohibited acts may be authorized through permits or Memoranda of Understanding if the take is incidental to an otherwise lawful activity, impacts of the authorized take are minimized and fully mitigated, the permit is consistent with any regulations adopted pursuant to any recovery plan for the species, and the project operator ensures adequate funding to implement the measures required by CDFW, which makes this determination based on available scientific information and considers the ability of the species to survive and reproduce.

California Fish and Game Code Sections 3511, 4700, 5050, and 5515

Protection of fully protected species is described in Fish and Game Code Sections 3511, 4700, 5050, and 5515. These statutes prohibit take or possession of fully protected species. Incidental take of fully protected species may be authorized under an approved Natural Community Conservation Plan.

Native Plant Protection Act (California Fish and Game Code Sections 1900-1913)

CDFW also has authority to administer the Native Plant Protection Act (NPPA) (CFGC Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under Section 1913(c) of the NPPA, the owner of land where a rare or endangered native plant is growing is required to notify the department at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

California Fish and Game Code Section 1600 et seq.

Section 1600 et seq. of the CFGC prohibits, without prior notification to CDFW, the substantial diversion or obstruction of the natural flow of, or substantial change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. For these activities to occur, CDFW must receive written notification regarding the activity in the manner prescribed by the department, and may require a lake or streambed alteration agreement. Lakes, ponds, perennial and intermittent streams and associated riparian vegetation, when present, are subject to this regulation.

California State Fish and Game Code Sections 3503 and 3503.5

Under these sections of the CFGC, the project operator is not allowed to conduct activities that would result in the taking, possessing, or destroying of any birds of prey; the taking or possessing of any migratory nongame bird as designated in the MBTA; the taking, possessing, or needlessly destroying of the nest or eggs of any raptors or nongame birds protected by the MBTA; or the taking of any nongame bird pursuant to CFGC Section 3800.

California Environmental Quality Act Guidelines Section 15380

In addition to the protections provided by specific federal and state statutes, CEQA Guidelines Section 15380(b) provides that a species not listed on the federal or state list of protected species nonetheless may be considered rare or endangered for purposes of CEQA if the species can be shown to meet certain specified criteria. These criteria are modeled on the definition in FESA and the section of the CFGC dealing with rare or endangered plants or animals.

Santa Barbara County

The County of Santa Barbara adopted the OCP in 1995 to guide development within the Orcutt area. The OCP EIR identified biological impacts for a variety of properties within Orcutt, including Key Site 21. Mitigation measures prescribed for these impacts were outlined in the OCP EIR, and several of these mitigation measures were incorporated into the OCP as policies and development standards. In addition, the County of Santa Barbara maintains a list of locally important plant species and attempts to minimize development impacts to these species. The County also regulates impacts to wetlands through the discretionary permitting process. Requirements for the protection of biological resources in the unincorporated area of Santa Barbara County are provided by the Comprehensive Plan Conservation Element, Environmental Resource Management Element (ERME), Land Use Element, Community Plans, and the Coastal Land Use Plan (if within the Coastal Zone). These documents identify sensitive habitats and species, and provide measures to direct project design and policies to protect biological resources.

The following OCP policies and Development standards, many of which serve to implement mitigation measures identified in the OCP EIR, would apply:

- Policy BIO-O-1:** Important natural resources in Orcutt, including sandhill chaparral, central dune scrub, wetlands, oak trees and woodland, Bishop pine forest, specimen trees, and central sage scrub shall be protected, consistent with the Open Space Plan and the standards below, unless this would prevent reasonable development of a property.
- DevStd BIO-O-1.1:** Development shall be sited and designed to avoid disruption and fragmentation of significant natural resources within and adjacent to designated undeveloped natural open space areas, minimize removal of significant native vegetation and trees, preserve wildlife corridors and provide reasonable levels of habitat restoration. Where possible, significant natural resources, such as specimen trees, adjacent to designated, natural undeveloped open space corridors should be preserved. (Implements OCP EIR Mitigation Measure BIO-20)
- DevStd BIO-O-1.2:** Development within or adjacent to designated natural open space areas shall be reviewed for, and required to implement, habitat restoration where site-specific impacts require restoration. If restoration on or near the site is not feasible, acquisition and preservation of additional habitat acreage should be considered, as a last resort if no other like-kind habitat mitigation options are available, payment into a mitigation bank program within the OPA that is acceptable to the County as provided for by the new DevStd BIO-O-1.8. Mitigation and restoration plans should identify acreage impacted, replacement ratios, success criteria, remedial measures, and funding and responsibility for long-term maintenance and

monitoring. All such restoration projects shall utilize native plants derived from local (Orcutt) seed and cutting stock, or as deemed biologically acceptable by a County qualified biologist. Wildlife relocation should be avoided. However, any wildlife relocation should be coordinated with Fish and Game and be consistent with applicable State standards.

- DevStd BIO-O-1.3:** Landscaping for development on the edge of designated natural undeveloped open space areas shall include native trees and shrubs, with habitat restoration efforts focused on buffers. Planting of highly invasive weedy plants (e.g., iceplant, pampas grass, veldt grass, Monterey pine, eucalyptus, spiny clotbur, and Australian fireweed) shall be prohibited within 500 feet of natural undeveloped open space areas as designated on the Open Space map. (Implements OCP EIR Mitigation Measure BIO-28)
- DevStd BIO-O-1.5:** The edges of designated undeveloped natural open space areas shall be clearly delineated and fenced where necessary to protect resources both during construction and, when appropriate, over the life of the project. Long term fencing shall be designed to accommodate wildlife passage where appropriate.
- DevStd BIO-O-1.7:** Development adjacent to undeveloped natural open space within high fire hazard areas shall be sited and designed to minimize fire protection activities (e.g., fuel breaks) that may potentially disrupt these areas. Structures shall be sited a minimum of 100 feet from the edge of designated open space areas in the rural area and along the urban/rural corridors (e.g., Orcutt Creek). This setback may be adjusted downward to retain open space vegetation and allow reasonable use of a property. Firefighting equipment access shall be allowed within this setback and landscaping within this area should not impede the use of such equipment. Paved roads and trails may be allowed within the setback area. (Implements OCP EIR Mitigation Measure BIO-15)
- DevStd BIO-O-1.8:** Where new development eliminates important onsite habitat (e.g. coastal sage scrub, grasslands, riparian habitat, and wetlands), county shall require development to restore or enhance habitat and wetlands), County shall require development to restore or enhance like-kind habitat either onsite or offsite. If restoration site are limited or unavailable, County shall require payment of adequate fees into a mitigation bank program acceptable to County to permanently protect a comparable or greater amount of created or restored habitat elsewhere within the OPA.
- Policy BIO-O-2:** Consistent with necessary flood control practices, natural stream channels and riparian vegetation in Orcutt shall be maintained in an undisturbed state in order to protect banks from erosion, enhance wildlife passageways, and provide natural greenbelts, unless this would prevent reasonable development of a property.
- DevStd BIO-O-2.1:** Development shall include: a minimum setback of 50 feet from the outside edge of riparian vegetation or the top of creek bank (whichever is further) which may be adjusted upward depending on slopes, biological

resources and erosion potential; hooding and directing lights away from the creek; drainage plans shall direct polluting drainage away from the creek or include appropriate filters; and erosion and sedimentation control plans shall be implemented during construction. (Implements OCP EIR Mitigation Measure BIO-24)

- Policy BIO-O-3:** Established native trees in designated open space areas shall be protected. Established native trees in developable areas shall be incorporated into the site landscaping plan to the greatest degree feasible except where it would interfere with reasonable development of a property. Native trees shall be considered established if they are six feet in height.
- DevStd BIO-O-3.1:** To the maximum extent feasible, development shall be designed to avoid damage to established native trees (e.g., oaks) by incorporating setbacks, clustering, or other appropriate methods. Areas protected from grading, paving, and other disturbances shall include the area 6 feet outside of established native tree driplines, unless this distance would interfere with reasonable development of a property. Where native trees are removed, they shall be replaced in a manner consistent with County standards. (Implements OCP EIR Mitigation Measure BIO-26)
- Policy BIO-O-4:** Non-native trees (e.g., eucalyptus groves and windrows) that provide known raptor nesting or key roosting sites shall be protected; non-native specimen trees shall be protected to the greatest degree feasible except where it would interfere with reasonable development of a property. Non-native trees of less than 25 inches in diameter at breast height do not qualify as specimens for this Policy.
- DevStd BIO-O-4.1:** Where non-native specimen trees are removed for development the County should consider replacement with native trees.
- Policy BIO-O-5:** New facilities in Orcutt, including roads, bike paths/trails, sewer lines and retention basins, shall to the maximum extent feasible be site sited and designed to avoid disruption of significant natural resources within designated natural undeveloped open space areas, minimize removal of significant native vegetation and trees and provide for reasonable levels of habitat restoration for significant habitats disrupted by construction.
- DevStd BIO-O-5.1:** Road construction shall minimize filling within creeks, stream corridors and wetlands and avoid or minimize removal of riparian vegetation. To the maximum extent feasible, bridges (rather than culverts) shall be required over all major creeks and wildlife corridors. Such bridges shall be designed to facilitate wildlife passage by providing at least 6 feet of vertical clearance and locate support structures outside of creek banks, if feasible. Crossings of tributaries and drainages should use bridges if a bridge would avoid or substantially reduce impacts to sensitive habitat and sediment buildup. Road projects should also preserve the hydrologic connectivity between wetlands, and between wetlands and upland areas. (Implements OCP EIR Mitigation Measure BIO-1)

- DevStd BIO-O-5.3:** Multi-use trail construction should avoid removal of riparian vegetation to the maximum extent feasible. The Orcutt Creek multi-use trail shall be set back a minimum of 50 feet from the outside edge of riparian vegetation or the top-of-bank (whichever is further), unless this would make the multi-use trail link infeasible. Trail construction shall include riparian restoration between the edge of existing native vegetation and the bicycle path. Trail lighting should be directed away from the creek. (Implements OCP EIR Mitigation Measure BIO-2)
- DevStd BIO-O-5.4:** Trails should follow existing dirt road and trail alignments and utilize existing bridges where feasible. Where this is not possible, prior to final trail alignment proposed trail routes should be surveyed and rerouted where necessary to avoid sensitive species, subject to final approval by P&D and the Park Department. All trails shall be sited and designed to avoid or minimize impacts to sensitive resources, areas of steep slopes and/or highly erosive/sandy soils, where feasible. Developers shall fund sign installation along certain trails (as identified in the Multi Use Trail Guidelines) providing educational and interpretive information and advising dog owners to keep their dogs out of sensitive habitats. (Implements OCP EIR Mitigation Measure BIO-9)
- DevStd BIO-O-5.5:** Siting and construction of a new or expanded sewage treatment facility and associated ponds and/r spraying grounds and sewer trunk line extensions shall avoid important natural resources and should be based on results of sensitive species surveys. Facilities shall be constructed a minimum distance of 50 feet from the edge of riparian, marsh and wetland areas and shall avoid amphibian retreat areas. Sewer trunk lines should be placed under or adjacent to roads, bike path or trails, not within creeks or wetland areas.
- DevStd BIO-O-5.6:** Excavated fill for retention basin construction shall not be placed within important natural resource areas. Areas adjacent to or within habitats which are disturbed during construction shall be revegetated with appropriate native species. All sensitive habitat areas adjacent to proposed retention basins shall be fenced before grading begins to prevent disturbance and stockpiling in these areas. (Implements a portion of OCP EIR Mitigation Measure BIO-13)
- DevStd KS21-4:** The area depicted in Figure KS21-1 shall remain in natural, undeveloped open space. No development except trails or a roadway to parcel 113-250-17 and/or the existing parking lot shall be permitted within this open space and no structures shall be permitted within 550 feet of the top of the creek bank. The 50-foot setback shall be delineated by a low fence and plantings of native trees and shrubs. (Implements a portion of OCP EIR Mitigation Measure KS21-BIO-1)

4.4.2 Previous Environmental Review

The Biological Resources section of the OCP EIR examined the biological resources of the project region and the potential impacts as a result of development under the OCP. Impacts and mitigation measures applicable to Key Site 21, including measures that apply to the Orcutt Planning Area as a whole as well as site-specific mitigation measures, are outlined in Table 4.4-2. The OCP EIR concluded that impacts to riparian vegetation would be reduced to a less than significant level but impacts to wildlife and loss of habitat in general would remain significant and unavoidable.

Table 4.4-2 Summary of Biological Impacts Identified in OCP Final EIR in Relation to the Proposed Project

OCP EIR Impact	Impact Summary	OCP EIR Impact Type	OCP EIR Mitigation	Impact Modified by Proposed Project?
Orcutt Planning Area Analysis				
BIO-19	Habitat Elimination/Habitat Fragmentation. Permanent loss or fragmentation of threatened or very threatened communities, diminution of wildlife populations through direct loss of habitats, disruption of wildlife corridors through encroachment, disturbance, introduction of domestic animals (especially predators), and weed invasion.	Class I	BIO-17a BIO-17b BIO-17c BIO-20 BIO-21	Yes. See analysis for Impact BIO- 3 below.
Bio-20	Elimination of wetlands. Elimination of 200 acres of wetlands would eliminate a substantial percentage of the last remaining freshwater wetlands on the central coast of California (90 percent of original statewide total has been eliminated) and would constitute a potentially significant impact. The elimination of the vernal wetlands in particular including “the best example of vernal pools in the County” [Olson 1991], (less than 2,000 acres remain in California) would create potentially significant impacts to these habitats. The loss of these wetlands would result in potentially significant impacts to a number of shorebirds and waterfowl such as black-necked stilt, killdeer, cinnamon teal, wood duck, and possibly the federal candidate species of tri-colored blackbird and long billed curlew through the loss of critical foraging and breeding habitat.	Class I	BIO-17c BIO-18	Yes. See analysis for Impact BIO- 4 below.
BIO-22	Fragmentation of wetland and upland habitat. Development between wetland and upland retreat sites of amphibians (or on the uplands themselves) would have a potentially significant impact on two federal candidates for the Endangered Species List: California tiger salamander and spadefoot toad, and would lead to their elimination from the Orcutt Planning area.	Class II	BIO-17c BIO-18 BIO-19 BIO-20	No

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OCP EIR Impact	Impact Summary	OCP EIR Impact Type	OCP EIR Mitigation	Impact Modified by Proposed Project?
BIO-23	Elimination of grasslands. Elimination of approximately 900 acres of grassland would create potentially significant impacts through elimination of habitat for at least eight California Species of Special Concern: coast horned lizard, white-tailed kite, golden eagle, northern harrier, Cooper’s hawk, California horned lark, loggerhead shrike, badger and burrowing owl (also a State candidate for listing as threatened or endangered), as well as numerous other wildlife species either wholly or partially dependent on these areas.	Class I	BIO-17c	Yes. See analysis for Impact BIO- 3 below.
BIO-27	Elimination of central coastal sage scrub. Urban development on roughly 150 acres of central coastal sage scrub would cause potentially significant impacts to this declining community (Table 5.2-1) and the uncommon Lompoc monkey flower.	Class I	BIO-17c BIO-23	Yes. See analysis for Impact BIO- 3 below.
BIO-28	Elimination of riparian communities. Development on, and encroachment near streams and creeks, construction of road bridges and culverts will potentially result in removal of riparian vegetation, polluted runoff, noise, light and glare, fill importation, sedimentation, increased maintenance, alteration of creek channels, and increased disturbance from humans, dogs, and cats.	Class I	BIO-17a BIO-17b BIO-17c BIO-24.	Yes. See analysis for Impact BIO-3 below.
BIO-30.1	Elimination of rare plants. Elimination of rare plants such as purisima and sand mesa manzanita, Lompoc yerba santa, sand almond, curly-leaved monardella, and others, could occur as a result of development of the Community Plan. This is potentially significant.	Class II	BIO-25 BIO-29	No
BIO-31	Removal of oak trees. Removal of oak trees due to site development would be potentially significant due to the wildlife habitat value that even a single oak tree in an urban environment provides for insects, reptiles, birds, and small mammals.	Class II	BIO-26	No
BIO-32	Removal of eucalyptus woodlands. Removal of eucalyptus woodlands that are used as a roosting and/or nesting site for songbirds and raptors could have a potentially significant impact on raptor populations, many of whom are California Species of Special Concern.	Class II	BIO-27	No
BIO-33	Weed invasion. Landscaping with weedy species in the proposed newly urbanized areas could have a potentially significant impact on the remaining acreages of native plant communities by displacing native species and thus significantly altering habitat characteristics and ecological functions. These weedy species include iceplant, pampas grass, veldt grass, eucalyptus, spiny clotbur and Australian fireweed.	Class II	BIO-28	No

OCP EIR Impact	Impact Summary	OCP EIR Impact Type	OCP EIR Mitigation	Impact Modified by Proposed Project?
Key Site 21 Analysis				
KS21-BIO-1	Loss of Vegetation and Habitat. Development of residential units, the hiking trail and the extension of sewer lines would lead to potentially significant impacts to riparian vegetation along the drainage corridors, coastal sage scrub, eucalyptus, and two sensitive plant species through the construction of roads and building sites.	Class II	KS21-BIO-1 KS21-BIO-2	No
KS21-BIO-2	Impacts to Wildlife. Development would create potentially significant impacts to wildlife through disturbance of habitat by domestic animals, disturbance from noise and light sources, and disruption of wildlife migration routes.	Class I	KS21-BIO-1 KS21-BIO-2 KS21-BIO-3	Yes. See analysis for Impact BIO-5 below.

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

Appendix G of the CEQA guidelines considers a project to have significant impact on biological resources if the project would:

- Substantially, adversely impact, either directly or through habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (§670.2 or 670.5) or in Title 50, Code of Federal Regulations (§17.11 or 17.12);
- Have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
- Have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service;
- Adversely impact state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) either individually or in combination with the known or probable impacts of other activities through direct removal, filling, hydrological interruption, or other means;
- Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.

Potential impacts related to potential conflicts with the provisions of an approved local, regional, or state habitat conservation plan are discussed in Section 4.15, *Effects Found Not to be Significant*.

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Guidelines for evaluation of biological impacts and significance thresholds are contained in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (October 2008, revised July 2015) and the Santa Barbara County Planner's Guide to Conditions of Approval and Mitigation Measures (2005). Determination of significance for disturbance to habitats or species within the County is based on the following criteria:

- a. Conflict with adopted environmental plans and goals of the community where it is located;
- b. Substantially affect a rare or endangered species of animal, plant or the habitat of the species;
- c. Interfere substantially with the movement of any resident or migratory fish or wildlife species; or
- d. Substantially diminish habitat for fish, wildlife, or plants.

The evaluation of project impacts as detailed in the Environmental Thresholds and Guidelines Manual calls for an assessment of both short- and long-term impacts. Significant impacts to species or habitats are those which substantially impact significant resources in the following ways:

- a. Substantially reduce or eliminate species diversity or abundance;
- b. Substantially reduce or eliminate quantity or quality of nesting areas;
- c. Substantially limit reproductive capacity through losses of individuals or habitat;
- d. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources;
- e. Substantially limit or fragment range and movement (geographic distribution or animals and/or seed dispersal routes); or
- f. Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Instances in which project impacts would be less than significant include:

- a. Small acreages of non-native grassland if wildlife values are low;
- b. Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies;
- c. Areas of historical disturbance such as intensive agriculture;
- d. Small pockets of habitats already significantly fragmented or isolated, and degraded or disturbed; or
- e. Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

Additional County guidelines are provided for specific biological communities. These are used in conjunction with the general impact assessment guidelines described above.

Wetlands

Based on the County guidelines, the following types of project-created impacts may be considered significant:

- a. Projects that result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or

would threaten the continuity of wetland-dependent animal or plant species are considered to have a potentially significant effect on the environment;

- b. Wildlife access, use, and dispersal in wetland habitats are key components of their ecosystem value. Projects that substantially interrupt wildlife access, use and dispersal in wetland areas, would typically be considered to have potentially significant impacts; and
- c. The hydrology of wetlands systems must be maintained if their function and values are to be preserved. Therefore, maintenance of hydrological conditions, such as the quantity and quality of runoff, must be assessed in project review.

Riparian Habitats

Based on the County guidelines, the following types of project-related impacts may be considered significant:

- a. Direct removal of riparian vegetation;
- b. Disruption of riparian wildlife habitat, particularly animal dispersal corridors and or understory vegetation;
- c. Intrusion within the upland edge of the riparian canopy (generally within 50 feet in urban areas, within 100 feet in rural areas, and within 200 feet of major rivers), leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion;
- d. Disruption of a substantial amount of adjacent upland vegetation where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian corridor, which reduces erosion and sedimentation potential; and
- e. Construction activity that disrupts critical time periods (nesting, breeding) for fish and other wildlife species.

Oak Woodlands and Forests

Based on the County guidelines, project-created impacts on oak woodlands and forests may be considered significant due to changes in habitat value and species composition such as the following:

- a. Habitat fragmentation;
- b. Removal of understory;
- c. Alteration to drainage patterns;
- d. Disruption of the canopy; or
- e. Removal of a significant number of trees that would cause a break in the canopy or disruption in animal movement in and through the woodland.

Individual Native Trees

Based on the County guidelines, the following types of project-related impacts may be considered significant:

- a. Impacts to native specimen trees, regardless of size. Specimen trees are defined as mature trees that are healthy and structurally sound and have grown into the natural stature particular to the species;

- b. Impacts to rare native trees, which are very low in number or isolated in distribution; or
- c. In general, the loss of 10% or more of the trees of biological value on a project site.

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Willow Creek and Hidden Canyon Residential Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed Neighborhoods of Willow Creek and Hidden Canyon Project.

Threshold:	Would the project substantially, adversely impact, either directly or through habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (§670.2 or 670.5) or in Title 50, Code of Federal Regulations (§17.11 or 17.12)?
Threshold:	Would the project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impact BIO-1 THE PROJECT WOULD RESULT IN IMPACTS TO SPECIAL STATUS PLANT SPECIES. THIS IMPACT WOULD BE CLASS II, SIGNIFICANT BUT MITIGABLE.

Thirty-seven special status plant species, two of which are federally endangered (beach layia [also state endangered] and La Graciosa thistle), have the potential to occur based on the presence of suitable habitat within Key Site 21 and the sewer line easement.

The 2004/2005 field survey conducted by LFR documented two special-status plant species within Key Site 21, Blochman's dudleya and Kellogg's horkelia (Appendix C). During surveys conducted in 2016, Blochman's dudleya was observed, but Kellogg's horkelia was not observed. Blochman's dudleya was observed outside of the development footprints for Willow Creek and the Hidden Canyon proposed development footprints. In addition, black-flowered figwort was potentially observed during the 2016 surveys. However, the specimen was not blooming or identifiable and therefore could only be identified as *Scrophularia* sp.

Focused botanical surveys which encompass the bloom periods of special status plant species that may occur on-site were not conducted within the natural communities that occur at the proposed sewer line easement; however, a reconnaissance level survey was conducted to assess the potential for special status plants to occur along the sewer line. In addition, the 2004/2005 field survey and 2016 botanical surveys were completed 14 and 3 years ago, respectively. Although no special status plant were detected within the development footprints for the two communities, in the intervening time, conditions on the project site may have changed, and the areas occupied by special status plants may have changed. In addition, presence of black flowered figwort could not be adequately assessed. Therefore, impacts to special status species with potential to occur are still possible at the time of project implementation. Direct impacts to special status plant species include mortality of individual special status plant species during construction activity within the Willow Creek and Hidden Canyon development footprints as well as along the proposed sewer line easement and restoration and fuel management activities within the open space. Indirect impacts include invasion by non-native weeds into areas disturbed by construction activities within these areas. Impacts to special status plant species would be potentially significant.

Mitigation Measures

OCP EIR Mitigation Measure BIO-29 requires a mitigation plan wherever impacts to rare plants occur and encourages consultation with CDFW. The following mitigation measures, which implement OCP EIR Mitigation Measure BIO-29, are required to mitigate potential impacts to special status plants.

BIO-1(a) Special Status Plant Species Pre-Construction Surveys

Updated surveys for special status plants (i.e., plants either state or federally listed or California Rare Plant Ranked) shall be completed by a County-approved biologist for all proposed disturbance areas prior to grading or construction activities associated with the project. The surveys shall be floristic in nature and shall be seasonally-timed to coincide with the flowering time for the target species. All plant surveys shall be conducted by a County-approved qualified biologist no more than two years prior to the start of grading or construction activities associated with the project. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map. Surveys shall be conducted in accordance with the most current protocols established by the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS). A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS as appropriate, for review and approval.

Plan Requirements and Timing. A report of the special status plant survey results shall be submitted to Planning and Development for review prior to zoning clearance issuance for development including sewer line construction. Mapped locations of special status plants shall be shown on grading and zoning plans.

Monitoring. Planning and Development permit processing planner shall ensure that the special status plant surveys have been completed prior to issuance of zoning clearance. Grading inspectors shall inspect as needed.

BIO-1(b) Special Status Plant Species Avoidance, Minimization, and Mitigation (implements OCP EIR Mitigation Measure BIO-29)

If Federally or State listed or California Rare Plant Ranked species are identified during special status plant species pre-construction surveys (Mitigation Measure BIO-1[a]), development shall avoid impacting these plant species to the greatest extent feasible. Special status plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm during grading and construction activities.

Where special status plant species cannot be feasibly avoided, impacts to special status plant species shall be mitigated at a minimum ratio of 2:1 (number of acres/individuals restored to number of acres/individuals impacted) for each species impacted. The Draft Open Space Management Plan (OSMP) shall be revised to include compensatory mitigation of impacted special status plant species. The Final OSMP shall be submitted to the County for approval (Note: if a state listed plant species will be impacted, the restoration plan shall also be submitted to the CDFW for approval and authorization for impacts must be obtained from CDFW). The compensatory mitigation component of the Draft OSMP shall be revised to include, at a minimum, the following components:

- a. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type);

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- b. Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved];
- c. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values);
- d. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including species to be used, container sizes, seeding rates, etc.]);
- e. Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule);
- f. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports);
- g. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of the prescribed number of container plants and 30 percent relative cover by vegetation type;
- h. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria;
- i. Notification of completion of compensatory mitigation and agency confirmation; and
- j. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

Plan Requirements and Timing. The results of the survey shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance. Planning and Development shall inspect the site prior to initiation of ground disturbance activities to ensure the protective fencing is installed properly. If special status plants cannot be avoided, the applicant shall submit the Final OSMP to Planning and Development for review and approval prior to zoning clearance issuance.

Monitoring. The protective fencing shall be monitored by Planning and Development permit compliance and building and safety staff until grading and construction activities are complete. Planning and Development shall ensure that the proposed development avoids impacts to special status plant species or impacts are mitigated for per the requirements of this measure.

Significance After Mitigation

Implementation of the above mitigation measures would reduce impacts to special status plant species to a less than significant level (Class II).

Threshold:	Would the project substantially, adversely impact, either directly or through habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (§670.2 or 670.5) or in Title 50, Code of Federal Regulations (§17.11 or 17.12)?
Threshold:	Would the project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impact BIO-2 THE PROJECT WOULD RESULT IN IMPACTS TO SPECIAL STATUS ANIMAL SPECIES. IMPACTS TO MOST SPECIAL STATUS ANIMAL SPECIES WOULD BE CLASS II, SIGNIFICANT BUT MITIGABLE; HOWEVER, IMPACTS TO CALIFORNIA TIGER SALAMANDER WOULD BE CLASS I, SIGNIFICANT AND UNAVOIDABLE.

Three special status animal species are known to occur on Key Site 21: California red-legged frog, California tiger salamander, and monarch butterfly. Twenty other special status animals have the potential to occur on-site and be impacted by the proposed development, based on the presence of suitable habitat.

Federal and State Listed

California Tiger Salamander

The wetland areas and basins and ponds located within Key Site 21 and the sewer line easement are potential CTS breeding areas. In addition, the basin (refer to Figure 4.4-2) in the northwest corner of the project site is identified as SAMA-21, a known breeding pond, by the USFWS (2010). The drift fence study conducted in the winter of 2004-2005 as well as aquatic survey conducted in 2017 detected CTS within Key Site 21. Direct impacts to CTS would occur through mortality or injury during any initial ground disturbing activities (from development of proposed neighborhoods, sewer line installation, as well as mitigation and fuel management program described in the Draft OSMP). Development of the project would also impact suitable upland habitat (up to 79.82 acres permanently removed and up to 0.80 acre of temporary impacts) and potential breeding/wetland habitat (up to 2.36 acres permanently removed and up to 0.11 acre of temporary impacts). Impacts to CTS are potentially significant.

California Red-legged Frog

The project could result in the loss or substantially degrade or reduce wetlands habitat suitable for special-status wildlife species resulting in incidental mortality of CRLF. Wetlands which are known to support CRLF are located within the public golf course, immediately adjacent to the project site. A total of nine CRLF individuals were observed within a man-made pond immediately west of the RMGC clubhouse. In addition, CRLF tadpoles were captured during April 2017 aquatic surveys within an irrigation reservoir at the southeastern portion of the RMGC. As currently proposed, the project will not impact this man-made pond; however, use of the project site by CRLF is not known definitively and other ponding locations and/ or upland habitats within and adjacent to the project site may be used by this species. Direct impacts to CRLF could occur through mortality or injury during any initial ground disturbing activities. Direct impacts to upland habitat will occur during construction of the residential development as well as potentially during the implementation of the mitigation and fuel management program described in the Draft OSMP. Up to 82.97 acres of upland and dispersal habitat could be permanently removed by the proposed project and up to 0.80 acre

temporarily impacted. In addition, up to 2.36 acres of potentially suitable wetlands or aquatic habitat could be permanently removed and up to 0.11 acre temporarily impacted. Indirect impacts to CRLF may occur during construction in the vicinity of drainages or ponds that contain suitable aquatic habitat through degradation of water quality from potential spills or construction generated erosion if upslope of such features. Impacts to CRLF are potentially significant.

Vernal Pool Fairy Shrimp

The project could result in the potential loss or degradation of vernal pool fairy shrimp habitat as well as direct mortality of individuals within suitable habitat. The project includes the proposed removal of aquatic habitat suitable for vernal pool fairy shrimp. Direct impacts to vernal pool fairy shrimp may occur as a result of ground disturbing activities. Up to 2.36 acres of vernal pool fairy shrimp habitat, corresponding to potential wetland habitat on site could be permanently removed and up to 0.11 acre temporarily impacted. Indirect impacts to vernal pool fairy shrimp may also occur during construction in the vicinity of suitable wetland habitat through degradation of water quality from potential spills or fill from construction generated erosion if activities occur upslope of such features. Impacts to vernal pool fairy shrimp are potentially significant.

Species of Special Concern

Monarch Butterfly

The project could result in the potential loss or degradation of monarch butterflies autumnal and over-wintering habitat.

Monarchs are known to migrate through the area during winter months along the coastal strip from Los Angeles to Santa Barbara with a known autumnal site on the public golf course. The project site provides suitable roosting habitat in the form of a large mixed eucalyptus windbreaks in the central, central-northern, and central-eastern portions of the site. The project will permanently impact approximately 0.49 acres of eucalyptus stands on the site. Due to the small overall impact area to eucalyptus stands (compared to the 5.08 total acres which occur on Key Site 21), the impact would be considered minimal to monarch butterflies. In addition, long-term indirect impacts from development would be minimal in comparison to existing disturbances of the golf course. Therefore, impacts to monarch butterflies would be less than significant.

Reptiles (Western Pond Turtle, Silvery Legless Lizard, Blainville's Horned Lizard, Coast Patch-nosed Snake, and Two-striped Garter Snake)

Suitable habitat can be found within the woodland, coastal scrub, and grassland habitats found on the site. Direct impacts to these species could occur from direct mortality during ground disturbing activities. The project site represents a small proportion of suitable habitat in comparison to suitable habitat to the south of the proposed project area. The existing disturbance level within the project site is influenced by the public golf course. Compared to the regional population of these species a relatively small number of individuals are expected to be encountered. Based on these factors, impacts as a direct result of the proposed project are not expected to cause a downward trend in the species range wide or regional/local populations or restriction in these species ranges that would lead to a federal or state listing. Impacts to reptile species of special concern are expected to be less than significant.

Amphibians (Western Spadefoot)

The wetland areas and basins and ponds located within Key Site 21 and the sewer line easement are potential breeding areas for western spadefoot. Suitable upland habitat for this species occurs in the immediate vicinity of these wetland areas and basins. Direct impacts to western spadefoot include mortality or injury of individuals during initial ground disturbance activities, as well as permanent or temporary impacts to potentially suitable breeding and upland habitat. Because this species has high breeding site fidelity and exhibits highly localized movement patterns mainly in the vicinity of suitable breeding habitat, populations are at a high risk of local extirpation from the loss of breeding habitat in combination with injury or mortality of individuals in uplands. Therefore, impacts to the western spadefoot from the proposed project are potentially significant.

Mammals (American Badger, San Diego Desert Woodrat, Western Red Bat, Townsends's Big-eared Bat, and Pallid Bat)

The project could result in the potential loss or degradation of special-status mammal habitat as well as direct mortality of individual mammal species as the project includes the proposed removal of habitat suitable for special status mammal species including American badger and San Diego desert woodrat. Specifically, direct impacts to these special status mammals may occur as a result of ground disturbing activities through injury, direct mortality, and destruction of dens or nests. However, only a small number of individuals compared to the regional population are expected to be impacted. Impacts as a direct result of the proposed project are not expected to cause a downward trend in these species range wide or regional/local populations or cause a restriction in these species ranges that would lead to a federal or state listing. Impacts to American badger and San Diego desert woodrat are expected to be less than significant.

The project could also result in the potential loss or degradation of bat roosting habitat. The project includes the proposed removal of existing trees around the periphery of the public golf course, which could potentially be utilized as roosting habitat by several bat species, including western red bat and pallid bat. Loss of roosting habitat is potentially significant considering roosting sites generally have unique characteristics that make them suitable. For example, the loss of maternity roosts can lower the reproductive success of a population. No direct impacts to Townsend's big-eared bat are expected as the site only provides suitable foraging habitat. Indirect impacts to these three bat species would include loss of foraging areas which could result in the reduction of prey populations available. However, based on the relatively small amount of area to be disturbed compared to the foraging habitat available immediately south of Key Site 21, this impact would be less than significant.

Special Status Birds, Nesting birds, and Raptors (including Tri-colored Blackbird, Grasshopper Sparrow, Yellow-breasted Chat, Loggerhead Shrike, Burrowing Owl, Yellow Warbler, White-tailed Kite, Golden Eagle, and Northern Harrier)

In addition to the special status animal species discussed above, several bird species protected by the California Fish and Game Code and Bald and Golden Eagle Protection Act may also nest in trees and shrubs on site. Two fully protected bird species (golden eagle and white-tailed kite), one state candidate Endangered/Species of Special Concern (tri-colored blackbird), and six state Species of Special Concern bird species (burrowing owl, yellow warbler, grasshopper sparrow, yellow-breasted chat, loggerhead shrike, and northern harrier) have the potential to occur or are known to occur on the project site. Impacts to golden eagle are unlikely due to the site only providing foraging habitat for the species and no direct or indirect impacts to golden eagle nesting are anticipated.

Development and sewer line construction may result in direct or indirect impacts to other nesting bird species, should they be present within and/or in the immediate vicinity of areas of disturbance at the time of construction. Potential nesting habitat for the tri-colored blackbird is available at the cattail marsh and arroyo willow thickets found within the development areas while the grasslands, woodlands, and shrub lands within the project site provide suitable nesting habitat for the remaining special status as well as other native bird species. Direct impacts to nesting birds may occur due to removal or trimming of trees, shrubs, and other nesting substrates that may contain active nests. Impacts could occur during initial ground disturbing activities as well as site preparation (clearing, grubbing, and weeding associated with mitigation and fuel management (thinning of vegetation and limbing) activities associated with the Draft OSMP. Indirect impacts to nesting birds may occur from construction activities in the vicinity of an active nest resulting in distress to adults and disruption of nesting behavior leading to abandonment or nest failure. Considering the amount of nesting habitat that would be impacted, in proportion to the available amount within Key Site 21, impacts from the proposed project would likely incur potentially significant impacts to the local bird populations within the Key Site. In addition, agriculture and other development in the west Santa Maria/Orcutt Area are predominant. Due to limitations of nesting habitat, it is likely that a higher proportion of individuals are nesting on Key Site 21 compared to surrounding area. Therefore, impacts to the success of avian breeding within Key Site 21 through direct or indirect impacts are potentially significant.

Mitigation Measures

The following mitigation measures would be required to reduce potentially significant impacts to special status animal species from the proposed development.

BIO-2(a) USFWS/CDFW Consultation

Prior to zoning clearance issuance for grading, the applicant shall consult with USFWS and/or CDFW (depending on the species) regarding potential impacts to the California red-legged frog (CRLF) and the California tiger salamander (CTS). The applicant shall obtain all necessary permits and approvals and shall implement measures as required by these permits and approvals.

Plan Requirements and Timing. The applicant shall submit copies of correspondence and/or permits (as applicable) with applicable agencies to Planning and Development prior to zoning clearance issuance for grading.

Monitoring. Planning and Development permit processing planner shall confirm that the applicant has obtained all necessary permits and approvals. Planning and Development compliance monitoring and building and safety staff shall monitor and inspect to ensure that required measures are implemented during grading and construction of the project.

BIO-2(b) California Tiger Salamander (CTS) and California Red-legged Frog (CRLF) Habitat Avoidance

Development shall avoid impacting CTS and CRLF habitat to the greatest extent feasible. To protect habitat adjacent to and outside of the limits of disturbance of the proposed project, the Owner/Applicant shall install bright orange protective fencing to delineate the extent of disturbance areas associated with the project (including the proposed sewer line easement) under the direction of a County-approved qualified biologist. If CTS and CRLF habitat cannot be avoided, the Owner/Applicant shall provide Planning and Development with the total acreages for habitat that

would be impacted prior to zoning clearance issuance for grading and implement Mitigation Measure BIO-2(c) below.

Plan Requirements and Timing. Grading plans showing the location of CTS and CRLF habitat as well as protective fencing locations shall be submitted to Planning and Development for review and approval prior to issuance of zoning clearance for grading.

Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place.

*BIO-2(c) California Tiger Salamander (CTS) and California Red-legged Frog (CRLF)
Compensatory Mitigation*

If CTS and CRLF habitat cannot be avoided per Mitigation Measure BIO-2(b), the Owner/Applicant shall establish an off-site conservation easement(s) as compensatory mitigation to offset impacts to CTS and CRLF habitat. The compensatory mitigation shall incorporate the conditions and compensatory mitigation requirements specified in the incidental take permit(s) and/or incidental take statement that could be issued by CDFW and USFWS for this project but shall meet the minimum standards specified in this measure. Compensatory mitigation shall be provided at a ratio of not less than 2:1 (area mitigated: area impacted) for upland habitat and 3:1 for aquatic habitat. Compensatory mitigation must occur off-site and shall not occur within the open space or other location on Key Site 21. Areas proposed for preservation must contain verified extant populations of CTS and/or CRLF depending on the species the preserved area is compensating for. These off-site locations for CTS compensatory mitigation must occur within the West Santa Maria/Orcutt metapopulation area (Appendix D of the Recovery Plan for the Santa Barbara County Distinct Population Segment of the California Tiger Salamander [*Ambystoma californiense*]; USFWS 2016).

Compensatory mitigation areas shall have a restrictive covenant prohibiting future development/disturbance and shall be managed in perpetuity to encourage persistence and enhancement of the preserved target species. Compensatory mitigation lands cannot be located on land that is currently held publicly for resource protection. The compensatory mitigation areas shall be managed by a conservation lands management entity or other qualified easement holder.

The CDFW and organizations approved by CDFW that meet the criteria below may be considered qualified easement holders for those species for which the CDFW has regulatory authority. To qualify as a “qualified easement holder” a private land trust must at a minimum have:

1. Substantial experience managing conservation easements that are created to meet mitigation requirements for impacts to special-status species;
2. Adopted the Land Trust Alliance’s Standards and Practices; and;
3. A stewardship endowment fund to pay for its perpetual stewardship obligations.

Other specific conditions for qualified easement holders may be outlined in incidental take permit(s) and/or incidental take statement that could be issued by CDFW and USFWS for this project.

The County shall determine whether a proposed easement holder meets these requirements. The owner/applicant shall also be responsible for donating to the conservation easement holder fees sufficient to cover administrative costs incurred in the creation of the conservation easement (appraisal, documenting baseline conditions, etc.) and funds in the form of a non-wasting endowment to cover the cost of monitoring and enforcing the terms of the conservation easement

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in perpetuity. The amount of these administrative and stewardship fees shall be determined by the conservation easement holder in consultation with the County.

Conservation easement(s) shall be held in perpetuity by a qualified easement holder (as defined above), and be subject to a legally binding agreement that shall: (1) Be recorded with the County Recorder(s); and (2) Contain a succession clause for a qualified easement holder if the original holder is dissolved.

The following factors shall be considered in assessing the quality of potential mitigation habitat: (1) current land use, (2) location (e.g., habitat corridor, part of a large block of existing habitat, adjacency to source populations, proximity to potential sources of disturbance), (3) vegetation composition and structure, (4) slope, (5) soil composition and drainage, and (6) level of occupancy or use by all relevant species.

To meet the requirement that the mitigation habitat is of value equal to, or greater than, the habitat impacted on the project site, the mitigation habitat must be either “suitable habitat” or “enhanced habitat” as described below:

Suitable Habitat. To meet the requirements for suitable habitat that provides equal or greater habitat value for listed animal species than the impacted habitat, the habitat must:

1. Provide habitat for special status animal species, such that special status animal species populations can regenerate naturally when disturbances are removed;
2. Not be characterized by (or adjacent to areas characterized by) high densities of invasive species, such as yellow star-thistle, or species that might jeopardize habitat recovery and restoration;
3. Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat; and
4. Not be located on land that is currently publicly held for resource protection.

Enhanced Habitat. If suitable habitat is unavailable, or in lieu of acquiring already suitable special status animal species habitat, the applicant may enhance potential habitat that:

1. Is within an area with potential to contribute to habitat connectivity and build linkages between populations;
2. Consists of actively farmed land or other land containing degraded habitat that will support enhancement;
3. Supports suitable soils, slope, and drainage patterns consistent with special status animal species requirements;
4. Cannot be located on land that is currently held publicly for resource protection; and
5. Does not contain hazardous wastes or structures that cannot be removed to the extent that the site could not provide suitable habitat.

Enhanced Habitat Standards. For enhanced habitat conditions to equal or exceed habitat conditions on the project site, the enhanced habitat shall meet the following habitat criteria: After five years, these sites must consist of suitable habitat or contain other habitat characteristics (e.g. small mammal burrows in upland habitat for CTS, wetlands, ponds, etc.) that are consistent with the known ecology of the special status animal species to which compensatory mitigation is being applied and the habitat components for which the mitigation is compensating for.

Plan Requirements and Timing. The applicant shall calculate the total acreages required to meet all compensatory mitigation obligations and submit these totals to County Planning and Development prior to final map clearance. The applicant shall then obtain County approval of the location of mitigation lands, the holder of conservation easements, and the restrictions contained in the easement(s) created for the permanent protection of these lands. Documentation of recorded easement(s) shall be submitted to and approved by the County prior to map clearance. Verification of having met habitat mitigation requirements shall be reviewed and approved prior to final inspection.

Monitoring: Planning and Development permit processing planner shall review and approve documentation of compensatory mitigation land acquisition and associated restrictive covenant for consistency with the conditions outlined in the measure. These lands may be identified through independent consultation with CDFW and/or USFWS. The Owner/Applicant shall provide evidence to Planning and Development permit processing planner of the establishment of a permanent conservation easement and maintenance endowment prior to final map clearance.

BIO-2(d) Listed Species Habitat Mitigation and Monitoring Plan

The applicant shall retain a County-approved qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP) to ensure the success of compensatory mitigation sites required for compensation of habitat impacts to the California tiger salamander (CTS) and the California red-legged frog (CRLF) that are to be enhanced pursuant to Mitigation Measure BIO-2(c). The HMMP shall be submitted to the County prior to zoning clearance issuance for grading. The HMMP shall include, at a minimum, the following information:

- a. A summary of habitat and species impacts and the proposed mitigation for each element;
- b. A description of the location and boundaries of the mitigation site(s) and description of existing site conditions;
- c. A description of any measures to be undertaken to enhance (e.g., through focused management) the mitigation site for special status species;
- d. Identification of an adequate funding mechanism for long-term management and identification of a conservation lands management entity to manage the conservation easement lands;
- e. A description of management and maintenance measures intended to maintain and enhance habitat for the target species (e.g., weed control, fencing maintenance);
- f. A description of habitat and species monitoring measures on the mitigation site, including specific, objective performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc.; monitoring shall document compliance with each element requiring habitat compensation or management;
- g. A contingency plan for mitigation elements that do not meet performance or final success criteria within described periods; the plan shall include specific triggers for remediation if performance criteria are not met and a description of the process by which remediation of problems with the mitigation site (e.g., presence of noxious weeds) shall occur;
- h. A requirement that the applicant shall be responsible for monitoring, as specified in the HMMP, for at least five years post-construction; during this period, regular reporting shall be provided to the County;
- i. Reporting shall include:
 1. An annual monitoring report to be submitted to the County; and

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2. Demonstration that the compensatory mitigation and management (1) will fully mitigate for any take of a CESA-listed species as defined by CESA, (2) minimize and mitigate any take of an FESA-listed species to the maximum extent practicable as defined by FESA, and (3) ensure that impacts from the project are not likely to jeopardize the listed species continued existence as defined by FESA.

Plan Requirements and Timing. The HMMP shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance for grading. Proof of purchase or an easement controlling off-site acreage shall also be submitted to Planning and Development prior to zoning clearance issuance for grading.

Monitoring. The restoration components shall be monitored by a County-approved qualified biologist for five years. Planning and Development permit processing planner shall ensure that the restoration requirements of the project included in this condition are addressed prior to issuance of zoning clearance for grading. Planning and Development permit compliance staff shall oversee implementation of the HMMP through periodic monitoring on-site during construction and a final restoration site inspection upon completion in accordance with the approved restoration plans. Monitoring shall continue for 5 years at a minimum and continue until the restoration requirements are achieved.

*BIO-2(e) California Tiger Salamander (CTS) and California Red-legged Frog (CRLF)
Avoidance and Minimization*

The following measures shall be implemented during grading and construction activities and implementation of the compensatory mitigation and fuel management program included in the Open Space Management Plan (OSMP).

- a. Pre-construction surveys for CTS and CRLF shall be conducted where suitable habitat is present by a County-approved biologist not more than 48 hours prior to the start of construction activities. The survey area should include the proposed disturbance area and all proposed ingress/egress routes, plus a 100-foot buffer. If any life stage of CRLF or CTS is found within the survey area, the USFWS and/or CDFW should be consulted to determine the appropriate course of action or the appropriate measures implemented in accordance with the Biological Opinion issued or Habitat Conservation Plan approved by the USFWS (relevant to CRLF and CTS) and/or the Incidental Take Permit issued by the CDFW (relevant to CTS).
- b. Ground disturbance shall be limited to the minimum necessary to complete construction activities. Construction limits of disturbance shall be flagged. All equipment and material storage, parking, staging and other support areas shall be identified prior to issuance of a grading permit. Areas of special biological concern within or adjacent to construction limits shall have highly visible orange construction fencing installed between said area and the limits of disturbance.
- c. All development activities occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, to avoid impacts to sensitive aquatic species.
- d. To avoid encountering migrating CTS within range of potentially suitable aquatic habitat, construction within upland areas within the range of CTS should be limited to July 15 to October 15. Work should be postponed if chance of rain is greater than 70% based on the NOAA National Weather Service forecast or within 48 hours following a rain event greater

than 0.1 inch. If work must occur during these conditions, a qualified biologist shall conduct a clearance sweep of work areas prior to the start of work.

- e. All work shall occur during daylight hours.
- f. All projects occurring within or adjacent to habitats that may support CTS or CRLF shall have a County approved biologist present during all initial ground disturbing/vegetation clearing activities.
- g. No CTS or CRLF shall be captured and relocated without expressed permission from the CDFW and/or USFWS.
- h. If at any time during construction CTS or CRLF enters the construction site or otherwise may be impacted by the project, all construction activities shall cease. A County-approved biologist shall document the occurrence and consult with the CDFW and/or USFWS as appropriate.
- i. Upon completion of construction all excess materials and debris shall be removed from the project site and disposed of appropriately.
- j. The work area shall remain clean. All food-related trash items shall be enclosed in sealed containers and removed from the site regularly.
- k. Pets shall be prohibited at the construction site.
- l. All vehicle maintenance/fueling/staging shall occur not less than 60 feet from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
- m. All equipment operating within aquatic habitat shall be in good conditions and free of leaks. Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access.
- n. At the end of each work day, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment.
- o. All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.
- p. If any CTS or CRLF are harmed, the County-approved biologist shall document the circumstances that led to harm and shall determine if project activities should cease or be altered in an effort to avoid additional harm to these species. Dead or injured special status species shall be disposed of at the discretion of the CDFW and USFWS. All incidences of harm shall be reported to the CDFW and USFWS within 48 hours.
- q. To ensure that diseases are not conveyed between work sites by the qualified biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force should be followed at all times.

Plan Requirements and Timing. These measures are to be implemented during grading and construction activities.

Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The approved biologist shall submit monthly maintenance reports during construction to Planning and Development permit compliance staff.

BIO-2(f) Western Spadefoot Toad Avoidance and Minimization

The following measures shall be implemented to reduce the potential for impacts with the final goal of no net loss of the species.

- a. Not more than two weeks prior to initiation of ground disturbing activities and vegetation removal, a County-approved qualified biologist shall conduct a pre-construction survey for western spadefoot toads. The survey area should include the project site and all proposed ingress/egress routes, plus a 100-foot buffer, where legally accessible. If the project is phased, a clearance survey shall be required for each phase of construction and/or individual lot development.
- b. If this species is found and individuals are likely to be killed or injured by construction activities, a County-approved biologist shall capture and relocate the animals from the project site before construction activities begin. The County-approved qualified biologist shall relocate individuals the shortest distance possible to a location that contains suitable habitat not likely to be affected by activities associated with the proposed project. The biologist(s) should maintain sufficiently detailed records of any individual observed, captured, relocated, etc., including size, coloration, any distinguishing features and photographs to assist him or her in determining whether translocated animals are returning to the project site.
- c. To ensure that diseases are not conveyed between work sites by the qualified biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force shall be followed at all times.
- d. A County-approved biologist shall be present during all initial ground disturbing activities, including vegetation removal, to recover western spadefoot toads that may be unearthed by construction activities. Individuals that are unearthed during excavation, if in good health, shall be immediately relocated to a designated relocation area to be determined by a County-approved biologist in coordination with CDFW. Individuals shall be relocated the shortest distance possible in a location that contains suitable habitat not likely to be affected by activities associated with the proposed project. The biologist(s) shall maintain sufficiently detailed records of any individual observed, captured, relocated, etc., including size, coloration, any distinguishing features and photographs (preferably digital) to assist him or her in determining whether translocated animals are returning to the project site. If injured, a CDFW-approved specialist shall be contacted to determine if the animal can be rehabilitated for release into the designated release area or be deposited at an approved vertebrate museum.

Plan Requirements and Timing. Prior to zoning clearance issuance for ground-disturbing activities, the name, qualifications, scope, and contact information for the surveying biologist must be submitted to the Planning and Development permit processing planner for approval in advance of the surveys. Proposed relocation areas shall be identified and approved by Planning and Development prior to beginning the work. A report of the results of the surveys and any required capture and relocation efforts shall be submitted to the Planning and Development permit processing planner for review prior to zoning clearance issuance for ground-disturbing activities. Monitoring measures are to be implemented during construction. This measure shall be printed on all grading and construction plans.

Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. Planning and Development permit processing

planner shall receive and review the results of the surveys prior to zoning clearance issuance for ground-disturbing activities. Planning and Development compliance monitoring and building and safety staff shall monitor on-site throughout grading and construction activities for compliance.

BIO-2(g) Preconstruction Surveys for Nesting Birds and Raptors

For grading and/or construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds and raptors covered by the California Fish and Game Code and the Migratory Bird Treaty Act shall be conducted by a County-approved qualified biologist no more than 14 days prior to vegetation and tree removal activities. The survey area for nesting birds and raptor species shall include the disturbance footprint plus a 300-foot and 500-foot buffer, respectively. If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer ranging from 50 to 300 feet based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest. The objective of the buffer shall be to reduce disturbances to nesting birds. All buffers shall be marked using high-visibility flagging or fencing, and, unless approved by the qualified biologist, no construction activities shall be allowed within the buffers until the adults and young have fledged from the nest and are no longer reliant on the nest site. The qualified biologist shall confirm that breeding/nesting is completed and that the young have fledged prior to the removal of the buffer.

Plan Requirements and Timing. The surveys shall be conducted no more than 30 days prior to the initiation of vegetation and/or tree removal activities. A report of the nesting bird survey results shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance for grading or construction activities which involve tree or vegetation removal. These measures are to be implemented during grading and construction activities.

Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. Planning and Development compliance monitoring and building and safety staff shall review the report for compliance and inspect the site during construction activities to ensure compliance. Active nests shall be monitored periodically by the County-approved biologist until it has been determined that the nest is no longer being used by either the young or adults.

BIO-2(h) Burrowing Owl Avoidance and Minimization Measures

The following measures shall be implemented in order to avoid and minimize impacts to burrowing owl.

- a. Ground-disturbance activities associated with construction of the project shall begin outside of the burrowing owl nesting season (nesting season is typically February 1 through September 15).
- b. Not more than 30 days prior to initiation of ground-disturbing activities, and again within 24-hours of the initiation of ground-disturbing activities associated with construction, a County-approved biologist shall conduct a take avoidance survey of the project site and surrounding areas to a distance of 150 meters, in accordance with the methods outlined in the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012). The pre-construction survey will cover all areas within 150 meters of the portion of the site where construction is scheduled to start. Areas within 150 meters that are not accessible due to property access restrictions shall be surveyed using binoculars. Surveys will be phased, based on the grading and construction schedule, such that they are conducted not more than 30 days before the start of ground disturbing activities in new areas. If grading and/or construction activities in

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portions of the site cease for a period of 14 days, those portions of the site will be resurveyed for burrowing owls prior to the resumption of grading and/or construction activities. If no occupied (breeding or wintering) burrowing owl burrows are identified, no further mitigation would be required. If occupied burrows are identified on the site or within 150 meters of the Project disturbance area, one of the following actions shall be taken: 1) permanent avoidance of the burrow or 2) establishment of a temporary avoidance buffer followed by passive relocation and compensatory mitigation for loss of habitat in conjunction with the measures below:

1. Site-specific, no-disturbance buffer zones shall be established and maintained between Project activities and occupied burrows, using the distances recommended in the CDFW guidelines (CDFG 2012) or as otherwise determined appropriate by the County-approved biologist in consultation with CDFW.
2. During the non-breeding season, if an occupied burrow cannot be avoided, and the burrow is not actively in use as a nest, the burrowing owls can be excluded from burrows in accordance with an approved Burrowing Owl Exclusion Plan, which shall be prepared and submitted for approval by CDFW prior to passive relocation of any burrowing owls. The Burrowing Owl Exclusion Plan shall be based on the recommendations made in the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012) and shall include the following information for each proposed passive relocation:
 - a. Confirmation by site surveillance that the burrow(s) is empty of burrowing owls and other species;
 - b. Identification of type of scope to be used and appropriate timing of scoping;
 - c. Occupancy factors to look for and what shall guide determination of vacancy and excavation timing;
 - d. Methods for burrow excavation;
 - e. Removal of other potential owl burrow surrogates or refugia on site;
 - f. Methods for photographic documentation of the excavation and closure of the burrow;
 - g. Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use to avoid take;
 - h. Methods for assuring the impacted site shall continually be made inhospitable to burrowing owls and fossorial mammals; and
 - i. Method(s) for compensatory mitigation for burrow loss.

Plan Requirements and Timing. The name, qualifications, scope, and contact information for the County-approved qualified surveying biologist must be submitted to Planning and Development in advance of the surveys. The biologist implementing the above mitigation measure must also submit documentation of coordinating this effort with Planning and Development prior to implementation. The above impact avoidance measure shall be included on all grading and construction plans prior to the issuance of zoning clearance for grading. A report on the implementation of impact avoidance measures used shall be included on all grading and construction plans prior to zoning clearance issuance for grading. A report on the implementation of impact avoidance measures implemented shall be submitted to Planning and Development permit compliance staff and CDFW upon completion of the construction project. If passive relocation is required, the Burrowing Owl

Exclusion Plan must be submitted and approved by Planning and Development prior to conducting exclusion activities.

Monitoring. The applicant shall retain a qualified County- and CDFW-approved biologist to monitor all construction activities as warranted to ensure compliance. The approved biologist shall submit monitoring reports to Planning and Development and CDFW for review and approval.

BIO-2(i) Vernal Pool Branchiopod Surveys and Mitigation

Prior to the issuance of zoning clearance for grading, protocol surveys for listed branchiopods (i.e., vernal pool fairy shrimp) shall occur within suitable habitat within the project site impact footprint and a 250-foot buffer. The protocol surveys shall be consistent with the Survey Guidelines for the Listed Large Branchiopods (USFWS 2015) or the current protocol established by the USFWS at the time surveys are conducted. If vernal pool fairy shrimp are detected and occupied habitat will be impacted, compensatory mitigation shall be provided at a ratio of not less than 3:1 for impacted vernal pool fairy shrimp impacted habitat. Compensatory mitigation and agency consultation shall be consistent with mitigation measure BIO-2(a). Compensatory mitigation shall be located off-site and the establishment of conservation easements and criteria for determining habitat value shall be consistent with the processes described in Mitigation Measure BIO-2(c). If enhancement of off-site mitigation areas will occur, a Habitat Mitigation and Monitoring Plan shall also be prepared and implemented consistent with Mitigation Measure BIO-2(d). If protocol surveys result in negative findings, no further action is required.

Plan Requirements and Timing. The applicant shall submit the results of the protocol surveys to Planning and Development permit processing planner and to USFWS for review and approval prior to zoning clearance issuance for grading.

Monitoring. Planning and Development shall ensure that documentation is received prior to zoning clearance issuance for grading. Planning and Development compliance monitoring and building and safety staff shall oversee implementation of mitigation plans if compensatory mitigation is required.

BIO-2(j) Worker Environmental Awareness Program (WEAP)

Prior to the initiation of grading or construction activities (including staging and mobilization), a County-approved qualified biologist shall conduct a WEAP training to be attended by all personnel associated with project construction. The purpose of the WEAP is to aid personnel in recognizing special status resources that may occur in the project site area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. In addition, personnel will be briefed on the reporting process in the event of an unintended occurrence or inadvertent injury to a special status species during construction or operations. All employees shall sign a form provided by the trainer documenting that they have attended the WEAP and understand the information presented to them.

Monitoring. Planning and Development compliance monitoring staff shall be notified by the owner/applicant of the date and time the training is scheduled so that they may attend. Fact sheets shall be reviewed and approved by Planning and Development prior to conducting the training. The required notification and an attendance log that includes the names and signatures of all personnel

that have received the training shall be provided to Planning and Development compliance monitoring staff prior to the start of grading or construction activities.

BIO-2(k) Incorporation of Species Protection Measures into the Open Space Management Plan (OSMP)

Prior to zoning clearance issuance for grading, the applicant shall revise the OSMP to incorporate applicable species protections measures described in Mitigation Measures BIO-1(a) through BIO-1(b) and BIO-2(a) through BIO-2(j) of the SEIR to ensure that impacts to special status plants and animals from restoration and fuel management activities are avoided or minimized within the open space areas. Requirements from the Incidental Take Permit and/or incidental take statement that may be issued by the USFWS and/or CDFW shall also be incorporated, as applicable relevant to federal and/or state listed species.

Plan Requirements and Timing. The owner/applicant shall submit the revised OSMP to Planning and Development as well as the USFWS and/or CDFW (as applicable to permits that may be issued for impacts to federal and state listed species) for review and approval prior to zoning clearance issuance for grading as well as the proposed sewer line construction.

Monitoring. The applicant shall retain a qualified County-approved biologist to monitor restoration and fuel management activities as warranted to ensure compliance. The approved biologist shall submit monitoring reports to Planning and Development compliance monitoring staff.

Significance After Mitigation

Implementation of the above mitigation measures would reduce impacts to special status animal species to a less than significant level (Class II), with the exception of potential impacts to CTS F, which require off-site compensatory mitigation (Mitigation Measure BIO-2[c]) that may not be feasible due to lack of available off-site locations for CTS compensatory mitigation within the West Santa Maria/Orcutt metapopulation area. Therefore, potential impacts to CTS would remain significant and unavoidable.

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

Impact BIO-3 THE PROJECT WOULD RESULT IN IMPACTS TO SENSITIVE HABITATS, INCLUDING RIPARIAN AREAS. THIS IMPACT WOULD BE SIGNIFICANT BUT MITIGABLE (CLASS II).

As described in Section 4.4.1(a), Environmental Setting, five sensitive plant communities occur on the project site, including purple needlegrass grassland, perennial ryegrass grassland, coast live oak woodland (including coast live oak woodland-arroyo willow thicket), coastal scrub (collectively coyote brush scrub and California sagebrush scrub on site). California sagebrush scrub (also referred to as central coast sage scrub) is also considered locally sensitive by the County of Santa Barbara Environmental Thresholds and Guidelines Manual (2008) and OCP (County of Santa Barbara 2004). Impacts to sensitive communities and riparian habitats include the removal of up to 1.5 acres of purple needlegrass grassland, 0.73 acre of perennial ryegrass grassland, 2.20 acres of coastal scrub (2.19 acres of coyote brush scrub and 0.01 acre of California sagebrush scrub) and well as the permanent removal of up to 1.55 acres and temporary impacts of up to 0.11 acre of riparian vegetation (arroyo willow thicket). No impacts to coast live oak woodland (including coast live oak

woodland-arroyo willow thicket associations) would occur. Impacts to sensitive natural communities are potentially significant.

Mitigation Measures

The following mitigation measures, which implement OCP EIR Mitigation Measure BIO-3, are required to reduce potentially significant impacts to sensitive natural communities resulting from the project to less than significant.

BIO-3(a) Sensitive Community Avoidance

Impacts to sensitive communities shall be avoided to the maximum extent feasible. Bright orange construction fencing shall be placed to delineate the extent of disturbance areas associated with the project (including the proposed sewer line easement) under the direction of a County-approved qualified biologist in order to protect sensitive communities that will not be impacted by the project. The fencing shall be installed prior to the start of any initiation of ground disturbance activities and shall remain in place until grading and construction activities are complete. No vehicles, person, materials, or equipment will be allowed in protected areas. Grading plans shall show the location of these habitats and protective fencing. If sensitive communities cannot be avoided, Mitigation Measure BIO-3(b) below shall be implemented.

Plan Requirements and Timing. Grading plans showing the location of sensitive communities as well as protective fencing locations for review and approval prior to issuance of zoning clearance for grading.

Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place.

BIO-3(b) Sensitive Community Mitigation (implements OCP EIR Mitigation Measure BIO-3)

Where sensitive communities cannot be avoided, impacts shall be offset through habitat restoration within the open space area (as delineated in the Final OSMP) and/or an off-site location at a ratio of 2:1 for impacted sensitive communities (habitat restored to habitat impacted). The location of restoration shall be determined by a County-approved biologist. On-site restoration is preferable, however off-site habitat acquisition and off-site restoration and/or enhancement may be considered if on site restoration is determined as unachievable to the satisfaction of Planning and Development, as long as the off-site approach results in equal compensatory value. The restoration shall include locally native species approved by the County. The restoration shall be incorporated into the final OSMP and/or be incorporated into an Off-Site Habitat Restoration Plan to be developed by a County-approved biologist pursuant to the requirements listed below.

Upon final design, the County-approved biologist shall determine the final impacts to sensitive communities and the subsequent amount of acreage needed for restoration for the project. The restoration shall be implemented for a period of not less than five years, or until restoration has been completed successfully as determined by a County-approved biologist in coordination with Planning and Development. Replacement ratios for off-site mitigation may be different than those required for on-site mitigation. The restoration program incorporated into the OSMP and/or the Off-Site Habitat Restoration Plan shall include, at a minimum, the following components:

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- a. Description of the project/impact site (i.e. location, responsible parties, areas to be impacted by habitat type);
- b. Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved];
- c. Description of the proposed compensatory mitigation-site (location and size, ownership status, existing functions and values of the compensatory mitigation-site);
- d. Implementation plan for the compensatory mitigation-site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including plant species to be used, container sizes, seeding rates, etc.]);
- e. Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule);
- f. Monitoring plan for the compensatory mitigation-site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports);
- g. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type;
- h. An adaptive management program and remedial measures to address negative impacts to restoration efforts;
- i. Notification of completion of compensatory mitigation and agency confirmation; and
- j. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

Plan Requirements and Timing. Grading plans showing the location of sensitive communities, as well as the revised OSMP and or Off-Site Habitat Restoration Plan shall be submitted to Planning and Development for review and approval prior to issuance of zoning clearance for grading.

Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place. Planning and Development shall review and approve the Final OSMP and/or Off-Site Habitat Restoration Plan.

BIO-3(c) Invasive Weed Prevention Best Management Practices

The following weed prevention best management practices shall be implemented to prevent the introduction of invasive weed species.

- a. During grading and construction, the project owner/applicant will make all reasonable efforts to limit the use of imported soils for fill. Soils currently existing on site should be used for fill material. If the use of imported fill material is necessary, the imported material must be obtained from a source that is known to be free of invasive plant species; or the material must consist of purchased clean material such as crushed aggregate, sorted rock, or other similar substances.
- b. To avoid the spread of invasive species, the contractor shall stockpile topsoil and redeposit the stockpiled soil after construction or transport the topsoil to a certified landfill for disposal.

- c. The erosion control/ restoration plans for the project must emphasize the use of native species that are expected to occur in the area and that are considered suitable for use at the project site.
- d. All erosion control materials including straw bales, straw wattles, or mulch used on-site must be free of invasive species seed.
- e. Exotic and invasive plant species will be excluded from any erosion control seed mixes and/or landscaping plant palettes associated with the proposed project.

Plan Requirements and Timing. This measure shall be printed on grading plans and are to be implemented during grading and construction activities.

Monitoring. The applicant shall maintain a County-approved biologist to monitor compliance with the above weed prevention measures.

BIO-3(d) Biologist Review of Landscape Plans

Landscape plans for future development shall be reviewed and approved by Planning and Development in coordination with a County-approved biologist. All landscaping shall be with native, locally collected plant species. The use of non-native invasive species shall be prohibited.

Plan Requirements and Timing. The Owner/Applicant shall incorporate this requirement into landscaping plans to be reviewed and approved by Planning and Development in coordination with a County-approved biologist prior to zoning clearance issuance for the construction of single family dwellings or common area landscaping. Landscaping shall be installed prior to Final Building Inspection Clearance.

Monitoring. Planning and Development compliance monitoring staff shall monitor implementation in the field.

Significance After Mitigation

Implementation of the above mitigation measures would reduce impacts to sensitive communities to a less than significant level through compensation for sensitive natural communities and riparian habitat (Class II).

Threshold: Would the project adversely impact state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact BIO-4 THE PROJECT WOULD IMPACT STATE AND FEDERALLY PROTECTED WETLANDS (INCLUDING, BUT NOT LIMITED TO, MARSH, VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS. THIS IMPACT WOULD BE SIGNIFICANT BUT MITIGABLE (CLASS II).

Three wetland vegetation communities were documented on site, including arroyo willow thickets, cattail marshes, and bristly ox-tongue, which would be permanently impacted by the conversion of the project site into residential uses. Impacts would total 1.55 acres of arroyo willow thickets (also discussed in Impact BIO-3), 0.12 acre of cattail marshes, and 0.69 acre of bristly ox-tongue, totaling 2.6 acres of impacts to wetland vegetation. Development of the proposed sewer line connection would result in an additional 0.11 acre of temporary impacts to arroyo willow thickets north of Key Site 21 on Key Site 22. In addition, project activities could contribute to the spread of invasive

wetland vegetation or wildlife to other wetland areas nearby. These habitats associated with wetland features have the potential to be regulated by the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW. Additionally, the proposed sewer line easement potentially crosses a jurisdictional waterway north of Key Site 21. Impacts to USACE, RWQCB, and CDFW jurisdictional features would require permits pursuant to the CWA and CFGC. Impacts to protected wetlands are potentially significant.

Mitigation Measures

The following mitigation measures would be required to reduce potentially significant impacts to protected wetlands to less than significant. Mitigation Measure BIO-3(b) above addresses potential impacts associated with the introduction of invasive weeds.

BIO-4(a) Agency Coordination

Impacts to drainages and wetlands as a result of the project may require permits from U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. The owner/applicant shall obtain and produce for the County correspondence from applicable state and federal agencies regarding compliance of the proposed development with state and federal laws.

Plan Requirements and Timing. The applicant shall submit copies of correspondence and/or permits (as applicable) with applicable agencies to Planning and Development prior to zoning clearance issuance for grading.

Monitoring. Planning and Development permit processing planner shall review agency correspondence prior to zoning clearance issuance for grading. Planning and Development compliance monitoring and building and safety staff shall monitor and site inspect to ensure that the project meets any requirements outlined by the agencies.

BIO-4(b) Wetland and Drainage Avoidance

Impacts to wetlands and drainages shall be avoided to the maximum extent feasible. Bright orange construction fencing shall be placed to delineate the extent of disturbance areas associated with the project (including the proposed sewer line easement) under the direction of a County-approved qualified biologist in order to protect wetlands and drainages that will not be impacted by the project. The fencing shall be installed prior to the start of any initiation of ground disturbance activities and shall remain in place until grading and construction activities are complete. No vehicles, person, materials, or equipment will be allowed in protected areas. Grading plans shall show the location of these areas and protective fencing. If wetlands and drainages cannot be avoided, Mitigation Measure BIO-4(c) below shall be implemented.

Plan Requirements and Timing. Grading plans showing the location of wetlands and drainages as well as protective fencing locations for review and approval prior to issuance of zoning clearance for grading.

Monitoring. Planning and Development compliance monitoring and/or building and safety staff shall inspect the site prior to initiation of grading activities and a minimum of once per week following the start of grading and construction to ensure protective fencing is in place.

BIO-4(c) Wetland and Drainage Mitigation

Impacts to wetland and drainages shall be mitigated at a minimum ratio of 2:1 (acres of habitat restored to acres impacted). Upon final design, the County-approved biologist shall determine the final impacts to wetlands and the subsequent amount of acreage needed for restoration for the project. Restoration on the project site is preferable. However, the County may approve off-site restoration at a location in the same watershed as the project (Upper Orcutt Creek; HUC180600080501) that results in equal compensatory value if the applicant can demonstrate to the County's satisfaction that restoration on the project site cannot be achieved. The Draft OSMP shall be revised or an Off-Site Restoration Plan developed by a County-approved biologist in accordance with Mitigation Measure BIO-3(a) above and shall be implemented for no less than five years after construction, or until the local jurisdiction and/or the permitting authority (e.g., USACE) has determined that restoration has been successful.

Plan Requirements and Timing. The applicant shall submit the revised OSMP or off-site Restoration Plan to Planning and Development for review and approval prior to issuance of grading permits.

Monitoring. Planning and Development shall ensure that impacts to wetlands from the proposed development are properly mitigated for.

BIO-4(d) Jurisdictional Areas Best Management Practices During Construction

The following best management practices shall be required for grading and construction within or 100 feet from jurisdictional areas or wetlands.

- a. Access routes, staging, and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to other waters (federal and state) including locating access routes and ancillary construction areas outside of jurisdictional areas.
- b. To control erosion and sediment runoff during and after project implementation, appropriate erosion control materials shall be deployed and maintained to minimize adverse effects on jurisdictional areas in the vicinity of the project.
- c. Project activities within the jurisdictional areas should occur during the dry season (typically between May 1 and September 30) in any given year, or as otherwise directed by the regulatory agencies. Deviations from this work window can be made with permission from the relevant regulatory agencies.
- d. During construction, no litter or construction debris shall be placed within jurisdictional areas. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.
- e. All project-generated debris, building materials, and rubbish shall be removed from jurisdictional areas and from areas where such materials could be washed into them.
- f. Raw cement, concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic species resulting from project-related activities, shall be prevented from contaminating the soil and/or entering jurisdictional areas.
- g. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan must be in place for prompt and effective response to

any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should an accidental spill occur.

Plan Requirements and Timing. These measures shall be implemented during grading and construction and shall be included on all land use, grading, and building plans.

Monitoring. The applicant shall retain a County-approved biologist to monitor compliance with the above measures. Planning and Development compliance monitoring and building and safety staff shall periodically inspect for compliance.

Significance After Mitigation

Implementation of the above mitigation measures would reduce impacts to jurisdictional areas to a less than significant level (Class II).

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

Impact BIO-5 THE PROJECT WOULD IMPACT WILDLIFE MOVEMENT. THIS IMPACT WOULD BE SIGNIFICANT BUT MITIGABLE (CLASS II).

The project site is located on the edge of a public golf course that is not configured in such a way as to substantially inhibit wildlife movement for large animals. Areas designated as Open Space would maintain corridors for wildlife movement and be connectors to the natural landscapes to the south. However, movement for small animals such as the California tiger salamander would be impacted from construction of the proposed access road to the Willow Creek Neighborhood. Physical barriers such as curbs would prevent movement as well as have potential to trap individuals within the roadway. Movement between SAMA-21, a known breeding pond, and upland areas to the south would be inhibited. Indirect effects from development of the proposed access road to wildlife movement may occur from an increase in light, fencing, and noise disturbance, as well as an increased presence of domestic animals and humans. Impacts to wildlife movement would be potentially significant.

Mitigation Measures

The following mitigation measures, which implement OCP EIR Mitigation Measures BIO-6 and KS21-BIO-3, are required to reduce potentially significant impacts to wildlife movement resulting from the project to less than significant.

BIO-5(a) Wildlife Impact Avoidance

The project shall incorporate the following design measures to reduce impacts to wildlife:

- a. Roadway widths adjacent to open space areas shall be the minimum width possible while maintaining Fire Department requirements for emergency access.
- b. Appropriate signage warning residents of the potential presence of wild animals on roadways and bike paths shall be installed along roads adjacent to open space areas. Interpretative educational signage discussing sensitive resources on site (oak woodland, rare plants and animals etc.) shall be installed along all bike paths, hiking trails and rest

areas. Information on educational signage shall be developed by a County-approved biologist. Such signage shall be maintained by the developer or HOA.

- c. Utilities, such as electrical, water and sewer, shall be installed under paved roads and sidewalks wherever possible.
- d. Informational brochures shall be provided to potential buyers and included as an attachment to the subdivision's CC&Rs outlining the impacts associated with non-native animals, (especially feral cats and dogs), impacts associated with introduction of invasive landscaping plants, and impacts associated with use of pesticides. The informational brochures shall also inform potential buyers of the potential for wild animals, such as coyotes, to prey upon domestic animals.

Plan Requirements and Timing. Grading and building plans shall include the above measures and shall be submitted to Planning and Development for review and approval prior to issuance of zoning clearance for grading and subdivision improvements. The informational brochure shall be submitted to Planning and Development for review and approval prior to zoning clearance issuance for the first residence. Signage shall be installed prior to occupancy clearance of the first residence.

Monitoring. Planning and Development compliance monitoring and building and safety staff shall site inspect upon completion of construction.

BIO-5(b) Fence Design

Project fencing for accessory components (i.e., roads, trail, etc.) shall be designed to minimize impacts to wildlife. Fencing shall not block wildlife movement. Where fencing is required for public safety concerns, the fence shall be designed to permit wildlife movement by incorporating design features such as:

- a. A minimum 18 inches between the ground and the bottom of the fence to provide clearance for small animals;
- b. A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and
- c. If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement.

Plan Requirements and Timing. Grading and building plans shall include the above measures and shall be submitted to Planning and Development for review and approval prior to issuance of zoning clearance for grading and subdivision improvements.

Monitoring. Planning and Development shall site inspect upon completion of construction.

BIO-5(c) Lighting Plan

The owner/applicant shall develop a lighting plan for the project to reduce light pollution in open space habitat areas, subject to review and approval by the Board of Architectural Review and Planning and Development. All lighting shall be dark sky compliant to reduce impacts on nocturnal ecosystems and the night sky. All lighting fixtures shall be fully shielded and fully cut-off. Lighting shall be low intensity, the minimum wattage required and of minimum height. The use of high-intensity floodlights on residential lots shall be restricted and all exterior lighting features within 100 feet of open space shall be fully shielded and fully cut-off to prevent "spill-over" into adjacent

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habitat. Night lighting of public areas shall be kept at the minimum necessary for safety purposes. All exterior lighting is to be turned off or dimmed after 10:00 p.m.

Plan Requirements and Timing. The owner/applicant shall develop the lighting plan for Board of Architectural Review and Planning and Development approval incorporating the above requirements. The lighting plan shall show the locations and height of all exterior lighting fixtures and the direction of light being cast by each fixture. This requirement shall be reflected on grading, zoning and building plans. Planning and Development and the Board of Architectural Review shall review the lighting plan for compliance with this condition prior to zoning clearance issuance. Light fixtures shall be installed in compliance with this condition prior to final building inspection clearance.

Monitoring. Planning and Development permit compliance and building and safety staff shall site inspect upon installation to ensure that exterior light fixtures have been installed consistent with their depiction and specifications on the final lighting plan.

BIO-5(d) Wildlife Passage

Soft-bottomed culverts or similar passageway crossing structures shall be incorporated into the roadway design for the access road to the Willow Creek Neighborhood to encourage and permit small animals such as the California tiger salamander to pass underneath the roadway. Passageways shall be installed at 200-foot intervals along the roadway. Passageway shall be designed in a way that encourages use by the target species.

Plan Requirements and Timing. This requirement shall be reflected on grading, zoning and building plans. Planning and Development shall review and approve the crossing design prior to zoning clearance issuance. Planning and Development shall seek input from the CDFW and USFWS, as necessary, regarding the adequacy of the crossing design prior to approval. Crossing structures shall be installed in compliance with this condition and the approved plans prior to final building inspection clearance.

Monitoring. Planning and Development permit compliance staff shall inspect the completed roadway to ensure that wildlife crossing structures have been installed consistent with their depiction and specifications on the design plans.

Significance After Mitigation

Implementation of the required mitigation measures would reduce indirect impacts to wildlife movement to a less than significant level (Class II).

Threshold: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
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Impact BIO-6 THE PROJECT WOULD RESULT IN IMPACTS TO PROTECTED TREES. THIS IMPACT WOULD BE SIGNIFICANT BUT MITIGABLE (CLASS II).

Based on County policies from the Conservation Element – Oak Tree Protection in the Inland Rural Areas of Santa Barbara County and OCP, development of the project would result in removal of 18 protected trees within the proposed Willow Creek neighborhood and five protected trees within the proposed Hidden Canyon neighborhood and approximately 64 protected trees along the proposed sewer line easement (Appendix C). Additionally, project development would impact the tree canopy and root zone of nine protected trees in the proposed Willow Creek neighborhood and five

protected trees in the proposed Hidden Canyon neighborhood (Appendix C). Impacts to protected trees would be potentially significant.

Mitigation Measures

BIO-6(a) Tree Protection Plan

The applicant shall submit a Tree Protection Plan (TPP) prepared by a County-approved biologist and/or arborist designed to avoid impacts to protected trees that are not planned for removal. The TPP shall include the following components:

- a. Prior to the onset of any construction activities, high visibility orange construction fencing shall be installed around existing stands and individuals that are to be retained at a buffer/extent radius of six feet beyond the canopy dripline, wherever the topography allows for such fencing or otherwise marked in the field to protect them from harm during grading and construction.
- b. No construction equipment shall be parked, stored, or operated within 25 feet of any protected tree dripline.
- c. No fill soil, rocks, or construction materials shall be stored or placed within 25 feet of the dripline of a protected tree.
- d. No artificial surface, pervious or impervious, shall be placed within 25 feet of the dripline of any protected tree, except for County-approved project access roads.
- e. Any roots encountered that are one inch in diameter or greater shall be cleanly cut. This shall be done under the direction of a County-approved arborist/biologist.
- f. Any construction activity required within three feet of a protected tree's dripline shall be done with hand tools.
- g. No permanent irrigation shall occur within the dripline of any existing protected tree.
- h. Only designated trees shall be removed. All grading and construction plans shall clearly delineate those trees to be removed and those to remain.

Plan Requirements and Timing. The owner/applicant shall: (1) submit the TPP; (2) Include all applicable components in the Tree Replacement Plan and/or Landscape and Irrigation Plans if these are required; and (3) include as notes or depictions all plan components listed above, graphically depicting all those related to earth movement, construction, and temporarily and/or permanently installed protection measures. The owner/applicant shall comply with this measure prior to zoning clearance issuance for grading and tract improvements. The owner/applicant shall install tree protection measures on site prior to the issuance of grading/building permits and pre-construction meeting.

Monitoring. The owner/applicant shall demonstrate to Planning and Development compliance monitoring and building and safety staff that trees identified for protection were not damaged or removed or, if damage or removal occurred, that replacement is completed as required by the TPP prior to final building inspection clearance.

BIO-6(b) Tree Replacement Plan

For protected trees that require removal, a Tree Replacement Plan shall be prepared and/or incorporated into the Final OSMP (depending upon on site and/or off-site replacement) by a certified arborist or landscape architect. The tree replacement plan shall be designed to replace

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native trees removed by the proposed project at a ratio of 10:1 (trees planted: trees impacted) for oak trees, 3:1 (trees planted: trees impacted) for arroyo willow, and 1:1 (native trees planted: non-native trees impacted) for non-native trees. Upon final design, the applicant's biologist shall determine the final impacts to protected trees and the subsequent number of replacement plantings needed for restoration for the project. Replacement trees shall be installed on-site. Monitoring of planted trees shall be for a minimum of seven years or until stasis has been determined by a certified arborist. The plan shall include the following components at a minimum:

- a. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type);
- b. Goal(s) of the compensatory mitigation project;
- c. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values);
- d. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including species to be used and container sizes]);
- e. Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule);
- f. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports);
- g. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants;
- h. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria;
- i. Notification of completion of compensatory mitigation; and
- j. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

Plan Requirements and Timing. The Tree Replacement Plan and/or revised OSMP shall be submitted to Planning and Development for review and approval prior zoning clearance issuance for grading for tract improvements. Plan components shall be included on grading and landscaping plans. Prior to zoning clearance issuance, the owner/applicant shall post a performance security to ensure the installation and maintenance of replacement trees for a minimum of five years.

Monitoring. The applicant shall demonstrate to Planning and Development compliance monitoring staff that all required components of the approved tree replacement plan (or revised OSMP) are in place as required prior to final inspection clearance and maintained throughout maintenance period. Planning and Development compliance monitoring staff signature is required to release the installation security upon satisfactory installation of all items in approved plans and maintenance security upon successful implementation of the replacement plan.

Significance After Mitigation

Implementation of the above mitigation measures would reduce impacts to protected trees to a less than significant level (Class II).

Threshold:	Would the project substantially, adversely impact, either directly or through habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (§670.2 or 670.5) or in Title 50, Code of Federal Regulations (§17.11 or 17.12)?
Threshold:	Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
Threshold:	Would the project adversely impact state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
Threshold:	Would the project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impact BIO-7 THE PROJECT WOULD RESULT IN REMOVAL AND DEGRADATION OF ENVIRONMENTALLY SENSITIVE VEGETATION FOR FUEL MANAGEMENT PURPOSES. THIS IMPACT WOULD BE SIGNIFICANT BUT MITIGABLE (CLASS II).

The Santa Barbara County Fire Department recommends a 100-foot vegetation fuel management zone from structures. Guidelines for fuel modification and vegetation management have been outlined in The Neighborhoods of Willow Creek and Hidden Canyon Specific Plan. The types of management will vary based on the slope, aspect, terrain, and density of vegetation. The guidelines include:

1. **General:** Vegetation management planting and thinning shall be implemented within a 100-foot vegetation management zone from residential structures adjacent to open natural areas intended for fire risk reduction. Individual residential lots shall incorporate low fuel and / or fire resistant plants into the design of the rear yard landscape.
2. **Residential graded pad-ornamental landscape zone:** The graded pad may consist of lawn and irrigated ground cover and shrubs and is considered an “irrigated zone,” equivalent to a “total clear zone.” Trees in this zone must be ten feet or more away from the residence.
3. **Landform graded slope zone (irrigated):** This zone includes the landform graded slopes created with grading of the residential pads. This zone shall begin a transition from the ornamental landscape to a more natural, but generally low fuel, landscape. This zone shall not include high fuel plants such as Chamise, Black sage, California sage and Coyote bush. Screen planting shall be arranged in a mosaic manner that limits the possibility of creating a fuel ladder into trees. This zone may extend beyond the graded slope into undisturbed open areas to allow for a naturalistic edge to be created that is visually harmonious with the larger natural setting. Irrigation shall be limited to the created slope and not extend into the undisturbed areas.
4. **Fuel Reduction Zone in natural areas:** Thinning of vegetation if necessary at the interface between the open space and the landform graded slope zone may include removal of dead wood and downed limbs in trees. Shrub thinning shall be done to transition smoothly into the adjoining undisturbed native plant community. Avoid contrived pruning and shaping to maintain a natural appearance.

5. **Tree Trimming:** Limbing-up of native trees (only if required to protect existing trees within the 100-foot fuel modification zone) and other incidental exotic trees such as eucalyptus or pine shall be up to six feet for Coast Live Oak and eight feet for all other species. Small oaks shall be limbed up to 1/3 of the tree's height.

Potential impacts would include vegetation removal, vegetation thinning, tree trimming, and removal of dead wood and downed tree limbs. Fuel management activities would focus on the removal and control of non-native species to meet the overall goals of the fuel management program. No ground disturbance is planned in association with the on-going fuel management program. However, long-term fuel management activities would potentially affect plant communities such as, coastal scrub, oak woodlands, native grasslands, and riparian vegetation, which would be a potentially significant impact.

Mitigation Measures

The following measure would be required to reduce potentially significant impacts associated with long-term fuel management activities on the project site to less than significant (class II).

BIO-7 Fuel Management Plan

The applicant shall prepare a Fuel Management Plan to be incorporated into the Final OSMP. The Fuel Management Plan shall include the following:

- a. The goal of the plan would be to meet the dual goals of public safety and protection of special-status plant species habitat and sensitive plant communities.
- b. The plan shall depict fuel management zones (i.e., zone 1, 2, and 3) wherever required and shall include specific special-status species habitat or sensitive plant communities protection and fuel management measures to be used in each fuel management zone for each plant community. On-site vegetation management shall be limited to the zones and clearance requirements/percentages conceptually described.
- c. Depending on the resource(s) to be encountered within fuel management zones, the Fuel Management Plan shall incorporate mitigation actions from the resource-specific Mitigation Measures BIO-1(a) through BIO-1(b), BIO-2(a) through BIO-2(k), BIO-3(a) through BIO-3(d), and BIO-4(a) through BIO-4(d) to avoid, minimize or compensate for significant impacts to special status species. If compensatory mitigation is required for fuel management activities, the mitigation actions from the resource-specific Mitigation Measures BIO-1(b), BIO-2(c), BIO-3(b), and BIO-4(c) shall be incorporated into the Final OSMP (or Off-Site Habitat Restoration Plan, if applicable).

Plan Requirements and Timing. The Fuel Management Plan shall be reviewed and approved by Planning and Development prior to zoning clearance issuance for grading. Site plans shall show any proposed fuel management zones and measures to protect any special-status species habitat occurring within the zones. Vegetation clearance within the fuel management zones shall be conducted in compliance with the Fuel Management Plan. Planning and Development shall also verify that the contents of the fuel management plan are also incorporated into the revised OSMP.

Monitoring. Planning and Development permit compliance staff shall monitor implementation of the Fuel Management Plan and respond to complaints.

Significance After Mitigation

Implementation of the above mitigation measures would reduce special status species, sensitive communities and wetlands impacts from fuel management activities to a less than significant level (Class II).

c. Cumulative Impacts

Significance for cumulative impacts to biological resources are based on:

- a. The cumulative contribution of other approved and proposed development to fragmentation of open space in the project site's vicinity;
- b. The loss of sensitive habitats and species;
- c. Contribution of the proposed project to urban expansion into natural areas; and
- d. Isolation of open space within the proposed project by future projects in the vicinity.

Cumulative impacts resulting from buildout of the Orcutt Planning Area was addressed in the OCP EIR and determined to be significant and unavoidable (Class I). Continued development in the northern part of Santa Barbara County will cumulatively increase the potential for impacts to biological resources, in combination with the proposed project. Cumulative development in the northern part of Santa Barbara County includes approximately 1,260 new residential units and 280 commercial units that are currently proposed, in process, approved, or under construction, in addition to approximately 973,500 square feet of commercial, winery, and institutional development. The proposed project would contribute incrementally to habitat loss within the Orcutt area taking into account all other projects, particularly in southern Orcutt where a number of key sites feature important sensitive resources. Native habitats support native wildlife species, many of which cannot survive in, or do not adapt to, the noise and disturbance associated with residential and urban developments. Species that tolerate developed, landscaped, and disturbed sites include aggressive, non-native species that further displace native plants and wildlife, or may prey upon native species. The project, both directly and indirectly, would contribute to the gradual reduction and fragmentation of native habitats (including sensitive habitats), loss of native plant species diversity and populations, and reduction in and potential loss of native wildlife diversity and populations.

Cumulative impacts to biological resources are addressed on a project-by-project basis through site-specific investigations and surveys as well as the development of the assessment of potential impacts and prescription of appropriate mitigation. Implementation of the mitigation measures described in Section 4.4.2(b), Project Impacts and Mitigation Measures, would reduce project-level impacts to biological resources to a less than significant level. However, the project's contribution to cumulative loss of sensitive habitats in general, and in particular to loss of upland and potentially suitable aquatic habitat for the federally and State listed California tiger salamander Santa Barbara County DPS and federally listed California red-legged frog in northern Santa Barbara County would be significant and unavoidable (Class I).

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4.5 Cultural and Tribal Cultural Resources

This section evaluates potentially significant impacts to cultural and tribal cultural resources associated with the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project in the Orcutt Community Plan (OCP) area in northern Santa Barbara County. The analysis in this section evaluates development of the proposed Willow Creek neighborhood, Hidden Canyon neighborhood, and tie-in to the recorded sewer line easement on Key Site 22 north of the site (collectively referred to as “the project”).

4.5.1 Setting

a. Regional Setting

Prehistory

At European contact, the region was occupied by the Chumash, a diverse population living in settlements along the California coast from Malibu Creek in the south to Estero Bay in the north, and from Tejon Pass, Lake Casitas and the Cuyama River inland to the islands of San Miguel, Santa Rosa, and Santa Cruz. Chumash society became increasingly complex over the past 9,000 years (Wallace 1955, Warren 1968). Wallace (1955) and Warren (1968) developed chronologies for the region. Chester King (1981) proposed sequences based on changes in ornaments, beads, and other artifacts. After A.D. 1000, changes in bead types suggested the evolution of new economic subsystems that contributed to the highly developed economic system observed by early Spanish explorers.

Discussion of the Early (6,000 B.C.-1,400 B.C.), Middle (1,400 B.C.-A.D. 1,000), and Late (A.D. 1,000-1542) periods is based on a chronological sequence developed by King (1981) for the Santa Barbara Channel region. The Early Period of the Santa Barbara Channel mainland was originally defined by Rogers (1929) and referred to as the “Oak Grove” Period. The primary diagnostic feature of this period is the milling stone, which was used to grind hard seeds into flour. The Middle Period is characterized by larger and more permanent settlements. Materials from Middle Period sites reflect a greater reliance on marine resources and include marine shells, fish remains, and fishhooks. Toward the end of this period the plank canoe was developed, making ocean fishing and trade with the Channel Islands safer and more efficient (Arnold 1987). Terrestrial resources continued to be exploited as evidenced by the presence of contracting-stemmed and corner-notched projectile points from Middle Period sites (Bamforth 1984). The Late Period was a time of increased social and economic complexity. The population increased, and permanent and semi-permanent villages clustered along the Santa Barbara channel and on the Channel Islands. Trade networks, probably controlled by village chiefs, expanded and played an important part in local Chumash culture, reinforcing status of differences and encouraging craft specialization. Acorns were processed using stone pestles and mortars, and deer were hunted with the bow and arrow. During this period there was an increase in the number of residential base camps and in the diversity of site settings (King 1981; Gamble 2008; Rogers 1929).

Following the 1542 Cabrillo voyage numerous small Chumash settlements were abandoned, and large historic towns were founded. The protohistoric culture of the Chumash is chronologically equated with the arrival of a Spanish expedition led by Gaspar de Portola’ in 1769. Subsequently, Chumash culture changed dramatically with the establishment of the Missions of Santa Barbara, Santa Ynez and La Purisima (King 1981; Gamble 2008).

History

Landberg (1965) divided the historic occupation of the project vicinity into three settlement periods: the Mission Period (A.D. 1769-1834), the Mexican Rancho Period (ca. A.D. 1834-1849), and the American Period (ca. A.D. 1849-present). Gaspar de Portola and his crew, who camped at the mouth of the Santa Maria River in July 1769, ushered in the Mission Period. Construction of the Mission Santa Barbara in 1786, Mission La Purisima Concepcion in 1787, Mission Santa Ynez in 1808, along with the establishment of numerous ranchos, altered both the physical and cultural landscape of the region. The missions were the center of Spanish influence in the region and affected native patterns of settlement, culture, trade, industry, and agriculture. Following the Mexican Revolution of 1821, California became part of the Republic of Mexico, and secularization of the Mission lands soon followed. The emphasis on cattle-raising in the post-Mission Period marked a shift from stock raising to farming and more intensive land uses marked the advent of the American Period. Major forces of regional change during the last 100 to 125 years include the development of the railroad system, improvements in maritime shipping, the growth of agribusiness concerns, and the development of the oil industry (Landberg 1965; Erlandson et. al. 2008; Gamble 2008).

b. Project Site Setting

A total of four prior archaeological investigations (Spanne 2004, Santoro and Toren 1995, Snethkamp and Colten 1982, Spanne 1980) have been conducted in the immediate project site vicinity. Three of the four archaeological investigations surveyed Key Site 21, including the project site (Spanne 2004, Snethkamp and Colten 1982, Spanne 1980). The remaining survey (Santoro and Toren 1995) surveyed Key Site 22 within which the proposed sewer line extension for the project would be located. All four investigations were conducted by County-qualified archaeologists and meet current standards and methods and are consistent with the County's Cultural Resource Guidelines. The findings of each of these investigations are detailed in the following paragraphs, in sequential order of when each occurred.

The 1980 Phase I survey of Key Site 21, including the project site (Spanne 1980), identified a historic-period solid waste disposal area (CA-SBA-1169/H) and an isolated prehistoric Monterey chert flake (RME-1) believed to be associated with Juan Arrellanes Adobe, which dates back to the Mexican Rancho Period of the mid-19th century. The historic-period solid waste disposal area is located outside of the project site, west of the drainage bordering the 14th fairway of the Rancho Maria Golf Club (RMGC) golf course, and contains animal bones, abalone and clam shell, ceramic tableware and glass bottle fragments, miscellaneous metal, and other domestic debris between 1874 and 1913. Greenwood and Associates evaluated the significance of CA-SBA-1169/H and determined that it qualifies as a significant historical resource according to CEQA standards (Greenwood, McIntyre, and Burkenroad 1980). The isolated Monterey chert flake was found on the golf course, outside of the project site. Spanne characterized the artifact as "an isolated find in areas where buried deposits are unlikely."

The survey of Key Site 22 (Snethkamp and Colten 1982) was conducted using 20-meter (65.5 foot) transect intervals. Ground surface visibility was limited by dense annual grasses. No cultural resources were identified within the portion of the Key Site 22 where the proposed sewer line for the project would be located.

The 1995 Phase I investigation was conducted in support of the County of Santa Barbara's OCP EIR and surveyed the project site and resurveyed Key Site 22. The surface survey using transect intervals spaced no more than 15-meters apart. No cultural resources were identified on the project site.

The most recent archaeological investigation included a Phase I Survey of 140 acres of Key Site 21, including the project site, using 15-meter transect intervals (Spanne 2004). The investigation also included a records search at the Central Coast Information Center at the University California Santa Barbara. Surface visibility was adequate to detect any cultural resources that might have been present. No prehistoric or historic cultural resources were identified during this investigation. No cultural resources were identified within the project site or in the area of the proposed sewer line extension during these recent archaeological studies.

Per the County Guidelines Section 2.3.2 Cultural Resources Identification, if an archaeological survey is older than ten years old but deemed to be sufficient, an addendum to the prior report(s) must be completed. The addendum is required to update all graphics to match the current development project; discuss any change in interpretation, impacts, or mitigation; and identify changes in circumstances or new information of substantial importance that cause one or more effects to cultural resources. Accordingly, an Addendum Phase I Archaeological Resources Investigation was conducted for the project site in December 2018 (refer to Appendix D). The Addendum Phase I Archaeological Resources Investigation determined that the two most recent studies conducted in 1995 and 2004 were sufficient. Based on the results of these surveys no cultural resources are known to occur on the project site.

c. Regulatory Setting

A cultural resource may be designated as significant by federal, State, or local authorities. State historic preservation regulations include the statutes and guidelines contained in CEQA (Public Resources Code Sections 20183.2 and 21084.1 and Section 15064.5 of the CEQA Guidelines). In order for a resource to qualify for listing in the National Register of Historic Places (NHRP) or the California Register of Historical Resources (CRHR), it must meet one or more identified criteria of significance. Criteria for determination of significant impacts to historical, cultural, and archaeological resources, including criteria for consideration of a resource as “historically significant” under CRHR, are described in Section 4.5.3(a), Methodology and Significance Thresholds.

The disposition of human remains is governed by Section 7050.5 of the California HSC and Sections 5097.94 and 5097.98 of the Public Resources Code and falls within the jurisdiction of the Native American Heritage Commission (NAHC).

Section 35.60.040 of the Santa Barbara County Land Use and Development Code (LUDC) describes the County’s resource protection standards that relate to historical and archaeological resources. Policies, actions, and development standards related to historical and archaeological resources in the Orcutt area are described in Section IV.E of the OCP.

The County Thresholds and Guidelines Manual incorporates mandates specified in CEQA Guidelines Sections 15064.5 and 15126.4. It also includes significance criteria for evaluating historic architectural resources identified in the County Cultural Resources Guidelines, which are described below in Section 4.5.3(a), Methodology and Significance Thresholds. According to the Santa Barbara County Historic Preservation Ordinance, in order for a resource to be eligible for designation as a County Landmark or Place of Historic Merit, it must meet the designation criteria defined in Section 18A-3 of the Santa Barbara County Municipal Code under consideration by the Historic Landmarks Advisory Commission and the Board of Supervisors. The Commission has bylaws which provide additional guidance on eligibility for establishing landmarks and places of historic merit (Ord. No. 4425 Section 1).

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Assembly Bill (AB) 52 establishes a formal consultation process for California tribes regarding tribal cultural resources defined in Public Resources Code Section 21074. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency.

Per California Government Code Section 65352.3 and Senate Bill (SB) 18 cities and counties are also required to formally consult with California Tribal government prior to adoption or amendment to a General Plan. Consultation shall occur with California Native American Tribes for the purpose of preserving or mitigating impacts to tribal cultural resources.

On November 30, 2017, pursuant to the requirements of AB 52 and SB 18, the County prepared and sent notification letters inviting tribes/tribal representatives listed with the NAHC to participate in consultation for the project. Tribal representatives/tribes contacted include: Julie Lynn Tumamait-Stenslie, Chair, Eleanor Arrellanes, and Raudel Joe Banuelos, Jr. of the Barbareno/Ventureno Band of Mission Indians; Gino Altamirano, Tribal Chair of the Coastal Band of the Chumash Nation; and Kenneth Kahn, Tribal Chairman of the Santa Ynez Band of Chumash Indians. On May 17, 2018, in response to the County’s request for consultation, Freddie Romero, Cultural Resources Coordinator for the Santa Ynez Band of Chumash Indians, attended a site visit with Frances Romero, Director at FORMA Design and representative of the project applicant. Subsequent to the site visit Mr. Romero requested the inclusion of the standard “unexpected discovery” condition as a Condition of Approval for the project. The County did not receive any other requests for consultation or other pertinent information about potential tribal cultural resources on the project site in response to the AB 52 and SB 18 notification letters.

In addition, policies, actions, and development standards related to historical and archaeological resources in the Orcutt area are described in Section IV.E of the OCP. Several of these were modeled after mitigation measures in the OCP EIR. The following OCP policy would apply to the project as proposed:

- Policy HA-O-I: Archaeological and historic resources in the Orcutt Planning Area shall be protected and preserved to the maximum extent possible (County of Santa Barbara 2004).

4.5.2 Previous Environmental Review

The OCP EIR examined potential impacts to cultural resources in the Archeological Resources section of the document. The OCP EIR determined that buildout of the OCP would result in a significant and unavoidable (Class I) cumulative impact associated with destruction, pilferage, and vandalism of archaeological resources at full buildout of the OCP. Portions of Key Site 21 were surveyed, but site-specific analysis was not performed for archeological resources at Key Site 21 as part of the OCP EIR.

The OCP EIR identified two potentially significant archaeological impacts that pertain to development on Key Site 21, including: destruction of pre-historic resources as a direct result of surface and subsurface grading (ARCH-1) and increased incidents of pilferage and vandalism (ARCH-2). The OCP EIR identified mitigation measures for public and private development projects pursuant to the Santa Barbara County archaeological guidelines, the State Office of Historic Preservation, and the State of California Native American Heritage Commission to minimize potential impacts to archaeological resources. These measures include archaeological site avoidance (ARCH-1), implementation of buffers (ARCH-2), subsurface testing and data recovery programs in

the event that avoidance is not possible (ARCH-3 and ARCH-4), site disturbance monitoring by a County-qualified archaeologist and a Native American representative (ARCH-5), fencing (ARCH-6), prohibition of activities that could destroy or damage archaeological or cultural sites (ARCH-7), cooperation with the State of California NAHC (ARCH-8) and consultation of County-qualified archaeologist and Native American Representative, and suspension of construction if archaeological remains are uncovered (ARCH-10). The OCP EIR determined that implementation of feasible mitigation measures would reduce impact ARCH-1 to a less than significant (Class II) level. Impact ARCH-2 was determined to remain significant and unavoidable (Class I) with implementation of the identified mitigation measures.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds

The significance of a cultural resource and impacts to the resource is determined by whether or not that resource can increase our knowledge of the past. The primary determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the CEQA Guidelines and the Santa Barbara County Environmental Thresholds and Guidelines Manual.

CEQA declares that the State of California will “take all steps necessary to provide the people of this state with [...] enjoyment of [...] historic environmental qualities.” The CEQA definition of “environmental qualities” includes objects of historic, archaeological, aesthetic significance [Public Resources Code (PRC) 21001] (Gammage, Jones, and Jones, 1975).

CEQA Guidelines Section 15064.5, Determining the Significance of Impacts to Archaeological Resources, states:

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, Section 5024.1, Title 14 CCR, Section 4852) including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.
- A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

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The County Cultural Resource Guidelines provide local criteria for determining the significance of archaeological resources. County criteria for “important archaeological resource” are identical to the CEQA criteria listed above.

Appendix G of the CEQA Guidelines considers a project to have a significant impact on cultural resources or tribal cultural resources if the project would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to as defined in Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
- Disturb any human remains, including those interred outside of dedicated cemeteries; and/or
- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Potential impacts to historical resources are discussed in Section 4.15, *Effects Not Found to be Significant*.

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Neighborhoods of Willow Creek and Hidden Canyon Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed project.

Threshold:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
Threshold:	Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Impact CUL-1 GROUND DISTURBING ACTIVITIES ASSOCIATED WITH PROJECT CONSTRUCTION COULD RESULT IN DIRECT AND/OR INDIRECT IMPACTS TO CA-SBA-1169/H AND/OR PREVIOUSLY UNDISCOVERED ARCHAEOLOGICAL RESOURCES, PURSUANT TO STATE CEQA GUIDELINES SECTION 15064.4. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION (CLASS II).

According to the Addendum to the Phase 1 Archaeological Resources Investigation for the project (Appendix D), during the four most recent archaeological studies, no archeological resources were identified within the proposed development areas on the project site, or the proposed sewer line extension area on Key Site 22. One isolated Monterey chert flake was identified on Key Site 21,

within the bounds of the RMGC public golf course, which is outside the proposed development areas for the project. According to the 1980 Phase I survey of Key Site 21, including the project site (Spanne 1980), this artifact was characterized as “an isolated find in areas where buried deposits are unlikely.” A historic-period solid waste disposal area (CA-SBA-1169/H) was also identified in the 1980 Phase I survey. Greenwood and Associates evaluated the significance of CA-SBA-1169/H and determined that it qualifies as a significant historical resource according to CEQA standards (Greenwood, McIntyre, and Burkenroad 1980). The historic-period solid waste disposal area is located outside of the proposed development areas for the project, west of the drainage bordering the 14th fairway of the RMGC golf course. Although there are no known archeological resources on the project site, project-related earth moving activities (e.g., during the construction of project) could impact previously undiscovered archaeological resources. Increased population on the project site could also result in an increase of artifact collecting and/or vandalism that could result in potential indirect impacts to the nearby historic-period solid waste disposal area (CA-SBA-1169/H) and/or previously undiscovered archaeological and historical sites. Examples of activities that could indirectly and substantially alter the integrity and significant qualities of such resources due to increased use of the project site include, but are not limited to: collection of unidentified artifacts from archaeological sites; unauthorized excavation or looting of sites; erosion and other damage resulting from non-motorized or motorized vehicle use (horses, bicycles, dirt bikes, etc.); illicit trash dumping; and vandalism to cultural features. Destruction or loss of integrity in these resources would result in a potentially significant impact requiring mitigation.

In addition, consistent with State law, if human remains are encountered during excavation within the project area, all work must halt, and the County Coroner must be notified (Section 7050.5-California Health and Safety Code). The coroner would determine if the remains are of forensic interest. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, the coroner would contact the NAHC. The NAHC would designate the most likely descendant (MLD), who would be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the Public Resources Code. The MLD shall make his/her recommendations within 48 hours of their notification by the NAHC. This recommendation may include:

- The nondestructive removal and analysis of human remains and items associated with Native American human remains;
- Preservation of Native American human remains and associated items in place;
- Relinquishment of Native American human remains and associated items to the descendants for treatment; or
- Other culturally appropriate treatment.

Mitigation Measures

To mitigate potential indirect impacts to CA-SBA-1169/H the following mitigation measure would apply.

CUL-1(a) Avoidance of Site CA-SBA-1169/H

CA-SBA-1169/H currently is protected by dense natural vegetation which serves as a barrier and discourages entry. To protect the site, this vegetation shall not be cleared at any time. Additionally, hiking or riding trails shall not be routed within 100 feet of the site, and its presence and location shall not be publicized in print or signage.

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

Plan Requirements and Timing. Final site plans for the Specific Plan (Case No. 16SPP-00000-00001) shall demonstrate avoidance of Site CA-SBA-1169/H. Planning & Development staff shall ensure that project features are designed to avoid cultural resources entirely.

Monitoring. Planning & Development staff shall ensure receipt of the revised site plan and distribution of the plan to the County Historic Landmarks Advisory Commission. Permit Compliance shall ensure that the plan is implemented prior to construction.

To mitigate potential direct and indirect impacts to undiscovered archaeological resources the following mitigation measures, which implement OCP EIR Mitigation Measures ARCH-5 and ARCH-10, would apply.

CUL-1(b) Archaeological Monitoring

The Owner/Applicant shall have all earth disturbances including scarification and placement of fill monitored by a Planning & Development approved archaeologist and a Native American consultant in compliance with the provisions of the County Archaeological Guidelines.

Plan Requirements and Timing. Prior to zoning clearance issuance, the Owner/Applicant shall submit a contract or Letter of Commitment between the Owner/Applicant and the archaeologist, consisting of a project description and scope of work, for Planning & Development staff review and approval. Once approved, the Owner/Applicant shall execute the contract.

Monitoring. The Owner/Applicant shall provide Planning & Development compliance monitoring staff with the name and contact information for the assigned onsite monitor(s) prior to grading/building permit issuance and pre-construction meeting. Planning & Development compliance monitoring staff shall confirm monitoring by archaeologist and Native American consultant and Planning & Development grading inspectors shall spot check field work.

CUL-1(c) Stop Work at Encounter

The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall immediately contact Planning & Development staff, and retain a Planning & Development approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of the County Archaeological Guidelines and conduct appropriate mitigation funded by the Owner/Applicant.

Plan Requirements and Timing. This condition shall be printed on all building and grading plans prior to approval of such plans.

Monitoring. Planning & Development permit processing planner shall check plans prior to issuance of zoning clearance and Planning & Development compliance monitoring staff shall spot check in the field throughout grading and construction.

Significance After Mitigation

Implementation of the Mitigation Measures CUL-1(a) through CUL-1(c) would reduce impacts associated with the potential to indirectly impact CA-SBA-1169/H and/or unearth previously undiscovered cultural resources during grading and construction to a less than significant level (Class II).

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact CUL-2 GROUND DISTURBING ACTIVITIES ASSOCIATED WITH THE PROJECT COULD CAUSE A SUBSTANTIAL ADVERSE CHANGE TO PREVIOUSLY UNDISCOVERED TRIBAL CULTURAL RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION (CLASS II).

At this time no tribal cultural resources have been identified on the project site. However, Santa Barbara County has a long history of Native American occupation and, therefore, all ground-disturbing activities have the potential to uncover previously undiscovered tribal cultural resources.

Pursuant to the requirements of AB 52 and SB 18 the County conducted Native American consultation for the project to identify potential concerns or issues associated with Native American cultural resources within the project vicinity. In response to the County's request for consultation a site visit was conducted with Freddie Romero, Cultural Resources Coordinator for the Santa Ynez Band of Chumash Indians, and Frances Romero, a representative for the project applicant, on May 17, 2018. Subsequent to the site visit Mr. Romero requested the inclusion of the standard "unexpected discovery" condition as a Condition of Approval for the project. No other Native American tribes or tribal representatives provided response or information regarding potential tribal cultural resources on or in the vicinity of the project site.

As a result of Native American consultation for the project and because future development activities for the project have the potential to impact tribal cultural resources, impacts to tribal cultural resources would be potentially significant, requiring mitigation.

Mitigation Measures

CUL-2 Continued Tribal Cultural Resources Consultation and Preservation

In the event that previously unidentified tribal cultural resources are identified by a Native American representative during the implementation of the project, the County shall contact California Native American tribe(s) that have expressed interest and begin or continue consultation procedures with that tribe(s). If, as a result of the consultation, the County determines that the resource is a tribal cultural resource and the proposed project will have a potentially significant impact, additional mitigation measures as discussed with the tribe to avoid or reduce impacts to the resource shall be required and implemented where feasible.

Plan Requirements and Timing. This condition shall be printed on all building and grading plans.

Monitoring. A County Planning & Development permit processing planner shall check plans prior to issuance of zoning clearance for grading and subdivision improvements, and Planning & Development compliance monitoring staff shall spot check in the field throughout grading and construction.

Significance After Mitigation

Implementation of Mitigation Measure CUL-2 would ensure that previously unidentified tribal cultural resources would not be impacted during project construction. With implementation of these measures, potential impacts to tribal cultural resources would be less than significant (Class II).

c. Cumulative Impacts

Cumulative development in the northern part of Santa Barbara County includes approximately 1,260 new residential units and 280 commercial units that are currently proposed, in process, approved, or under construction, in addition to approximately 973,500 square feet of commercial, winery, and institutional development. This cumulative development would have the potential to disturb archaeological and tribal cultural resources as well as human remains. The OCP EIR determined that the potential destruction, pilferage, and vandalism of archaeological resources due to buildout of the OCP would represent a potentially significant impact.

Implementation of OCP Policy HA-O-I, which requires the County to protect and preserve archeological resources to the maximum extent possible, would minimize potential cumulative impacts to cultural and tribal cultural resources. Buildout of the project site, as well as other projects in the Orcutt area, would also be subject to the County's current Cultural Resource Guidelines as well as Federal regulations, including AB 52. Project-specific mitigation applied on a case-by-case basis for development projects in the Orcutt area would reduce the potential for direct cumulative impacts to cultural resources to a less than significant level. However, as identified in the OCP EIR, the potential indirect cumulative impact associated with pilferage and vandalism of archaeological resources would be significant and unavoidable despite implementation of OCP EIR Mitigation Measures ARCH-1 through ARCH-8, and ARCH-10. Nevertheless, OCP EIR Mitigation Measures ARCH-1 through ARCH-8, and ARCH-10, as well as project-specific Mitigation Measures CUL-1 through CUL-2, which help implement the applicable OCP EIR mitigation measures, would ensure that the project's contribution to cumulative impacts would remain less than significant. Therefore, cumulative impacts to cultural resources and tribal resources in the Orcutt area as a result of the project are less than significant with implementation of mitigation (Class II).

4.6 Energy

This section analyzes the potential for the project to cause significant impacts related to energy consumption, renewable energy, and energy efficiency. This analysis follows the guidance for evaluation of energy impacts contained in Appendix F and Appendix G of the State CEQA Guidelines.

4.6.1 Setting

Energy use relates directly to environmental quality, because energy use can adversely affect air quality and can generate greenhouse gas (GHG) emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences, heats and cools buildings, and powers vehicles. Transportation energy use corresponds to the fuel efficiency of cars, trucks, and public transportation; the different travel modes such as auto, carpool, and public transit; and the miles traveled using these modes.

a. Energy Supply

Petroleum

California is one of the top producers of petroleum in the nation with drilling operations occurring throughout the state but concentrated primarily in Kern and Los Angeles counties. A network of crude oil pipelines connects production areas to oil refineries in the Los Angeles area, the San Francisco Bay area, and the Central Valley. California oil refineries also process Alaskan and foreign crude oil received at ports in Los Angeles, Long Beach, and the San Francisco Bay area. Crude oil production in California and Alaska is in decline, and California refineries depend increasingly on foreign imports (California Energy Commission [CEC] 2018a). According to the United States Energy Information Administration (EIA), California's field production of crude oil totaled 174.1 million barrels in 2017 (EIA 2018a).

Santa Barbara County Petroleum Infrastructure

In general, individual users, such as residents and employees, purchase petroleum fuels. One petroleum refinery is in Santa Maria in Santa Barbara County, and three gasoline stations are located in Orcutt (EIA 2018b, GasBuddy 2019). According to the California Department of Conservation (DOC) Division of Oil, Gas, and Geothermal Resources (DOGGR), hundreds of active, idle, and plugged oil and gas wells are in Santa Barbara County. Approximately 22 plugged wells, four idle wells, and two active wells are located in the Orcutt Planning Area (DOGGR 2018a).

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. Their use is encouraged through various statewide regulations and plans, such as the Low Carbon Fuel Standard and Senate Bill (SB) 32. Conventional gasoline and diesel may be replaced, depending on the capability of the vehicle, with alternative fuels such as hydrogen, biodiesel, and electricity. Currently, 35 hydrogen refueling stations are located in California, but none are located in Santa Barbara County [United States Department of Energy (DOE) 2018]. Ten biodiesel refueling stations exist in California; one is located in Santa Barbara County, in the city of Santa Barbara (DOE 2018). Dozens of vehicle charging stations exist in Santa Barbara County, but only one is in Orcutt (DOE 2018).

Electricity

In 2017, California's in-state electricity generation totaled 206,328 gigawatt-hours (GWh). Primary fuel sources for the state's electricity generation in 2017 included the following:

- Natural gas (43.4 percent)
- Large hydroelectric (17.9 percent)
- Solar photovoltaic (10.6 percent)
- Nuclear (8.7 percent)
- Wind (6.2 percent)
- Geothermal (5.7 percent)
- Small hydroelectric (3.1 percent)
- Biomass (2.8 percent)
- Solar thermal (1.2 percent)
- Coal (<1 percent)
- Petroleum coke (<1 percent)
- Waste heat (<1 percent)
- Oil (<1 percent)

In-state electricity generation capacity reached 79,644 megawatts (MW) in 2017 (CEC 2018c). Residential electricity demand accounted for approximately 32.7 percent of California's electricity consumption in 2017 while non-residential demand accounted for approximately 67.3 percent (CEC 2017a).

Every two years, the CEC prepares the Integrated Energy Policy Report (IEPR). This year's update to the IEPR highlights the implementation of California's innovative policies and the role the State played in establishing a clean energy economy. Volume II of the 2018 IEPR, scheduled for completion in February 2019, will provide more detail on several key energy issues and will encompass new analyses, as well as opportunities for public participation. According to the 2018 IEPR, California's electric grid relies increasingly on clean sources of energy such as solar, wind, geothermal, hydroelectricity, and biomass (CEC 2018d). As this transition advances, the grid is also expanding to serve new sectors including electric vehicles, rail, and space and water heating. California has installed more renewable energy than any other state in the United States with 22,250 MW of utility-scale systems operational (CEC 2018d).

Pacific Gas & Electric

Pacific Gas and Electric (PG&E) is responsible for providing power supply to the Santa Maria Valley region of Santa Barbara County, which includes the project site. PG&E's power system is one of the nation's largest electric and gas utility companies, and it maintains 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines (PG&E 2018a). In 2017, PG&E's power mix, including all PG&E-owned generation plus the company's power purchases, consisted of 33 percent renewable resources (wind, geothermal, biomass, solar, and small hydro), 27 percent nuclear generation, 20 percent natural gas, 18 percent large hydroelectric facilities, and 2 percent unspecified power that is not traceable to sources by any auditable contract trail (PG&E 2018b).

PG&E's 2018 Integrated Resource Plan serves as a roadmap through 2030 and guides PG&E's efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The Integrated Resource Plan introduces new constraints and considerations into the power system planning process and is intended to help applicable parties understand how load serving entities plan to shape their future energy portfolios to meet the State's clean energy goals. In the 2018 Integrated Resource Plan, PG&E analyzes three scenarios for 2030 that differ in various aspects, including the share of electric vehicles in the statewide fleet and availability of different energy sources. According to these scenarios, PG&E anticipates meeting a 2030 energy load demand of between 36,922 GWh and 37,370 GWh (PG&E 2018c).

Central Coast Power

The County of Santa Barbara and the Cities of Carpinteria, Goleta, and Santa Barbara (South Coast cities) are in the process of forming a joint powers authority (JPA) to create and administer a Community Choice Energy (CCE) program that will serve Santa Barbara County. In summer 2018, the Santa Barbara County CCE study was presented to the County Board of Supervisors and interested city councils, and the County of Santa Barbara and the South Coast cities agreed to pursue a CCE JPA (Central Coast Power 2018).

Santa Barbara County Electric Power Infrastructure

Eight power plants are located in Santa Barbara County:

- Two solar power plants on Vandenberg Air Force Base and in Cuyama,
- Three natural gas power plants in Goleta and unincorporated Santa Barbara County near Gaviota, and
- Three biomass power plants in Santa Maria and unincorporated Santa Barbara County near Goleta (EIA 2018b).

Natural Gas

Natural gas continues to play an important and varied role in California. The state's net natural gas production for 2017 was 162.7 billion cubic feet, or approximately 168,720 billion British thermal units (Btu), representing an increase of 3.6 percent from 2016 production (DOGGR 2018b).

California relies on out-of-state natural gas imports for nearly 90 percent of its supply (CEC 2019a). Its existing gas supply portfolio includes supplies from California onshore and offshore sources, southwestern United States supply sources, the Rocky Mountains, and Canada. The CEC estimates that approximately 45 percent of the natural gas burned across the state is used for electricity generation, and much of the remainder is consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors. Building and appliance energy efficiency standards account for up to 39 percent in natural gas demand savings since 1990 (CEC 2019a).

The 2018 California Gas Report presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2035. The report is prepared in even-numbered years, followed by a supplemental report in odd-numbered years, in compliance with California Public Utilities Commission (CPUC) Decision D.95-01-039. The projections contained in the California Gas Report are for long-term planning and do not necessarily reflect the day-to-day operational plans of the utilities (California Gas and Electric Utilities [CGEU] 2018).

California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 0.5 percent per year from 2018 to 2035. The forecast decline is due to a combination of moderate growth in the natural gas vehicle market and across-the-board declines in all other market segments: residential, commercial, electric generation, and industrial markets (CGEU 2018). Residential gas demand is expected to decrease at an annual average rate of 1.4 percent. Demand in the commercial and industrial markets are expected to increase slightly at an annual rate of 0.2 percent. Stricter codes and standards coupled with more aggressive energy efficiency programs and new goals laid out in SB 350, discussed in Section 4.6(c), *Regulatory Setting*, are making a significant impact on the forecasted load for the residential, commercial, and industrial markets (CGEU 2018).

For the purposes of load-following as well as backstopping intermittent renewable resource generation, gas-fired generation will continue to be the primary technology to meet the ever-growing demand for electric power. However, overall gas demand for electric generation is expected to decline at 1.4 percent per year for the next 17 years due to more efficient power plants, statewide efforts to minimize GHG emissions through aggressive programs pursuing demand-side reductions, and the acquisition of preferred power generation resources that produce little or no carbon emissions (CGEU 2018).

Pacific Gas & Electric

The project site is in PG&E's natural gas service area, which spans central and northern California (CEC 2018e). PG&E's service area is equipped with approximately 6,700 miles of gas transmission pipelines and 42,000 miles of gas distribution pipelines. The closest large-diameter gas transmission pipeline runs from Morro Bay to Kettleman City, approximately 36 miles northwest of the project site (PG&E 2019). Natural gas supplied by PG&E is sourced primarily by gas fields in the Sacramento Valley and the Permian, San Juan, and Anadarko basins in the Southwest (CGEU 2018).

In 2017, PG&E customers consumed a total of 4,714 million U.S. therms of natural gas. Residential users accounted for approximately 40 percent of PG&E's natural gas consumption. Industrial and commercial users accounted for another 36 percent and 20 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts (CEC 2017b). According to PG&E, although the number of households in its service area is projected to grow by approximately 0.86 percent per year from 2018 to 2035, residential sales are expected to decline by approximately 1.1 percent per year as a result of continued energy efficiency and electrification efforts as well as warming temperatures (CGEU 2018).

Santa Barbara County Natural Gas Infrastructure

As discussed above, hundreds of active, idle, and plugged oil and gas wells are located in Santa Barbara County. Of these, approximately 22 plugged wells, four idle wells, and two active wells are located in the Orcutt Planning Area. In addition, one natural gas processing plant is in unincorporated Santa Barbara County near the City of Lompoc (DOGGR 2018a, EIA 2018b). Several natural gas transmission pipelines are also located in Santa Barbara County, one of which traverses the western portion of Orcutt (National Pipeline Mapping System 2019).

b. Energy Demand

Petroleum

State

In 2016, transportation accounted for nearly 40 percent of California’s total energy demand, amounting to approximately 3,116 trillion Btu in 2016 (EIA 2018c). California’s transportation sector, including rail and aviation, consumed roughly 574 million barrels of petroleum fuels in 2016 (EIA 2018d). In 2016, petroleum-based fuels were used for approximately 98.4 percent of the State’s total transportation activity (EIA 2018d). The CEC produces the California Annual Retail Fuel Outlet Report, which is a compilation of gasoline and diesel fuel sales data from across the state available at the county level. According to the CEC, California’s 2017 fuel sales totaled 15,584 million gallons of gasoline and 3,798 million gallons of diesel (CEC 2018f).

Santa Barbara County

Santa Barbara County fuel sales are compared to statewide sales herein to provide regional and statewide context for fuel consumption. As shown in Table 4.6-1, Santa Barbara County consumed an estimated 170 million gallons of gasoline and 19 million gallons of diesel fuel in 2017 (CEC 2018f). As shown in Table 4.6-1, with a current (2018) population of 453,457 (DOF 2018), Santa Barbara County’s annual per capita gasoline consumption is approximately 374 gallons of gasoline and 42 gallons of diesel. Therefore, each person in Santa Barbara County consumes approximately 46.5 million Btu (MMBtu) of transportation fuel.

Table 4.6-1 2017 Annual Gasoline and Diesel Consumption

Fuel Type	Santa Barbara County (gallons)	California (gallons)	Proportion of Statewide Consumption	County per Capita Consumption (gallons)	County per Capita Consumption (MMBtu)¹
Gasoline	170,000,000	15,584,000,000	1.1%	374.9	41.2
Diesel	19,000,000	3,798,040,000	0.5%	41.9	5.3
Total	189,000,000	19,382,040,000	–	416.8	46.5

Note: Diesel and gasoline volumes are expressed in gallons while Btu volumes are expressed in millions of Btu (MMBtu).

¹ Population estimate for Santa Barbara County in 2018 was sourced from the California Department of Finance (2018).

Source: CEC 2018f

Electricity

State

According to the CEC, California consumed approximately 288,613 GWh in 2017, or approximately 984,749 billion Btu (CEC 2017a). According to the CEC’s Energy Consumption Database, residential electricity demand accounted for approximately 32.7 percent of California’s electricity consumption in 2017, and non-residential demand account for approximately 67.3 percent (CEC 2017a).

Santa Barbara County

Electricity consumption by residential land uses in Santa Barbara County is compared to statewide consumption herein to provide regional and statewide context. As shown in Table 4.6-2, residential land uses in Santa Barbara County consumed approximately 774 GWh in 2017 (CEC 2017a). With a current (2018) population of 453,457 (DOF 2018), Santa Barbara County’s per capita residential electricity consumption is approximately 1.7 MWh.

Table 4.6-2 2017 Annual Residential Electricity Consumption

Energy Type	Santa Barbara County (GWh)	PG&E (GWh)	California (GWh)	Proportion of PG&E Consumption	Proportion of Statewide Consumption	County Per Capita Consumption (MWh) ¹
Electricity	774	29,920	94,495	2.6%	0.8%	1.7

¹ Population estimate for Santa Barbara County in 2018 sourced from the California Department of Finance (2018).

Source: CEC 2017a

Natural Gas

State

In 2017, California consumed a total of 12,571 million U.S. therms of natural gas, or approximately 1,169 trillion Btu (CEC 2017c). According to the CEC’s Energy Consumption Database, residential natural gas demand accounted for approximately 35.5 percent of California’s total natural gas demand while non-residential natural gas demand accounted for approximately 64.5 percent (CEC 2017c).

Santa Barbara County

Natural gas consumption by residential land uses in Santa Barbara County is compared to statewide consumption herein to provide regional and statewide context. As shown in Table 4.6-3, Santa Barbara County consumed approximately 55 million US therms in 2017 (CEC 2017c). With a 2018 population of 453,457, Santa Barbara County’s per capita residential natural gas consumption is approximately 121 therms (DOF 2018).

Table 4.6-3 2017 Annual Residential Natural Gas Consumption

Energy Type	Santa Barbara County (millions of US therms)	PG&E (Millions of US therms)	California (millions of US therms)	Proportion of PG&E Consumption	Proportion of Statewide Consumption	County Per Capita Consumption (US therms) ¹
Natural Gas	55	1,873	4,457	2.9%	1.2%	121

¹ Population estimate for Santa Barbara County in 2018 sourced from the California Department of Finance (2018).

Source: CEC 2017b and 2017c

c. Regulatory Setting

Federal

Energy Independence and Security Act of 2007

The Energy Independence and Security Act, enacted by Congress in 2007, is designed to improve vehicle fuel economy and help reduce the United States' dependence on foreign oil. It expands the production of renewable fuels, reducing dependence on oil and confronting climate change. Specifically, it does the following:

- Increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard, requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels.
- Reduces United States demand for oil by setting a national fuel economy standard of 35 miles per gallon (mpg) by 2020 – an increase in fuel economy standards of 40 percent.

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act established fuel economy standards for new light-duty vehicles sold in the United States. The law placed responsibility on the National Highway Traffic and Safety Administration (NHTSA), a part of the United States Department of Transportation (USDOT), for establishing and regularly updating vehicle standards. The United States Environmental Protection Agency (USEPA) administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. In 2012, the USEPA and NHTSA established final passenger car and light truck CAFE standards for model years 2017-2021, which will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallon (USDOT 2014).

Energy Star Program

Energy Star is a voluntary labeling program introduced by USEPA to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specification for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes qualifying commercial and industrial buildings, as well as homes (USEPA n.d.).

State

California Energy Plan

The California Energy Plan, prepared by the CEC, identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The 2008 California Energy Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure

needs, as well as encouragement of urban designs that reduce vehicle miles travelled and accommodate pedestrian and bicycle access.

Assembly Bill 2076

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), the CEC and the California Air Resources Board (CARB) prepared and adopted a joint-agency report, *Reducing California's Petroleum Dependence*, in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita vehicle miles travelled. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 *Integrated Energy Policy Reports*, the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

Integrated Energy Policy Report

SB 1389 required the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC uses these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety. The most recent assessment, the *2018 Integrated Energy Policy Report*, contains two volumes. Volume I highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy. Volume II, scheduled for completion in February 2019, will provide more detail on several key energy issues and will encompass new analyses, as well as significant opportunities for public participation (CEC 2018d).

Senate Bill 350

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Senate Bill 100

Approved by the Governor on September 10, 2018, SB 100 accelerates the State's Renewable Portfolio Standard program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Assembly Bill 1493

AB 1493, known as the Pavley bill, amended Health and Safety Code sections 42823 and 43018.5, requiring CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

Implementation of new regulations prescribed by AB 1493 required that the state apply for a waiver under the federal Clean Air Act. Although the USEPA initially denied the waiver in 2008, the USEPA approved a waiver in June 2009, and in September 2009, CARB approved amendments to its initially adopted regulations to apply the Pavley standards that reduce GHG emissions from new passenger

vehicles in model years 2009 through 2016. According to CARB, implementation of the Pavley regulations is expected to reduce fuel consumption while also reducing GHG emissions.

Energy Action Plan

In October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the state's ongoing actions in the context of global climate change.

Assembly Bill 1007

AB 1007 required the CEC to prepare a plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other federal, state, and local agencies. The State Alternative Fuels Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Bioenergy Action Plan (Executive Order S-06-06)

Executive Order (EO) S-06-06 establishes targets for the use and production of biofuels and biopower and directs state agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050. Executive Order S-06-06 also calls for the state to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so that the state can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 Plan and provides a more detailed action plan to achieve the following goals:

- Increase environmentally and economically sustainable energy production from organic waste
- Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications
- Create jobs and stimulate economic development, especially in rural regions of the state
- Reduce fire danger, improve air and water quality, and reduce waste

California Building Energy Efficiency Standards (2016) - California Code of Regulations, Title 24, Part 6

California Code of Regulations, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are

updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods. In 2016, the CEC updated Title 24 standards with more stringent requirements effective January 1, 2017. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The CEC Impact Analysis for California's 2016 Building Energy Efficiency Standards estimates that the 2016 Standards are 28 percent more efficient than the previous 2013 standards for residential buildings and five percent more efficient for non-residential buildings. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided these standards exceed those provided in Title 24.

California Green Building Standards Code (2016) - California Code of Regulations Title 24, Part 11

California's Green Building Code, referred to as CalGreen, was developed to provide a consistent approach to green building in the State. Having taken effect in January 2016, the most recent version of CalGreen lays out the minimum requirements for newly constructed residential and nonresidential buildings to reduce GHG emissions through improved energy efficiency and process improvements. It also includes voluntary tiers to further encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

Local

Santa Barbara County Energy and Climate Action Plan

The County of Santa Barbara published the Energy and Climate Action Plan (ECAP) in 2015. The ECAP identified 53 emission reduction measures (ERM) that would enable the County to meet the GHG reduction target of 15 percent below baseline (2007) levels by 2020, consistent with AB 32. Several ERMs in the ECAP are targeted toward energy conservation, renewable energy, and energy efficiency, including an energy checklist for residential building permits (BE 2), energy efficiency education and outreach programs (BE 4), and support for small-scale renewable electricity generation (RE 3).

County of Santa Barbara Comprehensive Plan and County Code

The County of Santa Barbara Comprehensive Plan includes an Energy Element that contains long-range planning guidelines and strategies to encourage energy efficiency and alternative energy sources in Santa Barbara County. However, it does not include requirements applicable to individual development projects (County of Santa Barbara 2015).

Santa Barbara County Code Article VI adopts the California Energy Code, 2016 Edition as the Primary Energy Code of the County. The California Energy Code has specific requirements for building design to reduce energy consumption, including the use of certain building materials to ensure a greater degree of energy efficiency during building operation and construction and energy efficiency standards for appliances, lighting amenities, and water fixtures, among other project components.

Orcutt Community Plan

While the Orcutt Community Plan (OCP) does not address energy resources directly, it incorporates policies and development standards that serve to reduce energy consumption from construction

and operation of new and existing development in the OCP area. A summary of the OCP policies and development standards that would apply to the project is provided below. OCP Policies and Development Standards for air quality that would contribute to energy conservation include:

- Policy AQ-O-1, Prog. AQ-O-1.1, Prog. AQ-O-1.2, and Action AQ-O-1.3, which encourage land use planning and development design that is supportive of alternative modes of transportation and pedestrian oriented developments; and
- Policy AQ-O-3, which promotes the use of alternative fuels, solar energy systems, and use of construction techniques designed to conserve energy and minimize pollution.

OCP Policies and Development Standards for transportation that would contribute to energy conservation include:

- Policy CIRC-O-1 and Action CIRC-O-1.1, which encourage the implementation of long-term improvements to roadways and alternative transportation facilities, such as transit and alternative modes of transportation (e.g., bikeways and pedestrian paths);
- Policy CIRC-O-6, Action CIRC-O-6.1, and Action CIRC-O-6.2, which encourage development of all feasible forms of alternative transportation, including transit services and park-and-ride facilities;
- Policy CIRC-O-7, which encourages Caltrans to accommodate planned bicycle facilities in highway overpasses; and
- Policy CIRC-O-0, which requires development to be sited and designed to provide maximum access to non-motor vehicle forms of transportation where feasible.

4.6.2 Previous Environmental Review

The OCP EIR did not directly address impacts related to energy resources. Accordingly, this document includes a full analysis of potential impacts related to energy resources by construction and operation of the proposed project.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The California Emissions Estimator Model (CalEEMod) version 2016.3.2 was used to estimate energy demand based on project data provided by the project applicant, locally-appropriate industry-standard assumptions, and CalEEMod default values for projects in Santa Barbara County when project specifics were not known. Modeling was completed as part of the Air Quality Analysis Technical Report and Greenhouse Gas Emissions Technical Report prepared for the project by Dudek in January 2019 and peer reviewed by Rincon Consultants, Inc. The trip generation rates calculated in the project Traffic and Circulation Study (Appendix K) were used as inputs in CalEEMod. See Appendix B for a detailed discussion of methodology and modeling assumptions.

The CalEEMod results provide the average travel distance, vehicle trip numbers, and vehicle fleet mix during construction and operation of the proposed project. The CalEEMod results also provide the estimated gross electricity and natural gas consumption by land use during operation of the project. The values contained therein are used in this analysis to determine the anticipated energy consumption during construction and operation of the project.

Significance Thresholds

Appendix G of the CEQA guidelines considers a project to have a significant impact on energy resources if the project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Construction Energy Demand

The primary energy demands resulting from project construction would include fuel consumed by construction equipment and construction workers' vehicles traveling to and from the construction site. Project construction activities would also use building materials that would require energy use during the manufacturing and/or procurement of that material. Section 15126.2(b) of the CEQA Guidelines states, "This [energy] analysis is subject to the rule of reason and shall focus on energy use that is caused by the project." This analysis reasonably assumes that manufacturers of building materials such as concrete, steel, lumber, or other building materials would employ energy conservation practices in the interest of minimizing the cost of doing business. Therefore, the consumption of energy required for the manufacturing and/or procurement of building and construction material is not within the scope of this analysis.

While there is no formally adopted criteria signifying the relative efficiency of a project during its construction phase, this analysis takes into consideration the equipment and processes employed during project construction to qualitatively determine, to the extent possible, whether energy consumed during construction would be wasteful, inefficient, or unnecessary.

Operational Energy Demand

The per capita residential electricity and natural gas consumption for Santa Barbara County is described in Section 4.6(b), *Energy Demand*, to provide a regional understanding of existing consumption. However, these rates do not account for how consumption may differ among residential land use types depending on building square footage and are therefore not representative of the efficiency of energy used by residential land uses in the County. For example, single-family residences often consume more energy than multi-family residential units because single-family residences are often larger in size and thus require more lighting and heating. As a result, per capita consumption rates for single-family residences are often higher than those for multi-family residential units and do not provide a representative measure of energy efficiency. Therefore, countywide per capita electricity and natural gas consumption rates are not appropriate to use in determining whether operational energy consumption resulting from the project would be wasteful, inefficient, or unnecessary.

Average energy use intensity (EUI) data is therefore the appropriate metric to use in evaluating the project's operational energy usage because EUI measures energy consumption on a square footage basis, which provides a representative measure of energy efficiency. The EIA provides average EUI data for residential land uses in regions across the United States. This EUI data was developed in multi-year efforts that included constructing comprehensive lists of residential buildings, selecting statistically representative samples for those lists, and conducting thousands of interviews nationwide (EIA 2018e). Because California's Building Energy Efficiency Standards have placed the state on the forefront of energy efficiency and sustainability for residential and non-residential buildings, the EIA EUI data for the Pacific region of the U.S. is used herein as applicable criteria in

determining whether energy consumption resulting from the project would be wasteful, inefficient, or unnecessary (CEC 2018g). Although the EIA EUI data is provided at a multi-state level, it is applicable for use in this analysis because no statewide or local data is available for use as a numerical significance threshold. Therefore, if forecast energy consumption resulting from implementation of the project exceeds the average EUI for the Pacific region of the U.S., energy usage would be considered wasteful, inefficient, and unnecessary.

b. Project Impacts and Mitigation Measures

Because the OCP EIR did not directly address impacts related to energy resources, this document includes a full analysis of potential impacts related to energy resources by construction and operation of the proposed project. Impacts of full buildout of the project site under the OCP EIR are compared with those that are anticipated to occur under the proposed Willow Creek and Hidden Canyon Residential Project.

Threshold: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact E-1 PROJECT CONSTRUCTION AND OPERATION WOULD REQUIRE TEMPORARY AND LONG-TERM CONSUMPTION OF ENERGY RESOURCES. HOWEVER, PROJECT CONSTRUCTION AND OPERATION WOULD NOT RESULT IN THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

Construction

Project construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Table 4.6-4 summarizes the anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the project site.

Table 4.6-4 Proposed Project Construction and Operation Energy Use

Source	Fuel Consumption (Gallons)	
	Gasoline	Diesel
Construction Equipment & Hauling Trips	–	344,428
Construction Worker Vehicle Trips	155,037	–

See Appendix B for CalEEMod default values for fleet mix and average distance of travel, and Appendix M for energy calculation sheets.

As shown in Table 4.6-4, construction of the project would require approximately 155,037 gallons of gasoline and 344,428 gallons of diesel fuel. Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary.

CalGreen includes specific requirements related to recycling, construction materials, and energy efficiency standards that would apply to project construction and would minimize wasteful,

inefficient, and unnecessary energy consumption. Therefore, project construction would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant (Class III).

Operation

Energy demand from project operation would include fuel consumed by passenger vehicles; natural gas consumed for heating residences; and electricity consumed by residences including, but not limited to lighting, water conveyance, and air conditioning. The project would include several features to reduce energy consumption, including natural heating and cooling via roof overhangs and window placement and building orientation, pre-wiring for solar power; recirculating, point-of-use, or on-demand water heaters; low-flow plumbing fixtures.

Vehicle trips associated with the project would require approximately 112,008 gallons of gasoline and 23,805 gallons of diesel fuel, or 15,331 MMBtu annually, which would result in annual per capita fuel consumption of 35.6 MMBtu (15,331 MMBtu / 431 residents) (see Appendix B for calculation of population accommodated by the project and Appendix M for energy calculation sheets). As shown in Table 4.6-1, average per capita fuel consumption in Santa Barbara County is 46.5 MMBtu per year. Therefore, per capita fuel consumption by future residents of the project would be below average per capita fuel consumption for residents of Santa Barbara County and would not be wasteful, inefficient, or unnecessary.

In addition to transportation energy use, the proposed residences would require permanent grid connections for electricity and natural gas. Construction of the proposed residences would comply with the California Energy Efficiency Standards for Residential and Non-residential Buildings and CalGreen (California Code of Regulations Title 24, Parts 6 and 11). This code requires the provision of electric vehicle charging stations, water-efficient plumbing fixtures and fittings, recycling services, and other energy-efficient measures. The proposed residences would consume approximately 4,030 MMBtu per year of electricity for lighting and large appliances, and approximately 4,244 MMBtu per year of natural gas for heating. According to CalEEMod, the total square footage of the proposed residences would be approximately 369,400 square feet, which is an average EUI of 0.0224 MMBtu per square foot $([4,030 \text{ MMBtu} + 4,244 \text{ MMBtu}] / 369,400 \text{ square feet})$. According to the EIA, average EUI for residences in the Pacific region of the United States is 0.0315 MMBtu per square foot. Therefore, the project's EUI would be below the average EUI for residences in the Pacific region of the U.S. As a result, operation of the proposed project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant.

Mitigation Measures

No mitigation is required because this impact would be less than significant (Class III).

Threshold: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
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Impact E-2 THE PROJECT WOULD BE CONSISTENT WITH THE SANTA BARBARA COUNTY ECAP AND WOULD THEREFORE NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OF ENERGY EFFICIENCY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The Santa Barbara County ECAP contains several measures intended to increase energy efficiency and conservation and expanding the use of renewable energy. As discussed in detail in Section 4.9,

Greenhouse Gas Emissions, several measures of the Santa Barbara County ECAP are related to energy efficiency and renewable energy. Measures applicable to the proposed project include Measure T 3 (Alternative-Fuel Vehicles and Incentives), Measure T 4 (Alternative and Active Transportation), Measure RE 1 (Alternative Energy Development), and Measure RE 2 (Water Heaters). The project would be required by CalGreen to install electric vehicle supply equipment for future EV charging in all new single-family dwellings, consistent with Measure T 3. The project would also include connections to the planned Orcutt pedestrian and bicycle networks identified in the OCP and the addition of bicycle lanes to SR 1, consistent with Measure T4. Furthermore, all residences would be pre-wired for solar power, consistent with Measure RE 1, and recirculating, point-of-use, or on-demand water heaters would be installed in all residences, consistent with Measure RE 2. Therefore, the project would be consistent with the applicable ECAP measures related to renewable energy and energy efficiency, and no impact would occur in relation to state and local plans for renewable energy and energy efficiency.

Mitigation Measures

No mitigation is required because this impact would be less than significant (Class III).

c. Cumulative Impacts

Cumulative development in Santa Barbara County would increase demand for energy resources. However, new iterations of the California Building Energy Efficiency Standards and CalGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. In addition, vehicle fuel efficiency is anticipated to continue improving through implementation of the existing Pavley regulations under AB 1493, and implementation of the SBCAG 2040 RTP-SCS would reduce vehicle miles travelled in the county. Nevertheless, the combined increase in energy consumption in Santa Barbara County would potentially result in a significant cumulative impact related to the wasteful, inefficient, and unnecessary consumption of energy resources. However, the project would be constructed in accordance with the California Building Energy Efficiency Standards and CalGreen and would include energy-saving features that would reduce the potential for wasteful, inefficient, and unnecessary consumption of energy resources. In addition, the project would include several features to reduce energy consumption, including natural heating and cooling via roof overhangs and window placement and building orientation, pre-wiring for solar power; recirculating, point-of-use, or on-demand water heaters; low-flow plumbing fixtures. Furthermore, as discussed under Impact E-2, the project would be consistent with the Santa Barbara County ECAP, which was adopted to reduce the cumulative impact of energy consumption in the County. Therefore, the project would not have a cumulatively considerable contribution to this impact (Class III).

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4.7 Fire Protection

4.7.1 Setting

a. Project Site Setting

The project site is located on a portion of Key Site 21 in the OCP area, and includes parcels immediately to the west and east of the Rancho Maria Golf Club (RMGC). Key Site 21 is bounded by State Route (SR) 1 to the north, and agricultural uses to the east and west. The land south of Key Site 21 consists of vacant land, zoned Resource Management (RMZ-320). The adjacent agricultural uses, including those across SR 1, consist of mainly cultivated agriculture. The topography of the site varies, ranging from essentially flat to gentle slopes on the southern boundary. Vegetation on the site consists of chaparral as well as oak woodland, oak savannah, coastal sage scrub, and native grasses. The portions of the proposed Hidden Canyon Neighborhood and Willow Creek Neighborhood development areas that abut the golf course fairways are bordered primarily by irrigated turf.

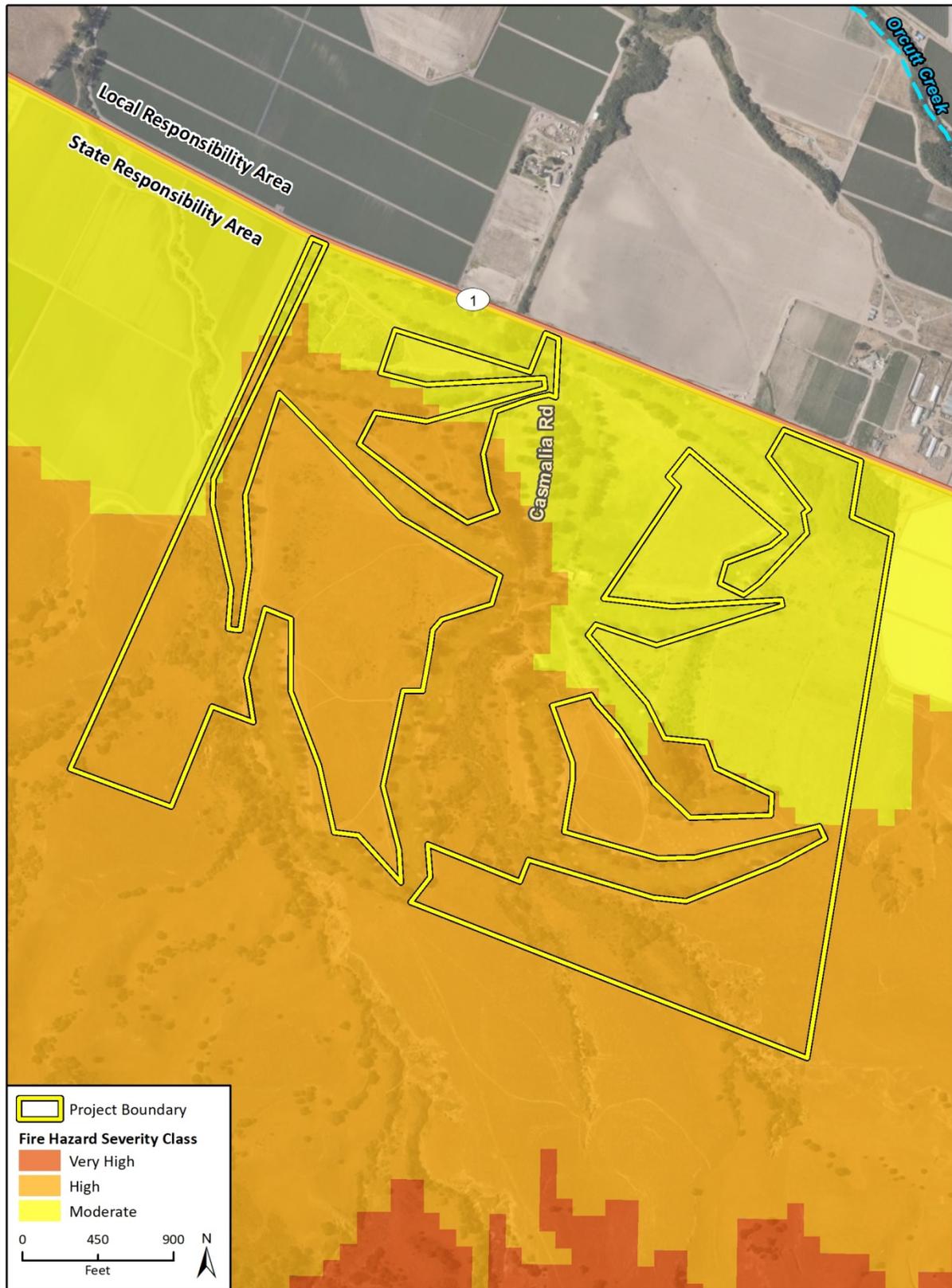
The California Department of Forestry and Fire Protection (CalFire) has designated the site as a high fire hazard area (CalFire 2008). Figure 4.7-1 shows the County's designated Fire Hazard Severity Zones on the project site and in the immediate vicinity. As depicted, the project site is located in a State Responsibility Area (SRA) and includes zones of moderate and high fire hazard severity. Classification of a zone as a moderate, high, or very high fire hazard zone is based on a combination of how a fire will behave and the probability of flames and embers threatening buildings in that area. "Moderate Fire Hazard Areas" are generally characterized by flatter terrain and limited wildland area exposure. A "High Fire Hazard Area" is an area designated by the Santa Barbara County Fire Department (SBCFD) as having a high propensity for wildfire due to the existence of excessive wild brush fuel, lack of adequate water for fire suppression, or lack of adequate access to firefighting equipment. This area is classified as a Wildland-Urban Interface Area by SBCFD.

Weather is the most influential component affecting wildfire. Specific weather events can occur that drastically alter the normally temperate Santa Barbara coastal plain climate to create catastrophic wildfire conditions. The winds that create extreme wildfire conditions in the Orcutt area are known as the "Santa Ana" winds.

The SBCFD provides fire prevention, fire suppression, and life safety services to the unincorporated areas of Santa Barbara County, including the community of Orcutt. SBCFD has 16 fire stations throughout the County, staffed year-round. There are two County fire stations that provide primary fire protection for the community of Orcutt and other unincorporated areas of Santa Maria Valley. Station 21, located approximately three miles from Key Site 21 at 335 Union Avenue in Orcutt, is staffed by one captain, one engineer, and one paramedic. Station 22 is located approximately five miles from Key Site 21, at 1600 Tiffany Park Court, and is staffed by one captain, one engineer, one firefighter/paramedic, and one firefighter. Station 22 would provide back-up firefighting support on an as-needed basis (Fidler 2018).

Primary access to the site would be provided by four driveways accessed from SR 1. Currently, the only route of ingress and egress to Key Site 21 is the RMGC entrance road, which extends south from SR 1 and terminates in the parking lot.

Figure 4.7-1 Fire Hazard Map



b. Regulatory Setting

State Requirements

The Division of Occupational Safety and Health of California (CAL-OSHA) requires that a minimum of two firefighters, operating as a team, conduct interior firefighting operations. In addition, a minimum of two firefighters must be positioned outside and remain capable of rapid intervention and rescue if needed. This is also known as the State of California's "Two-In, Two-out" law [29 CFR 1910.134(g)(4)]. If there are only three firefighters assigned to a fire engine, that engine company must wait for additional back-up to arrive before being able to engage in interior firefighting operations in order to be in compliance with State OSHA regulations.

County Requirements

Building standards for high fire hazard areas, including roof coverings, construction materials, structural components, and clearing of brush and vegetative growth, are identified in the Uniform Building Code (administered by the Santa Barbara County Building and Safety Division) and the Uniform Fire Code (Orcutt Community Plan, July 1997, amended October 2004).

SBCFD uses the service standard of one on-duty firefighter per 4,000 residents as the absolute maximum population that can be adequately served, and the National Fire Protection Agency's (NFPA) five-minute response time standard from the fire station to the location of the emergency. As of 2018, the firefighter to population ratio in the Orcutt area is 1:4,129 (based on seven full-time firefighters and an estimated 2010 population of 28,905 [Santa Barbara County Regional Growth Forecast 2010-2040, December 2012]), which does not meet the SBCFD maximum firefighter to population ratio. Currently, there are four firefighters on duty at all times at Station 22 and three firefighters on duty at all times at Station 21 (Fidler 2018).

In addition to fire protection services, the SBCFD provides First Responder Emergency Medical Services in the event of a medical emergency. Each firefighter is a certified Emergency Medical Technician (EMT). Station 22 located at 1596 Tiffany Park Court also has a paramedic assigned which can provide Advanced Life Support (ALS) service. Ambulance service is provided by American Medical Response through contract with Santa Barbara County (Fidler 2018).

The County has adopted a number of fire safety requirements and regulations, as well as standard fees, for new development. SBCFD currently imposes a fire mitigation fee to all new development occurring within the Santa Barbara County Fire Protection District (SBCFPD). This fee funds the construction of new fire stations and acquisition of new equipment and apparatus. Within the Orcutt Planning Area, the County additionally requires an "Orcutt Planning Area Development Impact Mitigation Fee," which is charged to all new development (Orcutt Planning Area Fee Summary Sheet, FY 2018-2019).

Fire flow requirements are based on SBCFD standards. SBCFD standards refer to the Uniform Fire Code fire flow requirements for other than one and two family dwellings. Uniform Fire Code fire flow requirements are based on building size, type of construction per California Building Code, and fire flow duration. A two-hour fire flow duration is required by California Code of Regulations Title 22. The SBCFD requires fire flow for residential units to be a minimum of 750 GPM for a duration of two hours (Fidler 2018). In addition, the water supply system must be able to meet maximum day water demand along with required fire flows while maintaining a minimum system-wide residual pressure of 20 psi (Fidler 2018).

Orcutt Community Plan

The Orcutt Community Plan (OCP) identified Orcutt as an area in need of a new fire station due to the imbalance of firefighter to population ratios and the inability of existing fire stations to respond to emergencies in the Orcutt area within the five-minute response time for urbanized areas. The OCP incorporates policies and development standards to ensure adequate fire protection services, including sufficient response times and service ratios. Several of these were modeled after mitigation measures in the OCP EIR. A summary of the OCP Development Standards, Actions, and policies that would apply to the project is provided below:

- Policy FIRE-O-1, which states the County shall strive to provide adequate fire protection services for the residents of Orcutt;
- Action FIRE-O-1.1, which requires the County to maintain the service ratio as set forth by the Board of Supervisors, as funds become available;
- Devstd FIRE-2.1, which requires development within or adjacent to high fire hazard areas to include fire prevention measures such as perimeter roads, trails, Class A or B roofs, adequate access to the urban/rural interface, and inclusion of structural setbacks. To minimize fire hazards, fencing located within the structural setback shall be comprised of fire-resistant materials;
- DevStd FIRE-2.2, which requires two routes of ingress and egress unless waived by the Fire Department;
- DevStd FIRE-2.3, which requires foothill development in Orcutt to be protected by water storage tanks connected to an existing water purveyor or private water supplies;
- Program FIRE-2.4, which requires Planning and Development and the County Fire Department to prepare a Fuel Management Program for wildlands within designated undeveloped open space areas. Implementation of this program shall be funded by fees assessed on affected parcels;
- Policy FIRE-O-3, which requires that the use of fuelbreaks in Orcutt be minimized, and where fuelbreaks are necessary, they shall be sited to minimize disruption of significant natural resources;
- DevStd FIRE-3.1, which states that fuelbreaks should incorporate perimeter roads and yards to the greatest extent feasible;
- DevStd FIRE-3.2, which states that to the maximum extent feasible, fuelbreaks shall not be constructed through riparian or wetland areas or result in the removal of healthy specimen oak trees. Within fuelbreaks, treatment of oak trees shall be limited to limbing the branches up to a height of 6-feet, removing dead wood, and mowing the understory. Where specimen oaks have multiple trunks, all trunks shall remain.

4.7.2 Previous Environmental Review

The OCP EIR examined the risk of upset and hazards, including those due to wildland fires, of the project region and the potential impacts resulting from development under the OCP. Previous site specific analysis was not performed for fire hazards at Key Site 21.

The OCP EIR concluded impacts related to the worsening of the firefighter to resident ratio under buildout of the Plan were significant and unavoidable, due to a shortage of fire protection services in Orcutt and a lack of available funding for additional resources. Mitigation Measures FIRE-1, FIRE-2, and FIRE-4, which address hiring of additional firefighters, additional development impact fees,

and a new fire station in West Orcutt) were identified as ways to help maintain adequate fire protection service levels, but uncertainty in the feasibility of implementing these measures resulted in the conclusion that this impact would remain significant and unavoidable (Class I). Since the approval of the OCP, fire mitigation fees have been raised consistent with the mitigation measures identified in the OCP EIR.

The OCP EIR also analyzed OCP Area-wide impacts related to wildland fire hazards, and concluded that Impacts FIRE-3 (wildland fire hazards), FIRE-5 (indirect effect from removal of vegetation), and FIRE-6 (cumulative fire impacts) were potentially significant but mitigable (Class II). The OCP EIR required Mitigation Measures FIRE-5 through FIRE-11 and FIRE-13 through FIRE-15 to mitigate wildland fire hazards to a less than significant level. These mitigation measures required the use of sprinkler systems and other mitigation identified by the Fire Department (FIRE-5); two routes of ingress and egress for the development and the incorporation of Uniform Fire Code standards in regards to access, building and water availability (FIRE-6); no development within 100 feet of flammable vegetation with the exception of spaced access points for fire-fighting access (FIRE-7); a requirement for use of Class A roofs (FIRE-8); the installation of water storage tanks (FIRE-9); and the construction of fire breaks of at least 100 feet between development and foothill vegetation and the annual maintenance of undergrowth and mature oak trees (FIRE-10). Other applicable measures included requirements that all fencing be composed of non-flammable material (FIRE-11), a Fuel Management Program for wildlands within the open space overlay prepared by Planning and Development with input from the County Fire Department (FIRE-13); fire breaks will be sited to minimize impacts to biological resources (FIRE-14); and siting development adjacent to open lands vegetated by chaparral, scrub or woodlands a minimum structural setback of 100 feet from the edge of the open space area to minimize fire hazards and include the use of paved roads on the perimeter between the development and open lands (FIRE-15).

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds

According to the County of Santa Barbara Environmental Thresholds and Guidelines Manual (October 2008), potentially significant human health and safety impacts would occur if project implementation would expose current or future site residents/employees/visitors to wildland fire-related hazards. The County's Environmental Thresholds and Guidelines Manual does not include specific significance thresholds for fire protection services or wildland fires. SBCFD has established a standard for the maximum acceptable service ratio as one on-duty firefighter per 4,000 residents and a maximum response time to emergency calls in urbanized areas of five minutes.

Appendix G of the CEQA guidelines considers a project to have a significant fire protection impact if the project would:

- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires;
- Result in a substantial adverse physical impact associated with the provision of new or physically altered fire service facilities;
- Result in the need for new or physically altered fire service facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services;
- Substantially impair an adopted emergency response plan or emergency evacuation plan;

Willow Creek and Hidden Canyon Residential Project (Key Site 21)

- Exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors;
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Potential impacts associated with the proposed circulation and emergency access routes for the project are discussed in Section 4.13, *Transportation and Circulation*. As discussed therein, the project would include adequate emergency access and the on-site circulation plan would be required to comply with County design standards to accommodate emergency vehicles and service vehicles. Therefore, impacts associated with impairment of emergency response and evacuation plans would be less than significant and are not discussed further in this section.

Potential impacts related to slope stability and landslides are discussed in Section 4.8, *Geologic Processes*. As discussed therein, stable slope conditions exist within the project site and the potential for substantial landslides was found to be very low. Potential impacts related to flooding, runoff, and drainage are discussed in Section 4.14, *Water Resources and Flooding*. The project would be required to comply with existing design guidelines, applicable SBCFCD requirements for post-development peak stormwater flows and Best Management Practices, and maintenance requirements described in the Neighborhood Stormwater Control Plans to avoid and/or minimize flooding impacts and impacts to on-site and off-site drainage. Therefore, impacts associated with exposure of people or structures to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes, would be less than significant and are not discussed further in this section.

b. Project Impacts and Mitigation Measures

Threshold:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?
Threshold:	Would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors?
Threshold:	Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact FP-1 THE PROJECT WOULD CREATE ADDITIONAL SOURCES AND INCREASED RISK OF WILDLAND FIRES IN A HIGH FIRE HAZARD AREA. COMPLIANCE WITH SBCFCD REQUIREMENTS, APPLICABLE OCP DEVELOPMENT STANDARDS, AND CONDITIONS OF APPROVAL PERTAINING TO FIRE MANAGEMENT WOULD ENSURE THAT POTENTIAL IMPACTS ASSOCIATED WITH WILDLAND FIRE HAZARDS WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The Orcutt Fire and Police Protection map in the OCP identifies locations within the OCP area that contain vegetation types that are highly susceptible to wildfire hazards (“Highly Flammable

Vegetation”). The project site and adjacent lands are not identified as areas containing Highly Flammable Vegetation. However, the County of Santa Barbara has designated portions of the site as a high fire hazard area (refer to Figure 4.7-1). New residential uses, associated infrastructure installation and maintenance, and additional human activity in this designated high fire hazard area would create additional sources and increased risk of wildland fires in the project area.

Fire Station 21 serves the part of Orcutt in which Key Site 21, including the project site, is located. The travel distance between Fire Station 21 and the project site is approximately 2.8 miles. As such, the project site is located within the SBCFD’s five-minute response time area (Fidler 2018). Standard Fire Department requirements such as road naming requirements, address number standards, hydrant requirements, and review of site circulation and design of secondary internal Emergency Vehicle Access (EVA) roads would apply to the project and would reduce the risk to people and structures from wildland fires. To comply with Standard Fire Department requirements, the project would also include a secondary emergency access road to the Willow Creek Neighborhood through the existing RMGC entrance road and a secondary access road to the Hidden Canyon Neighborhood along the eastern edge of the Hidden Canyon Neighborhood. The proposed secondary access roads would provide the 24-foot minimum width required by SBCFD.

The proposed development would be required to comply with OCP DevStds FIRE-2.1, FIRE-2.2, and DevStd FIRE-2.3, which incorporate a portion of OCP EIR Mitigation Measure FIRE-6 and the firewater storage requirements of OCP EIR Mitigation Measure FIRE-9, and require use of fire prevention measures, fencing comprised of fire-resistant materials in new residential development, and two routes of ingress and egress for the site. As Conditions of Approval on the project, project plans would also be required to include: a secondary emergency access plan for the Willow Creek Neighborhood, specifying road width to meet SBCFD standards and parking areas with general and accessible parking spaces to meet County requirements; fire/vegetation management plans for each proposed neighborhood that meets the SBCFD Development Standards; and onsite fire prevention construction techniques that meet SBCFD construction requirements. Incorporation of standard SBCFD requirements, applicable OCP development standards, and Conditions of Approval pertaining to fire management, would minimize impacts to people or structures as a result of project implementation increasing human activity and infrastructure and, thus new sources of wildland fires, pollutant concentrations from wildland fires, or the uncontrolled spread of wildland fires in the project area. This impact would be less than significant (Class III).

Mitigation Measures

No mitigation is required. Compliance with SBCFD requirements, applicable OCP development standards, and Conditions of Approval pertaining to fire management would ensure that potential impacts associated with wildland fire hazards would be less than significant (Class III).

Threshold:	Would the project result in a substantial adverse physical impact associated with the provision of new or physically altered fire service facilities?
Threshold:	Would the project result in the need for new or physically altered fire service facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services?

Impact FP-2 THE PROJECT WOULD INCREASE DEMAND ON THE SANTA BARBARA COUNTY FIRE DEPARTMENT, RESULTING IN A REDUCTION IN THE FIRE PROTECTION SERVICE RATIO. THE PROJECT WOULD BE SUBJECT TO THE ORCUTT PLANNING AREA FIRE MITIGATION FEE, WHICH PROVIDES FUNDING FOR NEW FIRE STATIONS AND ACQUISITION OF NEW EQUIPMENT AND APPARATUS REQUIRED TO SERVE NEW DEVELOPMENT. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The project site is located 2.8 miles from Fire Station 21 and is within the station’s five-minute response time radius. As discussed in Section 4.7.1(b), the firefighter to population ratio in the Orcutt area is 1: 4,129, which does not meet the SBCFD maximum firefighter to population ratio of 1:4,000. The project would result in up to 146 new residential units and generate 431 new residents, based on an average household size of 2.95 persons per residential unit (Dudek 2019). An increase of 431 residents would result in a fire protection service ratio of 1:4,191 for the Orcutt area.

Buildout of the Specific Plan would result in additional residents within the Fire Station 21 service area. The increase in population anticipated as a result of the project would incrementally degrade service ratios and may eventually result in the need for additional equipment and facilities. However, future development on Key Site 21 (and all other development under the OCP) would be required to pay the Orcutt Planning Area fire mitigation fee, which was adopted following approval of the OCP. Fire mitigation fees are applied toward the construction of new fire stations and acquisition of new equipment and apparatus. In addition, property taxes generated from buildout would serve to fund additional fire protection services (Fidler 2018). Although development of new fire protection facilities could result in environmental impacts, new fire protection facilities would be subject to environmental review and would be required to implement mitigation measures to reduce identified environmental impacts. As the future locations of these facilities are currently unknown, the environmental effects would vary and are speculative. With the payment of the required fire mitigation fees, the potential environmental impacts to fire protection services would be adverse, but less than significant (Class III).

Mitigation Measures

No mitigation is required. New fire protection facilities would be subject to environmental review and would be required to implement mitigation measures to reduce identified environmental impacts. Payment of the required fire mitigation fees would ensure that the potential environmental impacts to fire protection services would be adverse, but less than significant (Class III).

c. Cumulative Impacts

Cumulative development in the Orcutt area, including the 146 single-family units on Key Site 21, would increase the demand on fire protection services and would place structures in high fire hazard areas. As discussed in Section 3.0, Environmental Setting, 1,259 residential units, 279 commercial units, and 650,000 square feet of commercial and institutional development, and approximately 305,000 square feet of agricultural and winery development are currently under

construction, approved without entitlement to begin construction, or under permit review in the Orcutt area. This development would create additional sources and increased risk of wildland fires in a County-designated high fire hazard area and would demand additional fire protection services.

However, implementation of the development standards and design guidelines described in Section 4.7.2, *Previous Environmental Review*, as well as incorporation of standard SBCFD requirements, applicable OCP development standards, and Conditions of Approval pertaining to fire management, would reduce fire hazard risks on the project site. As such, the contribution of Neighborhoods Specific Plan buildout to the cumulative demand on existing fire protection services in the region would be reduced to less than cumulatively considerable. Additional services required as a result of buildout of the Neighborhoods Specific Plan would be financed through development mitigation fees and property taxes collected at buildout as described in Impact FP-2. Cumulative development in the Orcutt area, including the project site, would be required to comply with OCP DevStds FIRE-2.1, FIRE-2.2, and DevStd FIRE-2.3, which incorporate a portion of OCP EIR Mitigation Measure FIRE-6 and the firewater storage requirements of OCP EIR Mitigation Measure FIRE-9. The project's contribution to cumulative impacts on fire hazards in the region would be adverse, but less than significant (Class III).

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4.8 Geologic Processes

4.8.1 Setting

a. Geological Setting

A summary of the geology and soils in the general project area is discussed below. Additional information can be found in the Soils Engineering Report and Engineering Geology Investigation prepared for the project, prepared by GeoSolutions, Inc., dated June 7, 2016 (Appendix E), the Neighborhoods Specific Plan Environmental Documentation Report, prepared by Amec Foster Wheeler, Environmental & Infrastructure, Inc., dated March 2018 (Appendix F), and the Neighborhoods Specific Plan Paleontological Resource Assessment, prepared by Amec Foster Wheeler, Environmental & Infrastructure, Inc., dated January 7, 2019 (Appendix G).

Topography and Soils

The Santa Maria Valley is located along the southern portion of the Coast Range province near the boundary with the Transverse Ranges geomorphic province of Southern California. The Santa Maria Valley is bounded between the Casmalia Hills to the south and the San Luis Range to the north. The Santa Maria basin is interpreted as a pull-apart structure from movement by the Little Pine-Foxen Canyon-Santa Maria River faults and the Santa Ynez fault. The Santa Maria Valley consists of greater than 200 feet of Quaternary age Alluvial deposits underlain by Quaternary and Tertiary marine deposits (Appendix E). Locally, the southern portion of the site is located predominantly on tierra loam while the northern portion of the site is located on a mix of Betteravia loamy sand, Pleasanton sandy loam, Corralitos loamy sand, elder sandy loam, Corralitos sand, and Botella clay loam (United States Geological Survey 2019). Figure 4.8-1 illustrates the soils underlying the project site.

The project site is located at the base of the northern flanks of the east-west trending Casmalia Hills. The topography consists of gentle slopes that reach 420 feet in elevation along the southern perimeter of the site, dropping to 220 feet in elevation at the northwest corner of the property. The project site has a general downward slope from south to north at approximately 3:1 (horizontal to vertical) then flattens to 8:1. Surface drainage follows the topography to the north toward existing drainage gullies throughout the project site that lead to Orcutt Creek approximately 0.4 mile to the north (Appendix E). Figure 4.8-1 illustrates the topography of the project site.

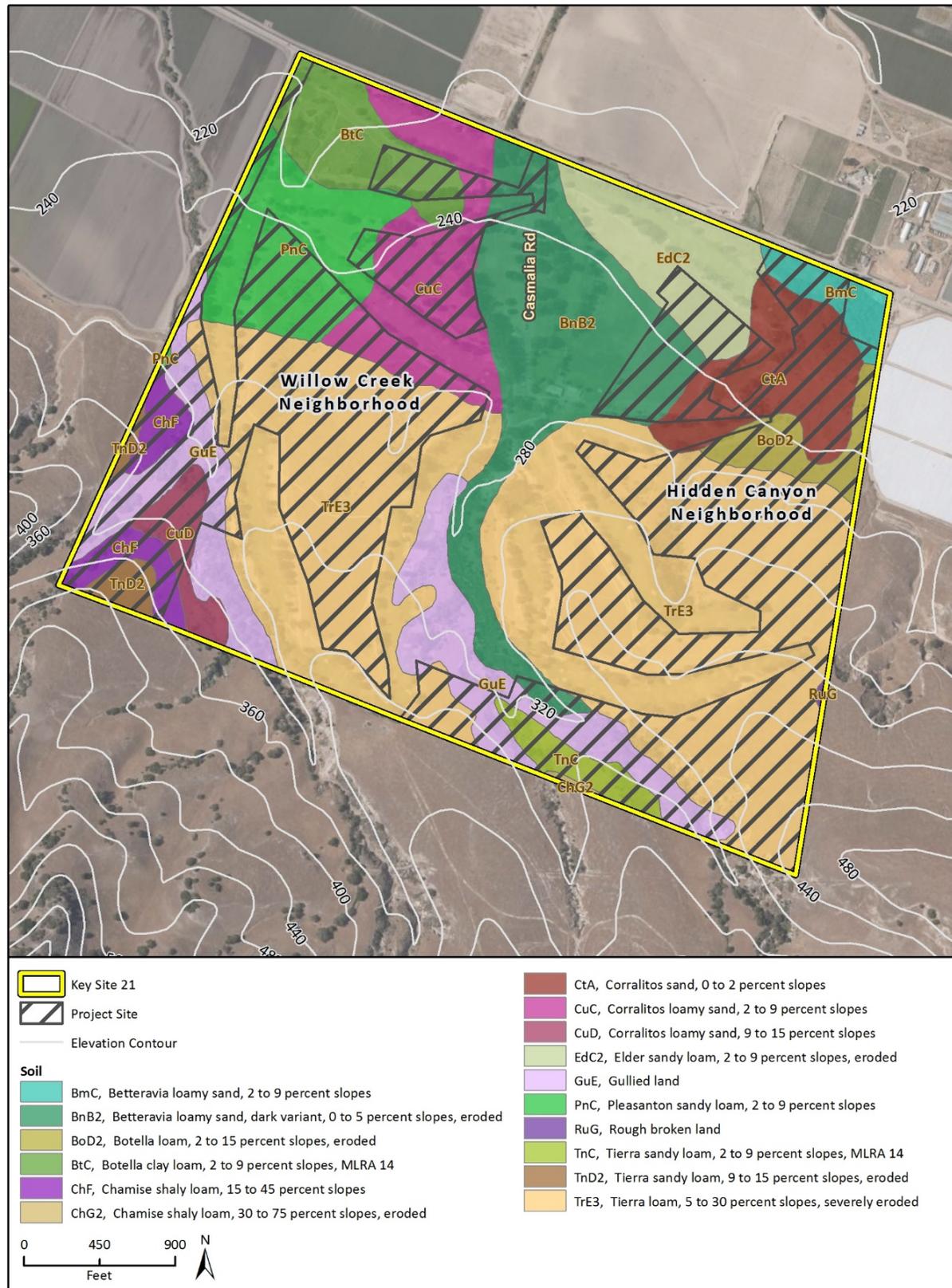
Seismic and Other Soil Hazards

Similar to much of California, the project site is located in a seismically active region. The Transverse Ranges are characterized by east-west trending structural features in contrast to the dominant northwest-southeast structural trend of California. Regional faults are depicted in the Geological Formations Map included in the Orcutt Community Plan (OCP) and the County's Seismic Safety and Safety Element (Santa Barbara County 2015).

Fault Rupturing

Seismically-induced ground rupture occurs as the result of differential movement across a fault. An earthquake occurs when seismic stress builds to the point where rocks rupture. As the rocks rupture, one side of a fault block moves relative to the other side. The resulting shock wave is the

Figure 4.8-1 Soils and Topography Map



Imagery provided by Microsoft Bing and its licensors © 2019.
 Additional data provided Soil Survey Staff, Natural Resources Conservation Service, USDA. Soil Survey Geographic (SSURGO) Database 2018. USGS 2019.

earthquake. If the rupture plane reaches the ground surface, ground rupture occurs. Active faults as defined by the State Geologist have been designated as Alquist-Priolo Fault Zones and require special regulation and study for projects proposed in these zones. Further discussion of the Alquist-Priolo Earthquake Fault Zoning Act is provided in the Regulatory Setting. According to the California Department of Conservation (DOC), the nearest Alquist-Priolo Earthquake Fault Zone is located approximately 16.7 miles southeast of the project site (DOC 2018).

No active faults are located on the project site or in the vicinity of the project site. The closest known active faults to the project site are the Los Alamos (13 miles to the southeast), Hosgri (31 miles to the northwest), and San Andreas (44 miles to the east) faults. The closest known potentially active faults are the Orcutt/Casmalia fault line, approximately one mile south of Key Site 21, and the Lions Head fault line located approximately 4 miles southwest of the project site. The OCP (1997) depicts the "Orcutt Frontal Fault" bisecting the northern portion of the subject property. However, the OCP indicates that the only fault with setback policy implications for new development is the potentially active Orcutt/Casmalia fault located outside of the urban area and crossing the southern foothills to the south of Key Site 21.

Groundshaking

In addition to surface rupture, fault displacement can generate seismic groundshaking, which is the greatest cause of widespread damage in an earthquake. Whereas surface rupture affects a narrow area above an active fault, groundshaking covers a wide area and is greatly influenced by the distance of the site to the seismic source, soil conditions, and depth to groundwater. Many faults are mapped in the foothills of the Santa Ynez Mountains and coastal plains of Santa Barbara County of varying types, lengths, and ages. An active fault is one that shows evidence of displacement within the last 11,000 years (Recent epoch). A fault which displaces deposits of late Pleistocene age (500,000 to 11,000 years) but with no evidence of recent movement is termed potentially active. Inactive faults are those that show evidence of displacement of rocks of early Pleistocene or older (500,000 years or older).

According to the County of Santa Barbara Seismic Safety and Safety Element, the site may experience moderate levels of ground shaking. In addition to damage to structural development, ground shaking can also cause seismic settlement and subsidence, lurch cracking, and lateral spreading. Similar to the surrounding areas, the project site may be affected by moderate to major earthquakes centered on one of the known active faults mentioned above. The San Andreas fault is the most likely active fault to produce groundshaking at the project site. However, the San Andreas Fault has a low probability of generating the highest ground accelerations at Key Site 21 because of its distance from the project site (Appendix E).

Tsunamis and Seiches

Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves and seiches are standing waves within confined bodies of water, typically reservoirs. As the property is at an elevation over 200 feet above mean sea level, the potential for a tsunami to affect the project site is low. Flooding associated with a seismic event (seiche) is considered low due to the absence of a body of water upslope of the property.

Liquefaction

Liquefaction occurs when saturated cohesionless soils lose shear strength due to earthquake shaking. Ground motion from an earthquake may induce cyclic reversals of shear stresses of large amplitude. Lateral and vertical movement of the soil mass combined with the loss of bearing strength usually results from this phenomenon. Liquefaction potential of soil deposits during earthquake activity depends on soil type, void ratio, groundwater conditions, the duration of shaking, and confining pressures on the potentially liquefiable soil unit. Fine, poorly graded loose sand, shallow groundwater, high intensity earthquakes, and long duration of groundshaking are the principal factors leading to liquefaction. The Santa Barbara County Seismic Safety and Safety Element maps illustrating areas of liquefaction risk indicate that the project site has a low problem rating for liquefaction. In addition, the potential for seismic liquefaction at Key Site 21 is low based on the presence of sandy and clayey soils, the relative density of the in-situ soils, the depth to groundwater, and the expected ground acceleration (Appendix E).

Subsidence

Subsidence involves deep-seated settlement due to the withdrawal of fluid (oil, natural gas, or water). According to the Santa Barbara County Seismic Safety and Safety Element, there are no documented instances of subsidence in Santa Barbara County (Santa Barbara County 2015). No oil or natural gas extraction activities currently take place on Key Site 21 or in the immediate vicinity.

Settlement and Compressible/Collapsible Soils

Compressible soils typically consist of organic material and are common in estuaries and other areas where deposits of organic matter are found. Collapsible soils are typically low density, fine-grained, and dominantly granular, characteristic of loamy sands, such as a majority of the soils on the project site. Collapsible soils can settle under relatively low loads when saturated and destroy foundations. The Santa Barbara County Seismic Safety and Safety Element describes Key Site 21 as having moderate potential for compressible/collapsible soils (Santa Barbara County 2015). The OCP indicates that the Orcutt Sand and Dune Sands are, in general, unconsolidated, poorly cemented, highly erodible and potentially subject to collapse under certain load and moisture conditions.

Erosive Soils

Soil erosion is the removal of soil by water and wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. The Santa Barbara County Comprehensive Plan Seismic Safety and Safety Element identifies most soils in the County as susceptible to erosion. However, susceptibility to erosion can typically be effectively controlled. Key Site 21 has the potential for erosive soils, and gully erosion was observed throughout the project site (Appendix E).

Expansive Soils

Soils with relatively high clay content are expansive due to the capacity of clay minerals to take in water and swell (expand) to greater volumes. The sandy characteristics of the soils on the project site are not highly susceptible to expansive soil hazards. The Santa Barbara County Seismic Safety and Safety Element identifies Key Site 21 as having a range of expansiveness potential ranging from no potential for expansive soils to moderate potential for expansive soils (Santa Barbara County 2015).

Slope Stability/Landslides

The Santa Barbara County Seismic Safety and Safety Element maps illustrating areas of slope stability/landslides, soil creep, and expansive soils indicate the site has a variable low to high potential for these types of soil hazards. Due to the nature of the geological formations beneath the project site area (Orcutt Sands and Dune Sands), slope stability is expected to be variable and dependent on grading plans. GeoSolutions conducted a numerical slope stability analysis and identified Key Site 21 as having a low potential for landslides (Appendix E).

b. Regulatory Setting

California Building Code

The California Building Code (CBC), Title 24, Part 2 provides building codes and standards for the design and construction of structures in California. The 2016 CBC is based on the 2015 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures. The CBC requires addressing soil-related hazards, such as treating hazardous soil conditions involving removal, proper fill selection, and compaction, prior to construction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. The County is responsible for enforcing the CBC.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was signed into law following the 1971 San Fernando earthquake. The Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act directs the California Geological Survey to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by the California Geological Survey in their land-use planning and permitting processes. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

California Environmental Quality Act

Paleontological resources are protected under the CEQA, which states, in part, that a project will “normally” have a significant effect on the environment if it, among other things, will disrupt or adversely affect a paleontological site except as part of a scientific study. Specifically, in Appendix G of the State CEQA Guidelines the question is posed, “Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.” To determine the uniqueness of

a given paleontological resource, it must first be identified or recovered. Therefore, mitigation of adverse impacts, to the extent practicable, to paleontological resources is mandated by CEQA.

Santa Barbara County Comprehensive Plan

The Seismic Safety and Safety Element of the County's Comprehensive Plan, amended in February 2015, is intended to guide land use planning with goals and policies to minimize the adverse effects of hazards related to geology, seismicity, fires, and flooding. The following goals and policies are pertinent to the proposed project:

- Geologic and Seismic Goal 1, which expresses the County's intent to protect the community from risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, dam failure, mudslides and landslides, subsidence, liquefaction, and other seismic hazards.
- Geologic and Seismic Protection Policy 1, which requires the County to minimize the potential effects of geologic, soil, and seismic hazards through the development review process.
- Geologic and Seismic Protection Policy 2, which requires the County to refer to the California Building Code, the Land Use Development Code, County ordinances, the Coastal Land Use Plan, and the Comprehensive Plan when considering the siting and construction of structures in seismically hazardous areas.
- Geologic and Seismic Protection Policy 6, which encourages the County to reference the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan when considering measures to reduce potential harm from seismic activity to property and lives.

Orcutt Community Plan

The OCP incorporates policies and development standards to provide construction- and operational-phase geologic hazard mitigation to reduce potential impacts involving soil expansion, soil erosion, soil collapsibility, and the lack of septic capability. Several of these were modeled after mitigation measures in the OCP EIR. A summary of the OCP Policies and Development standards that would apply to the project is provided below.

- Policy GEO-O-1, which requires development to be sited to avoid geologically hazardous areas;
- DevStd GEO-O-1.1, which requires new construction to be set back a minimum of 50 feet from all known active or potentially active faults which have been mapped;
- Policy GEO-O-2, which requires development to be sited and designed to minimize increased erosion in areas of high erosion potential;
- DevStd GEO-O-2.1, which states that consistent with Hillside and Watershed Policy #1, excessive grading for creation or enhancement of views shall not be permitted. Where new roads and driveways would require substantial grading, development shall be sited close to existing access roads;
- DevStd GEO-2.2, which states that development shall be prohibited on slopes greater than 30% unless this would prevent reasonable development of a property. In areas of unstable soils, highly erosive soils or on slopes between 20% and 30% development shall not be allowed, unless an evaluation by a qualified professional (e.g., soils engineer, geologist, etc.) establishes that the proposed project will not result in unstable slopes or severe erosion or this would prevent reasonable development of a property;

- DevStd GEO-O-2.3, which requires large stands of trees, and natural flood channels to be preserved unless this would prevent reasonable development of a property;
- DevStd GEO-O-2.4, which requires surface water runoff to be culverted and diverted to avoid erosion of exposed slopes and shall be directed to the nearest natural drainage channel;
- DevStd GEO-O-2.5, which requires cut and fill slopes in foothill areas to be planted with slope-stabilizing plants. Only native species shall be planted within designated natural open space corridors, and shall be irrigated until the plants are established;
- DevStd GEO-O-2.6, which requires landscaping plans to be reviewed by Planning and Development to ensure re-vegetation of graded areas in areas of sandy soils. Landscape securities shall be required unless expressly waived by Planning and Development.
- DevStd GEO-O-2.7, which requires the County to consider allowing lots to be drained to the rear only where it can be demonstrated that such rear-draining will reduce overall grading associated with a project and will provide an equal level of flood control protection as standard front-draining design;
- Policy GEO-O-3, which prohibits grading in excess of 50 cubic yards (combined cut and fill) to be permitted within areas designated open space in the Orcutt Community Plan without an approved grading permit.

Santa Barbara County Code, Section 14-29

Section 14-29 of the Santa Barbara County Code requires preparation and execution of an erosion and sediment control plan as part of grading plan requirements. The erosion and sediment control plan shall incorporate applicable County-approved best management practices. In lieu of such a plan, the County may accept a Stormwater Pollution Prevention Plan (SWPPP), if it contains the requirements of the County's erosion and sediment control Best Management Practices (BMP). Erosion and sediment control measures shall be in place prior to any grading on hillsides, sloping or mountainous terrain.

4.8.2 Previous Environmental Review

Evaluation of geologic resources in the OCP EIR focused on potential geologic hazards in the OCP planning area. The OCP analysis identified potentially significant (Class II) impacts, including increased erosion, sedimentation on creeks, collapsible soils, potential fault rupture, seismic shaking, and unstable slope development constraints, septic constraints from clay-rich soils, and conflicts with future oil exploration activities. The OCP analysis identified significant and unavoidable (Class I) impacts related to community-wide erosion and downstream sedimentation resulting from buildout of the OCP planning area. Site specific analysis was not performed for geologic or soil resources at Key Site 21.

The OCP EIR included mitigation measures to reduce impacts from geologic processes. Applicable mitigation measures from the OCP EIR are summarized below.

- Mitigation GEO-1 through Mitigation GEO-9 require that new development employ measures, strategies and project designs that reduce sediment flow, slope erosion, and siltation of nearby waterways. Special attention is given to new development that takes place on slopes of 20 percent or greater, such as in Mitigation GEO-2 and GEO-3 which prioritize the avoidance of development and ground disturbance on slopes of 20 percent or greater.

- Mitigation GEO-10 requires a site-specific geologic and soils investigation be conducted to determine if expansive or collapsible soils are present on the project site.
- Mitigation GEO-11 requires the avoidance of new buildings of all types on, or within 50 feet of, an active or potentially active fault.
- Mitigation GEO-12 and Mitigation GEO-13 require on-site testing to demonstrate adequate septic disposal capacity prior to approval of discretionary projects or issuance of a building permit for ministerial projects.

4.8.3 Impact Analysis

a. Methodology and Significance Thresholds

Assessment of impacts is based on review of site information and conditions and County information regarding geologic issues. Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, impacts associated with geologic processes would be considered significant if:

- The project site or any part of the project is located on land having substantial geologic constraints, as determined by the Planning and Development Department or the Public Works Department. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. Special Problem Areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards and other physical limitations to development.
- The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5:1 (horizontal to vertical).
- The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade.
- The project is located on slopes exceeding 20 percent grade.

Appendix G of the State CEQA guidelines considers a project to have a significant hydrological impact if the project would:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
 - Strong seismic ground shaking;
 - Seismic-related ground failure, including liquefaction; and
 - Landslides.
- Result in substantial soil erosion or the loss of topsoil;
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; and/or
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Potential impacts related to soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems are discussed in Section 4.15, *Effect Found Not to be Significant*.

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Willow Creek and Hidden Canyon Residential Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed Willow Creek and Hidden Canyon Residential Project.

Threshold:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none">▪ Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;▪ Strong seismic ground shaking;▪ Seismic-related ground failure, including liquefaction; and▪ Landslides.
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Impact GEO-1 THE PROJECT SITE MAY BE SUBJECT TO STRONG GROUNDSHAKING, WHICH HAS THE POTENTIAL TO CAUSE FILL MATERIAL TO SETTLE, DESTABILIZE SLOPES, AND/OR CAUSE PHYSICAL DAMAGE TO STRUCTURES, PROPERTY, UTILITIES, ROAD ACCESS, AND PEOPLE. COMPLIANCE WITH OCP EIR MITIGATION MEASURES, OCP DEVELOPMENT STANDARDS, AND EXISTING LOCAL, STATE, AND FEDERAL REGULATIONS WOULD ENSURE THAT IMPACTS RELATED TO GROUNDSHAKING REMAIN LESS THAN SIGNIFICANT (CLASS III).

The nearest active fault to the project site is located in Los Alamos, approximately 13 miles south of the project site. None of the faults mapped in the vicinity of the project site are considered to be active. However, based on information in the OCP, the Orcutt/Casmalia Fault, located within one mile of the southern boundary of the project site, is potentially active. The Santa Barbara County Seismic Safety and Safety Element indicate that the area surrounding the project site could be subject to moderate ground shaking from the Orcutt/Casmalia fault. Movement on this fault would not generate surface rupture on the project site due to its distance from the project site. Therefore, the project site is not vulnerable to fault rupture.

The project site is located in a region with high seismicity and could be subject to strong groundshaking from earthquakes on regional or local causative faults. Besides the direct physical damage to structures caused by groundshaking, marginally stable slopes and inadequately compacted fill material could move and cause additional damage from landslides, liquefaction, subsidence, or collapse. Gas, water, and electrical lines can be ruptured during the ground shaking

or broken during the movement of material activated by the seismic event, which can jeopardize public safety after an earthquake.

The OCP EIR determined that seismically-induced liquefaction was not anticipated to occur within the OCP planning area. The Soils Engineering Report and Engineering Geology Investigation prepared for the project (Appendix E) identifies the potential for soil settlement resulting from building foundations being supported by two soil materials with different settlement characteristics. Potential impacts associated with settlement and expansive soils are discussed in Impact GEO-4, and Mitigation Measure GEO-3.

The OCP EIR identifies very low potential for substantial landslides to occur, as most of the OCP planning area is underlain by ancient dune sands deposits and has generally gentle slopes that would not result in substantial landslide potential. In addition, the OCP EIR included Mitigation Measures GEO-10 and GEO-11, which prohibits development on expansive or liquefiable soils and requires avoidance of building construction of all types within 50 feet of faults, respectively.

The slope stability analysis determined that stable slope conditions exist within the project site, and that the potential for the project to cause collapsible soil hazards would be low (Appendix E).

The most recent California Building Code (CBC) requirements and Santa Barbara County's Uniform Building Code ensure that new habitable structures are engineered to withstand the expected ground acceleration at a given location, minimizing the risk to life and property from seismic hazards. To conform to the CBC, the proposed buildings on-site would be designed to withstand probable groundshaking that could result from the Orcutt/Casmalia Fault. Compliance with all applicable provisions of the California Building Code would ensure that impacts from groundshaking remain less than significant.

Mitigation Measures

No mitigation measures are required because this impact is less than significant (Class III).

Threshold: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
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Impact GEO-2 THE PROJECT WOULD INVOLVE GRADING ACTIVITIES ON SLOPES WHICH EXCEED 20 TO 30 PERCENT GRADIENTS.. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

The proposed project would include grading to fill the side slopes of existing drainage gullies to achieve level residential pads and internal access roads. In addition, the project involves the construction of retaining walls outside residential footprints. Retaining walls would be limited to four feet in height, indicating landform modifications for creating building envelopes that would not result in steep elevation changes (Appendix E). In addition, engineering designs for the project do not limit cut slope heights to 15 feet or lower. Slopes in excess of 15 feet in height as measured from the lowest finished grade would increase the potential for unstable hillsides, creating a potential for landslides and other soil stability hazards.

The project would require grading on slopes exceeding 20 percent for 32 residential lots and 11 road segments, and grading on slopes exceeding 30 percent for 13 residential lots and six road segments (Appendix E). Of the residential lots that would encroach on slopes over 20 percent gradients, the majority would occur along a minor ravine draining the northwestern portion of APN 113-250-017 on the project site. Development Standard GEO-O-2.2 of the OCP, which incorporates OCP EIR

Mitigation Measure GEO-3, prohibits development on erosive soils or slopes between 20 and 30 percent unless a geotechnical evaluation or similar report by a qualified expert demonstrates that the proposed development will not result in unstable slopes or severe erosion. Because slope grades directly contribute to landslide and erosion risks associated with hillside development, this development standard further prohibits development on slopes greater than 30 percent unless this limitation would restrict reasonable development.

In compliance with this requirement, a site-specific geology investigation was prepared for the project to assess the site for geotechnical hazards associated with soils (refer to Appendix E). The geology investigation concluded that the portion of the project site proposed for development would not be subject to severe slope stability risks. Nonetheless, a number of residential lots and roadway segments would be located on slopes exceeding 20 and 30 percent gradients. Mitigation Measure GEO-1 would be required to reduce impacts resulting from locating development on unstable soils.

Mitigation Measures

Implementation of Mitigation Measure GEO-1 would reduce potential impacts resulting from cut slopes exceeding 15 feet in height and development on slopes exceeding 20 and 30 percent gradients.

GEO-2 Soils Engineering Report Measures for Slope Stability

On-site development shall require, and comply with, all recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions in June 2016 (Appendix E), including, but not limited to the following measures intended to reduce impacts from development on steep slopes and slope stability:

- Use engineered fill for building pads.
- Cut benches every four feet within any fill areas constructed on slopes greater than 10:1 (horizontal to vertical). Each bench shall be a minimum of 10 feet wide, with a minimum of two percent slope gradient.
- The construction contractor shall ensure that no continuous cut slopes exceed 15 feet in height as measured from the lowest finished grade.
- Exterior continuous footings shall be founded at a minimum depth of 12 inches below the lowest adjacent final grade for single-story structures and 18 inches below the lowest adjacent final grade for two-story structures. Foundations shall be designed in accordance to Section 1808.6.1, 2016 California Building Code.
- The minimum footing and grade beam sizes and depths in engineered fill shall be reviewed and approved by County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant.
- All foundation excavations shall be observed and approved by County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant. For foundation excavations for required embedment depth, County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant shall observe and approve excavation activities prior to the placement of reinforcing steel and/or concrete.
- Concrete slabs-on-grade and flatwork shall not be placed directly on unprepared native materials. Floor slabs shall be a minimum of 4 inches thick and reinforced with a minimum of #3 bars spaced at a maximum of 18 inches on-center, each way. Where lapping of the

slab steel is required, laps in adjacent bars shall be staggered a minimum of every five feet. If floor loads exceed 200 pounds per square foot, County of Santa Barbara Public Works Department staff or a County-approved geotechnical consultant shall review and approve the slab design.

These requirements shall be identified on project grading plan and development plans. Planning & Development staff shall review and approve all final plans prior to issuance of grading permits.

Plan Requirements and Timing. All recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions in June 2016 (Appendix E) shall be reflected on grading and building plans.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Planning & Development staff will review grading plans for compliance prior to issuance of grading permits. Grading and building inspectors shall ensure compliance in the field.

Significance After Mitigation

Mitigation Measure GEO 1 would reduce impacts from potential hazards of slope failure to a less than significant level.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?
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Impact GEO-3 THE LOCATION AND FILL REQUIREMENTS OF THE PROJECT COULD RESULT IN LONG-TERM EROSION RUNOFF AND SEDIMENTATION IN NEARBY WATERWAYS. COMPLIANCE WITH EXISTING COUNTY BEST MANAGEMENT PRACTICES, AS WELL AS OCP POLICIES AND DEVELOPMENT STANDARDS, WOULD REDUCE EROSION POTENTIAL. NEVERTHELESS, LONG-TERM EROSION RUNOFF AND SEDIMENTATION MAY RESULT IN POTENTIALLY SIGNIFICANT HAZARDS ASSOCIATED WITH LONG-TERM EROSION RUNOFF AND SEDIMENTATION. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

Development of the project would require grading of the project site, including approximately 1,007,916 cubic yards of cut and fill. The grading is planned to be balanced between the Hidden Canyon and Willow Creek Neighborhoods. This grading activity would result in temporary exposure of ground surfaces throughout the project site. Most of the project site is underlain by Tierra Loam soil of five to 30 percent slopes and is severely eroded, which may result in rapid surface runoff rapid and high erosion hazards.

Because grading is planned to occur outside of the dry season of the year (April 1 to September 30), a standard erosion-control plan would be required that incorporated Santa Barbara County Best Management Practices to address and minimize sedimentation. Erosion of temporarily exposed soils could result in erosion-induced siltation of drainages on the project site. Impervious services installed in the early stages of construction could concentrate water flow, leading to increased erosion and siltation of drainages.

The project includes a 1,500-foot long public trail on the easternmost side of Key Site 21 in the proposed Hidden Canyon neighborhood. Ground disturbance during trail maintenance activities would result in potential short-term erosion and sedimentation, resulting in potentially significant short-term impacts. However, such trail improvements would prevent long-term erosion, resulting in beneficial long-term impacts.

The project incorporates Santa Barbara County BMPs for erosion control, which include the following:

- Utilize landform grading techniques to blend constructed slopes to the natural landform in a gradual naturalistic manner.
- Slope banks needed to create a road or lot building area that extends beyond the road areas or residential lots shall have as gentle as possible slope and shall be revegetated to transition and match the natural open space character.
- Any temporary or permanent ground disturbance on slopes shall be treated with erosion control measures within 30 days of disturbance.
- Any permanent grading shall be planted within four weeks with permanent planting appropriate to the landscape zone the slope occurs in, along with any appropriate irrigation and/or erosion fabric, seed or other treatment, to protect the slope from erosion.
- Graded areas shall be revegetated within four weeks of grading activities with deep rooted, native, drought-tolerant species to minimize slope failure and erosion potential. If necessary, as determined by Planning & Development, irrigation shall be provided. Geotextile binding fabrics shall be used if necessary to hold slope soils until vegetation is established.
- During the rainy season (October 1 through March 30), slopes shall be treated for erosion control immediately consistent with County of Santa Barbara Public Works Standards.
- Methods such as retention basins, drainage diversion structures, spot grading, silt fencing/coordinated sediment trapping, straw bales, and sand bags, etc. shall be used to prevent erosion on slopes and siltation during grading and construction activities.
- After construction of tract improvements and until construction of individual homes, exposed areas shall be stabilized to prevent wind and water erosion, using methods approved by Planning & Development Grading Division and Air Pollution Control District.
- Cut and fill benches shall be constructed at regular intervals.
- Excavation and grading shall be limited to the dry season of the year (i.e., April 1 to September 30) unless a Planning & Development Building and Safety-approved erosion control plan is in place and all measures therein are in effect.

The OCP EIR identified potentially significant impacts associated with blowing sand, increased erosion, slope collapse, and sedimentation on creeks and local drainages due to development on steep slopes with highly erosive soils during construction grading. The following development standards and policies were identified in the OCP to address potentially significant impacts associated with erosion and sedimentation during construction:

- DevStd FLD-O-3.2** Silt fencing, straw bales, sand bags, sediment basins, etc., shall be used in conjunction with other methods to prevent erosion on slopes and siltation of stream channels.
- Policy GEO-O-2** In areas of high erosion potential, development shall be sited and designed to minimize increased erosion.
- DevStd GEO-O-2.4** All surface water runoff shall be culverted and diverted to avoid exposed slopes directed to the nearest natural drainage channel. Where such measures are feasible and would not substantially increase erosion, vegetated earthen channels should be substituted for culverts. Cribwalls or other methods should be used where necessary to retain slopes.

DevStd GEO-O-2.6 Landscape plans shall be reviewed by P&D [Planning and Development] to ensure revegetation of graded areas in areas of sandy soils. Landscape securities shall be required unless expressly waived by P&D.

The above development standards and policy would reduce potential erosion induced siltation of creek and other drainages. However, the project site is located on loose surface soils and along a deep ravine with vertical slopes and would require filling of topographic depressions to provide level pads for planned development. The geology investigation prepared for the project identified potentially significant hazards associated with long-term erosive runoff and sedimentation that may impact the unnamed drainages feeding into Orcutt Creek to the north. Therefore, mitigation is required to reduce impacts associated with soil erosion and loss of topsoil to less than significant.

Mitigation Measures

Mitigation Measure GEO-1 includes fill requirements for slopes greater than 10:1 (horizontal to vertical). In addition, Mitigation Measure GEO-3 is also required to ensure that fill material is sufficiently compacted to reduce potential for soil erosion and sedimentation into drainages.

GEO-3 Fill Compaction

Fill depths exceeding 4-feet deep shall be compacted to a minimum relative density of 95 percent (ASTM D1557-07) to reduce long-term sedimentation resulting from proposed filling of topographic depressions within the project site.

Plan Requirements and Timing. This requirement shall be reflected on grading and building plans.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Grading and building inspectors shall ensure compliance in the field.

Significance After Mitigation

Implementation of Mitigation Measures GEO-1 and GEO-3 and implementation of applicable Santa Barbara County erosion control BMPs, as well as conformity with OCP policies and development standards, would reduce impacts associated with the short-term exposure of graded soils and potential for soil erosion and sedimentation into drainages resulting from buildout of the project to as less than significant level.

Threshold: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
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Impact GEO-4 THE PROJECT WOULD BE LOCATED ON POTENTIALLY EXPANSIVE SOILS THAT POSE A RISK FOR SETTLEMENT. COMPLIANCE WITH CALIFORNIA BUILDING CODE REQUIREMENTS WOULD REDUCE THE RISK OF POTENTIAL HAZARDS ASSOCIATED WITH EXPANSIVE SOILS. NEVERTHELESS, LONG-TERM DEVELOPMENT ON SOILS WITH A HIGH POTENTIAL FOR EXPANSION OR SETTLEMENT MAY RESULT IN POTENTIALLY SIGNIFICANT HAZARDS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

The OCP EIR determined that the western OCP area, including the project site, is underlain by “Dune Sand” of the Orcutt Formation, sandy alluvial deposits characterized by severe erosion and collapsible soil hazards. The Graciosa Canyon/Orcutt Creek area is also clay-rich and therefore has an expansive soil hazard potential. To reduce potential impacts from expansive soils, the OCP EIR

includes Mitigation GEO-10, which requires a site-specific geologic and soils investigation be conducted to determine whether expansive or collapsible soils are present on the project site. If that investigation identifies expansive and/or liquefiable soils on-site, then they would be removed and replaced with suitable engineered backfill, and expansive soils would be reused for landscaping purposes.

The Soils Engineering Report and Engineering Geology Investigation prepared for the project (Appendix E) identifies the potential for soil settlement resulting from expansive soils on the project site. Development on soils with the potential for expansion or settlement would result in a potentially significant impact, requiring mitigation.

Mitigation Measures

Mitigation Measure GEO-1 includes fill requirements for slopes greater than 10:1 (horizontal to vertical). Mitigation Measure GEO-3 requires that fill material is sufficiently compacted to reduce potential for soil erosion and sedimentation into drainages. In addition, Mitigation Measure GEO-4 is also required to ensure all recommendations contained in the Soils Engineering Report and Engineering Geology Investigation (Appendix E) are fully implemented.

GEO-4 Soils Engineering Report Measures for Expansive/Liquefiable Soils

On-site development shall require, and comply with, all recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions in June 2016 (Appendix E), including, but not limited to the following measures intended to reduce impacts from expansive and/or liquefiable soils:

- Isolated pad footings shall be a minimum of two square feet in size and are permitted for single floor loads only. Foundations shall be designed in accordance to Section 1808.6.2, 2016 California Building Code.
- The base of all grade beams and footings shall be level and stepped as required to accommodate any change in grade while maintaining the minimum required footing embedment and slope setback distance.

All on-site structures shall comply with applicable provisions of the California Building Code. These requirements shall be identified on project grading plans and development plans. Planning & Development staff shall review and approve all final plans for the removal of expansive and/or liquefiable soils prior to issuance of grading permits.

Plan Requirements and Timing. Prior to zoning clearance issuance for grading, the owner/applicant shall include all recommendations contained in Section 13.0 of the Soils Engineering Report and Engineering Geology Investigation prepared for the project by GeoSolutions in June 2016 (Appendix E) shall be reflected on grading and building plans.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Grading and building inspectors shall ensure compliance in the field. Planning & Development staff will review grading plans for compliance prior to issuance of grading permits. Grading and building inspectors shall ensure compliance in the field.

Significance After Mitigation

Implementation of Mitigation Measures GEO-1, GEO-3, and GEO-4 would ensure that impacts associated with expansive and liquefiable soils would be reduced to a less than significant level (Class II).

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
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Impact GEO-5 GROUND DISTURBANCE DURING PROJECT CONSTRUCTION COULD POTENTIALLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE; HOWEVER, IMPLEMENTATION OF RECOMMENDED BEST MANAGEMENT PRACTICES WOULD MINIMIZE POTENTIAL IMPACTS TO LESS THAN SIGNIFICANT (CLASS II).

As discussed in the Neighborhoods Specific Plan Paleontological Resource Assessment prepared by Amec Foster Wheeler in January 2019 (Appendix G), ground disturbance during construction of the project would occur within Quarternary-aged older dune sands and Orcutt sand (Appendix G). These geological units have a low potential to contain significant paleontological resources. However, geologic units of similar age and geographic proximity have been found to contain fossil material in or around the City of Santa Maria. Because ground disturbance during project construction could unintentionally discover or destroy significant paleontological resources, the project would have a potentially significant impact on paleontological resources. Therefore, the recommended best management practices contained in the Neighborhoods Specific Plan Paleontological Resource Assessment are included herein as mitigation to reduce potential impacts to less than significant.

Mitigation Measures

GEO-5(a) Worker Paleontological Resource Awareness Session

A qualified consultant selected by the Permittee and approved by Planning & Development shall develop a worker awareness program to educate all workers regarding the protection of any paleontological resources that may be discovered during project development, as well as appropriate procedures to enact should paleontological resources be discovered. The qualified consultant shall develop appropriate training materials including a summary of geologic units present at the development site, potential paleontological resources that may be encountered during development, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to project development, and as new employees are added to the project site workforce. The qualified consultant shall provide awareness session sign-in sheets documenting employee attendance to the County as requested.

Plan Requirements and Timing. The worker awareness program shall be reviewed and approved by Planning & Development prior to grading/building permit issuance. The Owner/Applicant shall provide Planning & Development compliance monitoring staff with the name and contact information for the qualified consultant prior to grading/building permit issuance and pre-construction meeting.

Monitoring. The Owner/Applicant shall demonstrate that the worker awareness program conforms to the required conditions.

GEO-5(b) Paleontological Resources Inadvertently Discovered During Grading

If any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the Permittee, under the direction of the qualified consultant identified in Mitigation Measure GEO-5(a), shall:

- Temporarily cease grading within 50 feet of the finds and redirect activity elsewhere to ensure the preservation of the resource in which the discovery was made;
- Immediately notify the Santa Barbara County Planning and Development and Public Works Departments regarding the resource and redirected grading activity;
- Obtain the services of a professional paleontologist who shall assess the significance of the find and provide recommendations as necessary for its proper disposition for review and approval by Santa Barbara County Planning and Development; and
- Complete all significance assessment and mitigation of impacts to the paleontological resource and verification reviewed and approved by Santa Barbara County Planning and Development prior to resuming grading in the area of the find.

Upon discovery of potentially significant paleontological resources and completion of the above measures, the Permittee shall submit to Santa Barbara County Planning and Development a report prepared by the qualified paleontologist documenting all actions taken.

Plan Requirements and Timing. This condition shall be printed on all building and grading plans.

Monitoring. Planning & Development compliance monitoring staff shall confirm monitoring by the qualified consultant and grading inspectors shall spot check field work.

Significance After Mitigation

With incorporation of Mitigation Measures GEO-5(a) and GEO-5(b), the project would result in less than significant impacts to paleontological resources in the project area.

c. Cumulative Impacts

Buildout of the Orcutt area would place development in areas that are prone to earthquakes and seismic-related hazards, contribute to erosion or the loss of topsoil through construction and operational activities, place development on or result in unstable soils, or place development on expansive soils. The OCP EIR identified potential impacts associated with blowing sand and the presence of collapsible soils. However, the OCP EIR determined that the level of significance of these cumulative impacts would be determined on a case-by-case basis. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Any specific geologic hazards associated with each individual site would be limited to that site without affecting other areas. Compliance with County regulations and policies (including compliance with County development standards; OCP development standards; CBC requirements; OCP EIR mitigation; and Mitigation Measures GEO-1, GEO-3, GEO-4, GEO-5(a), and GEO-5(b), where applicable) would reduce seismic and geologic hazards. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Cumulative geologic hazard impacts would be adverse, but less than significant with mitigation (Class II). Potential paleontological impacts for individual projects would depend upon the location, type, and size of development and the specific geologic units and paleontological potential on a given site. Potential impacts to paleontological resources

Willow Creek and Hidden Canyon Residential Project (Key Site 21)

associated with each individual site would be limited to that site without affecting other areas and impacts to these resources would be mitigated on a case-by-case basis.

4.9 Greenhouse Gas Emissions

This section analyzes the potential for the project to cause significant impacts related to greenhouse gas (GHG) emissions and climate change. The analysis in this section is based on a Greenhouse Gas Emissions Technical Report prepared for the project by Dudek in January 2019 and peer reviewed by Rincon Consultants, Inc. The full study is provided in Appendix H.

4.9.1 Setting

a. Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95% or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-20th century (IPCC 2013).

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO₂, include fluorinated gases and SF₆ (United States Environmental Protection Agency [U.S. EPA] 2018). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO₂e), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane CH₄ has a GWP of 25, meaning its global warming effect is 25 times greater than carbon dioxide on a molecule per molecule basis (IPCC 2007).

Carbon Dioxide

The global carbon cycle is made up of large carbon flows and reservoirs. Billions of tons of carbon in the form of CO₂ are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, carbon fluxes among these various reservoirs are roughly balanced (U.S. EPA 2018). CO₂ was the first GHG demonstrated to be increasing in atmospheric concentration, with the first conclusive measurements being made in the second half of the 20th century. Concentrations of CO₂ in the atmosphere have risen approximately 45% since the industrial revolution. The global atmospheric concentration of CO₂ has increased from a pre-industrial value of about 280 parts per million (ppm) to 405 ppm in 2017 (IPCC 2007; National Oceanic and Atmospheric Association [NOAA] 2018a). The average annual CO₂ concentration growth rate was larger between 2008 and 2017 (average: 2.2 ppm per year) than it has been over the course of the past 39 years (1979-2017 average: 1.8 ppm per year), although there is year-to-year variability in growth rates (NOAA 2018b). Currently, CO₂ represents an estimated 74% of total worldwide GHG emissions (IPCC 2007). The largest source of CO₂ emissions, and of overall GHG emissions, is fossil fuel combustion.

Methane

Methane is an effective absorber of radiation, though its atmospheric concentration is less than that of CO₂ and its lifetime in the atmosphere is limited to 10 to 12 years. Over the last 250 years, the concentration of CH₄ in the atmosphere has increased by 148% (IPCC 2007), although total emissions have declined from 1990 levels. Anthropogenic sources of CH₄ include enteric fermentation associated with domestic livestock, landfills, natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, stationary and mobile combustion, and certain industrial processes (U.S. EPA 2018).

Nitrous Oxide

Concentrations of N₂O began to rise at the beginning of the industrial revolution and continue to increase at a relatively uniform growth rate (NOAA 2018). N₂O is produced by microbial processes in soil and water, including those reactions that occur in fertilizers that contain nitrogen, fossil fuel combustion, and other chemical processes. Use of these fertilizers has increased over the last century. Agricultural soil management and mobile source fossil fuel combustion are the major sources of anthropogenic N₂O emissions. The GWP of nitrous oxide is approximately 298 times that of CO₂ (IPCC 2007).

Fluorinated Gases (HFCs, PFCs and SF₆)

Fluorinated gases, such as HFCs, PFCs, and SF₆, are powerful GHGs that are emitted from a variety of industrial processes. Fluorinated gases are used as substitutes for ozone-depleting substances such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and halons, which have been regulated since the mid-1980s because of their ozone-destroying potential and are phased out under the Montreal Protocol (1987) and Clean Air Act Amendments of 1990. Electrical transmission and distribution systems account for most SF₆ emissions, while PFC emissions result from semiconductor manufacturing and as a by-product of primary aluminum production. Fluorinated gases are typically emitted in smaller quantities than CO₂, CH₄, and N₂O, but these compounds have much higher GWPs. SF₆ is the most potent GHG the IPCC has evaluated.

b. Greenhouse Gas Emissions Inventory

Federal Emissions Inventory

Total U.S. GHG emissions were 6,511.3 million metric tons (MMT or gigatonnes) of CO₂e in 2016 (U.S. EPA 2018). Total U.S. emissions have increased by 2.4 percent since 1990; emissions decreased by 1.9 percent from 2015 to 2016 (U.S. EPA 2018). The decrease from 2014 to 2015 was a result of multiple factors, including: (1) substitution from coal to natural gas and other non-fossil energy sources in the electric power sector and (2) warmer winter conditions in 2016 resulting in a decreased demand for heating fuel in the residential and commercial sectors (U.S. EPA 2018). Since 1990, U.S. emissions have increased at an average annual rate of 0.1 percent. In 2016, the industrial and transportation end-use sectors accounted for 29 percent each of GHG emissions (with electricity-related emissions distributed), respectively. Meanwhile, the residential and commercial end-use sectors accounted for 15 percent and 16 percent of CO₂e emissions, respectively (U.S. EPA 2018).

California Emissions Inventory

Based on the California Air Resource Board's (CARB) California Greenhouse Gas Inventory for 2000-2016, California produced 429.4 MMT of CO₂e in 2016 (CARB 2018a). The major source of GHGs in California is associated with transportation, contributing 41 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 23 percent of the state's GHG emissions, and electric power accounted for approximately 16 percent (CARB 2018a). California emissions are due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. CARB has projected that statewide unregulated GHG emissions for the year 2020 will be 509 MMT of CO₂e (CARB 2018b). These projections represent the emissions that would be expected to occur in the absence of any GHG reduction actions.

Santa Barbara County Emissions Inventory.

In 2015, the County of Santa Barbara published its Energy and Climate Action Plan (ECAP). The ECAP included a 2007 GHG emissions inventory. Results of the inventory are shown in Table 4.9-1.

Table 4.9-1 Santa Barbara County 2007 GHG Emissions Inventory

Source	Subsector	2007 Total (MT of CO ₂ e)
Transportation	On-Road Transportation from Trips Beginning and/or Ending in the Unincorporated County	521,160
Residential Energy	Residential Electricity Residential Natural Gas	195,490
Commercial Energy	Commercial Electricity Commercial Natural Gas	121,580
Off-Road	Agricultural Equipment Construction and Mining Equipment Industrial Equipment Lawn & Garden Equipment Light Commercial Equipment	102,140
Solid Waste	Landfilled Waste Alternative Daily Cover	91,920
Agriculture	Fertilizer Emissions Livestock Emissions	62,110
Water and Wastewater	Electricity Used by Water Systems Wastewater Emissions Septic Tanks	49,520
Industrial Energy	Industrial Electricity Industrial Natural Gas	46,780
Aircraft	Landings and Takeoffs from Santa Ynez Airport	2,270
Total		1,192,970

Source: County of Santa Barbara 2015

c. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature (GMST) for the decade from 2006 to 2015 was approximately 0.87°C (0.75°C to 0.99°C) higher than the average GMST over the period from 1850 to 1900. Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations are in agreement that LSAT as well as sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014 and 2018).

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential

impacts of climate change in California include loss in water supply from snow pack, sea level rise, more extreme heat days per year, larger and more frequent forest fires, and more drought years (State of California 2018). In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state as well as regionally-specific climate change case studies (State of California 2018). While there is growing scientific consensus about the possible effects of climate change at a global, statewide, and regional level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. Below is a summary of some of the potential effects that could be experienced in California as a result of climate change.

Air Quality

Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. As temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have been occurring at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality would worsen. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (California Natural Resources Agency 2009).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. For example, many southern California cities have experienced their lowest recorded annual precipitation twice within the past decade; however, in a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources [DWR] 2008). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. However, the average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 5.9 inches along the central and southern California coast (State of California 2018). The Sierra snowpack provides the majority of California's water supply by accumulating snow during the state's wet winters and releasing it slowly during the state's dry springs and summers. A warmer climate is predicted to reduce the fraction of precipitation falling as snow and result in less snowfall at lower elevations, thereby reducing the total snowpack (DWR 2008; State of California 2018). The State of California projects that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

Hydrology and Sea Level Rise

As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Climate change has the potential to induce substantial sea level rise in the coming century (State of California 2018). The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 millimeters (mm) per year, which is double the observed 20th century trend of 1.6 mm per year (World Meteorological Organization [WMO] 2013). As a result, global mean sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO 2013). Sea levels are rising faster now than in the previous two millennia, and the rise is expected to accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea-level rise of 10 to 37 inches by 2100 (IPCC 2018). A rise in sea levels could completely erode 31 to 67 percent of southern California beaches, result in flooding of approximately 370 miles of coastal highways during 100-year storm events, jeopardize California's water supply due to salt water intrusion, and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018). In addition, increased CO₂ emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has a \$50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2018). Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent; water demand could increase as hotter conditions lead to the loss of soil moisture; crop-yield could be threatened by water-induced stress and extreme heat waves; and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems and Wildlife

Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California 2018). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

d. Regulatory Setting

Federal Regulations

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) held that the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines, and requires annual reporting of emissions. In 2012, the U.S. EPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) held that U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

California Regulations

California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. California has numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

California Advanced Clean Cars Program

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, U.S. EPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emissions Vehicles (LEV), Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

Assembly Bill 32

California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO₂e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction

measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 statewide goals. The update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

Senate Bill 97

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Natural Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

Senate Bill 375

SB 375, signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPOs) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Santa Barbara County Association of Governments (SBCAG) was assigned targets of an 13% reduction in GHGs from transportation sources by 2020 and a 17% reduction in GHGs from transportation sources by 2035. The SBCAG 2040 Regional Transportation Plan and Sustainable Communities Strategy (2040 RTP-SCS) demonstrated that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years.

Senate Bill 32

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies and policies, such as SB 350 and SB 1383 (see below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with statewide per capita goals of six metric tons (MT) CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

Senate Bill 1383

Adopted in September 2016, SB 1383 requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with the CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Executive Order B-55-18

On September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Environmental Quality Act

Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the *State CEQA Guidelines* for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted *CEQA Guidelines* provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. To date, a variety of air districts have adopted quantitative significance thresholds for GHGs.

For more information on the Senate and Assembly Bills, Executive Orders, and reports discussed above, and to view reports and research referenced above, please refer to the following websites: www.climatechange.ca.gov and www.arb.ca.gov/cc/cc.htm.

Local Regulations

SBCAG 2040 RTP-SCS

SBCAG prepared a 2040 RTP-SCS, adopted in August 2017, which explains how the region will achieve the required GHG per capita emission targets as well the co-benefits of reducing criteria pollutants. The 2040 RTP-SCS is based on a preferred land use and transportation scenario, which lays out one possible pattern of future growth and transportation investment for the region. The 2040 RTP-SCS preferred scenario emphasizes a transit-oriented development and infill approach to land use and housing, supported by complementary transportation and transit investments. The

2040 RTP-SCS meets the requirements of SB 375 and successfully achieves the region's GHG emission targets in 2020 and 2035, while accommodating forecast growth and regional housing needs. The 2040 RTP-SCS would meet the SBCAG region's GHG emission targets from passenger vehicles for 2020 and 2035, achieving reductions in per capita CO₂ emissions from passenger vehicles of 13.3% by 2020 and 17.7% by 2035 (SBCAG 2017).

Santa Barbara Air Pollution Control District

On April 30, 2015, the Santa Barbara Air Pollution Control District (SBCAPCD) adopted an "AB 32 Consistency" threshold for stationary sources that require a Permit to Operate from the District (including a screening level threshold of 10,000 MT CO₂e). The SBCAPCD has not adopted quantitative significance thresholds for land use projects.

County of Santa Barbara ECAP

In May 2015, the County of Santa Barbara Board of Supervisors adopted its ECAP and certified the accompanying EIR. The ECAP commits the County to reduce community-wide GHG emissions by 15 percent below 2007 levels by 2020 consistent with the California Global Warming Solutions Act of 2006 (Assembly Bill 32) and the original Climate Change Scoping Plan (CARB 2008). The ECAP identified 53 emission reduction measures (ERMs) that would enable the County to meet the GHG reduction target of 15 percent below baseline (2007) levels by 2020, consistent with AB 32. Examples of the ERMs in the ECAP include, an energy checklist for residential building permits (BE 2), energy efficiency education and outreach programs (BE 4), and additional opportunities to recycle cardboard, glass, paper, and plastic products (WR 2). Specific projects included in the ECAP's emission forecast are not currently required to incorporate ERMs listed in the ECAP or any other mitigation measures to reduce GHG emissions. According to the most recent (2017) progress report, 2016 emissions from Santa Barbara County are 14 percent higher than 2007 levels due to increases in vehicle trips, construction activity, natural gas use in non-residential buildings, and agricultural fertilizer use. As a result, to meet its target of 15 percent below 2007 levels, the County would need to reduce emissions by 26 percent from 2016 levels (County of Santa Barbara 2018).

The ECAP included a GHG emissions forecast for unincorporated Santa Barbara County through 2020. The growth estimates used in the ECAP's GHG emissions forecast were based on SBCAG's Regional Growth Forecast 2005-2040 and the 2010 U.S. Census (SBCAG 2007). The growth estimates were based on factors that included population projections, vehicle trends, and planned land uses. The sources of GHG emissions included various sectors, such as transportation, residential energy, commercial energy, off-road, solid waste, agriculture, water and wastewater, industrial energy, and aircraft. As a result, most residential and commercial projects that are consistent with the County's zoning (in 2007) were included in the forecast. However, certain projects were not included in the emissions forecast, such as stationary source projects (e.g., large boilers, gas stations, auto body shops, dry cleaners, oil and gas production facilities, and water treatment facilities), Comprehensive Plan amendments, and community plans that exceed the County's projected population and job growth, due to uncertainty in forecasting their GHG emissions. Projects not included in the forecast must be evaluated on a case-by-case basis.

Concurrent with the ECAP, the Board of Supervisors also adopted an amendment to the Energy Element of the Comprehensive Plan that requires the County to monitor progress towards meeting the emission reduction target and, as necessary, update the ECAP.

The ECAP meets the criteria in CEQA Guidelines Section 15183.5(b) for a "plan to reduce GHG emissions." Therefore, the ECAP is a qualified GHG reduction plan for the purposes of tiering under

CEQA. However, the ECAP is not qualified to streamline development projects with a horizon year post-2020 because it does not outline a discrete pathway to achieving the 2030 GHG emission reduction target established by SB 32 or the 2045 target established by EO B-55-18. The ECAP does not include quantitative significance thresholds for land use projects. Instead, it outlines a programmatic approach to review new development. Any project-specific environmental document that relies on the ECAP for its cumulative impacts analysis must identify specific ERMs applicable to the project and demonstrate the project's incorporation of the measures. In addition, the ECAP includes a checklist to assist project applicants and County staff in determining whether a proposed project that was considered in the County's 2020 and 2035 GHG emissions forecasts is within substantial compliance with the ECAP ("Appendix F. ECAP Consistency Checklist Template"). The County's GHG emissions forecasts were based on growth estimates contained in the SBCAG's 2007 Regional Growth Forecast (County of Santa Barbara 2015).

Orcutt Community Plan

While the OCP does not address GHG emissions directly, the OCP incorporates policies and development standards that serve to reduce GHG emissions from construction and operation of new and existing development in the OCP area. A summary of the OCP policies and development standards that would apply to the project is provided below. OCP Policies and Development Standards for air quality that would contribute to GHG emissions reduction include:

- Policy AQ-O-1, Prog. AQ-O-1.1, Prog. AQ-O-1.2, and Action AQ-O-1., which encourage land use planning and development design that reduce air pollution through development of transportation infrastructure supportive of alternative modes of transportation and pedestrian oriented developments; and
- Policy AQ-O-3, which promotes the use of alternative fuels, solar energy systems, and use of construction techniques designed to conserve energy and minimize pollution.

OCP Policies and Development Standards for transportation that would contribute to GHG emissions reduction include:

- Policy CIRC-O-1 and Action CIRC-O-1.1, which encourage the implementation of long-term improvements to roadways and alternative transportation facilities, such as transit and alternative modes of transportation (e.g., bikeways and pedestrian paths);
- Policy CIRC-O-6, Action CIRC-O-6.1, and Action CIRC-O-6.2, which encourage development of all feasible forms of alternative transportation, including transit services and park-and-ride facilities;
- Policy CIRC-O-7, which encourages Caltrans to accommodate planned bicycle facilities in highway overpasses; and
- Policy CIRC-O-0, which requires development to be sited and designed to provide maximum access to non-motor vehicle forms of transportation where feasible.

4.9.2 Previous Environmental Review

The OCP EIR was certified in 1995, prior to the passage of any state legislation regulating GHG emissions or their analysis under CEQA. Therefore, the OCP EIR did not address impacts related to GHG emissions and climate change. Accordingly, this document includes a full analysis of potential impacts related to GHG emissions by construction and operation of the proposed project.

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

GHG emissions from construction and operation of the project were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 based on project data provided by the project applicant, locally-appropriate industry-standard assumptions, and CalEEMod default values for projects in Santa Barbara County when project specifics were not known. The trip generation rates calculated in the project Traffic and Circulation Study (Appendix K) were used as inputs in CalEEMod. See Appendix H for a detailed discussion of methodology and GHG emission modeling assumptions.

Significance Thresholds

Appendix G of the CEQA Guidelines considers a project to have a significant impact related to GHG emissions if the project would:

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

In addition, CEQA Guidelines Section 15064.4(b) states that a lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.

Project-Specific Efficiency Threshold

In accordance with CEQA Guidelines Section 15064.4(b)(2), this analysis develops a project-specific, locally-appropriate efficiency threshold to determine the significance of the project's GHG emissions. An efficiency threshold is calculated by dividing the allowable GHG emissions inventory in a selected calendar year by the service population (residents plus employees). This calculation identifies the quantity of emissions that can be permitted on a per service population basis without significantly impacting the environment. This approach is appropriate for the proposed project because it measures the project's emissions on a per-service population basis to determine its overall GHG efficiency relative to regulatory GHG reduction goals, as opposed to applying a relatively arbitrary threshold limit that may not be well substantiated.

For the proposed project, an efficiency threshold was calculated based on Santa Barbara County’s projected target GHG emission levels that would be consistent with state targets and the service population of Santa Barbara County in the year of project buildout (2024). To develop the service population for the project’s buildout year, forecasted population and employment data was sourced from the SBCAG Regional Growth Forecast, which is consistent with the assumptions in the ECAP (SBCAG 2012). Data from the SBCAG 2010-2040 Regional Growth Forecast was used to linearly interpolate population and employment for the year 2024 (SBCAG 2012). Calculations used to derive the 2024 service population are detailed below. As shown, the County’s 2024 service population would be approximately 206,574 persons.

$$2024\ SP = 2020\ SP + (2035\ SP - 2020\ SP) * \frac{(2024 - 2020)}{(2035 - 2020)}$$

Where:

2020 SP = 145,581 residents + 55,779 employees: 201,360 persons (SBCAG 2012)

2024 SP = Linear interpolation between 2020 SP and 2035 SP: 206,574 persons

2035 SP = 160,588 residents + 60,324 employees: 220,912 (SBCAG 2012)

The County of Santa Barbara ECAP sets a target of reducing GHG emissions by 15 percent below baseline (2007) emissions by 2020, which is consistent with guidance to local governments contained in the AB 32 Climate Change Scoping Plan for achieving a return to 1990 levels in accordance with AB 32 (CARB 2008). However, the project would be operational in 2024 and must therefore demonstrate GHG emission reductions consistent with SB 32, which sets a statewide goal of reducing GHG emissions by 40 percent below 2020 levels by year 2030.

To develop a locally-applicable, project-specific 2024 threshold, the County’s baseline (2007) GHG emissions inventory was modified by removing emission sectors that would not be directly affected by the proposed land-use changes, such as the industrial, agricultural, and aircraft sectors. As shown in Table 4.9-2, after removing emission sectors that do not apply to the project, the 2007 GHG emissions from the remaining sectors were then summed to estimate a project-applicable 2007 GHG emissions level, which is 1,006,530 MT of CO₂e. In accordance with AB 32, this baseline level was reduced by 15 percent to determine the applicable 2020 GHG emissions target (855,551 MT of CO₂e per year). In accordance with SB 32, the 2020 target was then reduced by 5.2 percent per year through 2024 to determine the project-applicable 2024 GHG emissions target (677,596 MT of CO₂e per year) (CARB 2015).

The project-applicable 2024 GHG emissions target was divided by the countywide 2024 service population to determine a locally-appropriate, project-specific threshold. As shown in Table 4.9-3, the locally-appropriate 2024 project-specific threshold consistent with the SB 32 target is 3.3 MT of CO₂e per service population. Therefore, for this project-specific analysis, the project would be compliant with the SB 32 target if project emissions are below the locally-applicable, project-specific 3.3 MT CO₂e per service population threshold.

Table 4.9-2 Santa Barbara County 2007 GHG Emissions Inventory Sectors

Source	Subsector	2007 Total (MT of CO ₂ e)	Project- Specific?	Reason for Inclusion/Exclusion
Transportation	On-Road Transportation from Trips Beginning and/or Ending in the Unincorporated County	521,160	Yes	Residents would make vehicle trips to and from the project site.
Residential Energy	Residential Electricity	185,610	Yes	Residences would be powered electricity and natural gas.
	Residential Natural Gas	109,880	Yes	
Commercial Energy	Commercial Electricity	41,960	Yes	Efficiency thresholds are based on the service population, which includes both residents and employees.
	Commercial Natural Gas	79,620	Yes	
Off-Road	Agricultural Equipment	67,500	No	No agricultural uses are proposed.
	Construction and Mining Equipment	58,560	Yes	Construction equipment would be used during project construction.
	Industrial Equipment	2,490	No	No industrial uses are proposed.
	Lawn & Garden Equipment	2,560	Yes	On-site usage by residents
	Light Commercial Equipment	1,030	Yes	Efficiency thresholds are based on the service population, which includes both residents and employees.
Solid Waste	Landfilled Waste	90,440	Yes	Residents would generate and dispose of solid waste.
	Alternative Daily Cover	1,480	Yes	
Agriculture	Fertilizer Emissions	34,080	No	No agricultural uses are proposed.
	Livestock Emissions	28,030	No	
Water and Wastewater	Electricity Used by Water Systems	42,680	Yes	Residents would consume water and generate wastewater.
	Wastewater Emissions	1,550	Yes	
	Septic Tanks	5,290	No	
Industrial Energy	Industrial Electricity	33,490	No	No industrial uses are proposed.
	Industrial Natural Gas	13,290	No	
Aircraft	Landings and Takeoffs from Santa Ynez Airport	2,270	No	Residents are not expected to regularly use the Santa Ynez Airport given that it is not a commercial airport.
Total 2007 GHG Emissions		1,192,970		
Sectors Not Applicable to the Project		(186,440)		
2007 GHG Emissions Applicable to the Project		1,006,530		
Source: County of Santa Barbara 2015				

Table 4.9-3 SB 32 Locally-Appropriate Project-Specific Threshold

Source		Metric
Locally-Appropriate 2030 Project Threshold	2007 Countywide Project-Applicable GHG Emissions ¹	1,006,530
	2020 Countywide Project-Applicable GHG Emissions Target ¹	855,551
	2024 Countywide Project-Applicable GHG Emissions Target ²	677,596
	2024 Countywide Service Population ³	206,574
	2024 Service Person Target (MT of CO₂e per Service Person)	3.3

¹ Source: SBCAG 2015

² Interpolation of AB 32 reduction target (15 percent reduction of baseline 2007 emission levels) and SB 32 target (40 percent in accordance with SB 32)

³ Interpolation of 2020 and 2035 population and household data from SBCAG 2010-2040 Regional Growth Forecast (Appendices B and H)

At this time, the State has codified a target of reducing emissions to 40 percent below 1990 emissions levels by 2030 (SB 32) and has developed the 2017 Scoping Plan to demonstrate how the State will achieve the 2030 target and make substantial progress toward the 2050 goal of an 80 percent reduction in 1990 GHG emission levels set by EO S-3-05. In the recently signed EO B-55-18, which identifies a new goal of carbon neutrality by 2045 and supersedes the goal established by EO S-3-05, CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

While State and regional regulators of energy and transportation systems, along with the State’s Cap and Trade program, are designed to be set at limits to achieve most of the reductions needed to hit the State’s long-term targets, local governments can do their fair share toward meeting the State’s targets by siting and approving projects that accommodate planned population growth and projects that are GHG-efficient. The AEP Climate Change Committee recommends that CEQA GHG analyses evaluate project emissions in light of the trajectory of state climate change legislation and assess their “substantial progress” toward achieving long-term reduction targets identified in available plans, legislation, or EOs. Consistent with AEP Climate Change Committee recommendations, horizon year (2024) GHG impacts are analyzed in terms of whether the project would impede “substantial progress” toward meeting the reduction goal identified in SB 32 and EO B-55-18. As SB 32 is considered an interim target toward meeting the 2045 State goal, consistency with SB 32 would be considered contributing substantial progress toward meeting the State’s long-term 2045 goals. Avoiding interference with, and making substantial progress toward, these long-term State targets is important as these targets have been set at levels that achieve California’s fair share of international emissions reduction targets that will stabilize global climate change effects and avoid the adverse environmental consequences described under Section 4.9.1, *Setting* (Executive Order B-55-18).

Project Service Population

Average household size varies throughout California; therefore, the service population attributed to this project is based on average household size data specific to Santa Barbara County. Based on a linear interpolation of 2020 and 2035 population and household data from SBCAG’s 2010-2040 Regional Growth, an average of 2.95 persons are anticipated to live in each dwelling in Santa

Barbara County in 2024 (Appendices B and H). Accordingly, the project would accommodate approximately 431 residents in 2024.¹

b. Project Impacts and Mitigation Measures

Because the OCP EIR did not address impacts related to GHG emissions and climate change, this document includes a full analysis of potential impacts related to GHG emissions by construction and operation of the proposed project. Impacts of full buildout of the project site under the OCP EIR are compared with those that are anticipated to occur under the proposed Willow Creek and Hidden Canyon Residential Project.

Threshold: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 PROJECT CONSTRUCTION AND OPERATION WOULD GENERATE TEMPORARY AND LONG-TERM INCREASES IN GHG EMISSIONS. THESE EMISSIONS WOULD RESULT IN A POTENTIALLY SIGNIFICANT CONTRIBUTION TO GLOBAL CLIMATE CHANGE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

Because the OCP EIR did not address impacts related to GHG emissions and climate change, this analysis does not take into account GHG emissions from buildout envisioned by the existing OCP because these emissions were not analyzed in the OCP EIR. Project construction would generate temporary GHG emissions primarily as a result of operation of construction equipment on-site, as well as from vehicles transporting construction workers to and from the project site and heavy trucks to transfer cut and fill soil between portions of the project site to balance grading. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling.

Modelling of construction emissions assumed that construction would occur over the course of 55 months, beginning in June 2019 and ending in January 2024, with construction occurring concurrently at both the Willow Creek and Hidden Canyon Neighborhood locations. The construction equipment mix was based on locally appropriate industry standard CalEEMod default values developed by SBCAPCD. Soil material would be balanced on-site between the two locations. Estimated annual construction GHG emissions are shown in Table 4.9-4.

¹ The project would not provide any employment opportunities; therefore, the service population does not include any employees.

Table 4.9-4 Estimated GHG Emissions during Construction

	Emissions (MT of CO₂e)
2019	615.1
2020	1,280.1
2021	1,694.2
2022	1,652.0
2023	851.7
2024	1.8
Total	6,095.0
Amortized over estimated project lifetime (30 years)	203.2

Notes: All emissions modeling was completed using CalEEMod. See Appendix H for modeling results. Some numbers may not sum exactly due to rounding. Emission data shown is from “mitigated” results, which account for compliance with regulations and project design features.

As shown in Table 4.9-4, project construction would emit approximately 6,095 MT of CO₂e in total, or approximately 203 MT of CO₂e per year when amortized over a 30-year period.²

New residential development would generate long-term GHG emissions from new vehicle trips (mobile emissions), combustion of natural gas and use of electricity (energy emissions), solid waste disposal, water use, and consumer products, architectural coatings, and landscaping equipment (area emissions). Table 4.9-5 summarizes and combines the amortized construction, operational, and mobile GHG emissions associated with the project.

² Neither the SBCAPCD nor the County of Santa Barbara have provided guidance on what the amortization period for individual projects should be. The South Coast Air Quality Management District (SCAQMD) recommends a period of 30 years (SCAQMD 2008). In contrast, the San Luis Obispo County Air Pollution Control District (SLOAPCD) recommends a 50-year period for residential projects and a 25-year period for non-residential or commercial projects (SLOAPCD 2012). To provide a conservative estimate of emissions, the SCAQMD 30-year amortization period is utilized in this analysis.

Table 4.9-5 Combined Annual GHG Emissions (Construction and Operation)

Emission Source	Annual Emissions (MT of CO ₂ e)
Construction	203.2
Operational	
Area	1.8
Energy	496.9
Solid Waste	23.7
Water	34.1
Mobile	
CO ₂ and CH ₄	908.8
N ₂ O	0.01
Total Project Emissions	1,668.5
Project Service Population (SP)	431
Project Emissions per Service Population (MT CO₂e/SP/year)	3.9
Project-Specific Efficiency Threshold (MT CO ₂ e/SP/year)	3.3
Exceed Project Specific Threshold?	Yes

Notes: All emissions modeling was completed using CalEEMod. See Appendix H for modeling results. Some numbers may not sum exactly due to rounding. Emission data shown is from “mitigated” results, which account for compliance with regulations and project design features.

As shown in Table 4.9-5, combined annual GHG emissions would be approximately 3.9 MT of CO₂e per service person per year, which would exceed the locally-appropriate, project-specific threshold of 3.3 MT of CO₂e per service person per year. Therefore, the project would result in a potentially significant increase in GHG emissions.

Mitigation Measure

GHG-1 GHG Emissions Reduction Plan

The project developer shall prepare and implement a plan to reduce operational GHG emissions through implementation of one or more of the following measures:

- a. Prior to zoning clearance issuance, the project applicant shall develop a project Greenhouse Gas Reduction Program (GGRP) that reduces annual GHG emissions from the project by a minimum of 246.2 MT of CO₂e per year (0.6 MT of CO₂e per person per year) over the operational life of the project. The plan shall be implemented on-site by the project applicant and may include, but not be limited to, the following components:
 1. Installation of renewable energy facilities (e.g., solar photovoltaics)
 2. Construction of residences that achieve energy and water efficiencies beyond those specified in the California Code of Regulations, Title 24 requirements
 3. Implementation of energy efficient building design exceeding California Building Code requirements

4. Installation of energy-efficient equipment and appliances exceeding California Green Building Code standards
5. Installation of outdoor water conservation and recycling features, such as smart irrigation controllers and reclaimed water usage
6. Installation of low-flow bathroom and kitchen fixtures and fittings
7. Installation of light emitting diode (LED) lights
8. Provision of incentives and outreach for future residents to promote alternative transportation and transit use
9. Promotion of alternative fuel vehicles
10. Implementation of carbon sequestration measures;

OR

- b. If GHG emissions cannot be reduced through implementation of the GGRP, the project applicant shall purchase carbon offsets to reduce GHG emissions below threshold levels. Carbon offsets shall be purchased from a validated source³ to offset annual GHG emissions or to offset one-time carbon stock GHG emissions.

Plan Requirements and Timing. The GGRP shall be submitted by the project developer and reviewed and approved by the County Planning & Development Department as being in compliance with this measure prior to zoning clearance. Applicable elements of the approved GGRP shall be reflected on project site plans prior to permit approval. If GHG emissions cannot be reduced through compliance with such a plan, purchased carbon offsets shall be approved by Planning & Development staff prior to permit approval.

Monitoring. Condition compliance shall monitor and verify implementation of measures included in the GGRP to ensure implementation of mitigation measures included in the plan.

Significance After Mitigation

Implementation of Mitigation Measure GHG-1 would reduce the project's GHG emissions to approximately 3.3 MT of CO₂e per person per year, which would not exceed the locally-appropriate, project-specific 2024 efficiency threshold of 3.3 MT of CO₂e per person per year. Therefore, with Mitigation Measure GHG-1, the project's GHG emissions would be not impede substantial progress toward meeting the State's 2030 and 2045 GHG reduction goals, and impacts related to GHG emissions would be reduced to a less than significant level (Class II).

³ Validated sources are carbon offset sources that follow approved protocols and use third-party verification. At this time, appropriate offset providers include only those that have been validated using the protocols of the Climate Action Registry, the Gold Standard, or the Clean Development Mechanism (CDM) of the Kyoto Protocol. Credits from other sources will not be allowed unless they are shown to be validated by protocols and methods equivalent to or more stringent than the CDM standards.

Threshold: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 THE PROJECT WOULD BE CONSISTENT WITH THE EMISSIONS-REDUCTION GOALS OF THE COUNTY’S ECAP AND THE SBCAG 2040 RTP-SCS; HOWEVER, IT WOULD BE INCONSISTENT WITH THE GHG REDUCTION TARGETS IN THE 2017 SCOPING PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

As discussed under Section 4.9.1, *Setting*, several plans have been adopted to reduce GHG emissions in California generally and in Santa Barbara County specifically. The project’s consistency with the County of Santa Barbara ECAP, the SBCAG 2040 RTP-SCS, and the 2017 Scoping Plan are discussed below.

County of Santa Barbara ECAP

The County of Santa Barbara ECAP provides various GHG emission reduction measures in order to help the County achieve a 15 percent reduction in GHG emissions by 2020. However, the County’s GHG emissions have been increasing since 2007, and the County would need to reduce emissions by 26 percent from 2016 levels to achieve its 2020 target (County of Santa Barbara 2018). The ECAP EIR includes a programmatic analysis of GHG emissions for unincorporated Santa Barbara County, and a project may tier from the ECAP’s certified EIR for its impact analysis of GHG emissions if a project’s emissions were considered in the ECAP forecasts and the project does not exceed the growth projections assumed in the ECAP. Although the project would require approval of a specific plan and an amendment to the County’s Comprehensive Plan, the project would result in fewer homes being built on Key Site 21 than assumed for the site under buildout of the OCP. Therefore, the project was considered in the ECAP’s 2020 and 2035 GHG emissions forecasts, and this analysis utilizes the ECAP Consistency Checklist Template to determine whether the project would be consistent with the ECAP.

Appendix F of the County’s ECAP states that if a proposed project’s GHG emissions were considered in the County’s 2020 and 2035 forecasts, the project may demonstrate consistency with the ECAP by identifying how project design and implementation will incorporate the list of required measures and actions included in Appendix F, as applicable. Table 4.9-6 describes the project’s consistency with the applicable required measures and actions from Appendix F of the ECAP.

Table 4.9-6 Project Consistency with Applicable Required ECAP Measures and Actions

Measure	Project Consistency
<p>T 3 Alternative-Fuel Vehicles and Incentives. Increase the use of alternative-fuel vehicles, and plan for the development of alternative-fuel infrastructure. Develop new electric vehicle (EV) ready ordinance requiring new one- and two-family dwellings to install conduit for future installation of an EV charging station.</p>	<p>Consistent. The County has not adopted an EV ready ordinance. However, the project would be required to comply with CalGreen (California Code of Regulations Title 24, Part 11), which requires the installation of electric vehicle supply equipment for future EV charging in all new single-family dwellings.</p>
<p>T 4 Alternative and Active Transportation. Enhance alternative and active transportation. Projects will continue to be required to include mass transit improvements such as bus stops, pullouts, and shelters, or funding to assist in the installation of mass transit improvements as mitigation for significant impacts.</p>	<p>Consistent. The project would include connections to the planned Orcutt pedestrian and bicycle networks identified in the OCP through the proposed trail connection and staging area as well as improvements to SR 1, including the addition of bicycle lanes.</p>

Measure	Project Consistency
<p>BE 5 Community Forestry. Maintain and expand the drought-tolerant and native tree population.</p> <p>Zoning ordinance will be amended to require landscape plans to include shade trees in parking lots and street trees, where appropriate.</p> <p>Tree replacement and mitigation will continue to be required when removing trees with new development.</p> <p>The protection of native trees on land with proposed development will continue to be required.</p>	<p>Consistent. The County has not yet amended the zoning ordinance to require landscaping plans to include shade trees in parking lots or street trees. However, the project would include 123 acres of open space that would consist of 29.8 acres of managed open space and 97 acres of undisturbed open space. Furthermore, as discussed in Section 4.4, <i>Biological Resources</i>, the project would be required to comply with Policy BIO-O-3, DevStd BIO-O-3.1, Policy BIO-O-4, and DevStd BIO-O-4.1 of the OCP, which require protection of native trees in developable areas to the greatest degree feasible, replacement of native trees in a manner consistent with County standards, and protection of non-native trees that provide known raptor nesting or key roosting sites to the greatest degree feasible. The removal of 87 protected trees would be mitigated in accordance with OCP and County standards, which require replacement of coast live oaks at a 10 to 1 ratio and arroyo willows at a 3 to 1 ratio. All other protected trees would be mitigated in accordance with Mitigation Measure BIO-5(b). In addition, implementation of Mitigation Measures BIO-1.4.1 and BIO-3.2b-1 from the OCP EIR would require replacement of removed eucalyptus woodlands and Monterey pine trees on a 1:1 basis with native trees. The project would also plant native trees as part of its landscaping plan.</p>
<p>RE 1 Alternative Energy Development. Increase the use of alternative energy technology as appropriate in new and existing development.</p> <p>Develop the new solar photovoltaic (PV) ready construction ordinance to require new single-family dwelling units to be built to accommodate future solar PV system installation.</p>	<p>Consistent. The County has not adopted a solar PV ready construction ordinance. However, all residential units would be pre-wired for solar power.</p>
<p>RE 2 Water Heaters. Increase the replacement of existing water heaters with high-efficiency, tankless, or solar water heaters.</p> <p>New residential development will continue to be required to use high-efficiency water heaters or tankless heaters and continue to encourage new and existing development to participate in the State’s CSI-Thermal program, which provides rebates to utility customers who install solar thermal systems to replace water-heating systems powered by electricity or natural gas.</p>	<p>Consistent. Recirculating, point-of-use, or on-demand water heaters would be installed in all residences.</p>
<p>WE 3 Water-Efficient Landscaping. Increase the use of native or drought-tolerant landscaping and smart irrigation technologies in new and renovated developments and at public parks and facilities.</p> <p>Continue to require proposed projects to reduce outdoor water use in new landscapes through compliance with the California Water Conservation Act.</p>	<p>Consistent. The proposed project would be required by the County to comply with the State of California’ model Water Efficient Landscape Ordinance. The project would achieve compliance through several methods, including but not limited to the following:</p> <ul style="list-style-type: none"> ▪ Encouraging the use of compatible, non-invasive, climate-suitable, and drought-tolerant landscape designs; ▪ Grouping plants by water needs; ▪ Implementing evapotranspiration irrigation controls

Measure	Project Consistency
	<p>and private irrigation systems;</p> <ul style="list-style-type: none"> ▪ Encouraging the use of water-efficient systems, such as drip or bubblers in all areas needing irrigation except turf irrigation and small ornamental plantings; and ▪ Encouraging the use of efficient use of water from the roof drains for landscape irrigation.

Source: County of Santa Barbara 2015

As summarized in Table 4.9-6, the project would be consistent with the applicable required measures and actions from Appendix F of the ECAP and would therefore be consistent with the County of Santa Barbara ECAP.

SBCAG 2040 RTP-SCS

SBCAG’s 2040 RTP-SCS provides land use and transportation strategies to reduce regional GHG emissions. The project’s consistency with applicable goals and objectives from the 2040 RTP-SCS is discussed in Table 4.9-7.

Table 4.9-7 Project Consistency with Applicable SBCAG 2040 RTP-SCS Goals and Objectives

Goals and Objectives	Project Consistency
Environment	
<p>Goal: Foster patterns of growth, development and transportation that protect natural resources and lead to a healthy environment.</p> <p>Objective 1: Reduce GHG emissions in compliance with CARB regional targets.</p> <p>Objective 4: Promote transit use and alternative transportation.</p> <p>Objective 5: Reduce vehicle miles traveled.</p> <p>Objective 6: Preserve open space and agricultural land.</p>	<p>Consistent. GHG emission forecasts contained in the SBCAG 2040 RTP-SCS are based on the 2010-2040 Regional Growth Forecast, which accounts for local General Plan land uses (SBCAG 2012). The OCP was published prior to the development of the SBCAG 2010-2040 Regional Growth Forecast in 2012; therefore, buildout of Key Site 21 is accounted for in the SBCAG 2010-2040 Regional Growth Forecast. Because the project would result in less development on-site than buildout envisioned under the OCP, the project is accounted for in the development of the GHG emissions and vehicle miles travelled (VMT) forecasts contained in the 2040 RTP-SCS and would not inhibit SBCAG from reaching its regional GHG emission targets, consistent with Objective 1.</p> <p>The project would include connections to the planned Orcutt pedestrian and bicycle networks identified in the OCP through the proposed trail connection and staging area as well as improvements to SR 1, including the addition of bicycle lanes. Therefore, the project would be consistent with Objective 4.</p> <p>The 2040 RTP-SCS preferred scenario for VMT reduction is based on land uses allowable under adopted General Plans with intensification of select locations in core urban areas. The project site is not identified as a location for proposed land use intensification (SBCAG 2017). Therefore, the project would not conflict with the VMT reductions anticipated by the SBCAG 2040 RTP-SCS under the preferred scenario and would be consistent with Objective 5.</p> <p>The project would provide 123 acres of open space on the 189-acre project site, consistent with Objective 6.</p>

Goals and Objectives	Project Consistency
Mobility & System Reliability	
<p>Goal: Optimize the transportation system to improve accessibility to jobs, schools, and services, allow the unimpeded movement of people and goods, and ensure the reliability of travel by all modes.</p> <p>Objective 3: Increase bike, walk, and transit mode share.</p>	<p>Consistent. The project would include connections to the planned Orcutt pedestrian and bicycle networks identified in the OCP through the proposed trail connection and staging area as well as improvements to SR 1, including the addition of bicycle lanes, which would be consistent with Objective 3.</p>
Equity	
<p>Goal: Assure that the transportation and housing needs of all socio-economic groups are adequately served.</p> <p>Objective 1: Comply with HCD/Regional Housing Needs Assessment.</p> <p>Objective 2: Provide adequate affordable and workforce housing near jobs.</p>	<p>Consistent. The project would assist the County in meeting its housing requirements by developing housing and would be consistent with the provisions of the Santa Barbara Inclusionary Housing Element because the project would pay a fee to offset the lack of affordable housing on-site. The fee would be used to support development of affordable housing near jobs elsewhere in the County, which would reduce GHG emissions from transportation sources, consistent with Objectives 1 and 2.</p>
<p>Source: SBCAG 2017</p>	

As summarized in Table 4.9-7, the project would be consistent with the applicable goals and objectives from the SBCAG 2040 RTP-SCS. Therefore, the project would not conflict with or obstruct implementation of the SBCAG 2040 RTP-SCS.

2017 Scoping Plan and EO B-55-18

The 2017 Scoping Plan outlines a pathway to achieving the reduction targets set under SB 32, which is considered an interim target toward meeting the State’s long-term 2045 goal established by EO B-55-18. As discussed in Section 4.9.3(a), Methodology and Significance Thresholds, the project would impede “substantial progress” toward meeting the SB 32 and EO B-55-18 targets if per service person GHG emissions exceeded the locally-appropriate, project-specific 2024 efficiency threshold. As discussed under Impact GHG-1, the project’s GHG emissions would exceed the 2024 efficiency threshold. As a result, the project would potentially conflict with the 2017 Scoping Plan and EO B-55-18. However, implementation of Mitigation Measure GHG-1 would reduce GHG emissions below the 2024 efficiency threshold. Therefore, with incorporation of Mitigation Measure GHG-1, the project would not conflict with or interfere with implementation of the 2017 Scoping Plan or EO B-55-18.

Mitigation Measure

Implementation of Mitigation Measure GHG-1 would be required to reduce the project’s GHG emissions to a level that is consistent with the GHG reduction targets contained in the 2017 Scoping Plan and EO B-55-18.

Significance After Mitigation

Implementation of Mitigation Measure GHG-1 would ensure that the project is consistent with the GHG reduction targets contained in the 2017 Scoping Plan and EO B-55-18. Therefore, with

Mitigation Measure GHG-1, the project would be consistent with applicable GHG reduction plans, policies, and regulations, and impacts would be less than significant with mitigation (Class II).

c. Cumulative Impacts

Growth within Santa Barbara County would result in increased GHG emissions from vehicle trips, energy consumption, and other sources. Analyses of GHGs are cumulative in nature because project-level GHG emissions contribute to the cumulative impact of the accumulation of GHGs in the atmosphere. Projects falling below the impact thresholds discussed above would have a less than significant impact, both individually and cumulatively. As indicated in Impact GHG-1, GHG emissions associated with the project would be less than significant with implementation of Mitigation Measure GHG-1 and as discussed in Impact GHG-2, the project would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions with implementation of Mitigation Measure GHG-1. Therefore, the project's contribution to significant cumulative impacts related to GHG emissions is not cumulatively considerable with implementation of required mitigation (Class II).

4.10 Land Use

4.10.1 Setting

a. Regional Land Use

The project site is located in the County of Santa Barbara, which occupies approximately 2,774 square miles of both urban and rural land uses. The project site lies within the Santa Maria Valley, south of the Santa Maria city limits, in the community of Orcutt. Rural land uses, such as rangeland, row crops, and open space occupy the outlying areas of the City and the majority of the area to the south, north, east, and west of the site.

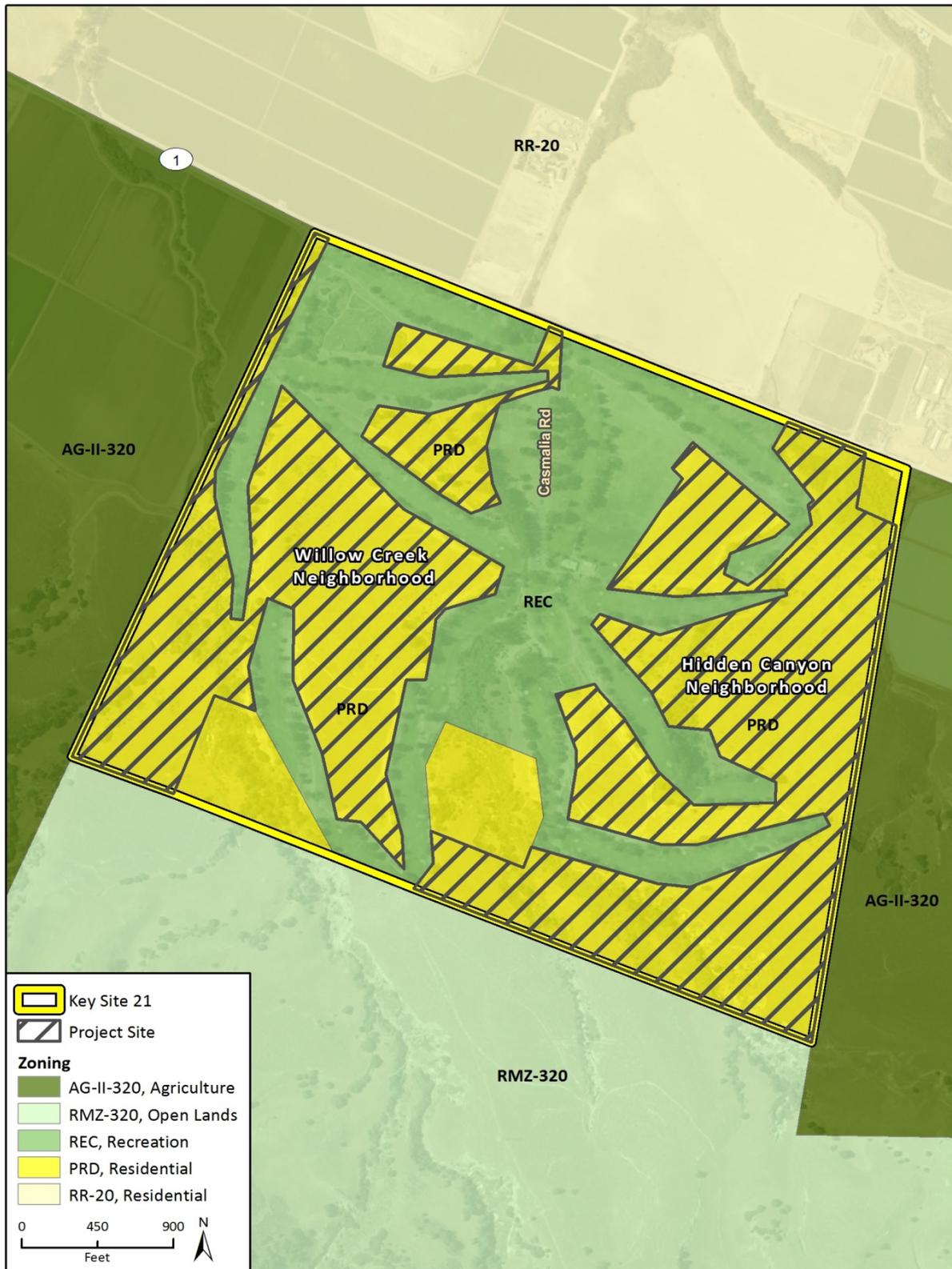
Orcutt is a semi-rural, primarily residential community. Residential neighborhoods are interspersed among large vacant parcels, some of which include grazing livestock, and large parcels on the edges of the community which still remain vacant. The majority of development in the community is single family residences, large estates, and ranchette homes. Mobile homes, condominiums, and townhomes are scattered throughout the community. Over the last 30 years, most of the residential development in the central urban area has occurred in developer-constructed subdivisions rather than custom homes on single lots.

Orcutt also includes approximately 524,000 square feet of developed commercial space, which is located at the intersections of Clark Avenue and Bradley Road, in the Old Town Orcutt area, and at the corner of Lakeview and Orcutt Roads. Smaller commercial areas are located at the intersection of Clark Avenue and Orcutt Road, Foster and Orcutt Roads, Foster and Bradley Roads, and Winter and Orcutt Roads. Large vacant commercially zoned sites are located at Clark Avenue and U.S. 101, and the intersection of Santa Maria Way and College Drive. In addition, several new restaurants have opened in Old Town Orcutt over the past few years that attract people from the City and from other parts of the County.

b. Project Site Setting

The 190-acre project site, located on a portion of Key Site 21, and west of Central Orcutt, is primarily characterized by rural agricultural uses and open space. The site is bound by SR 1 on the north, which runs in a northwest-southeast direction adjacent to the site. Residential Ranchette zoning (RR-20, 20-acre minimum lot size) borders the project site to the north, across SR 1. These lots are currently developed with agricultural uses consisting primarily of row crops. Agricultural zoning (AG-II-320, 320-acre minimum lot size) and uses border the site to the east and west. These lots are also developed with agricultural uses including row crops and cattle grazing. Vacant, grazing land borders the site's southern boundary and is zoned RMZ-320 (Resource Management, 320-acre minimum lot size). The Rancho Maria Golf Club, a public 18-hole golf course, is located on the central parcel of Key Site 21, occupying 130 acres of the site. The project site is currently zoned Planned Residential Development (PRD) to allow for comprehensively planned development of large acreage primarily for residential use. The site is currently vacant and undeveloped. Figure 4.9-1 shows the existing zoning of the project site and surrounding parcels.

Figure 4.10-1 Existing Zoning of Site and Surrounding Parcels



Imagery provided by Microsoft Bing and its licensors © 2019.
 Zoning data provided by County of Santa Barbara 2018.

Fig 4.9-1 Existing Zoning of Site and Surrounding Parcels

c. Regulatory Setting

Santa Barbara County regulates the design of the built environment through its General Plan and Land Use and Development Code (LUDC). New development is required to be consistent with the General Plan and the Orcutt Community Plan's (OCP) policies and development standards. OCP Development Standards specific to development on Key Site 21 include:

- DevStds KS21-1 through KS21-3, which describe procedural requirements pertaining to the submittal of a Specific Plan, and limitations on potential Resort Visitor Serving land uses;
- DevStds KS21-4 through KS21-6, which describe requirements for natural, undeveloped open space, public staging and hiking trail easements, and landscaped buffers;
- DevStd KS21-7, which describes requirements for residential development adjacent to the existing public golf course;
- DevStd KS21-8, which requires development to preserve natural landforms to minimize grading;
- DevStd KS21-9, which requires coordinated access points on Highway 1 between Key Site 21 and Key Site 22;
- DevStd KS21-10, which requires that site design be coordinated with the existing public golf course to minimize risks to occupants and visitors; and
- DevStd KS21-11, which requires development to minimize visual impacts to Highway 1 and the surrounding rural area.

The site is designated Planned Development with a 150-unit maximum under the OCP and LUDC, and is zoned Planned Residential Development (PRD). The property is not enrolled in an agricultural preserve (Williamson Act) contract.

4.10.2 Previous Environmental Review

The OCP EIR examined the existing land use on the project site and the potential land use impacts resulting from development under the OCP in two sections of the document: Land Use and Visual Resources/Open Space. The OCP EIR also reviewed the project against regulatory documents adopted by the County and other agencies responsible for regional planning efforts. The OCP EIR determined that buildout of the OCP would result in significant and unavoidable (Class I) impacts to land use associated with economic fiscal impacts and the urbanization of rural and semi-rural areas. The OCP EIR did not include site-specific analysis of land use impacts on Key Site 21.

The OCP EIR identified four potentially significant land use impacts that pertain to development on Key Site 21, including an increase in regional traffic (LU-1), economic fiscal impacts (LU-2), conversion of agricultural land (LU-3), and urbanization of rural and semi-rural areas (LU-4). The EIR identified measures that would minimize potential land use impacts, including the recruitment of business interests to the Orcutt area (LU-1), coordination with Caltrans to incorporate alternative transportation mechanisms to reduce impacts to the regional transportation network due to increased commuting (LU-2), and review of the land use plan to determine if densities could be raised to offset the need to add additional land and to promote development at densities which make transit a viable option (LU-3).

The OCP EIR determined that the required mitigation measures would alleviate transportation infrastructure impacts, and only partially reduce impacts associated with fiscal impacts to services and facilities. The EIR concluded that fiscal land use impacts and the conversion of agricultural land and loss of open space would remain significant and unavoidable (Class I). Impacts associated with

the conversion of agricultural land are addressed in Section 4.2, *Agricultural Resources*, and impacts to public services and facilities are discussed in Section 4.11, *Public Services and Recreation*.

4.10.3 Impact Analysis

a. Methodology and Significance Thresholds

In accordance with the Appendix G of the CEQA guidelines, a project would result in a significant impact if it would:

- Physically divide an established community; or
- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Potential impacts related to physically dividing an established community are discussed in Section 4.15, *Effects Found Not to be Significant*.

Substantial changes in the amount of open space in comparison to existing adopted County land use maps, or conflicts with designated open space area (as shown in the OCP or elsewhere in the General Plan) would be considered significant land use impacts. Potential conflicts with other adopted policies and regulations are addressed in Appendix F.

Land use impacts were assessed based upon the level of physical impact anticipated for the various issues that can affect compatibility (air quality, noise, human health and safety, aesthetics). Although the County does not have “Land Use” thresholds of significance, it does provide guidelines related to “quality of life.”

Quality of life is broadly defined as the aggregate effect of all impacts on individuals, families, communities, etc. and on the way those groups function. Quality of life issues, while difficult to quantify, are often primary concerns to the community affected by a project. Examples of these issues include:

- Loss of privacy;
- Neighborhood incompatibility;
- Nuisance noise levels (not exceeding noise thresholds);
- Increased traffic in quiet neighborhoods (not exceeding traffic thresholds); and
- Loss of sunlight/solar access.

The elements comprising quality of life are considered on a case-by-case basis. In accordance with County guidelines, “Where a substantial physical impact to the quality of the human environment is demonstrated, the project’s effect on ‘quality of life’ shall be considered significant.” Therefore, a project would be considered to have a significant land use impact if it meets one of the following criteria:

- The project is incompatible in scale or use characteristics with any adjacent land uses; or
- The project would result in land use conflicts that are detrimental to the well-being and privacy of existing uses.

These thresholds are augmented by those contained in Section 4.1, *Aesthetics/ Visual Resources*; Section 4.2, *Agricultural Resources*; Section 4.3, *Air Quality*; and Section 4.10, *Noise*, which are issues that relate directly to land use compatibility.

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Willow Creek and Hidden Canyon Residential Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed Willow Creek and Hidden Canyon Residential Project.

Threshold:	Would the project be incompatible in scale or use characteristics with any adjacent land uses?
Threshold:	Would the project result in land use conflicts that are detrimental to the well-being and privacy of existing uses?

Impact LU-1 THE PROJECT WOULD RESULT IN A CHANGE IN CHARACTER OF THE SITE AND THE SCALE OF DEVELOPMENT ON THE SITE. THIS WOULD PRESENT POTENTIAL QUALITY OF LIFE COMPATIBILITY ISSUES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

Development on the project site would result in long-term land use compatibility changes that relate to quality of life issues, such as privacy and solar access. Noise nuisance impacts and mitigation measures are discussed in Section 4.10, *Noise*. Traffic-related impacts are addressed in Section 4.12, *Transportation and Circulation*. Visual compatibility impacts are discussed in Section 4.1, *Aesthetics*.

The project consists of 146 single family homes on 76.5 acres, on a portion of the 190-acre project site. Both neighborhoods would have a maximum building height of 35 feet, and a combined density of 1.9 dwelling units/acre. The resulting density would exceed that of the existing surrounding rural residential and agricultural uses. Although all future development on the project site, including lighting and landscaping, would be required to satisfy OCP Gateway policies, including but not limited to review and approval by the Board of Architectural Review, the proposed density and proximity to lower density areas would present potential neighborhood quality of life incompatibilities. The Willow Creek neighborhood improvements also include gated secondary access at the public golf course parking lot for emergency personnel and residents that would affect circulation through the RMGC.

The surrounding uses are primarily rural, agricultural, and recreational. The nearest existing residences to the project site include single-family residences located approximately 75 feet north and 500 feet of the Key Site 21 boundary at the northeast corner of the site. Therefore, the proposed single family residences would not abut existing residential development. The minimum rear yard setback for all lots would be ten feet. The proposed setbacks would provide a landscape buffer between the golf course fairway and the proposed housing. In addition, homes adjacent to the golf course fairway would be single-story to reduce impacts to the existing golf course use, related to privacy, shading, aesthetics and solar access. The project also includes safety netting intended to protect residents and golf course users from errant golf balls along the western primary access road to the Willow Creek Neighborhood. The net would be visible from vantage points along SR 1. The project includes landscaping that would screen views of the proposed safety netting. The on-site circulation plan would be designed pursuant to County design standards to accommodate emergency vehicles, service vehicles, and delivery trucks. The project does not include hazardous

Willow Creek and Hidden Canyon Residential Project (Key Site 21)

transportation design elements, a new traffic signal or major revisions to an existing traffic signal, and would not add traffic to a roadway that has design features that would become a potential safety problem, or otherwise create an unsafe situation. The proposed safety netting, internal circulation plan design, and setbacks and landscaping, in combination with the restriction to single-story homes adjacent to the golf course fairway, would result in quality of life changes that may be adverse, but would be less than significant. However, as described in Section 4.1, *Aesthetics*, long-term compatibility impacts related to aesthetics would remain potentially significant and require mitigation.

Mitigation Measures

Mitigation measures and OCP development standards related to long-term compatibility conflicts are discussed in Section 4.1, *Aesthetics*. Mitigation Measures AES-2(a) through AES-2(d), and AES-3 would apply. No additional mitigation measures are required, as no additional significant impacts were identified.

Significance After Mitigation

With implementation of Mitigation Measures AES-2(a) through AES-2(d), and AES-3, impacts associated with long-term compatibility impacts related to nuisance noise and visual compatibility would be adverse, but less than significant (Class II).

Threshold: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 THE PROJECT WOULD BE CONSISTENT WITH THE APPLICABLE POLICIES AND DEVELOPMENT STANDARDS IN THE ORCUTT COMMUNITY PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The OCP identifies the project site as Planned Residential Development, 150 unit maximum (PDR). The project would result in the buildout of 146 residential units. OCP development standards DevStd KS21-1 through DevStd KS21-11 outline specific development requirements for Key Site 21, including landscape buffering, compatibility with the adjacent golf course, and use of low-profile design. The project includes undeveloped open space, and public staging and hiking trail easements, consistent with DevStds KS21-4 through KS21-6. In addition, the project would be required to preserve natural landforms to minimize grading and provide coordinated access points on Highway 1 between Key Site 21 and Key Site 22, consistent with DevStds KS21-8 and KS21-9). The proposed residential units adjacent to the existing golf course would include private outdoor areas to provide a landscape buffer between the two uses, consistent with DevStds KS21-7 and KS21-10.

The project includes safety netting along the western primary access road to the Willow Creek Neighborhood to prevent conflicts between the proposed residential units and the golf course from potential safety hazards from errant golf balls. The project also includes landscaping that would screen views of the proposed safety netting. Furthermore, the on-site circulation plan would be designed pursuant to County design standards, and would not include transportation design elements that would become a potential safety problem, or otherwise create an unsafe situation. These elements of the project would ensure compatibility of the project with the golf course, as intended by development standards DevStd KS21-1 through DevStd KS21-11. The project would not conflict with applicable Key Site 21-specific OCP policies (project consistency with other adopted policies and regulations are addressed in Appendix F). Overall, land use impacts related to

consistency with land use policies contained in the Orcutt Community Plan would be adverse but less than significant. Therefore, this impact would be less than significant (Class III).

Mitigation Measures

No mitigation is required because this impact would be less than significant (Class III).

c. Cumulative Impacts

Cumulative development in the community of Orcutt includes 1,259 new residential units and 279 commercial residential units that are currently proposed, in process, approved, or under construction, in addition to 650,000 square feet of commercial and institutional development and approximately 305,000 square feet of agricultural and winery development are currently proposed, in process, approved, or under construction. Buildout of the Orcutt area would continue to urbanize the Orcutt community, and result in additional loss of open space areas. The OCP EIR identified potentially significant impacts resulting from OCP buildout due to increased regional traffic, economic fiscal impacts, conversion of agricultural land, and urbanization of rural and semi-rural areas. Cumulative development in the Orcutt area would also result in short-term construction air and noise emissions, and long-term land use compatibility effects related to quality of life issues, noise and traffic nuisances, aesthetic incompatibility, and agriculture/urban conflicts. Potential land use conflicts would be addressed on a case-by-case basis as individual projects are reviewed by County decision-makers. Implementation of County policies and development standards in the OCP, General Plan, and LUDC related to land use would minimize these potential cumulative impacts. Cumulative land use impacts would be adverse but less than significant (Class III).

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4.11 Noise

4.11.1 Setting

The Santa Barbara County Comprehensive Plan Noise Element (Adopted 1979, Republished May 2009) provides basic information regarding the physical characteristics of noise and the existing noise environment in the general vicinity of the project site. The following is a summary of the information contained in the Noise Element and other sources of background information that address the properties of noise and sound propagation and is intended to provide sufficient background material to allow consideration of the potential noise impacts of the proposed development.

a. Overview of Sound Measurement

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the ambient noise level to be judged as twice as loud. In general, a 3 dBA change in the ambient noise level is noticeable, while 1 to 2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while areas adjacent to arterial streets are in the 50 to 60+ dBA range. Normal conversational levels are in the 60 to 65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (i.e., drop off) at a rate of 6 dBA per doubling of distance from point sources (e.g., industrial machinery). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which homes in California are constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows (Federal Transit Administration [FTA] 2018).

In addition to the instantaneous measurement of sound levels, the duration of sound is important because sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. Lmax is the highest RMS (root mean squared) sound pressure level within the measuring period, and Lmin is the lowest RMS sound pressure level within the measuring period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (DNL), which is the 24-hour average noise level with a 10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.), or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a 10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. Noise levels described by DNL and CNEL usually do not differ by more than 1 dBA. In practice, CNEL and DNL are used interchangeably.

The relationship between peak hourly Leq values and associated Ldn/CNEL values depends on the distribution of traffic over the entire day. There is no precise way to convert a peak hour Leq to Ldn or CNEL. However, in urban areas near heavy traffic, the peak hour Leq is typically 2 to 4 dBA lower than the daily Ldn/CNEL. In less heavily developed areas, such as suburban areas, the peak hour Leq is often roughly equal to the daily Ldn/CNEL. For rural areas with little nighttime traffic, the peak hour Leq will often be 3 to 4 dBA greater than the daily Ldn/CNEL value (California State Water Resources Control Board [SWRCB] 1999).

b. Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. In the County of Santa Barbara, noise sensitive land uses (also referred to as “sensitive receptors”) include: residential, including single and multifamily dwellings, mobile home parks, and dormitories; transient lodging, including hotels, and motels; hospitals, nursing homes, convalescent hospitals, and other facilities for long-term medical care; and public or private educational facilities, libraries, churches, and places of public assembly (County of Santa Barbara 2009). Therefore, these types of uses have more stringent noise exposure targets than manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance.

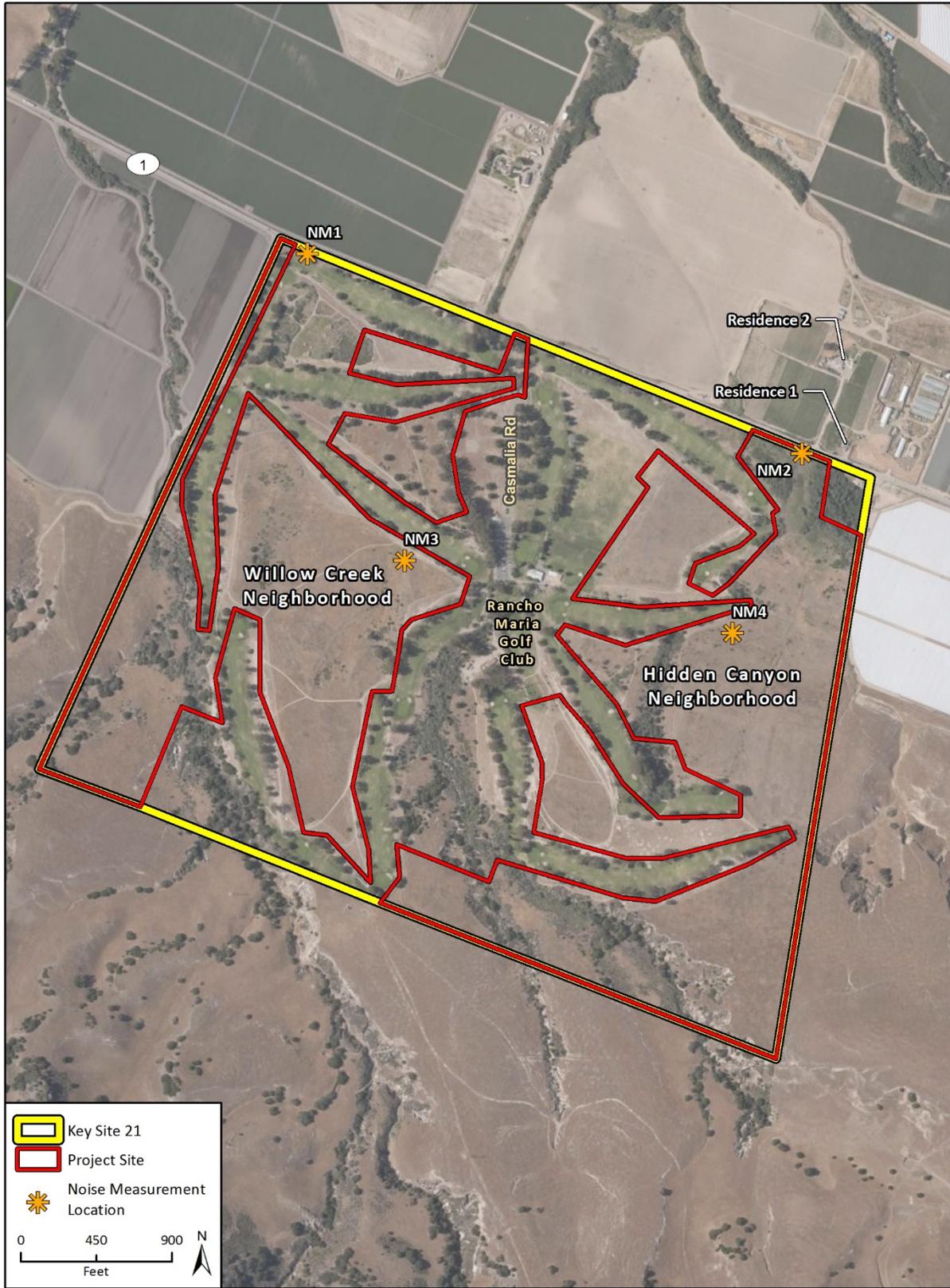
Sensitive receptors nearest to the project site include single-family residences located approximately 75 feet north (“Residence 1”) and 500 feet north (“Residence 2”) of the Key Site 21 boundary at the northeast corner of the site. These sensitive noise receptors are shown on Figure 4.11-1. The proposed residential units within the proposed Willow Creek and Hidden Canyon neighborhoods would also be considered sensitive receptors under the County’s definition. The adjacent Rancho Maria Golf Club (RMGC) public golf course is not identified by the County as a noise sensitive receptor. However, due to concerns expressed during the NOP process with regard to potential impacts to patrons at the RMGC from project construction noise, potential temporary construction noise levels at the RMGC are discussed herein.

Residences situated along the study area roadway segments, as identified in Section 4.13, *Transportation and Circulation*, including segments of State Route (SR) 1, Solomon Road, and Clark Avenue are also recognized as sensitive receptors in the vicinity of the project site.

c. Project Site Setting

The primary transportation noise source in the project area is SR 1, which runs along the northern boundary of Key Site 21 and the northernmost portions of the project site (refer to Figure 2-2 in Section 2, *Project Description*). Traffic from SR 1 is audible along the northern portion of the site. According to the Traffic and Circulation Study (Traffic Study) prepared for the project by Stantec in January 2019 (Appendix K), Average Daily Traffic (ADT) flow for SR 1 adjacent to the site is approximately 4,000 vehicles per day. Other roadways identified as part of the study area in the Traffic Study, including State Route 135 (SR 135), Clark Avenue, Broadway Street, Solomon Road,

Figure 4.11-1 Noise Measurement Locations



Willow Creek and Hidden Canyon Residential Project (Key Site 21)

and Orcutt Road, are located far enough away from the project site that traffic along these roadways does not substantially contribute to roadway-related noise at the project site.

Aircraft traffic at the Santa Maria Public Airport, which is located approximately 1.5 miles northeast of Key Site 21, is a minor noise source at the site. In 1993, the Santa Barbara County Airport Land Use Commission (ALUC) and Santa Barbara County Association of Governments (SBCAG) adopted the Santa Barbara County Airport Land Use Plan (1993 ALUP) to detail and ensure compatible land uses surrounding the Santa Barbara Municipal Airport and Santa Maria Public Airport. An Airport Background Data and Assumptions Report for the Santa Maria Public Airport was also drafted in 2012 and updated again in 2017, but never formally adopted. As shown in the 1993 ALUP and draft compatibility plans for the Santa Maria Public Airport, the project site is in the helicopter approach and departure corridor for the airport and is subject to occasional aircraft overflights. However, the site is outside the 60 dBA CNEL noise contour for the airport (SBCAG 1993). As a result, aircraft noise does not currently exceed County standards on the project site.

The project site is comprised of three undeveloped parcels situated on the eastern and western portions of Key Site 21 at the outer edges of the public RMGC golf course and between the fairways. There are no existing sources of noise on the project site. According to the OCP EIR, the ambient noise environment in west Orcutt is primarily affected by vehicle traffic along SR 135, SR 1, Black Road, and Clark Avenue. Noise levels on the project site tend to be loudest in the immediate vicinity of SR 1, with the highest noise levels experienced during pass-bys of large trucks, and diminish at more distant points on the site from SR 1. Due to the semi-rural and rural land uses in this portion of the Orcutt Planning Area, ambient noise levels are generally low.

To evaluate existing ambient sound levels in the project site vicinity, four 15-minute sound level measurements were collected on December 19, 2018 during and after the morning peak hours between 7:00 p.m. and 9:00 p.m. using an ANSI Type 2 integrating sound level meter. Noise Measurements 1 and 2 were collected on the northern boundary of the project site and are representative of existing ambient noise levels along SR 1. Noise Measurements 3 and 4 were collected within each of the proposed neighborhood development areas and area representative of existing ambient noise levels on the project site. Figure 4.11-1 shows the noise measurement locations. Table 4.11-1 summarizes the noise measurement activities and results. Average noise levels are provided in Leq for 15-minute measurement periods (Leq[15]); Lmin and Lmax are also provided.

Table 4.11-1 Project Vicinity Sound Level Monitoring Results

#	Measurement Location	Sample Times	dBA Leq(15)	dBA Lmax	Primary Noise Source	Distance to Centerline of the Noise Source (feet)
1	Along the northern frontage of the project site on SR 1	7:00–7:15 a.m.	74.7	87.1	Traffic on SR 1	25
2	Along the northern frontage of the project site on SR 1	7:50–8:05 a.m.	74.7	98.9	Traffic on SR 1	25
3	Near center of proposed Willow Creek Neighborhood development area	8:33–8:48 a.m.	41.4	61.8	Traffic on SR 1	1,500
4	Near center of proposed Hidden Canyon Neighborhood development area	9:03–9:18 a.m.	48.1	72.4	Traffic on SR 1	1,200

See Appendix J for noise monitoring data.

Source: Rincon field visit on December 19, 2018 using ANSI Type 2 integrating sound level meter

d. Regulatory Setting

County of Santa Barbara Comprehensive Plan

The County of Santa Barbara has adopted noise policies in its Comprehensive Plan Noise Element (adopted 1979, republished May 2009). These policies establish both interior and exterior noise limits for noise compatibility, which are identified in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (March 2018). The noise level standard for outdoor activity areas of new residential units is 65 dBA CNEL. Outdoor activity areas generally include backyards of single-family residences and individual patios or common outdoor activity areas of multi-family developments. The maximum noise exposure for indoor living areas in new residential units is 45 dBA CNEL.

County of Santa Barbara Environmental Thresholds and Guidelines Manual

To reduce construction impacts, the County of Santa Barbara Environmental Thresholds and Guidelines Manual (March 2018) indicates that construction within 1,600 feet of sensitive receptors shall be limited to weekdays between the hours of 8:00 a.m. and 5:00 p.m.

Orcutt Community Plan

The evaluation of noise in the Orcutt Community Plan (OCP) focuses on motor vehicles, aircraft, construction activities, and commercial/industrial operations. The OCP incorporates policies and development standards intended to provide construction- and operational-phase noise control to reduce noise conflicts in the Orcutt Planning Area. Applicable OCP policies and development standards include:

- Policy NSE-O-1, which states that development of new noise sensitive uses (as defined in the Noise Element) in Orcutt should provide attenuation of ambient noise levels for indoor living areas and, where practical, for outdoor living areas.
- DevStd NSE-O-1.1, which states that noise sensitive land uses should be located outside of 65 dB(A) CNEL contours, unless this would prevent reasonable development of a property.
- DevStd NSE-O-1.2, which requires noise sensitive uses proposed in areas exceeding 65 dB(A) CNEL to be designed so that exterior living spaces do not exceed 65 dB(A) CNEL and interior noise levels attributable to exterior sources do not exceed 45 dB(A) CNEL when doors and windows are closed.
- DevStd NSE-O-1.3, which requires project design to use a combination of vegetated berms, unit orientation or other methods to reduce noise affecting interior and exterior living spaces where possible to limit the use of sound walls. Soundwalls are only to be used if alternative noise reduction measures are ineffective. If required, soundwalls shall be decorative masonry or wood walls planted with fast-growing vines and shrubs.
- Policy NSE-O-2, which requires that construction noise in Orcutt be minimized during non-standard work hours.
- DevStd NSE-O-2.1, which requires that standard construction working hours (i.e., 8 a.m. to 5 p.m., Monday-Friday) be required for development activities. Flexibility to allow extended hours on weekdays and/or occasional working hours on Saturdays should be determined on a case-by-case basis by the County.

- DevStd NSE-O-2.2, which states that noise attenuation barriers, muffling of grading equipment and additional mitigation where deemed appropriate should be required for development where construction equipment generates noise levels in excess of 95 dB(A).

4.11.2 Previous Environmental Review

The OCP EIR examined potential noise impacts resulting from development under the OCP. The OCP EIR determined that buildout of the OCP would result in significant and unavoidable (Class I) noise impacts associated with increased traffic and development in close proximity to sensitive receptors. The Key Site 21 site specific analysis did not include an evaluation of noise impacts at Key Site 21. The programmatic analysis in the OCP EIR identified three potentially significant noise impacts that pertain to development in the OCP area and would apply to development on Key Site 21, including: noise increases of greater than 3 dBA on secondary Orcutt-area roadways (NSE-1), noise levels exceeding 65 dBA along major travel corridors (NSE-2), and construction related noise (NSE-3). The EIR identified measures that would minimize potential noise impacts, including locating development beyond the 65 dBA contour where possible (NSE-1), requiring design modifications for sensitive uses to reduce exterior and interior noise (NSE-2 and NSE-3), and construction scheduling limits and construction noise attenuation measures (NSE-5). The residual impacts to noise after mitigation were identified as significant and unavoidable (Class I).

4.11.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The analysis of noise impacts considers the effects of both temporary construction-related noise and long-term noise associated with operation of the project.

Construction noise was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM; 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. RCNM provides reference noise levels for standard construction equipment but does not take into consideration variations in topography or staging locations of construction equipment on the project site. For the purposes of this analysis, construction equipment operations were modeled within each of the proposed neighborhood development areas, at the approximately location of Noise Measurements 3 and 4, because the majority of project construction activity would occur in and surrounding these areas.

Four measurements of average sound levels (Leq) were taken on the site to evaluate existing ambient noise levels. These measurements provide the basis for analysis of potential noise levels impacts from SR 1 (refer to Appendix J). The measured Leq sound levels characterize existing noise conditions found on the site, as influenced by topographical variations, local built environment noise obstructions and reflective surfaces, and traffic flow in the area. The field data records and sound level meter output are included in Appendix J.

Roadway noise was modeled using the U.S. Department of Housing and Urban Development (HUD) Exchange Day/Night Noise Level (DNL) Calculator (HUD 2018). Roadway noise was modeled under existing, existing + project, cumulative, and cumulative + project conditions along SR 1 based on trip generation estimates in the Traffic Study (Appendix K) prepared for the project. The cumulative

traffic forecasts assume development of approved and pending projects in the Santa Maria Valley (including Old Town Orcutt and the OCP, and projects outside of a community or Specific Plan area) that would contribute to traffic on area roadways and at intersections. Roadway noise was modeled along the SR 1 corridor because this portion of the project site would be the most affected by project-generated traffic.

Significance Thresholds

Appendix G of the CEQA guidelines considers a project to have a significant noise impact if the project would result in:

- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Generation of excessive ground-borne vibration or ground-borne noise levels; and/or
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

The project does not propose the use of vibratory pile drivers or other equipment that would result in ground-borne vibration or ground-borne noise. Therefore, the project would not result in significant impacts associated with exposure of persons to excessive ground-borne vibration or ground-borne noise levels, and the associated CEQA significance thresholds are not discussed further in this report. In addition, the project site is outside the 60 dBA CNEL contour for the Santa Maria Public Airport. Therefore, the project would not result in impacts associated with airport noise, and the associated County and CEQA significance thresholds are not discussed further in this report.

Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, noise impacts would be considered significant if:

- Noise from grading and construction activity proposed would occur within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals, or care facilities. This is based upon an assumed average construction noise level of 95 dBA at a distance of 50 feet from the source, which would result in a noise level of approximately 65 dBA at a distance of 1,600 feet.
- The proposed project would generate noise levels in excess of 65 dBA CNEL and could affect sensitive receptors.
- Outdoor living areas of noise-sensitive uses would be subject to noise levels in excess of 65 dBA CNEL.
- Interior living areas of noise-sensitive uses would be subject to noise levels in excess of 45 dBA CNEL.

For traffic-related noise, impacts would be considered significant if project-generated traffic would result in exposure of sensitive receptors to an unacceptable increase in noise levels.

Recommendations contained in the FTA Transit Noise and Vibration Impact Assessment were used to determine whether increases in traffic noise would be unacceptable. With these standards, the acceptable noise exposure increase is reduced with increasing ambient existing noise exposure,

such that higher ambient noise levels have a lower acceptable noise exposure increase. Table 4.11-2 shows the significance thresholds for increases in traffic-related noise levels caused by the project.

Table 4.11-2 Significance of Changes in Operational Roadway Noise Exposure

Existing Noise Exposure (dBA Ldn or Leq)	Acceptable Noise Exposure Increase (dBA Ldn or Leq)
45	7
50	5
55	3
60	2
65	1
70	1
75	0

Source: FTA 2018

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Willow Creek and Hidden Canyon Residential Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed Neighborhoods of Willow Creek and Hidden Canyon Project.

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

Impact N-1 PROJECT CONSTRUCTION WOULD INTERMITTENTLY GENERATE HIGH NOISE LEVELS IN THE PROJECT SITE VICINITY. PROJECT CONSTRUCTION WOULD TAKE PLACE ADJACENT TO THE RMGC FAIRWAYS AND NEAR EXISTING RESIDENCES NORTH OF KEY SITE 21, TEMPORARILY EXPOSING PATRONS AT THE RMGC TO NOISE LEVELS EXCEEDING COUNTY THRESHOLDS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

Construction activity would result in temporary noise in the project area, exposing surrounding receptors to increased noise levels. Increases in noise levels at off-site receptors during construction of the project would occur intermittently throughout the estimated 55-month construction period, with the possibility of occasional single-event disturbances from construction. In addition, construction noise would typically be higher during the heavier periods of initial construction (i.e., site preparation and grading work) and would be lower during the later construction phases (i.e., interior building construction). Construction noise would be reduced during the later construction phases because construction activities and equipment used during these phases typically generate less noise than site preparation and grading activities, and because the physical structures of the proposed project would break line-of-sight noise transmission from active portions of the construction area to nearby sensitive receptors. Furthermore, noise exposure would fluctuate

depending on the specific construction activity, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Construction activities typically require the use of numerous pieces of noise-generating equipment. As shown in Table 4.11-3, peak noise levels associated with the use of individual pieces of heavy equipment that may be used in project construction may reach up to 88 dBA at 50 feet from the source, depending on the types of equipment in operation at any given time and phase of construction (FTA 2018).

Table 4.11-3 Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level 50 feet from Source, dBA
Backhoe	80
Dozer	85
Grader	85
Loader	80
Scraper	85
Crane	88
Generator	82
Paver	85
Roller	85
Air Compressor	80
Truck	84

Source: FTA 2018

Sensitive Noise Receptors

Table 4.11-4 shows the maximum expected construction noise levels at the nearest sensitive receptors based on the combined construction equipment anticipated to be used concurrently during each phase of construction as modeled in RCNM. Construction noise model worksheets are provided in Appendix J.

Table 4.11-4 Construction Noise Levels at Sensitive Receptors from Each Proposed Development Area

Receptor	Noise Level at Receptor from Proposed Hidden Canyon Neighborhood Development Area (dBA Leq)	Noise Level at Receptor from Proposed Willow Creek Neighborhood Development Area (dBA Leq)
Site Preparation		
Residence 1	60.7	54.3
Residence 2	58.1	53.8
Grading		
Residence 1	61.7	55.3
Residence 2	59.1	54.8
Building Construction		
Residence 1	58.9	52.5
Residence 2	56.3	52.0
Paving		
Residence 1	61.2	54.9
Residence 2	58.7	54.4
Architectural Coating		
Residence 1	48.4	42.1
Residence 2	45.8	41.6

Source: RCNM output in Appendix J

As shown in Table 4.11-4, project construction would not exceed 65 dBA Leq at nearby noise-sensitive receptors. The estimated construction noise levels do not take into account that equipment would be dispersed in various areas of the site in both time and space. Due to spatial and equipment limitations, only a certain amount of equipment can operate near a given location at a particular time. Therefore, the noise levels presented in Table 4.11-4 represent a conservative estimate of construction noise from a centralized located in each of the proposed development areas for each given phase.

Based on the maximum hourly average noise levels and the fact that construction activity would primarily be limited to daytime hours, construction activities are not anticipated to exceed the County's 24-hour average standard of 65 dBA CNEL. Construction noise impacts at nearby County-identified sensitive receptors would be less than significant (Class III).

RMGC Receptors

Table 4.11-5 shows the maximum expected construction noise levels at the RMGC based on the combined construction equipment anticipated to be used concurrently during each phase of construction as modeled in RCNM. Construction noise model worksheets are provided in Appendix J.

Table 4.11-5 Construction Noise Levels at RMGC from Each Proposed Development Area

Construction Phase	Noise Level at RMGC from Proposed Hidden Canyon Neighborhood Development Area (dBA Leq)	Noise Level at RMGC from Proposed Willow Creek Neighborhood Development Area (dBA Leq)
Site Preparation	61.4	64.9
Grading	62.4	65.9
Building Construction	59.5	63.1
Paving	61.9	65.5
Architectural Coating	49.1	59.6

Source: RCNM output in Appendix J

As shown in Table 4.11-5, construction activity may result in short-term, daytime noise levels that would exceed 65 dBA Leq at the RMGC during the grading and paving phases of development of the proposed Willow Creek neighborhood. As described above, the estimated construction noise levels do not take into account that equipment would be dispersed in various areas of the site in both time and space. Due to spatial and equipment limitations, only a certain amount of equipment can operate near a given location at a particular time. Therefore, the noise levels presented in Table 4.11-5 represent a conservative estimate of construction noise from a centralized located in each of the proposed development areas for each given phase.

Based on the maximum hourly average noise levels and the fact that construction activity would primarily be limited to daytime hours, construction activities are not anticipated to exceed the County’s 24-hour average standard of 65 dBA CNEL. Nevertheless, patrons at the RMGC clubhouse would be exposed to construction-phase noise from grading and construction activities that would occasionally exceed 65 dBA Leq, and could exceed County standards if construction were to occur during early morning or evening hours. Although temporary in duration, construction noise impacts would be potentially significant (Class II) and mitigation would be required.

Mitigation Measures

N-1(a) Construction Hours Limitations (Modification of OCP EIR Mitigation Measure NSE-5)

Noise-generating construction activity for site preparation and for future project development shall be limited to the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. No construction shall occur on weekends or State or County holidays (e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall also be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.

Plan Requirements and Timing. The Owner/Applicant shall provide and post signs stating these restrictions at all construction site entries. Signs shall be posted prior to commencement of construction and maintained throughout construction.

Monitoring. The Owner/Applicant shall demonstrate to Planning & Development permit compliance monitoring staff that signs are posted prior to grading/building issuance and pre-construction meeting. Building inspectors and permit compliance staff shall spot check and respond to complaints.

N-1(b) Construction Noise Control Measures

The following noise attenuation measures shall be implemented during project construction:

- **Mufflers.** During all project site excavation and grading, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
- **Stationary Equipment.** All stationary construction equipment shall be located and oriented so that emitted noise is directed away from the nearest noise sensitive receptors.
- **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise sensitive receptors.
- **Electrically-Powered Tools and Facilities.** Where available, electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.
- **Additional Noise Attenuation Techniques**
 - During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and the noise sensitive receptors within 500 feet of active construction equipment. Temporary sound barriers shall consist of sound blankets affixed to construction fencing along all sides of the construction site boundary facing potentially sensitive receptors.
 - All construction vehicles, such as bulldozers and haul trucks, shall be prohibited from idling in excess of 5 minutes.
 - The contractor shall inspect construction equipment to ensure that such equipment is in proper operating condition and fitted with standard factory silencing features. Construction equipment shall utilize all standard factory silencing features, such as equipment mufflers, enclosures, and barriers.

Plan Requirements and Timing. These measures shall be reflected on grading and building plans.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions prior to zoning clearance issuance. Planning & Development compliance monitoring staff and Grading and building inspectors shall ensure compliance in the field during construction activities.

Significance After Mitigation

Implementation of Mitigation Measures N-1(a) and N-1(b) would ensure that construction activities only occur during normal daytime hours and on weekdays, when people are less likely to be disturbed by noise and would reduce sound levels from the loudest individual pieces of construction equipment. These measures would reduce overall construction noise and prevent nighttime construction noise, which would ensure that average daily construction noise levels would not exceed the County of Santa Barbara's maximum acceptable level of 65 dBA CNEL. Therefore, with implementation of these mitigation measures, construction noise impacts would be less than significant (Class II).

Threshold: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
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Impact N-2 THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS ON THE PROJECT SITE, INCLUDING THE PROPOSED RESIDENCES OF THE WILLOW CREEK AND HIDDEN CANYON NEIGHBORHOODS, TO NOISE IN EXCESS OF COUNTY STANDARDS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

As shown in Table 4.11-1, the sound level measurements taken on the project site indicated an existing ambient noise level of 41.4 dBA Leq(15) at the approximate center of the proposed Willow Creek neighborhood development area and 48.1 dBA leq(15) at the approximate center of the proposed Hidden Canyon neighborhood development area during peak traffic hours. As discussed in the Overview of Sound Measurement, for rural areas with little nighttime traffic, the peak hour Leq will often be 3 to 4 dBA greater than the daily Ldn/CNEL value. Accordingly, the sound level measurement in each of the proposed development areas would be reduced by 3 to 4 dBA, if considered in terms of Ldn or CNEL, resulting in existing ambient sound level of approximately 37.4-38.4 dBA CNEL for the proposed Willow Creek neighborhood and approximately 44.1-45.1 dBA CNEL for the proposed Hidden Canyon neighborhood.

The noise policies in the County's Comprehensive Plan Noise Element as well as OCP DevStd NSE-O-1.2 establish noise level standards for outdoor activity areas of new residential units of 65 dBA CNEL, and not to exceed 45 dBA CNEL for indoor living areas in new residential units. Modern building construction techniques that comply with the 2016 California Green Building Code requirements typically provide an exterior-to-interior noise attenuation of at least 25 dBA (FTA 2018). Based on the sound levels measured on the project site, the proposed residences would not be exposed to exterior noise levels in excess of the County's exterior noise standard 65 dBA CNEL, or interior noise levels that would exceed the County's interior noise standard of 45 dBA CNEL, at the proposed new residences.

Operations associated with the proposed residential project may result in increased noise on Key Site 21, including at the RMGC, from periodic trash hauling services, internal circulation and parking, use of common and private outdoor use areas. Parking noise is typically associated with screeching tires, slamming doors, and people's voices. Operational noise associated with outdoor use areas would include conversations, music, television, or other sound-generating equipment. These unscheduled operational noises would be required to comply with County noise regulations. Noise from conversation would be an intermittent and temporary noise source. Additionally, trash services and parking noise associated with the RMGC are already a common occurrence in the project vicinity and would not result in a substantial permanent increase in ambient noise levels at

Willow Creek and Hidden Canyon Residential Project (Key Site 21)

the RMGC above levels existing without the project. Therefore, project operations would not increase noise levels at the RMGC in excess of the County’s exterior standard of 65 dBA CNEL or interior standard of 45 dBA CNEL.

Impacts associated with exterior and interior noise exposure in excess of County standards to sensitive receptors on Key Site 21, including the RMGC as well as the proposed new residences in the Willow Creek and Hidden Canyon neighborhoods, would be less than significant (Class III).

Mitigation Measures

No mitigation is required because these impacts would be less than significant (Class III).

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

Impact N-3 PROJECT-GENERATED TRAFFIC WOULD NOT INCREASE NOISE LEVELS ON AREA ROADWAYS IN EXCESS OF COUNTY STANDARDS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The project would generate new vehicle trips and increase traffic on area roadways. Based on trip generation estimates provided in the Traffic Study prepared for the project (Appendix K), the project would generate an estimated 1,378 ADT. Project trips were distributed and assigned to the street network based on the project trip distribution pattern listed in Table 4.13-7 and illustrated in Figure 4.13-3 in Section 4.13, *Transportation and Circulation*. Existing and existing + project traffic noise was modeled on the study area roadway segments using the HUD DNL Calculator for existing and existing + project ADT volumes. Table 4.11-6 summarizes the roadway noise modeling results with and without project-added vehicle trips.

Table 4.11-6 Comparison of Existing and Existing + Project Traffic Noise Levels

Modeled Roadway Segment ¹	Roadway Noise (dBA Ldn)				
	Existing [1]	Existing + Project [2]	Noise Level Increase [2]-[1]	Noise Increase Criteria (dBA)	Exceed Criteria?
SR 1 – Black Rd to Solomon Road ²	72.2	73.1	0.9	1	No
SR 1 – Solomon Rd to Clark Ave ²	72.7	73.5	0.8	1	No
Solomon Rd ³	63.7	64.6	0.9	2	No
Clark Ave – SR 1 to Broadway St ³	72.7	73.4	0.7	1	No
Clark Ave – Broadway St to SR 135 ³	74.2	74.5	0.3	1	No
Clark Ave – East to SR 135 ³	71.2	71.4	0.2	1	No

1. The segment of SR 1 from Clark Avenue to SR 135 was not modeled as there are not sensitive receptors along this roadway segment. See Appendix J for HUD DNL worksheets.

2. Distribution of Cars, Medium Trucks, and Heavy Trucks based on Caltrans Traffic Census Program 2017 truck traffic data.

3. Distribution of Cars, Medium Trucks, and Heavy Trucks used in model based on standard assumption for non-State highways of 95 percent cars, 3 percent medium trucks, and 2 percent heavy trucks.

Source: HUD 2018

As shown in Table 4.11-6, noise generated by project traffic would result in less than 1 dBA noise level increase along study area roadway segments. This increase would not be perceptible and would not exceed the FTA Transit Noise and Vibration Impact Assessment acceptable noise exposure increase. Therefore, the project would not significantly increase noise levels at noise sensitive receptors along the roadways in the vicinity of the project site. The project would not result in a substantial permanent increase in ambient noise levels above levels existing without the project. Impacts would be less than significant (Class III).

Mitigation Measures

No mitigation is required because this impact would be less than significant (Class III).

c. Cumulative Impacts

In contrast to near-term, site-specific noise impacts, cumulative noise impacts include impacts resulting from traffic-generated increases in roadway noise assuming development of all approved and pending projects in the Santa Maria Valley that would contribute to traffic on area roadways and at intersections. Cumulative and cumulative + project traffic noise was modeled on the study area roadway segments using the HUD DNL Calculator using cumulative and cumulative + project ADT volumes. Table 4.11-7 summarizes the roadway noise modeling results with and without project-added vehicle trips.

Table 4.11-7 Comparison of Cumulative and Cumulative + Project Noise Levels

Modeled Roadway Segment ¹	Roadway Noise (dBA Ldn)				
	Cumulative [1]	Cumulative + Project [2]	Noise Level Increase [2]-[1]	Noise Increase Criteria (dBA)	Exceed Criteria?
SR 1 – Black Rd to Solomon Road ²	71.5	72.5	1.0	1	No
SR 1 – Solomon Rd to Clark Ave ²	72.3	73.1	0.8	1	No
Solomon Rd ³	64.5	65.3	0.8	2	No
Clark Ave – SR 1 to Broadway St ³	75.7	76.0	0.3	1	No
Clark Ave – Broadway St to SR 135 ³	74.2	74.4	0.2	1	No
Clark Ave – East to SR 135 ³	72.4	72.5	0.1	1	No

¹ The segment of SR 1 from Clark Avenue to SR 135 was not modeled as there are not sensitive receptors along this roadway segment. See Appendix J for HUD DNL worksheets.

² Distribution of Cars, Medium Trucks, and Heavy Trucks used in model based on Caltrans Traffic Census Program 2017 truck traffic data.

³ Distribution of Cars, Medium Trucks, and Heavy Trucks used in model based on standard assumption for non-State highways of 95 percent cars, 3 percent medium trucks, and 2 percent heavy trucks.

Source: HUD 2018

As shown in Table 4.11-7, noise generated by project traffic would result in a maximum 1 dBA noise level increase along study area roadway segments. This increase would not be perceptible and would not exceed the FTA Transit Noise and Vibration Impact Assessment acceptable noise exposure increase. Therefore, the project would not significantly increase cumulative noise levels at

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noise sensitive receptors along the roadways in the vicinity of the project site and cumulative noise impacts would be less than significant (Class III).

4.12 Public Services and Recreation

4.12.1 Setting

This section analyzes the effect of the project on schools, wastewater, solid waste generation, police protection and recreational resources. The project’s effect on fire protection services is addressed in Section 4.7, *Fire Protection*.

a. Project Site Setting

Public Schools

The project site is located within the Orcutt Union School District (OUSD) and the Santa Maria Joint Union High School District (SMJUHS). The project would be served by Pine Grove Elementary School, Orcutt Junior High School, and Ernest Righetti High School. Table 4.12-1 shows current enrollment and enrollment capacity for these schools for the 2017-2018 school year.

Table 4.12-1 Key Site 21 Area School Enrollment

Schools	Enrollment	Enrollment Capacity	Percent Capacity Utilization
Pine Grove Elementary ¹	526	621	85%
Orcutt Junior High ¹	567	553	103%
Ernest Righetti High ²	2,175	2,517	86%

¹ Source: Carol Sutton, personal communication 2019.

² Includes permanent (1,518) and 37 portable classroom (999) capacity (Reese Thompson, personal communication 2018).

Wastewater

Sewer service for the project would be provided by the Laguna County Sanitation District (LCS). The District’s boundaries encompass most of the area of Orcutt that is within the urban boundary and areas to the west and north of the Orcutt Planning area, including portions of the City of Santa Maria and the Santa Maria Airport. The District’s sewer infrastructure consists of a wastewater reclamation facility, a network of trunk sewers and collection pipes, and spray fields for disposal of treated effluent. The District’s 24-inch main trunk line generally runs east/west, approximately 1,000 feet north of Key Site 21, and is fed by gravity flows from the majority of the planning area.

The project would be served by a public sewer connection to an existing LCS 24-inch line by constructing a 1,000-foot long connection across Key Site 22 to the north of the project site. The project site would be served by the proposed onsite collection system, comprised by a network of gravity sewer lines located in the private roads serving the individual units that will meet at State Route 1 (SR 1) and tie into a recorded easement to the 24-inch sewer main to the North. The existing 24-inch line was designed to accommodate development of Key Site 21 in the Orcutt Community Plan (OCP).

LCS currently collects, treats, and disposes of approximately 1.6 to 1.7 million gallons per day (MGD) of wastewater. The District’s treatment plant has a permitted/rated design capacity of 3.7 MGD, currently at 45 percent capacity with an available capacity of 1.3 MGD (Wilder 2018). This plant is regulated by the Central Coast Regional Water Quality Control Board (CCRWC) in San Luis Obispo under Waste Discharge Requirements and Master Reclamation Permit Order 01-042. All of

the water that is collected and treated at the facility is treated to disinfected tertiary levels and recycled through irrigation and agricultural uses on District land and various off-site locations.

Solid Waste

Solid waste collection service in Orcutt is provided by Health Sanitation Service (HSS), a private refuse collection, recycling, and disposal company. Solid waste generated in the area is transported to the City of Santa Maria Landfill, the second largest landfill in the County located at the northeastern corner of the Santa Maria city limits, adjacent to the Santa Maria River. The permitted capacity of the landfill is approximately 13.9 million cubic yards (CY), with a total remaining capacity of approximately 1.5 million CY and is estimated to reach capacity in 2022. In addition, the approved Santa Maria Integrated Waste Management Facility is planned to be operational in 2020, and will enable the City to phase out the use of the existing Santa Maria Landfill (Cantu 2018).

Police Protection

Police protection in Orcutt is provided by the Santa Barbara County Sheriff's Department (SBCSD). The Orcutt Planning Area is serviced by the SBCSD's Santa Maria Station located at 812-A West Foster Road in Santa Maria, approximately 3.2 miles from the project site. The Santa Maria Station serves approximately 900 square miles of unincorporated area in the County, including the area surrounding Santa Maria and Guadalupe, as well as the communities of Orcutt, Gary, Sisquoc, Casmalia, Tepesquet, and Los Alamos (Turner 2018). The Santa Maria Station is staffed with 22 officers. Based on this value, the current service ratio is one officer per 1,368 residents in the Orcutt area. This exceeds the County standard of one officer per 1,200 residents (1:1,200) and represents a deficit in existing police protection services.

The approximate response time the project site varies based on call volume. Assuming officers are available to respond, the response time to the project site would be approximately five minutes. However, actual response time can vary from 5 to 20 minute if officers are already out on call. Backup police protection services would be available from the California Highway Patrol (CHP), the Santa Maria Police Department, and the Guadalupe Police Department on an as-needed basis (Turner 2018).

Recreation

The Orcutt area currently has approximately 160 acres of dedicated public recreation space (County of Santa Barbara 1995). Approximately 95 percent of this acreage is located at the far northern end of the community within Waller Park, located at the intersection of Waller Lane and State Route 135, which functions as a regional park utilized by the Santa Maria Valley residents. This highly developed 153.5-acre County park contains an extensive urban forest, hilly turf areas, two ponds, group and family picnic/barbecue areas, a basketball court, softball fields, volleyball courts, pony rides, and parking. Rice Ranch regional park, located approximately 3.5 miles east of the project site, includes a community park, several dog parks, and playgrounds. In addition, there are approximately seven acres of public neighborhood parks in the Orcutt area, with an additional nine acres in County-maintained open space (County of Santa Barbara 1995).

The Rancho Maria Golf Course (RMGC), a public facility that is open year-round, borders the interior portions of the project site (refer to Figure 2-2 in Section 2, *Project Description*).

b. Regulatory Setting

Public Schools

Operating revenue provided to school districts is funded by local property tax revenue accrued at the State level and then allocated to each protocol district based on the average daily student attendance. However, physical improvements to accommodate new students come primarily from assessed development mandated by State Law. The School Facilities Legislation (California Government Code 65995) was enacted to generate revenue for school districts for capital acquisitions and improvements. SMJUHSD and OUSD can collect development fees based upon a State-required fee schedule. As a condition of development, a developer can be required to pay the statutory school fees in effect at the same time of issuance of building permits to SMJUHSD and OUSD. However, mitigation is limited by State law. For projects which do not involve a legislative act, payment of standard fees is the maximum mitigation allowed.

Wastewater

Santa Barbara County Wastewater Regulations

Through a memorandum of understanding with the CCRWQCB, on-site sewage disposal systems in Santa Barbara County are regulated by the County Public Health Department, Environment Health Services Division (EHS). The County Wastewater Ordinance sets forth specific requirements related to permitting and inspection of onsite systems; septic tank design and construction; drywell and disposal field requirements; servicing, inspection, reporting and upgrade requirements; and regulations for on-site systems. Standards pertaining to system sizing and construction are contained in the California (Uniform) Plumbing Code.

Solid Waste

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) required all cities and counties to develop a Source Reduction and Recycling Element (SRRE) for diverting 50 percent of their solid waste from landfills by the year 2000. To comply with the goals set by AB 939, the County of Santa Barbara requires a reduction in solid waste generation for all new development projects in the County. County waste characterization studies estimate that implementation of a SRRE program could reduce the total volume of waste generated by new development projects by approximately 50 percent (Santa Barbara County 2018). Through recycling and reduction programs and policies, Santa Barbara County has achieved a 69 percent solid waste diversion rate as of 2006 (CalRecycle 2014).

Police Protection

The County of Santa Barbara imposes a police protection service mitigation fee on all new development in the Orcutt Planning Area to provide funding for capital facilities and related equipment associated with hiring new Sheriff Deputies required to serve new development (Orcutt Planning Area Fee Summary Sheet, FY 2017-2018). State legislation sets certain legal and procedural parameters for the charging of development impact fees. This legislation was passed as Assembly Bill 1600 (AB 1600) and is codified as California Government Code Sections 66000 through 66008 (“Mitigation Fee Act”).

Recreation

State and Federal Sources of Funding

Funding sources for park expansion include Quimby Fees, State Grants, and Federal Grants. Federal assistance may also be available in the form of funding from programs such as the Land and Water Conservation Fund Program, and the Department of the Interior's Small Reclamation Projects.

County Parks Department Fee Structure

Quimby fees apply to subdivisions only. Ordinance 3339/3656 of the Santa Barbara County Code requires dedication of land and/or payment of a fee for the purposes of providing park and recreation facilities as a condition of all subdivisions. The Quimby Ordinance provides for the dedication of park land in lieu of fees for a new project. Any subdivision creating 50 or more units may be required to dedicate land for park purposes. Government Code Section 66477, the "Quimby Act," is the enabling statute for this ordinance. The current fees in the Orcutt Planning Area are \$4,556.00 per new single-family dwelling unit and are limited to capital improvements (County of Santa Barbara 2018).

Orcutt Community Plan

Development standards were incorporated in the OCP to minimize overall and site-specific impacts on public services and recreation. Several of these were modeled after mitigation measures in the OCP EIR. OCP development standards for public services that would apply to the project include:

- DevStd RR-O-1.3, which states that all residential and commercial development shall establish a recyclable material pickup area;
- DevStd RR-O-1.4, which requires that all developers provide recycling bins at construction sites;
- DevStd WW-O-2.1, which states the applicable conditions under which the County will accept Can-and-Will-Serve letter for all new developments;
- DevStd WW-O-3.1, which requires on-site filtration systems for developments contributing to wastewater flows;
- DevStd WW-O-3.3, which requires the County to make findings that a project's effluent will meet Regional Water Quality Control Board (RWQCB) standards;
- DevStd SCHO-O-1.2, which states that if a Mello-Roos Community Facilities (CFD) is formed, all applicants for new developments that impact schools in the Orcutt Planning Area (OPA) must agree to participate in the CFD or demonstrate an alternative method for mitigation.

OCP development standards for recreation that would apply to the project include:

- DevStd PRT-O-4.1 and DevStd PRT-O-4.3, which require development on sites with identified trail corridors to construct and maintain for two years designated trails indicated in the Orcutt Multiple Use Trails Plan;
- DevStd PRT-O-4.2, which states that trails should cross primary, and where appropriate secondary, roadways at controlled intersections and be limited to six (6) feet in width in natural undeveloped open space areas, except along Class I bikeways and emergency access routes;
- DevStd KS21-5, which requires the developer to dedicate an easement for and construct a public staging area and hiking trail along the east side of the site boundary;

- DevStd KS21-7, which requires development to be designed to facilitate pedestrian access to the golf course and accommodate continued use of the public golf course.

4.12.2 Previous Environmental Review

OCP EIR

The OCP EIR examined potential impacts to public services and recreation that would result from development under the OCP in two sections of the document: Public Services, and Parks, Recreation, and Trails. The OCP EIR determined that buildout of the OCP would result in significant and unavoidable (Class I) impacts to public services and recreation. Site specific analysis was not performed for public services or recreation at Key Site 21.

The OCP EIR identified 18 potentially significant public services impacts that pertain to development on Key Site 21, including: inadequate number of police officers (POL-1), development outside of the existing five-minute response area (POL-2), increased solid waste from 10-year buildout (SW-1), increased solid waste from full buildout (SW-2), increased need for new landfill (SW-3), increased TDS levels (WW-1), need for additional trunk and feeder lines (WW-2), development outside the sewer district's boundary (WW-3), potential flows exceed plant capacity (WW-4), increased grease or chemical levels (WW-5), increased TDS levels from retrofitting (WW-6), exceedance of OUSD's permanent/expanded school capacities (SCH-1), capacity exceedance at Righetti High/need for new high school (SCH-2), need for 1-2 additional elementary schools (SCH-3), operational impacts (SCH-4), exceedance of capacity at OUSD (SCH-5), exceedance of capacity at SMJUHS (SCH-6), lack of school sites (SCH-7), and lack of funding (SCH-8). The OCP EIR identified Mitigation Measures that would minimize potential public services impacts, including development fees (PS-1), waste disposal and recycling requirements (SW-1 through SW-6), wastewater requirements (WW-1 through WW-7), and school facility and funding requirements (SCH-1 through SCH-3). The OCP EIR determined that implementation of feasible mitigation measures would not reduce the majority of identified public services impacts to a less than significant level. Implementation of Mitigation Measure WW-1, which requires TDS-reduction methods, was found to reduce impacts related to increased TDS levels (WW-1) to a less than significant level.

The OCP EIR identified five potentially significant impacts to recreation including: intensification of use in existing recreational facilities (REC-1), increased demand for recreational facilities (REC-2), loss of open space/established public use of trails (REC-3), increased demand for neighborhood parks (REC-4), and inadequate funding for park construction/maintenance (REC-5). The OCP EIR identified Mitigation Measures that would minimize potential recreational impacts, including adoption of an Open Space Overlay and Plan (REC-1a and b), formation of a Landscape-Open Space Maintenance District (REC-1c), acquisition of public parks (REC-2), coordination with the City of Santa Maria for provision of a recreational open space area (REC-3), coordination with school districts (REC-4), funding sources (REC-5 and REC-7), adoption of a Bikeways Plan and Multiple Use Trails Plan (REC-8 and REC-9), recreational area requirements (REC-9), and fee or easement requirements (REC-6 and REC-11). The residual impact to recreational facilities after mitigation was identified as significant but unavoidable (Class I).

4.12.3 Impact Analysis

a. Methodology and Significance Thresholds

Appendix G of the CEQA guidelines considers a project to have a significant impact to public services and/or recreation if the project would:

- Result in a substantial adverse physical impact associated with the provision of new or physically altered police, school, or other public facilities;
- Result in the need for new or physically altered police, school, other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services;
- Require or result in the relocation or construction of new or expanded wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects;
- Result in 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;
- Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

The project's effect on fire protection services is addressed in Section 4.7, *Fire Protection*.

Appendix G of the CEQA guidelines considers a project to have a significant impact to recreation if the project would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

To address the Appendix G checklist questions for public services, this analysis uses the County's service-specific thresholds. This analysis relies on the County of Santa Barbara Environmental Thresholds and Guidelines Manual (March 2018) to determine thresholds of significance of impacts related to schools, solid waste, and recreation. Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, as well as standards from the SBCSD, EPA and RWQCB, public services impacts would be considered significant if the project:

- Generates sufficient students to require an additional classroom. This assumes 29 students per classroom for elementary/junior high students, and 28 students per classroom for high school students, based on the lowest student per classroom loading standards of the State school building program;
- Generates wastewater that causes a treatment plant's average daily flow to meet or exceed 75 percent of the plant's design capacity;
- Results in more than 350 tons of construction and demolition debris, which is equivalent to the construction of 47,000 square feet of new residential buildings;

- Generates 5 percent or more of the expected annual increase in waste generation, thereby using a significant portion of the remaining landfill capacity. Based on an assumed 4,000 tons per year increase in solid waste generation, the numerical value associated with the 5 percent increase is 196 tons/year.
- Decreases the standard service ratio of police officer to resident of 1:1,200;
- Results in a response time greater than five minutes;

A discussion of the significance thresholds for these issue areas, along with a discussion of methodology associated with each of the issue areas evaluated in this section, is provided below.

Wastewater

On a cumulative basis, the EPA and the Regional Water Quality Control Board have a threshold for overall facilities capacity. Securing agreements and permits and designing and constructing plant improvements is subject to a number of uncertainties. The EPA and the RWQCB recommend a 75 percent capacity “check-point” threshold. This threshold requires a sewer district to establish a schedule for necessary treatment plant upgrades (or replacement) and to submit this schedule to both the EPA and the RWQCB at such time as the average daily flow exceeds 75 percent of the design capacity of the existing facilities. Therefore, impacts to wastewater treatment would be significant if project-generated wastewater causes a treatment plant’s average daily flow to meet or exceed 75 percent of the plant’s design capacity.

The LCSO establishes wastewater generation rates based on development type and housing density. The generation rate is then multiplied by the development acreage to determine a total project wastewater treatment demand. The wastewater duty factors used in this analysis were 0.00034 cubic feet per second (cfs) for single-family residential units, based on LCSO Standard Specifications for the Construction of Sanitary Sewers.

Police Protection

The Santa Barbara County Sheriff’s Department (SBCSD) utilizes a standard service ratio of officer to resident of 1:1,200 and a maximum response time of five minutes. The County does not currently have thresholds for police protection impacts, and as such, the standard service ratio is used to determine impacts.

Public Schools

Information on school facilities was collected from administrators at OUSD and SMJUHSO. The estimate of the projected future residential growth was combined with data on student generation factors provided by OUSD and SMJUHSO to derive estimated school enrollment impacts of the proposed project. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, August 27, 1998), the payment of statutory fees “...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.”

Solid Waste

Solid waste generation for the proposed project was estimated using solid waste generation rates in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (March 2018). The

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196 tons per year threshold is based on 5 percent of the expected annual percentage increase in the total average solid waste generation for Santa Barbara County from 1990 to 2005. As landfill space is already limited, any increase in solid waste of 1 percent or more of the estimated increase accounted for in the Source Reduction and Recycling Element (SRRE) would also be considered an adverse contribution to regional cumulative solid waste impacts. One percent of the SRRE projected increase in solid waste equates to 40 tons per year. Projects or developments that generate less than 40 tons per year of solid waste would not be considered to have an adverse effect due to the small amount of waste generated by these projects and the existing waste reduction provisions in the SRRE.

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Willow Creek and Hidden Canyon Residential Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed Neighborhoods of Willow Creek and Hidden Canyon Project.

Threshold:	Would the project result in a substantial adverse physical impact associated with the provision of new or physically altered school facilities?
Threshold:	Would the project result in the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?

Impact PS/R-1 THE PROJECT WOULD INCREASE THE DEMAND FOR SCHOOLS. THROUGH THE REQUIRED PAYMENT OF STATE-MANDATED IMPACT MITIGATION FEES, POTENTIAL IMPACTS TO PUBLIC SCHOOLS WOULD BE ADVERSE, BUT LESS THAN SIGNIFICANT (CLASS III).

Using student generation factors of 0.38 students per unit for elementary schools (K-6), 0.38 students per unit for middle schools (7-8), and 0.099 students per unit for high schools, the project would generate 41 new elementary school students, 14 new junior high school students, and 14 new high school students (Orcutt Union School District 1994). Table 4.12-2 shows projected enrollment increases attributable to the project.

Table 4.12-2 Post-Project Local School Student Enrollment

School	Operating Capacity	Current Student Enrollment	Current % Capacity Utilization	New Students Generated by the Project ¹	Enrollment with Project	Capacity with Project
Pine Grove Elementary School	621	526	85%	41	567	91%
Orcutt Junior High School	553	567	103%	14	581	105%
Ernest Righetti High School	2,517	2,175	86%	14	2,189	87%

¹ Student generation factors of 0.38 students per unit for elementary school, 0.38 students per unit for junior high school, and 0.099 students per unit for high school were used to determine the student generation

As shown in Table 4.12-2, the proposed residential development would add 55 students to schools in the OUSD (Pine Grove Elementary and Orcutt Junior high) and 14 students to the SMJUHS (Ernest Righetti High School).

Pine Grove Elementary and Ernest Righetti High School currently have sufficient capacity to accommodate new students without the need for additional classrooms. However, Orcutt Junior High School is currently over capacity, as indicated by Table 4.12-2. Therefore, an increase in 14 students would contribute to the need for new or expanded classroom facilities. As discussed in Methodology and Significance Thresholds above, the collection of state-mandated fees (pursuant to Section 65995(3)(h) of the California Government Code) is considered full and complete mitigation for impacts to public schools. The project would be required by State law to pay their fair share of impact mitigation fees in order to finance school facilities, and impacts to public schools would be adverse, but less than significant.

Mitigation Measures

No mitigation measures would be required. Through the required payment of State-mandated impact mitigation fees, potential impacts to public schools would be adverse, but less than significant (Class III).

Threshold:	Would the project require or result in the relocation or construction of new or expanded wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?
Threshold:	Would the project result in 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?

Impact PS/R-2 THE PROJECT WOULD NOT SUBSTANTIALLY DIMINISH THE LCSD’S WASTEWATER TREATMENT CAPACITY, NOR REQUIRE SUBSTANTIAL NEW OR EXPANDED WASTEWATER TREATMENT FACILITIES, STORMWATER DRAINAGE FACILITIES, OR OTHER UTILITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

As discussed in Section 4.12.3(a), *Methodology and Significance Thresholds*, the LCSD establishes wastewater generation rates based on development type and housing density. Table 4.12-3 shows the project’s estimated wastewater generation.

As shown in Table 4.12-3, the project would generate an estimated 76,000 gallons per day (0.076 MGD) of wastewater. This would increase the wastewater processed at the LCSD from 1.7 to 1.78 MGD, representing approximately 48.1 percent of the total plant design capacity. Because additional wastewater would not cause the LCSD plant to exceed 75 percent of its existing design capacity, to the project would not result in a significant impact to wastewater treatment.

Table 4.12-3 Project Wastewater Flows

	CFS/unit	Average Runoff (CFS)	Peak Runoff (CFS)
Willow Creek Neighborhood			
90 units	0.00034	0.030	0.074
Hidden Canyon Neighborhood			
56 units	0.00034	0.019	0.046
Total		0.049 (0.076 MGD)	0.250 (0.161 MGD)

CFS – cubic feet per second; MGD – million gallons per day

Unit flows derived from LCSD Standard Specifications for the Construction of Sanitary Sewers, September 2014

Peak Runoff = Average Runoff x 2.4

The project would also require addition of off-site trunk and feeder lines on Key Site 22, north of the project site. In compliance with OCP EIR Mitigation Measure WW-4, the project would be required to pay trunk and feeder line fees to fund these required off-site improvements. The project would not require new off-site stormwater drainage facilities; as discussed in Section 4.14, *Water Resources and Flooding*, stormwater runoff from the project site would discharge at or below existing drainage conditions, consistent with SBCFCD’s post-development runoff criteria. The project would connect to existing off-site electric power, natural gas, or telecommunications facilities. Therefore, with the payment of required trunk and feeder line fees for wastewater infrastructure, impacts associated with the expansion or constructions of new wastewater treatment facilities and other utilities would be less than significant.

Mitigation Measures

No mitigation measures are required because these impacts would be less than significant (Class III).

Threshold:	Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Threshold:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact PS/R-3 THE PROJECT WOULD GENERATE SOLID WASTE THAT WOULD INCREASE DEMAND ON THE SANTA MARIA LANDFILL. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE (CLASS I).

The project would increase the population of the Orcutt area by an estimated 431 residents, which would result in approximately 417 tons of new solid waste per year, based on solid waste generation rates in the County of Santa Barbara Environmental Thresholds and Guidelines Manual. This would exceed the County’s 196 tons per year threshold for solid waste generation by 221 tons per year.

The project would be subject to the County’s waste reduction and recycling requirements. County waste characterization studies estimate that implementation of a Source Reduction and Recycling element (SRRE) program can attain up to 50 percent reduction in the solid waste stream. Although the requirements would reduce the demand by up to 208 tons per year, the project’s estimated

solid waste generation would still exceed the County's 196 tons per year threshold. Therefore, the project would result in a potentially significant impact to landfill capacity.

Construction activity would also generate solid waste, particularly wood, metal, and cardboard. According to the County of Santa Barbara Thresholds and Guidelines Manual, construction of 47,000 square feet of new residential buildings would have a significant impact on solid waste services. Based on an estimated minimum residential unit size of 1,500 square feet, development of the proposed 146 single-family residences would result in over 200,000 square feet of new construction. Therefore, the disposal of construction materials would exceed the County's threshold for new construction, resulting in a potentially significant impact on solid waste services.

Mitigation Measures

PS/R-3 Source Reduction and Solid Waste Management Plan (SRWMP)

The applicant shall prepare a Source Reduction and Solid Waste Management Plan (SRWMP) subject to County approval prior to issuance of grading permits. The SRWMP shall describe commitments to reduce the amount of waste generated during construction of the project and estimate the reduction in solid waste generated during each phase of project construction. The SRWMP shall include, at a minimum:

1. Construction Source Reduction

- a. A description of how fill will be used on the construction site, instead of landfilling.
- b. A program to purchase materials that have recycled content for project construction.

2. Construction Solid Waste Reduction

- a. Prior to construction, the contractor will arrange for construction recycling service with a waste collection provider. Roll-off bins for the collection of recoverable construction materials will be located onsite. The applicant, or authorized agent thereof, shall arrange for pick-up of recycled materials with a waste collection provider or shall transport recycled materials to the appropriate service center. Wood, concrete, drywall, metal, cardboard, asphalt, soil, and land clearing debris may all be recycled.
- b. The contractor will designate a person to monitor recycling efforts and collect receipts for roll-off bins and/or construction waste recycling. All subcontractors will be informed of the recycling plan, including which materials are to be source-separated and placed in proper bins.
- c. Recycling and composting programs including separating excess construction materials on-site for reuse/recycling or proper disposal (e.g., concrete, asphalt, wood, brush). Provided separate on-site bins as needed for recycling.

3. Operation Solid Waste Reduction

- a. Provision of space and/or bins for storage of recyclable materials within common areas of the project site.
- b. Implementation of a green waste source reduction program for composting in open areas, and the use of mulching mowers in all common open space lawns.

Plan Requirements and Timing. The Owner/Applicant shall submit a Source Reduction and Solid Waste Management Plan to Planning & Development for review and approval prior to approval of zoning clearance. The applicant shall implement all aspects of the Plan during construction and operation of the project in accordance with the above-described conditions.

Monitoring. The Owner/Applicant shall demonstrate to Planning & Development compliance monitoring staff that all required source reduction and solid waste reduction measures are implemented during project construction and operational solid waste reduction measures are implemented prior to occupancy.

Significance After Mitigation

Although Mitigation Measure PS/R-3 would reduce solid waste generation during the construction phase of the project and during project operation, waste generated by the project may still exceed the County's annual solid waste threshold of 196 tons per year. The project would result in the construction of more than 200,000 square feet of new residential buildings. Therefore, the project would exceed the County's solid waste thresholds for construction and operation. Impacts related to solid waste would be significant and unavoidable (Class I).

Threshold:	Would the project result in a substantial adverse physical impact associated with the provision of new or physically altered police protection facilities?
Threshold:	Would the project result in the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Impact PS/R-4 BUILDOUT OF THE PROJECT WOULD INCREASE DEMAND ON THE SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT (SBCSD). THE PROJECT WOULD BE SUBJECT TO POLICE PROTECTION SERVICE MITIGATION FEES, WHICH PROVIDE FUNDING FOR CAPITAL FACILITIES AND RELATED EQUIPMENT ASSOCIATED WITH HIRING NEW SHERIFF DEPUTIES REQUIRED TO SERVE NEW DEVELOPMENT. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

Based on an average household size of 2.95 persons per unit in the Orcutt Plan Area (SBCAG 2012), the proposed 146 residential units would generate 431 residents at the site. This population increase would reduce the service ratio from 1:1,368 to 1:1,388, which would not satisfy the SBCSD goal of 1:1,200. Therefore, the project would contribute to the County's existing police service ratio deficit.

As discussed in Section 4.12(b), *Regulatory Setting*, the County imposes a police protection service mitigation fee based on Public Infrastructure financing program for the Orcutt Community Plan to provide funding for capital facilities and related equipment associated with hiring new Sheriff deputies required to serve new development. Payment of the required police protection service mitigation fee also implements OCP EIR Mitigation Measure POL-1. Although development of new police protection facilities could result in environmental impacts, the evaluation of such impacts would be speculative because the location and timing of such facilities is not known at this time. Future facilities that would be constructed would be subject to environmental review and potential indirect physical impacts associated with construction of new police protection facilities would be addressed through separate CEQA review on a case-by-case basis. Therefore, the payment of required police protection service mitigation fees would ensure that impacts to police services would be less than significant.

Mitigation Measures

Payment of the required police protection service mitigation fee would implement OCP EIR Mitigation Measure POL-1 and reduce impacts associated with the deficit in police protection services. With payment of the County-required police protection service mitigation fee, potential impacts to police protection services would be adverse, but less than significant (Class III).

Threshold:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Threshold:	Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact PS/R-5 THE PROJECT WOULD NOT SIGNIFICANTLY INCREASE THE DEMAND FOR RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES THAT MAY HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The project would result in new residents, and would increase the demand parkland in the Orcutt Planning Area. Based on Orcutt’s average household size of 2.95 persons per dwelling unit (SBCAG 2012), the proposed 146 residential units would generate an estimated 431 new residents. The County has established a standard of 4.7 acres of parkland per 1,000 residents. Therefore, the project would generate a need for approximately 2.0 acres of parkland.

The project does not include any new public parklands, but would provide on-site recreational components, including approximately 97 acres of undisturbed open space, a trail staging area, and public recreational trail that would be located along the eastern project boundary (shown on the OCP Area Parks, Recreation, and Trails Map). The terminus of the trail would be at the access road for the Hidden Canyon Neighborhood subterranean water tank, approximately 750 feet north of the project’s southern boundary. The Hidden Canyon tentative tract map includes an easement to the remaining 750 feet of trail corridor extending to the southeast corner of the project boundary. The Santa Barbara County Community Services Department, Park Division would be responsible for installing the balance of the trail at a future date as part of an overall project to extend the trail on the adjacent parcel to the south (Garciacelay 2018). The proposed staging area and trail would implement the OCP-designated trail RM-1 within the project site (identified in the OCP Area Parks, Recreation, and Trails Maps) and would be consistent with the OCP Key Site 21 DevStd KS21-5.

The project would be required to pay County parkland development impact fees (Quimby fees), which would be directed to new parks and recreation facilities or improvements to existing parks and recreation facilities in the Orcutt area. Although development of new parks and recreation facilities could result in environmental impacts, the evaluation of such impacts would be speculative because the location and timing of such facilities is not known at this time. Future facilities that would be constructed would be subject to environmental review and potential indirect physical impacts associated with construction of new parks and recreation facilities would be addressed through separate CEQA review on a case-by-case basis. Therefore, the payment of the County’s required parkland development impact fees would ensure compliance with the policies and performance standards in the OCP as part of the project, and impacts associated with parks and recreational facilities would be less significant.

Mitigation Measures

No mitigation measures are required because these impacts would be less than significant (Class III).

c. Cumulative Impacts

Public Schools

Residential development in the area under cumulative conditions could generate enough new students such that it may exceed the capacity of schools within the OUSD or SMJUHSD and may require new or altered school facilities in the future. Based on the same student generation factors used for the project-level impact analysis, cumulative residential development within the Orcutt area would be expected to generate 478 elementary and middle school students, and 125 high school students, for a total of 603 students under cumulative conditions. The project would generate 69 students, which accounts for approximately 11 percent of the total students generated from cumulative buildout within the Orcutt area, and less than 1 percent of the 7,800 students enrolled in the SMJUHSD.

Although development of new schools could result in environmental impacts associated with ground disturbance (e.g., biological resources, cultural resources, etc.), and/or noise and traffic, a precise evaluation of environmental impacts would be speculative because the location and timing of such facilities is not known at this time. Future facilities that would be constructed as a result of cumulative development would be subject to additional environmental review. As discussed above, the collection of state-mandated fees (pursuant to Section 65995(3)(h) of the California Government Code) is considered full and complete mitigation for impacts to public schools. Through the payment of impact mitigation fees, potential cumulative impacts related to public schools would be adverse, but less than significant (Class III).

Wastewater

Based on the LCSD residential wastewater generation factors, cumulative residential development in the Orcutt Planning Area would generate approximately 0.28 MGD of wastewater. Based on LCSD's wastewater generation rate of 0.000525 MGD per 1,000 square feet of non-residential use, cumulative non-residential development in the Orcutt Planning Area would generate approximately 0.34 MGD of wastewater. In total, buildout of the Orcutt Planning Area would increase wastewater generation by an estimated 0.62 MGD. Existing plus cumulative development would generate approximately 2.32 MGD of wastewater, which represents approximately 60 percent of the treatment plant's permitted capacity of 3.7 MGD. Therefore, cumulative wastewater demand in the Orcutt Planning Area would not exceed the 75 percent capacity checkpoint threshold for the plant's design capacity. As such, cumulative wastewater impacts would be less than significant (Class III).

Solid Waste

The proposed development, in conjunction with other planned and pending development in the Santa Maria/Orcutt area, would increase solid waste generation, thereby reducing the lifespan of solid waste landfills serving the area. The project would contribute incrementally to the cumulative impact to landfill capacity. The project would generate 208 tons of additional waste per year, after accounting for 50 percent waste reduction. Implementation of Mitigation Measure PS/R-3 would reduce solid waste generation during the construction phase of the project and during project operation. However, waste generated by the project would still exceed the County's 40 tons per year

cumulative solid waste threshold. Therefore, the project would result in significant and unavoidable (Class I) contribution to cumulative solid waste impacts.

Police Protection

Residential development under cumulative conditions would generate additional residents, thereby increasing the demand on police services. As with the project, new development in the Orcutt Planning Area would be subject to the County's police protection service mitigation fee, which provides funding for capital facilities and related equipment associated with hiring new Sheriff deputies required to serve new development. Payment of the required police protection service mitigation fee also implements OCP EIR Mitigation Measure POL-1. Although development of new police protection facilities could result in environmental impacts, the evaluation of such impacts would be speculative because the location and timing of such facilities is not known at this time. Future facilities that would be constructed would be subject to environmental review and potential indirect physical impacts associated with construction of new police protection facilities would be addressed through separate CEQA review on a case-by-case basis. Therefore, the payment of the required police protection service mitigation fees would ensure that cumulative impacts to police services would remain less than significant (Class III).

Recreation

The project provides public open space improvements, including a public trail connection that is identified in the OCP. The project, in conjunction with other planned and pending development in the Orcutt Planning Area, would increase demand on recreational facilities. However, payment of Quimby Act park fees would be required for new subdivisions in the Orcutt area, and these fees would be used to develop additional public parks serving the OCP area. Although development of new parks and recreation facilities could result in environmental impacts, the evaluation of such impacts would be speculative because the location and timing of such facilities is not known at this time. Future facilities that would be constructed would be subject to environmental review and potential indirect physical impacts associated with construction of new parks and recreation facilities would be addressed through separate CEQA review on a case-by-case basis. Therefore, the payment of the County's required parkland development impact fees would ensure compliance with the policies and performance standards in the OCP as part of the project, and cumulative impacts to recreational facilities would be less than significant (Class III).

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4.13 Transportation and Circulation

This section provides analyses of the potential traffic and circulation impacts associated with the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project in the Orcutt Community Plan (OCP) area in northern Santa Barbara County. This section outlines the results of the Traffic and Circulation Study prepared for the project by Stantec in May 2019 and peer reviewed by Associated Transportation Engineers and Rincon Consultants, Inc. (Appendix K).

4.13.1 Setting

a. Study Area

The study area for the evaluation of potential transportation and circulation impacts associated with the project is the western portion of the OCP area, generally bounded by Black Road to the west, SR 135 to the east, Union Valley Parkway to the north and the SR 1 to the south. The roadway segments and intersections identified for analysis were obtained from County staff. Table 4.13-1 lists the key roadways and intersections included in the traffic analysis. The principal components of the study area street network are illustrated in Figure 4.13-1.

Table 4.13-1 Study Area Roadways and Intersections

Roadways	Intersections
SR 1 n/o Solomon Rd	SR 1/Black Rd
SR 1 n/o Clark Ave	SR 1/Solomon Rd
Solomon Rd e/o SR 1	SR 1/Clark Ave
Clark Ave w/o Broadway St	Broadway St/Clark Ave
Clark Ave w/o Norris St	Foxenwood Ln/Clark Ave
Clark Ave e/o Orcutt Rd	SR 135 SB Ramps/Clark Ave
	SR 135 NB Ramps/Clark Ave
	Orcutt Rd/Clarke Ave

Source: Traffic and Circulation Study, Appendix K

b. Level of Service Criteria

Traffic operations presented in this section are based on “Levels of Service” (LOS) methodologies and procedures outlined in the Highway Capacity Manual (HCM; Transportation Research Board 2016). As outlined in the HCM, LOS is measured on an A-F scale, with LOS A representing the best operating conditions from a traveler’s perspective and LOS F representing conditions where demands exceed capacity. The County’s acceptable level of service standard for roadways and intersections within the Orcutt Planning Area is LOS C, except that LOS D is required to be maintained at all Clark Avenue roadway segments and intersections between Blosser Road on the west and Foxenwood Lane on the east (County Board of Supervisors Resolution 12-294; refer to Appendix K).

Roadways

Levels of service for the roadways within the study area are based on the County's engineering design capacities for roadways and the Circulation Element roadway designations adopted in the OCP. A table discussing the roadway definitions and capacities is included in the Technical Appendix of the Traffic and Circulation Study for the project (Appendix K).

Intersections

Levels of service for signalized intersections under the County's jurisdiction were calculated using the Intersection Capacity Utilization methodology (ICU) and the results are shown as a volume-to-capacity ratio. Level of service for the unsignalized intersections and signalized intersections under the jurisdiction of the California Department of Transportation (Caltrans) were calculated using operations methodologies outlined in the HCM and the results are presented in the average number of seconds of vehicle delay.

c. Street Network

The existing Orcutt roadway classifications are defined by the County Transportation Division and Planning & Development staff to correlate to the Primary and Secondary roadway classification system according to the physical design characteristics of each roadway and the land uses served. The principal components of the study area street network are illustrated in Figure 4.13-1 and briefly discussed below.

State Route 1

SR 1 is a two-lane State highway serving the communities of Guadalupe, Oceano, and Grover Beach to the north; and Lompoc to the south. Just south of the project, SR 1 merges with SR 135 for a short distance. The intersections at Black Road, Solomon Road, and Clark Avenue are controlled by stop signs.

State Route 135

SR 135 is a primary north-south route through the Santa Maria/Orcutt urban area. From its junction with SR 1, SR 135 is a four-lane freeway with a full-access diamond interchange at Clark Avenue. North of Clark Avenue, SR 135 is a limited access four-lane expressway, with signalized access at its intersection with Foster Road and Lakeview Drive.

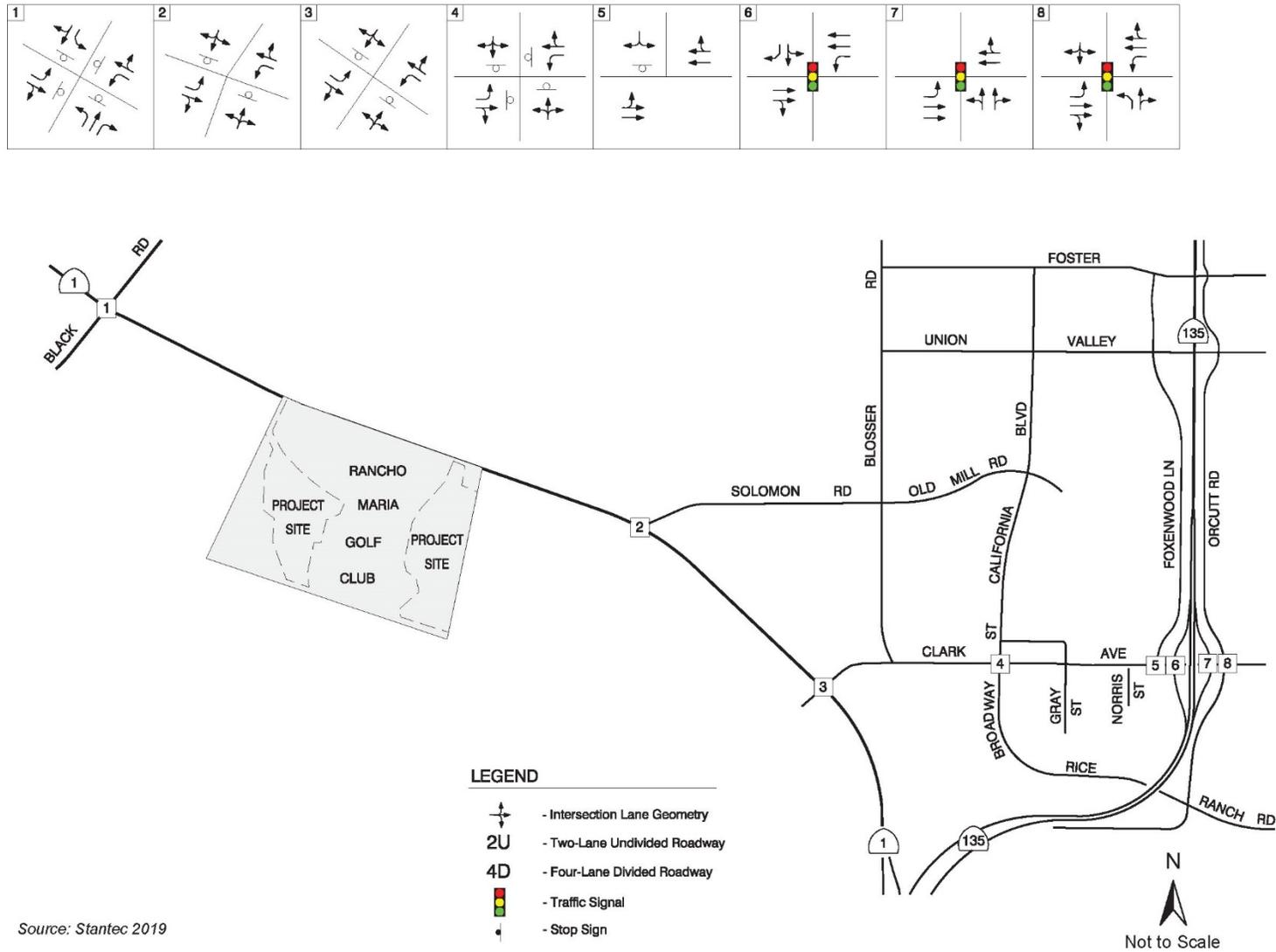
Clark Avenue

Clark Avenue is an east-west arterial that extends through the Orcutt area from east of U.S. 101 to SR 1 on the west. It provides connections to both U.S. 101 and SR 135 via full access interchanges. Clark Avenue is a two-lane Primary 3 roadway between SR 1 and SR 135 and a four-lane Primary 2 roadway east of SR 135.

Broadway Street

Broadway Street is a north-south facility that is classified as a Secondary 2 roadway north of Clark Avenue and a Primary 3 arterial south of Clark Avenue.

Figure 4.13-1 Project Study Area Street Network



Solomon Road

Solomon Road is a two-lane Secondary 1 roadway that extends easterly from SR 1 to Blosser Road. It provides access to the project site from the northeast portion of Orcutt and regional traffic using Union Valley Parkway.

Orcutt Road

Orcutt Road is a two-lane secondary roadway that parallels the east side of Route 135. Orcutt Road extends from north of Lakeview Road to Rice Ranch Road.

d. Roadway Operations

Figure 4.13-2 illustrates the existing average daily traffic (ADT) volumes for the study area roadway segments. The existing ADT volumes were collected in May 2018 for this study (count data is contained in the Technical Appendix of the Traffic and Circulation Study [Appendix K]). The roadway classifications, design capacities, traffic volumes, and levels of service are summarized in Table 4.13-2.

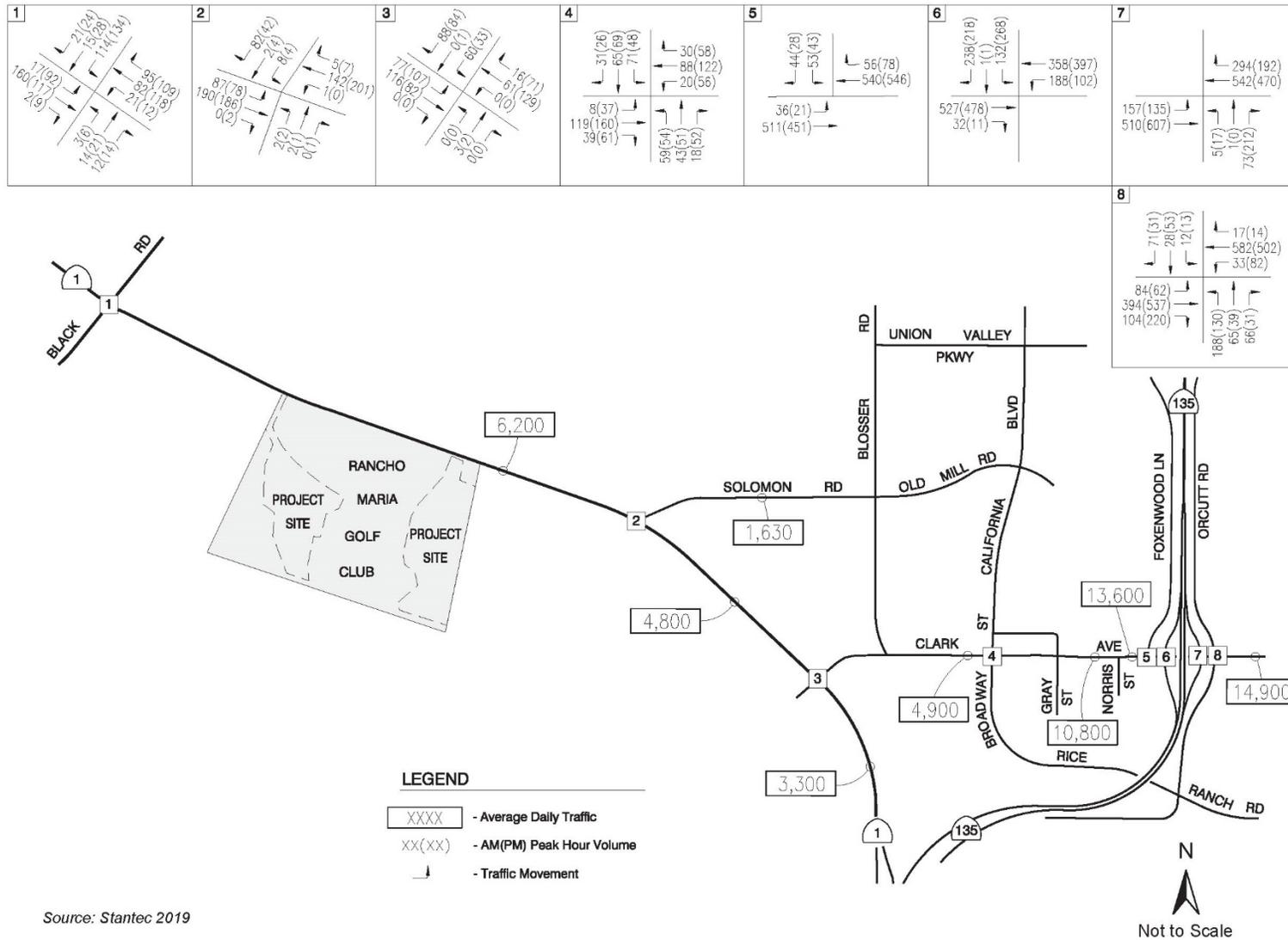
Table 4.13-2 Existing Levels of Service – Roadway Segments

Roadway Segment	Classification	Number of Lanes	Existing ADT	Acceptable LOS Threshold	Existing LOS
SR 1 n/o Solomon Rd	Primary 1	2	6,200	15,900	LOS A
SR 1 n/o Clark Ave	Primary 1	2	4,800	15,900	LOS A
Solomon Rd e/o SR 1	Secondary 1	2	1,630	7,300	LOS A
Clark Ave w/o Broadway St	Primary 3	2	4,900	12,500	LOS A
Clark Ave w/o Norris St	Primary 3	2	10,800	14,100 ¹	LOS B
Clark Ave w/o Foxenwood Ln	Primary 3	4	13,600	33,900 ¹	LOS A
Clark Ave e/o Orcutt Rd	Primary 2	4	14,900	34,000	LOS A

¹ Acceptable level of service threshold for roadway segment is LOS D.
 Source: Traffic and Circulation Study, Appendix K

Comparison of the existing ADT volume and the corresponding design capacity for each roadway shows that the roadway segments in the study area currently operate at LOS A, which is acceptable based on the County’s standards.

Figure 4.13-2 Existing Traffic Volumes



e. Intersection Operations

Levels of service were calculated for study area intersections using the AM and PM peak hour traffic volumes illustrated in Figure 4.13-2 (counts collected in May 2018; refer to count data in Appendix K). Existing levels of service are summarized in Table 4.13-3 (level of service worksheets are included in Appendix K).

Table 4.13-3 Existing Levels of Service – Intersections

Intersection	Control	AM Peak Hour		PM Peak Hour	
		Delay	V/C Ratio	Delay	V/C Ratio
SR 1/Black Rd	All-Way Stop	10.2 sec/LOS B	–	11.2 sec/LOS B	–
SR 1/Solomon Rd	Two-Way Stop	14.7 sec/LOS B	–	13.6 sec/LOS B	–
SR 1/Clark Ave	Two-Way Stop	12.0 sec/LOS B	–	13.9 sec/LOS B	–
Broadway St/Clark Ave	All-Way Stop	9.7 sec/LOS A	–	10.5 sec/LOS B	–
Foxenwood Ln/Clark Ave	One-Way Stop	18.2 sec/LOS C	–	16.9 sec/LOS C	–
SR 135 SB Ramps/Clark Ave	Signal	18.1 sec/LOS B	0.47/LOS A	15.4 sec/LOS B	0.48/LOS A
SR 135 NB Ramps/Clark Ave	Signal	21.7 sec/LOS C	0.48/LOS A	16.1 sec/LOS B	0.46/LOS A
Orcutt Rd/Clarke Ave	Signal	–	0.53/LOS A	–	0.53/LOS A

Source: Traffic and Circulation Study, Appendix K

As shown, the study area intersections currently operate at LOS C or better during the AM and PM peak hours, which is acceptable based on the County’s LOS C standard.

f. Planned Roadway Improvements

The Orcutt Transportation Improvement Plan (OTIP) identifies long-term public improvements to roadways and alternative transportation facilities targeted to provide for acceptable levels of service on roadways and intersections within the Orcutt Planning Area. The Orcutt Transportation Improvement Plan (OTIP) requires fees for transportation impacts caused by new development in the Orcutt Planning Area. These fees may be used for roads, pedestrian facilities, transit and bicycle facilities.

4.13.2 Previous Environmental Review

The OCP EIR analyzed the operation of the arterial and collector street system serving the Orcutt Planning Area with development under the OCP in the Traffic/Circulation section of the document. The OCP EIR determined that buildout of the OCP would result in two significant and unavoidable (Class I) impacts to traffic/circulation associated with increased traffic volumes/delays and roadway congestion and traffic safety hazards at 10-Year buildout of the OCP. The OCP EIR determined that buildout of the OCP would result in three additional significant and unavoidable (Class I) impacts to traffic/circulation associated with increased traffic volumes/delays, intersection traffic delays, and

roadway congestion and traffic safety hazards at full buildout of the OCP. Site specific analysis was not performed for traffic/circulation at Key Site 21.

The OCP EIR identified four potentially significant traffic impacts that pertain to development on Key Site 21, including: increased roadway congestion and traffic safety hazards at 10-Year buildout, creation of alternative transportation mode deficits at 10-Year buildout and full buildout, and increased traffic volumes at unsignalized intersections at full buildout. The EIR identified measures that would minimize potential traffic/circulation impacts, including realignment of Foxenwood Lane and/or construction of a landscaped center median on Clark Avenue (CIRC-7), implementation of traffic fee programs and improvements for new alternative transportation facilities and services (CIRC-8 through CIRC-14), and installation of traffic signals, restriping, and roadway widening improvements at various intersections and roadway segments (CIRC-19 through CIRC-22, and CIRC-24). The OCP EIR determined that implementation of feasible mitigation measures would reduce the identified traffic/circulation impacts that apply to the project study area intersections and roadway segments to a less than significant level (Class II).

4.13.3 Impact Analysis

a. Methodology and Significance Thresholds

Appendix G of the CEQA guidelines considers a project to have a significant impact on transportation and/or circulation if the project would:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment); and/or
- Result in inadequate emergency access.

CEQA Guidelines Section 15064.3(b) provides guidance for determining the significance of transportation impacts. However, as stated therein, lead agencies may elect to be governed by the provisions of Section 15064.3(b) immediately but are not mandated to do so until July 1, 2020.

For the purposes of this analysis, the County's thresholds of significance for traffic impacts, contained in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (March 2018), were used to determine if the project would result in potential traffic impacts. The applicable standards from the OCP were applied to evaluate the project's consistency with County policies for roadway segments. Caltrans standards were used to evaluate potential impacts of the project at State facilities. The applicable traffic thresholds and standards are outlined below.

Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, traffic impacts would be considered significant if the project would:

- Result in traffic that increases the volume-to-capacity (V/C) ratio at local intersections by the values provided in Table 4.13-4.
- Include access to a major road or arterial road that would require access that would create an unsafe situation, a new traffic signal, or major revisions to an existing traffic signal.

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

- Add traffic to a roadway that has design features (e.g., narrow width, road-side ditches, sharp curves, poor sight distance, inadequate pavement structure) that would become a potential safety problem with the addition of project traffic.
- Result in traffic that utilizes a substantial portion of an intersection's capacity where the intersection is currently operating at acceptable levels of service, but with cumulative traffic would degrade to or approach LOS D (V/C 0.80) or lower. Substantial is defined as a minimum change of 0.03 for an intersection which would operate from 0.80 to 0.85, a change of 0.02 for an intersection which would operate from 0.86 to 0.90 and a change of 0.01 for an intersection which would operate greater than 0.90 (LOS E or worse).

Table 4.13-4 Significant Changes in Levels of Service

Intersection Level of Service (Including Project)	Increase in V/C or Trips Greater Than
LOS A	0.20
LOS B	0.15
LOS C	0.10
LOS D	15 trips
LOS E	10 trips
LOS F	5 trips

Source: County of Santa Barbara 2018

According to the OCP Standards for Determination of Project Consistency – Consistency Standards for Primary Roadways (Primary 1 through Primary 3):

- For Primary roadways segments, a project is considered consistent with the OCP where the Estimated Future Volume does not exceed the Acceptable Capacity.
- For Primary roadway segments where the Estimated Future Volume exceeds the Acceptable Capacity, a project is considered consistent with the OCP if:
 - a. Intersections affected by traffic assigned from the project operate at or above minimum level of service standards, or
 - b. If the project provides a contribution toward an alternative transportation project (as defined in the OTIP) that is deemed to offset the effects of project-generated traffic.

Caltrans has established the cusp of the LOS C/D range as the target level of service standard for State Highway intersections. If an existing State Highway facility is operating at less than the target LOS, the existing Measure of Effectiveness (MOE) should be maintained.

b. Project Impacts and Mitigation Measures

Threshold: Would the project result in traffic that increases the volume-to-capacity (V/C) ratio at local intersections?

Impact T-1 THE PROJECT WOULD ADD NEW VEHICLE TRIPS TO STUDY AREA INTERSECTIONS. ALL STUDY AREA INTERSECTIONS WOULD CONTINUE TO OPERATE AT ACCEPTABLE LEVELS OF SERVICE WITH IMPLEMENTATION OF THE PROJECT. THE PROJECT WOULD RESULT IN LESS THAN SIGNIFICANT PROJECT-SPECIFIC INTERSECTION IMPACTS (CLASS III).

Trip generation estimates were developed for the project using the rates for Single-Family Detached Housing (Land Use #210) contained in ITE’s Trip Generation Manual (2017). Trip generation estimates for the project are shown in Table 4.13-5.

Table 4.13-5 Project Trip Generation

Land Use	Size	ADT		AM Peak Hour		PM Peak Hour	
		Rate	Trips	Rate	Trips (in/out)	Rate	Trips (in/out)
Single Family Housing (Land Use #210)	146 units	9.44	1,378	0.74	108 (27/81)	0.99	145 (91/54)

Source: Traffic and Circulation Study, Appendix K

As shown in Table 4.13-5, the project would result in approximately 1,378 daily trips, with 108 trips occurring in the AM peak hour and 145 trips occurring in the PM peak hour.

Project trips were distributed and assigned to the street network based on the trip distribution percentages developed for the Rancho Maria Estates Traffic Impact Study, prepared in September 2005 by Penfield & Smith Engineers, for the project site. The trip distribution percentages were adjusted to account for street network changes that have been implemented since 2005. These changes include the extension of Union Valley Parkway to Blosser Road which provides an alternate route for regional traffic via Blosser Road and Solomon Road to the site. The project distribution pattern is listed in Table 4.13-6. The distribution and assignment of project traffic is illustrated in Figure 4.13-3. The existing + project traffic volumes are shown in Figure 4.13-4.

Table 4.13-6 Project Trip Distribution

Roadway (to/from)	Direction	Trip Distribution
Clark Avenue	East	35%
Union Valley Parkway	Northeast	30%
SR 135	North	15%
SR 1	South	10%
Black Road	North	5%
Old Town Orcutt	East	5%
Total		100%

Source: Traffic and Circulation Study, Appendix K

Figure 4.13-3 Project Trip Distribution and Assignments

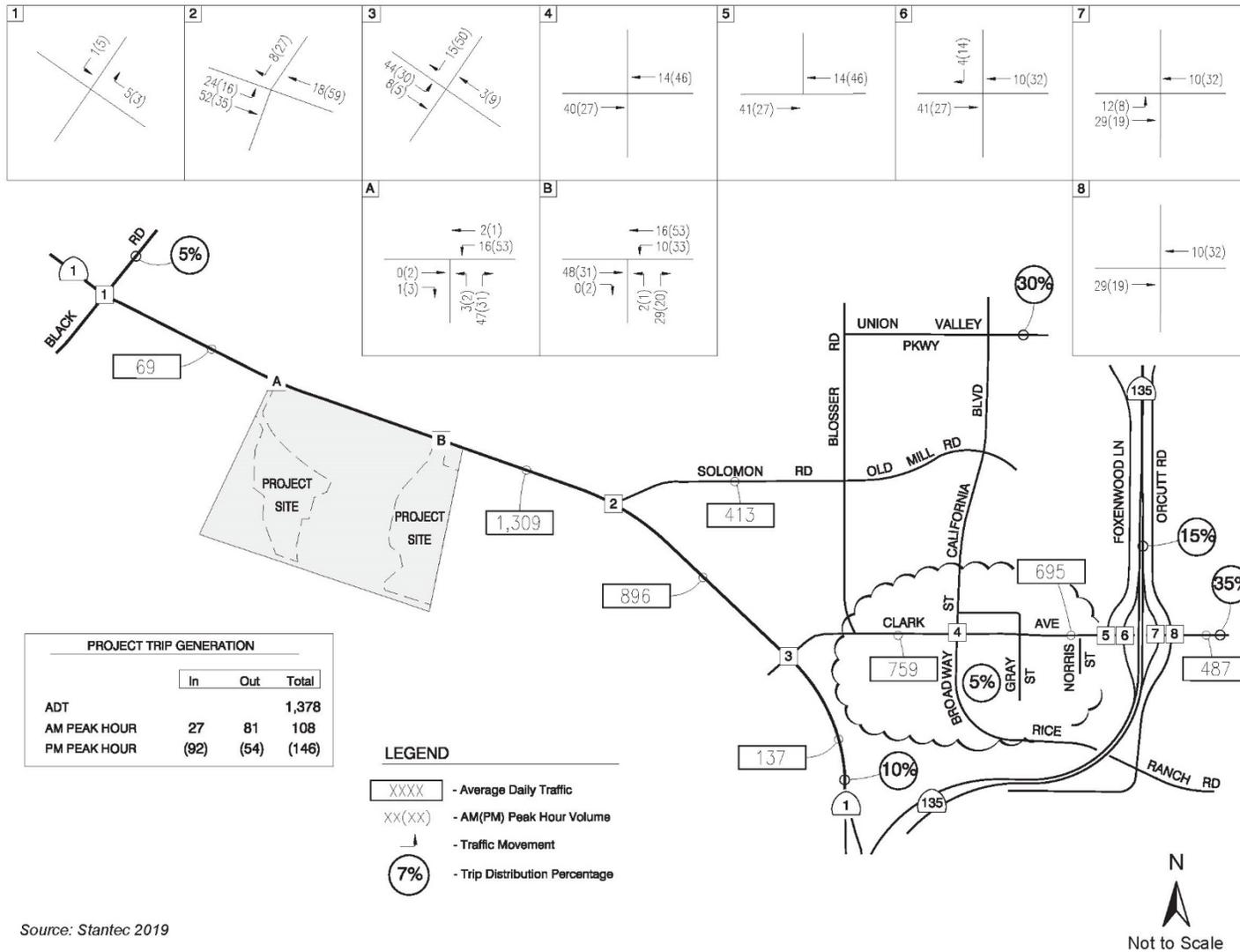
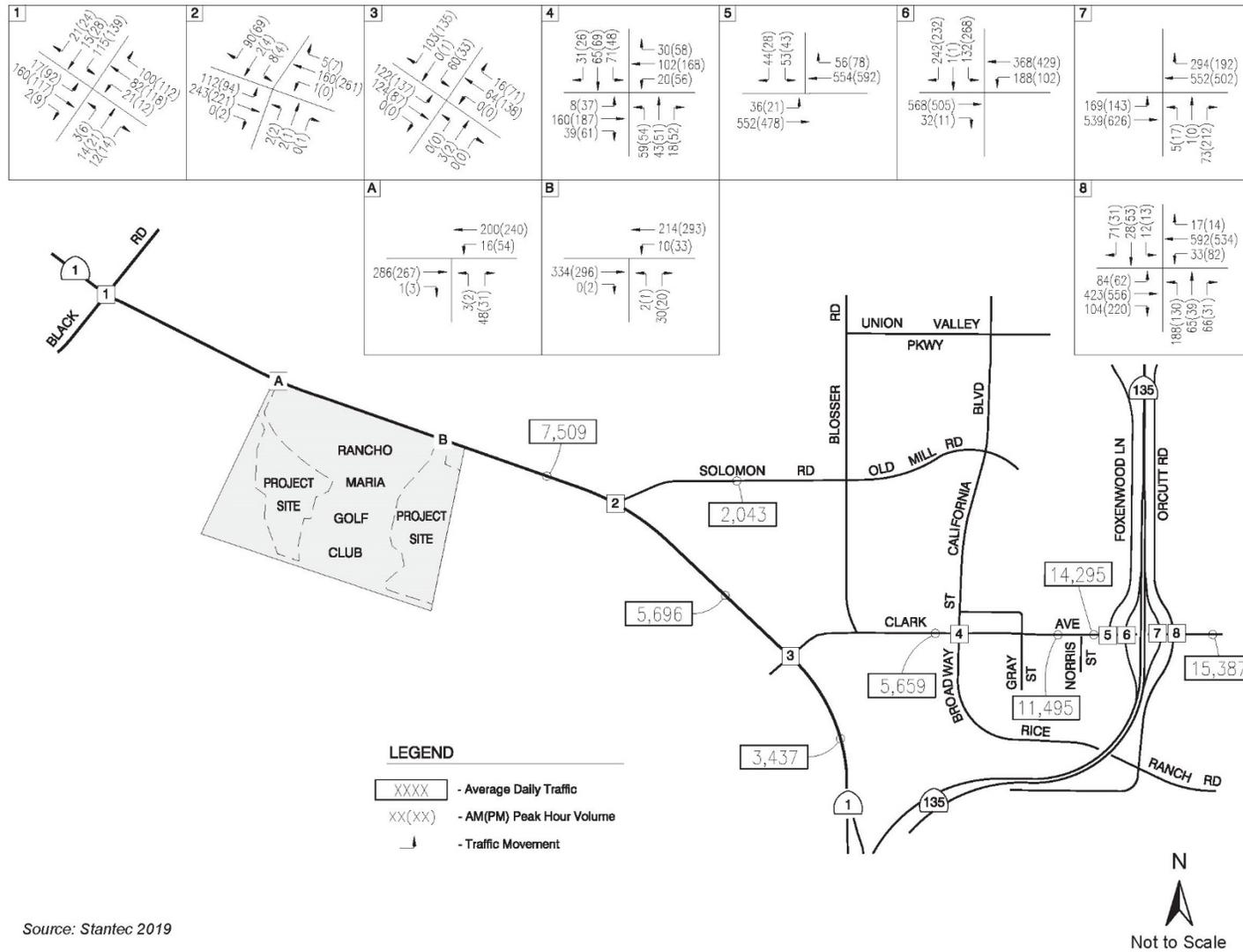


Figure 4.13-4 Existing + Project Traffic Volumes



Source: Stantec 2019

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

Levels of service were calculated for the study area intersections using the existing + project volumes illustrated in Figure 4.13-4. Table 4.13-7 and Table 4.13-8 compare the existing and existing + project levels of service and identify the significance of project-added traffic.

Table 4.13-7 Existing + Project AM Peak Hour Levels of Service – Intersections

Intersection	Existing		Existing + Project		Change in Delay or V/C	Impact?
	Delay	V/C Ratio	Delay	V/C Ratio		
SR 1/Black Rd	10.2 sec/LOS B	–	10.2 sec/LOS B	–	0.0 sec	No
SR 1/Solomon Rd	14.7 sec/LOS B	–	17.1 sec/LOS C	–	2.4 sec	No
SR 1/Clark Ave	12.0 sec/LOS B	–	13.3 sec/LOS B	–	1.3 sec	No
Broadway St/Clark Ave	9.7 sec/LOS A	–	10.1 sec/LOS B	–	0.4 sec	No
Foxenwood Ln/Clark Ave	18.2 sec/LOS C	–	19.0 sec/LOS C	–	0.8 sec	No
SR 135 SB Ramps/Clark Ave	18.1 sec/LOS B	0.47/LOS A	18.6 sec/LOS B	0.49/LOS A	0.5 sec/0.02	No
SR 135 NB Ramps/Clark Ave	21.7 sec/LOS C	0.48/LOS A	21.7 sec/LOS C	0.49/LOS A	0 sec/0.01	No
Orcutt Rd/Clarke Ave	–	0.53/LOS A	–	0.53/LOS A	0.00	No

Source: Traffic and Circulation Study, Appendix K

Table 4.13-8 Existing + Project PM Peak Hour Levels of Service – Intersections

Intersection	Existing		Existing + Project		Change in Delay or V/C	Impact?
	Delay	V/C Ratio	Delay	V/C Ratio		
SR 1/Black Rd	11.2 sec/LOS B	–	11.3 sec/LOS B	–	0.1 sec	No
SR 1/Solomon Rd	13.6 sec/LOS B	–	16.0 sec/LOS C	–	2.4 sec	No
SR 1/Clark Ave	13.9 sec/LOS B	–	15.2 sec/LOS C	–	1.3 sec	No
Broadway St/Clark Ave	10.5 sec/LOS B	–	11.2 sec/LOS B	–	0.7 sec	No
Foxenwood Ln/Clark Ave	16.9 sec/LOS C	–	18.2 sec/LOS C	–	1.3 sec	No
SR 135 SB Ramps/Clark Ave	15.4 sec/LOS B	0.48/LOS A	15.5 sec/LOS B	0.49/LOS A	0.1 sec/0.01	No
SR 135 NB Ramps/Clark Ave	16.1 sec/LOS B	0.46/LOS A	16.4 sec/LOS B	0.48/LOS A	0.3 sec/0.02	No
Orcutt Rd/Clarke Ave	–	0.53/LOS A	–	0.53/LOS A	0.00	No

Source: Traffic and Circulation Study, Appendix K

As shown in Table 4.13-7 and Table 4.13-8, all study area intersections would continue to operate at LOS C or better during the AM and PM peak hours, which is considered acceptable based on County and Caltrans standards. The project would result in less than significant project-specific intersection impacts (Class III).

Mitigation Measures

No mitigation measures are required because this impact would be less than significant (Class III).

Threshold: Would the project result in estimated future volumes of Primary roadway segments that exceed the acceptable capacity?

Impact T-2 THE PROJECT WOULD ADD NEW VEHICLE TRIPS TO STUDY AREA ROADWAYS. ALL STUDY AREA ROADWAY SEGMENTS ARE FORECAST TO OPERATE WITHIN THE COUNTY’S ACCEPTABLE CAPACITY WITH IMPLEMENTATION OF THE PROJECT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

Table 4.13-9 lists the existing + project traffic volumes and levels of service for the study area roadway segments.

Table 4.13-9 Existing + Project Levels of Service – Roadway Segments

Roadway Segment	Classification	Existing ADT	Existing + Project ADT	LOS C Threshold	Existing + Project LOS
SR 1 n/o Solomon Rd	Primary 1	6,200	7,509	15,900	LOS A
SR 1 n/o Clark Ave	Primary 1	4,800	5,696	15,900	LOS A
Solomon Rd e/o SR 1	Secondary 1	1,630	2,043	7,300	LOS A
Clark Ave w/o Broadway St	Primary 3	4,900	5,659	12,500	LOS A
Clark Ave w/o Norris St	Primary 3	10,800	11,495	14,100	LOS C
Clark Ave w/o Foxenwood Ln	Primary 3	13,600	14,295	33,900	LOS A
Clark Ave e/o Orcutt Rd	Primary 2	14,900	15,387	34,000	LOS A

Source: Traffic and Circulation Study, Appendix K

As shown in Table 4.13-9, the study area roadway segments are forecast to operate at LOS C or better with existing + project traffic volumes, which meets the County’s standard. Therefore, the project would not significantly impact the study area roadway segments (Class III).

Mitigation Measures

No mitigation measures are required because this impact would be less than significant (Class III).

Threshold:	Would the project include access to a major road or arterial road that would require access that would create an unsafe situation, a new traffic signal, or major revisions to an existing traffic signal?
Threshold:	Would the project add traffic to a roadway that has design features (e.g., narrow width, road-side ditches, sharp curves, poor sight distance, inadequate pavement structure) that would become a potential safety problem with the addition of project traffic?

Impact T-3 THE PROJECT INCLUDES TWO NEW FULL-ACCESS CONNECTIONS AND ONE NEW SECONDARY ACCESS CONNECTION TO STATE ROUTE 1. PROJECT ACCESS AND DESIGN WOULD NOT RESULT IN NEW OR EXACERBATED SAFETY ISSUES AT THESE LOCATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

Access to the site is proposed via one full-access connection to SR 1 at the western boundary of the site and one full-access connection to SR 1 between the RMGC entrance and the eastern boundary of the site (refer to Figure 2-3 and 2-4 in Section 2, *Project Description*, which show the development plans for the proposed neighborhoods). Secondary (emergency) access is proposed via a right-turn in-and-out only connection to SR 1 and a driveway that would extend from the RMGC parking lot.

Intersection design, including left-turn channelization and deceleration to widen SR 1 at the two full-access intersections for the project, would be required to conform to the design criteria contained in Topic 405 – Intersection Design Standards of the Caltrans Highway Design Manual (HDM; 2018). As discussed in Section 2, *Project Description*, Caltrans will be a responsible agency for reviewing and approving the frontage improvements within Caltrans right-of-way along SR 1.

The Traffic and Circulation Study for the project (Appendix K) included a sight distance analysis for the proposed access connections to SR 1. The sight distance analysis was conducted pursuant the criteria contained in the HDM, which indicates a minimum corner sight distance requirement of 715 feet assuming a design speed of 65 MPH on SR 1. Figure 4.13-5 illustrates that the project would meet the required minimum sight distance standards.

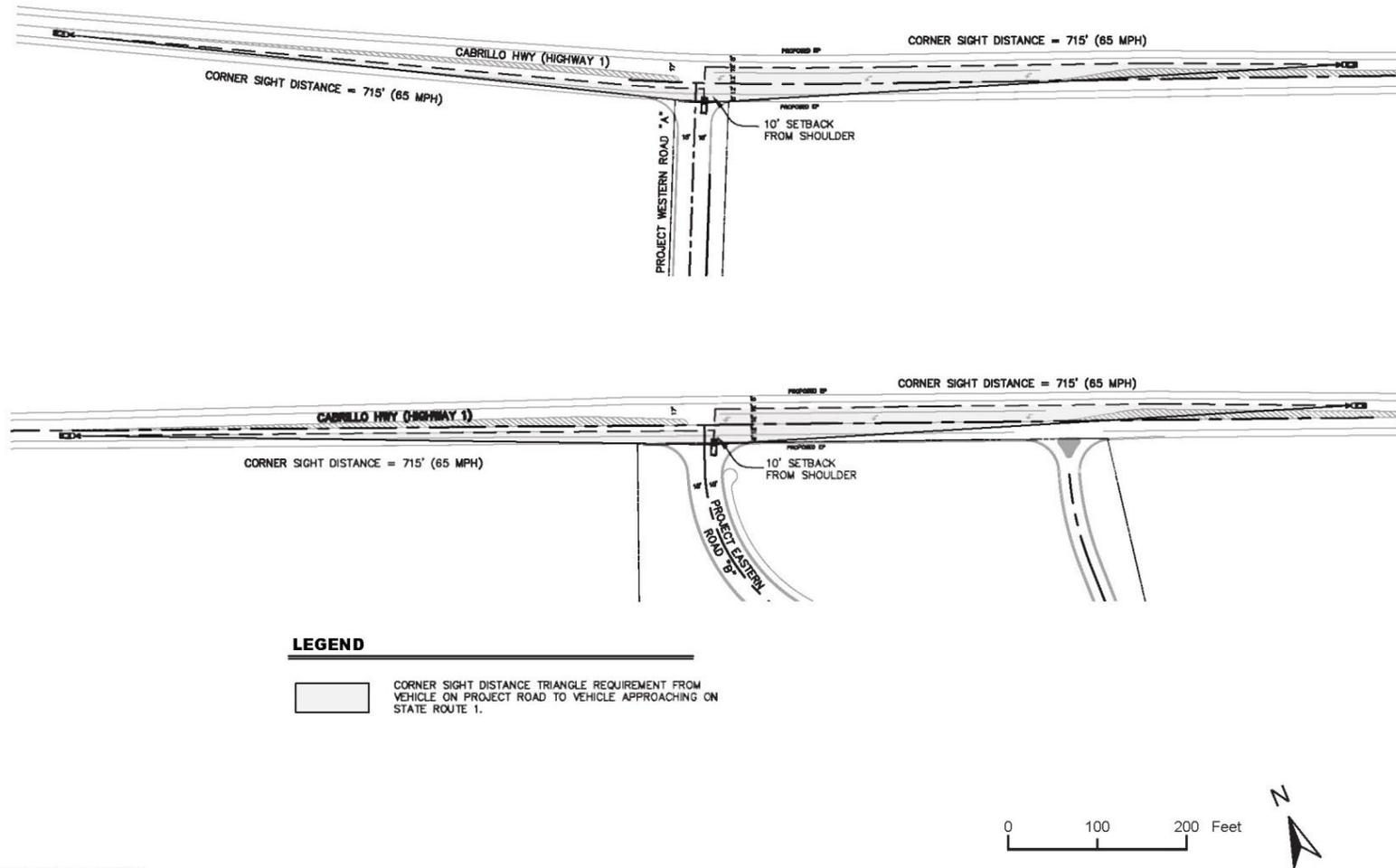
As shown in Figure 2-3 in Section 2, *Project Description*, the on-site circulation for the eastern Hidden Canyon Neighborhood consists of one main driveway and residential streets. Secondary (emergency) access to the Hidden Canyon Neighborhood is proposed via a 25-foot driveway located along the site’s eastern boundary. As shown in Figure 2-4 in Section 2, *Project Description*, the on-site circulation for the Willow Creek Neighborhood consists of a main driveway that connects to the residential streets serving the single-family dwellings. Secondary (emergency) access to the Willow Creek Neighborhood would be via the proposed connection to the RMGC parking lot. The on-site circulation plan would be designed pursuant to County design standards to accommodate emergency vehicles, service vehicles and delivery trucks.

The project does not include hazardous transportation design elements, a new traffic signal or major revisions to an existing traffic signal and would not add traffic to a roadway that has design features that would become a potential safety problem, or otherwise create an unsafe situation. Therefore, this impact would be less than significant (Class III).

Mitigation Measures

No mitigation measures are required because this impact would be less than significant (Class III).

Figure 4.13-5 Project Driveways – Corner Site Distances



Source: Stantec 2019

c. Cumulative Impacts

Threshold: Would the project result in traffic that utilizes a substantial portion of an intersection's capacity where the intersection is currently operating at acceptable levels of service, but with cumulative traffic would degrade to or approach LOS D (V/C 0.80) or lower?
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Impact T-4 THE PROJECT WOULD CONTRIBUTE NEW VEHICLE TRIPS TO CUMULATIVE TRAFFIC CONDITIONS THAT WOULD RESULT IN AN UNACCEPTABLE LEVEL OF SERVICE AT THE FOXENWOOD LANE/CLARK AVENUE INTERSECTION. THIS CUMULATIVE IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE (CLASS I).

The cumulative traffic forecasts assume development of approved and pending projects in the Santa Maria Valley (including Old Town Orcutt and the OCP, and projects outside of a community or Specific Plan area) that would contribute to traffic on area roadways and at intersections. The County's Cumulative Projects List (September 2017) and the City of Santa Maria Major Developments List (January 2018) are included in the Technical Appendix of the Traffic and Circulation Study for the project (Appendix K). Pending and approved projects that have a direct effect on the study area roadway network include the North County Jail (Black Road and Betteravia Road), Key Site 17 (Old Town Orcutt), Key Site 11, Key Site 18 (Oasis Community Center) and the Rice Ranch Specific Plan. Cumulative and cumulative + project traffic volumes are shown in Figure 4.13-6 and Figure 4.13-7.

Frontage improvements associated with the proposed Oasis Community Center, located north of Clark Avenue and west of Foxenwood Lane, include constructing a raised median on Clark Avenue from Norris Street to Foxenwood Lane and providing an eastbound left-turn lane at the Clark Avenue/Foxenwood Lane intersection. Other improvements associated with this proposed project include reducing the number of eastbound lanes on Clark Avenue from two lanes to one lane and widening and restriping Foxenwood Lane to provide separate southbound left-turn and right-turn lanes.

Figure 4.13-6 Cumulative Traffic Volumes

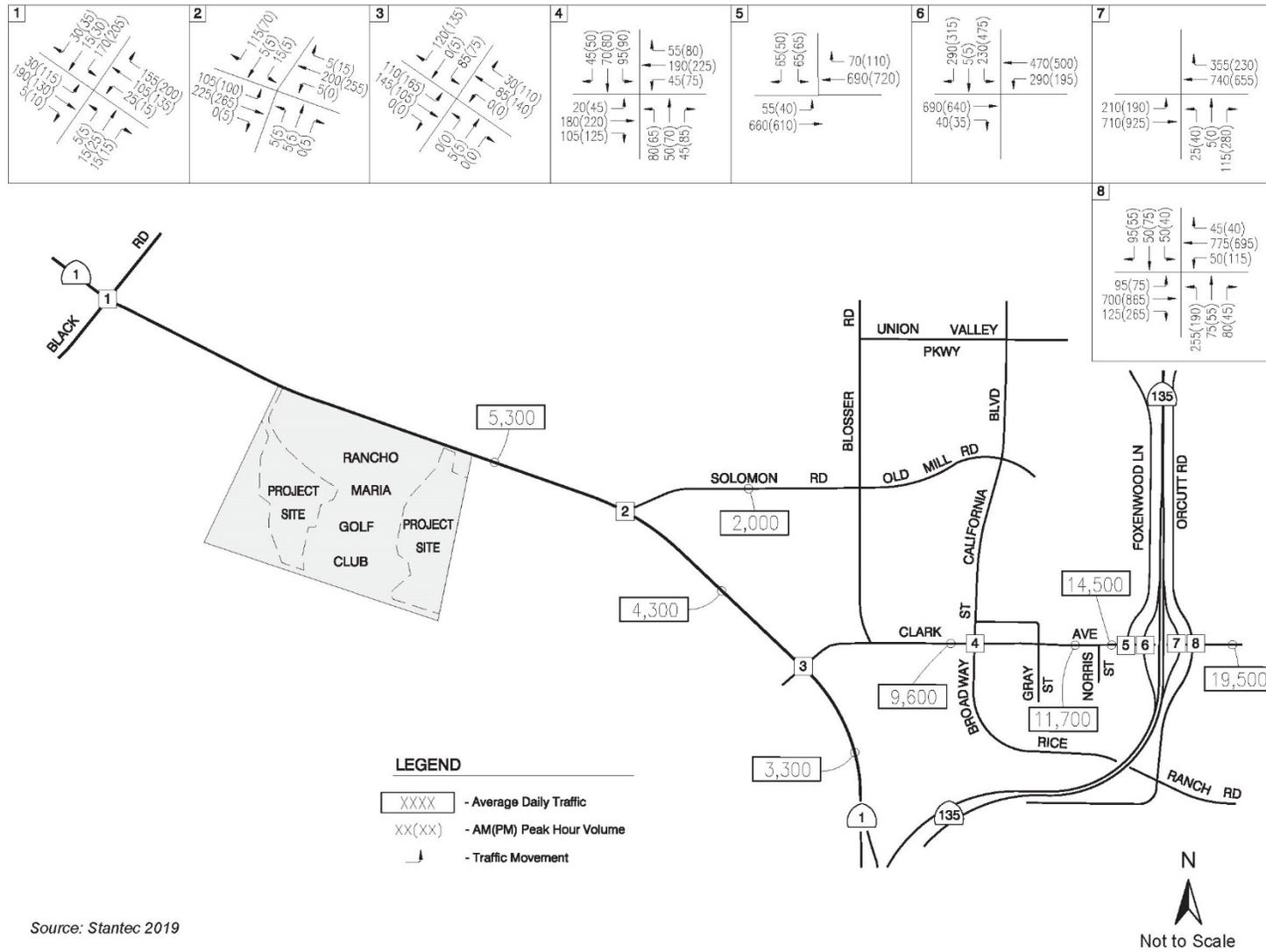
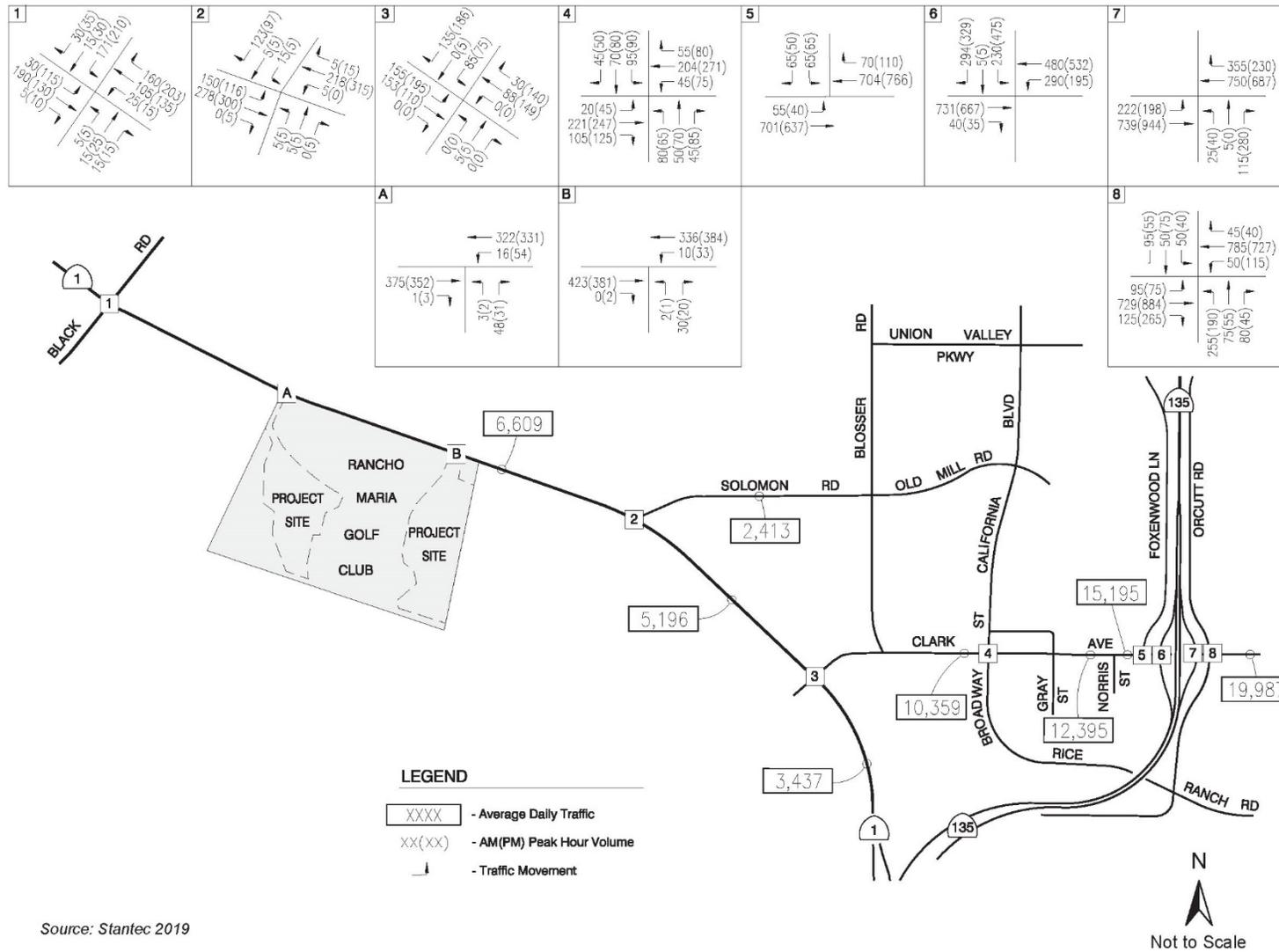


Figure 4.13-7 Cumulative + Project Traffic Volumes



Source: Stantec 2019

Cumulative Roadway Impacts

Table 4.13-10 shows the cumulative and cumulative + project levels of service for the study area roadways.

Table 4.13-10 Cumulative + Project Levels of Service – Roadway Segments

Roadway Segment	Classification	Cumulative ADT	Cumulative + Project ADT	LOS C Threshold	Cumulative + Project LOS
SR 1 n/o Solomon Rd	Primary 1	5,300	6,609	15,900	LOS A
SR 1 n/o Clark Ave	Primary 1	4,300	5,196	15,900	LOS A
Solomon Rd e/o SR 1	Secondary 1	2,000	2,413	7,300	LOS A
Clark Ave w/o Broadway St	Primary 3	9,600	10,359	12,500	LOS B
Clark Ave w/o Norris St	Primary 3	11,700	12,395	14,100	LOS C
Clark Ave w/o Foxenwood Ln ¹	Primary 3	14,500	15,195	25,400	LOS A
Clark Ave e/o Orcutt Rd	Primary 2	19,500	19,987	34,000	LOS A

¹ LOS C threshold capacity adjusted from 33,900 ADT (Primary 3 roadway with 4 lanes) to 25,400 ADT (Primary 3 roadway with 3 lanes) to account for EB lane reduction from two lanes to one lane

Source: Traffic and Circulation Study, Appendix K

As shown in Table 4.13-10, the study area roadway segments are forecast to operate at LOS C or better under cumulative + project conditions. The project would result in less than significant roadway impacts under cumulative conditions (Class III).

Cumulative Intersection Impacts

Levels of service were calculated for the study area intersections using the cumulative and cumulative + project volumes shown in Figure 4.13-6 and Figure 4.13-7. Table 4.13-11 and Table 4.13-12 compare the cumulative and cumulative + project forecasts.

Table 4.13-11 Cumulative + Project AM Peak Hour Levels of Service – Intersections

Intersection	Cumulative		Cumulative + Project		Change in Delay or V/C	Impact?
	Delay	V/C Ratio	Delay	V/C Ratio		
SR 1/Black Rd	12.6 sec/LOS B	–	12.7 sec/LOS B	–	0.1 sec	No
SR 1/Solomon Rd	18.3 sec/LOS C	–	21.0 sec/LOS C	–	2.7 sec	No
SR 1/Clark Ave	13.7 sec/LOS B	–	15.6 sec/LOS C	–	1.9 sec	No
Broadway St/Clark Ave	13.0 sec/LOS B	–	14.9 sec/LOS B	–	1.9 sec	No
Foxenwood Ln/Clark Ave	>50.0 sec/LOS F	–	>50.0 sec/LOS F	–	10.5 sec	Yes
SR 135 SB Ramps/Clark Ave	22.5 sec/LOS C	0.66/LOS B	23.7 sec/LOS C	0.67/LOS B	1.2 sec/0.01	No
SR 135 NB Ramps/Clark Ave	29.6 sec/LOS C	0.62/LOS B	30.4 sec/LOS C	0.64/LOS B	0.5 sec/0.02	No
Orcutt Rd/Clarke Ave	–	0.70/LOS B	–	0.70/LOS B	0.00	No

Bolded values exceed County LOS C standard.

Source: Traffic and Circulation Study, Appendix K

Table 4.13-12 Cumulative + Project PM Peak Hour Levels of Service – Intersections

Intersection	Cumulative		Cumulative + Project		Change in Delay or V/C	Impact?
	Delay	V/C Ratio	Delay	V/C Ratio		
SR 1/Black Rd	15.5 sec/LOS C	–	15.6 sec/LOS C	–	0.1 sec	No
SR 1/Solomon Rd	16.4 sec/LOS C	–	19.7 sec/LOS C	–	3.3 sec	No
SR 1/Clark Ave	18.3 sec/LOS C	–	22.0 sec/LOS C	–	3.7 sec	No
Broadway St/Clark Ave	16.5 sec/LOS C	–	19.5 sec/LOS C	–	3.0 sec	No
Foxenwood Ln/Clark Ave	>50.0 sec/LOS F	–	>50.0 sec/LOS F	–	13.8 sec	Yes
SR 135 SB Ramps/Clark Ave	23.3 sec/LOS C	0.73/LOS C	23.6 sec/LOS C	0.74/LOS C	0.3 sec/0.01	No
SR 135 NB Ramps/Clark Ave	17.6 sec/LOS B	0.60/LOS A	18.3 sec/LOS B	0.61/LOS B	0.7 sec/0.01	No
Orcutt Rd/Clarke Ave	–	0.75/LOS C	–	0.76/LOS C	0.01	No

Bolded values exceed County LOS C standard.

Source: Traffic and Circulation Study, Appendix K

The cumulative + project level of service forecasts shown in Table 4.13-11 and Table 4.13-12 show that most of the study area intersections are forecast to operate at LOS C or better during the AM and PM peak hours under cumulative + project conditions, which is considered acceptable based on County and Caltrans standards.

The project would contribute to significant cumulative impacts at the Foxenwood Lane/Clark Avenue intersection, which is forecast to operate at LOS F during the AM and PM peak traffic hours under both cumulative and cumulative + project conditions. The project would add 10.5 seconds to the vehicle delays during the AM peak hour and 13.8 seconds to the vehicle delays during the PM peak hour, which exceed the County’s cumulative impact threshold for intersections forecast to operate at LOS F. This cumulative impact would be potentially significant.

Mitigation Measures

As discussed above, the project would contribute to significant cumulative impacts at the Foxenwood Lane/Clark Avenue intersection, which is forecast to operate at LOS F during the AM and PM peak traffic hours under both cumulative and cumulative + project conditions. To offset project contributions to cumulative traffic impacts, the project applicant shall contribute fair share transportation fees to mitigate impacts to the existing circulation system in the Orcutt Planning Area (OPA). The amount of the fee would be determined by the County Public Works/Transportation Division, based on adopted fee schedules at the time of payment.

This potential cumulative impact would be reduced by payment of the transportation impact fee for transportation improvements identified in the Orcutt Transportation Improvement Plan (OTIP). The OTIP contains a listing of roadway and intersection improvements, neighborhood “traffic calming” measures and other roadway improvements (i.e., sidewalks, bus turn outs, etc.) that would mitigate future development while reducing travel times throughout the planning area. Installation of a traffic signal at the Foxenwood Lane/Clark Avenue intersection would result in a signalized corridor from Foxenwood Lane to Orcutt Road with coordinated traffic signals, and the intersection would operate at LOS C or better under cumulative conditions. However, the SR 135 ramps immediately east of the intersection and Orcutt Creek corridor west of the intersection have historically represented physical constraints that limit signalization options at this intersection. In addition, the cumulative traffic volumes do not satisfy traffic signal warrants. County Public Works/Transportation Division would be responsible for determining the appropriate intersection improvements at the time of implementation, but for the purpose of this analysis, signalization of the Foxenwood Lane/Clark Avenue intersection is considered potentially infeasible.

As a result of feasibility concerns associated with potential mitigation options at the Foxenwood Lane/Clark Avenue intersection, the project contribution to cumulative impacts would remain significant and unavoidable (Class I).

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4.14 Water Resources and Flooding

4.14.1 Setting

a. Project Site Setting

The Specific Plan area is located at the base of the northern flanks of the east-west trending Casmalia Hills. The topography consists of gentle slopes that reach 420 feet in elevation along the southern perimeter of the site, dropping to 220 feet elevation at the northwest corner of the property. Orcutt Creek is located approximately 2,500 feet to the north of the Specific Plan area. Three unnamed drainages flow in a northwesterly direction across the Specific Plan Area and are tributaries to Orcutt Creek. Runoff drains by sheet flow and outlets to a culvert crossing beneath State Route 1 (SR 1). Some runoff from the site is detained in existing ponds on Key Site 21.

The Central Coast Regional Water Quality Control Board (RWQCB) has listed Orcutt Creek as impaired from a variety of pollutants, including metalloids, nutrients, pathogens, pesticides, excessive salinity, toxicity, turbidity, and high water temperature (Central Coast RWQCB, 2018).

The Federal Emergency Management Agency (FEMA) designated 100-year floodplain ranges from 250 to 2,000 feet wide along Orcutt Creek. According to FEMA Flood Insurance Maps (FIRMs), the entire project area is outside the 100-year and 500-year floodplain.

The Specific Plan area overlies the Santa Maria Groundwater Basin (SMGB) and is within the Santa Maria Valley Management Area. The Rancho Maria Golf Club (RMGC) currently obtains its water supply from the SMGB through an on-site well. Existing water demand includes domestic use at the RMGC clubhouse and golf course irrigation.

b. Water Quality Background

The following is a summary of information from the Santa Barbara County Public Works Water Resources Division and is intended to provide sufficient background material to allow consideration of the potential hydrology and water quality impacts of the project.

Storm Water Runoff

Storm water runoff from lands modified by human activities can harm surface water resources and, in turn, cause or contribute to an exceedance of water quality standards by changing natural hydrologic patterns, accelerating stream flows, destroying aquatic habitat, and elevating pollutant concentrations. Such runoff may contain or mobilize high levels of contaminants, such as sediment, suspended solids, nutrients (phosphorous and nitrogen), heavy metals and other toxic pollutants, pathogens, oxygen-demanding substances, and floatables. After a storm event, water runoff carries these pollutants into nearby streams, rivers, lakes, estuaries, wetlands, and oceans. The highest concentrations of these contaminants often are contained in “first flush” discharges, which occur during the first major storm after an extended dry period. Individually and combined, these pollutants impair water quality, threatening designated beneficial uses and causing habitat alteration or destruction.

Urbanization alters the natural infiltration capability of the land and generates a host of pollutants that are associated with the activities of dense populations, thus causing an increase in storm water runoff volumes and pollutant loading in storm water that is discharged to receiving water bodies.

Urban development increases the amount of impervious surface in a watershed as farmland, forests, and other natural vegetation with natural infiltration characteristics are converted into buildings with rooftops, driveways, sidewalks, roads, and parking lots with virtually no ability to absorb storm water. Storm water runoff washes over these impervious areas, picking up pollutants along the way while gaining speed and volume because of their inability to disperse and filter into the ground. What results are storm water flows that are higher in volume, pollutants, and temperature than the flows from more pervious areas, which have more natural vegetation and soil to filter the runoff. Studies reveal that the level of imperviousness in an area strongly correlates with decreased quality of the nearby receiving waters.

Construction Site Runoff

Polluted storm water runoff from construction sites often flows to storm drains and ultimately is discharged into local rivers and streams. Sediment is usually the main pollutant of concern. Sediment runoff rates from construction sites are typically 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forest lands. Pollutants that are commonly discharged from construction sites include sediment, solid and sanitary wastes, nitrogen (fertilizer), phosphorus (fertilizer), pesticides, concrete truck wash out, construction chemicals, and construction debris.

Post Construction Runoff

There are generally two forms of substantial impacts of post-construction runoff. The first is caused by an increase in the type and quantity of pollutants in storm water runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g., nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried to receiving waters, such as lakes, ponds, and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans. The second kind of post construction runoff impact occurs by increasing the quantity of water delivered to the water body during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from surfaces such as asphalt and concrete and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include stream bank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

c. Water Supply

Currently, all fresh water within the Santa Maria Valley is supplied by groundwater from the SMGB. The basin underlies approximately 110,000 acres of land, including the entire community of Orcutt, and has a storage capacity of 1.1 million acre feet (Santa Barbara County 2012). Due to legal disputes regarding the status of the SMGB and water demands, the SMGB was adjudicated in 2008. Its management is dictated by the courts and requires annual reporting. The Stipulation divided the overall SMGB into three management areas, the largest of which overlies the main Santa Maria Valley (the Santa Maria Valley Management Area, or SMVMA). The SMVMA includes approximately 175 miles of the SMGB in northern Santa Barbara and San Luis Obispo Counties (Luhdorff and Scalmanini Consulting Engineers [LSCE] 2018). The SMVMA encompasses the contiguous area of the Santa Maria Valley, Sisquoc Plain, and Orcutt upland, and is primarily comprised of agricultural land

and areas of native vegetation, as well as the urban areas of Santa Maria, Guadalupe, Orcutt, Sisquoc, and several small developments.

Groundwater levels in the SMVMA have varied greatly over the last 15-20 years. As noted in the 2017 annual report for the SMVMA (LSCE 2018), the shallow and deep groundwater levels across the majority of the SMVMA remain above historical low levels and do not meet Stipulation provisions defining a condition of severe water shortage. Total dissolved solids (TDS) levels in the SMVMA have generally remained stable at or below the California Department of Public Health's secondary standard (e.g., for taste and odor) of 1,000 mg/L. The Santa Maria Valley Management Area Annual Report (California Department of Water Resources 2019) for the SMGB states that the total annual groundwater extraction for the reporting period (January 1, 2018 to December 31, 2018) was 129,956 acre feet. The amount of water imported for supplemental use from the State Water Project was 9,875 acre feet.

Golden State Water Company (GSWC) is a public water provider that serves Orcutt and surrounding areas, which overlie the SMGB. GSWC draws on several water sources to provide water for the Orcutt System. These sources include local groundwater, imported water from the State Water Project (SWP) through a contract with the Central Coast Water Authority (CCWA), purchased and/or assigned water from Santa Maria, and associated return flows that may be recaptured from the SMGB. Currently, groundwater is pumped from 12 wells in the SMGB (GSWC 2016). Since State water is used primarily as a supplemental water supply, the amount received by water purveyors in the County varies each year.

According to the GSWC 2015 Orcutt Urban Water Management Plan, the water supplies available to the Orcutt system are sufficient to meet the projected water demand for each multiple-dry year period because groundwater and purchased water can supply reliable water through 2040. GSWC estimates population using the Santa Barbara County Association of Governments (SBCAG) population, housing, and employment data. The Orcutt System's metered water use in 2015 was calculated to be 5,588 acre-feet per year (AFY). Per capita water use has dropped from over 250 gallons per capita per day (GPCD) based on 10- to 15-year average baseline data to 157 GPCD in 2015 based on 5-year average baseline data (GSWC 2016). The Specific Plan area is located outside of the GSWC Orcutt system location map identified in the 2015 Orcutt Urban Water Management Plan and is outside of GSWC's service area. Under the Santa Maria Groundwater Basin Adjudication Stipulation, all overlying owners that are also stipulating parties have a prior and paramount overlying right, whether or not yet exercised. The water rights for the proposed Specific Plan included in the project are covered by this settlement agreement.

d. Regulatory Setting

Clean Water Act

The Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act or CWA) requires that discharges do not substantially degrade the physical, chemical or biological integrity of the Nation's waters. Specifically, Section 402 established the National Pollutant Discharge Elimination System (NPDES) Regulations for wastewater and other pollutant discharges.

Congress amended the CWA in 1987 to require the implementation of a two-phased program to address storm water discharges. Phase I, promulgated by the U.S. Environmental Protection Agency (EPA) in November 1990, requires NPDES permits for storm water discharges from municipal separate storm sewer systems (MS4s) serving populations of 100,000 or greater, construction sites disturbing greater than 5 acres of land, and ten categories of industrial activities.

The EPA recognized that smaller construction projects (disturbing less than 5 acres) and small municipal separate storm sewers (MS4s¹) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve storm water quality, the EPA promulgated the NPDES Phase II program (*Federal Register* Vol. 64, No. 235, December 8, 1999). The Phase II regulations became effective on February 7, 2000 and require NPDES permits for storm water discharges from regulated small MS4s and for construction sites disturbing more than 1 acre of land. The Phase II regulations published by the EPA designated the urbanized areas² of Santa Barbara County as a regulated small MS4.

In addition, Sections 401 and 404 of the Clean Water Act establish regulations for the discharge of dredged or fill material into waters of the United States and water quality impacts associated with these discharges. In California, the Porter-Cologne Water Quality Control Act establishes waste discharge standards pursuant to the Federal NPDES program, and the state has the authority to issue NPDES permits to individuals, businesses, and municipalities.

National Flood Insurance Program

Flood Insurance Rate Maps issued by the Federal Emergency Management Administration (FEMA) divide flood areas into three zones: Zone A for areas of 100-year flood, base flood elevations not determined; Zone B for areas of 500-year flood; and Zone C for areas of minimal flooding. The National Flood Insurance Program 100-year floodplain is considered to be the base flood condition. This is defined as a flood event of a magnitude that would be equaled or exceeded an average of once during a 100-year period. Floodways are defined as stream channels plus adjacent floodplains that must be kept free of encroachment as much as possible so that 100-year floods can be carried without substantial increases (no more than one foot) in flood elevations. Development in these floodplain areas are subject to the standard conditions of approval of the Santa Barbara County Flood Control and Water Conservation District and the requirements and development standards set forth in the County Flood Plain Management Ordinance (Chapter 15-A of the County Code) and the Development Along Water Courses Ordinance (Chapter 15-B of the County Code).

Project Clean Water

The County of Santa Barbara Water Resources Division, Project Clean Water, has developed the 2012 Storm Water Management Program Guidance Document for Municipal Stormwater Permits. The document provides direction for development and implementation of Best Management Practices (BMP) to address potential stormwater pollution impacts and ensure consistent treatment of water quality, consistent with the NPDES Phase II permit regulations requiring the development of a Storm Water Pollution Prevention Plan (SWPPP) for projects over one acre in size.

Orcutt Community Plan

The Orcutt Community Plan (OCP) incorporates policies and development standards to provide construction- and operational-phase runoff control to reduce flooding impacts and to ensure adequate long-term water availability in the OCP. Several of these were modeled after mitigation measures in the OCP EIR. A summary of the OCP development standards that would apply to the

¹ Those generally serving less than 100,000 people and located in an urbanized area as defined by the Bureau of the Census.

² An urbanized area is a land area comprising one or more places (central place(s)) and the adjacent densely settled surrounding area (the urban fringe) that together have a residential population of at least 50,000 and an overall population density of at least 1,000 people per square mile.

project is provided below. DevStds GEO-O-2.2 through GEO-O-2.6 require the use of erosion control and slope stabilization measures, and are discussed in more detail in Section 4.8, *Geologic Processes*. OCP Policies, Actions, and Development Standards for flooding and drainage include:

- Policy FLD-O-1, which requires flood risks in the Orcutt planning area to be minimized through appropriate design and land use controls;
- Action FLD-O-1.1, which requires designation of 100-year floodplains as open space;
- DevStds FLD-O-1.2 through FLD-O-1.4, which prohibit development within such 100-year floodplains and limits the types of developments in other flood-prone areas;
- Policy FLD-O-2, which requires off-site runoff associated with development to be minimized;
- DevStd FLD-O-2.1, which requires the use of pervious construction materials to limit off-site runoff;
- Policy FLD-O-3, which requires short-term and long-term erosion associated with development to be minimized;
- DevStds FLD-O-3.1 through FLD-O-3.3, which require incorporation of erosion control features into project development;
- Policy FLD-O-4, which require the County to construct and maintain a regional retention basin system in Orcutt as depicted in Figure 35 of the OCP, if feasible; and
- Action FLD-O-4.1 and DevStds FLD-O-4.2 through FLD-O-4.4, which require construction of regional retention basins to accommodate increased runoff associated with project development.

OCP Policies and Development Standards for water resources include:

- Policy WAT-O-1, which requires County staff to actively assist local purveyors, user, special districts and/or regulators in the development of long-term supplemental water to meet present and future water needs for Orcutt.
- DevStd WAT-O-1.3, which creates an infrastructure financing program that requires developers to pay fees sufficient to offset increased water demand to ensure that residents do not have to pay for water supplies necessary to serve new development (Policy WAT-O-6);
- Policy WAT-O-2, which requires that new development must be offset by long-term supplemental water supplies that do not result in further overdraft of the local groundwater basin and that are adequate to meet the project's new water demand. Supplemental water is defined as a source of water other than groundwater, unless the groundwater basin has determined to no longer be in overdraft or the use of groundwater is consistent with the final water rights judgement entered in the Santa Maria Groundwater Basin adjudication;
- DevStd WAT-O-2.2, which requires applicants to provide either a "Can and Will Serve" letter from the California Cities Water Company dated before July 1997 or an "Intent to Serve" letter from the California Cities Water Company or other water purveyors demonstrating that net water demand will be offset by a long-term supplemental water supply if the Basin is in a state of overdraft and the use of groundwater is not consistent with the Santa Maria Basin water rights adjudication; otherwise applicants must demonstrate adequacy of the water supply proposed to serve projects;
- DevStd WAT-O-2.3, which requires the developer to provide a "Can and Will Serve" letter and necessary final contract(s) consistent with the conditions of the discretionary permits and terms of the draft contract(s);

- Policy WAT-O-3, which states that development in Orcutt shall incorporate water efficient design and technology;
- Policy WAT-O-4, which states that previous agricultural historic use shall not be credited toward the water demand for urban development, unless required by law; and
- Policy WAT-O-5, which requires water used to serve new development in Orcutt to have a TDS level of no greater than 425 mg/L.

Santa Maria Basin Water Rights Adjudication

Water rights to the Santa Maria Basin have been adjudicated by the five-phase trial Santa Maria Valley Water Conservation District vs. City of Santa Maria, et. al (Superior Court, County of Santa Clara, Case no. 770214). The Superior Court of California, County of Santa Clara, passed down the Stipulation of the SMGB Litigation in 2008 in order to ensure the Basin's long-term sustainability. Under the Santa Maria Groundwater Basin Adjudication Stipulation, all overlying owners that are also stipulating parties have a prior and paramount overlying right, whether or not yet exercised. The water rights for the proposed Specific Plan included in the project are covered by this settlement agreement.

4.14.2 Previous Environmental Review

The OCP EIR examined potential impacts to regional water resources, flooding, and drainage that would result from development under the OCP in two sections of the document: Flooding and Drainage, and Water Resources. While the Specific Plan area (Key Site 21) was examined in the OCP and associated OCP EIR, a site specific analysis for drainage or water resources at Key Site 21 was not conducted.

The OCP EIR identified potentially significant impacts to water resources associated with residential, commercial-industrial, municipal, and agricultural growth which would contribute to ongoing and increased overdraft of the SMGB by generating an increase in net water demand of 3,304 acre feet per year (AFY) at full buildout. Of this total, the net water demand for new residential units (5,175 units) resulting from full buildout of the OCP would be 3,071 AFY. The net water demand resulting from residential development on Key Site 21 was included in the projected water demand for full buildout of the OCP area.

The OCP EIR identified mitigation measures that would minimize potential water resource impacts, including payment of fees to offset increased water demand (WAT-1), formation of a Community Services District to provide for public control of the planning and implementation of water supply and conservation measures (WAT-2), obtaining additional out-of-basin supplemental water supply through long-term exchange agreement (WAT-3), and project-specific water conservation measures for new development projects (WAT-4). The residual impacts on water resources after mitigation, including cumulative water resource impacts, were identified as significant but feasibly mitigated (Class II) if a commitment were made by the involved water purveyors and agencies to purchase out-of-basin permanent supplemental supplies to offset the new demand associated with buildout under the OCP. Residual impacts would be significant and unavoidable (Class I) if no commitments were made. In compliance with this measure, since 1996, supplemental water has been imported to the County through the State Water Project, reducing potentially significant impacts to water resources to less than significant (Class II).

The OCP EIR identified potentially significant flooding and drainage impacts that pertain to development on Key Site 21, including: increased storm flows from impervious surfaces (FLD-3),

increased runoff and associated sedimentation that could decrease channel and retention basin capacity (FLD-4), and increased sedimentation of farmland in the Guadalupe Lakes area (FLD-5).

The EIR identified mitigation measures that would minimize potentially significant flooding and drainage impacts, including fair share contribution to installation and maintenance for a regional retention basin and other design and maintenance requirements for regional retention basins (FLD-4), erosion control measures and desilting requirements for Orcutt Creek (FLD-6), sedimentation traps and check dams for open space areas associated with structural development projects (FLD-7), use of pervious construction materials to minimize runoff conveyed offsite (FLD-8), and best management practices for drainage outlets into natural creek channels (FLD-10). The OCP EIR determined that implementation of feasible mitigation measures would reduce flooding and drainage impacts, including cumulative impacts, but that residual impacts would remain significant and unavoidable (Class I). In approving the OCP, the Board of Supervisors adopted a Statement of Overriding Considerations for those identified environmental impacts which would have Class I cumulative impacts even after incorporating all feasible mitigation measures.

4.14.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Water demand for the proposed project was estimated using consumptive use factors obtained from the County of Santa Barbara Environmental Thresholds and Guidelines Manual (March 2018). The proposed Willow Creek neighborhood would provide 90 single family lots with an average residential lot size of 11,400 sf and the proposed Hidden Canyon neighborhood would provide 56 single family lots with an average residential lot size of 18,000 sf. Therefore, water use factors used that represent indoor and outdoor use were interpolated at 0.97 AFY per unit for 15,000 sf estate lots, the approximate mean of the two proposed neighborhoods average lots sizes, based on the County's AFY per unit factors for 13,400 sf estate lots and 20,000 sf estate lots. Santa Barbara County has developed thresholds of significance for groundwater basins that are in a state of overdraft.

Significance Thresholds

Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, hydrology and water quality impacts would be considered significant if the project:

- Is located within an urbanized area of the County and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- Increases the amount of impervious surfaces on a site by 25% or more;
- Results in channelization or relocation of a natural drainage channel;
- Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks or wetlands;
- Is an industrial facility that falls under one or more of categories of industrial activity regulated under the NPDES Phase I industrial storm water regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities;

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);

- Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses of a receiving waterbody;
- Results in a discharge of pollutants into an "impaired" waterbody that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving waterbody, as identified in by the RWQCB.

As required by the Santa Barbara County Environmental Thresholds and Guidelines Manual, all projects determined to have a potentially significant stormwater quality impact must prepare and implement a Storm Water Quality Management Plan (SWQMP) to reduce the impact to the maximum extent practical. The County requires that each SWQMP shall include the following:

- Identification of potential pollutant sources that may affect the quality of the discharges to storm water;
- The proposed design and placement of structural and non-structural Best Management Practices (BMPs) to address identified pollutants;
- A proposed inspection and maintenance program; and
- A method of ensuring maintenance of all BMPs over the life of the project.

Implementation of BMPs identified in the SWQMP generally will be considered to reduce impacts to stormwater quality to a less than significant level.

Appendix G of the CEQA guidelines considers a project to have a significant hydrological impact if the project would:

- Violate any water quality standards or waste discharge requirements;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or
- Be subject to inundation by seiche, tsunami, or mudflow.

The proposed project would not result in the development of any industrial facilities that would involve industrial activities that are regulated under the NPDES Phase I industrial storm water regulations. Therefore, the proposed project would not result in impacts to water quality resulting from the development of such facilities, and the associated County significance thresholds are not discussed further in this report. Because the proposed Specific Plan would not result in any housing or other structures within the 100-year flood hazard area, no impacts associated with these thresholds would occur, and the associated CEQA guidelines questions are not discussed further in this report. Because the Specific Plan is not located within an identified dam inundation zone or in a location subject to inundation by seiche tsunami, or mudflow (Santa Barbara County 2017), no impacts associated with these thresholds would occur, and the associated CEQA guidelines questions are not discussed further in this report.

Appendix G of the CEQA guidelines considers a project to have a significant impact to water supply or groundwater depletion if the project would:

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; and/or
- Not have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

The current threshold for projects in the Santa Maria Basin is 25 AFY (Santa Barbara County, October 2008, revised July 2018). It should be noted that this rate was developed to address potential impacts related to groundwater extraction, and does not account for the availability of purchased water from the SWP.

Potential impacts related to soil erosion and sedimentation are discussed in Section 4.8, *Geologic Processes*.

b. Project Impacts and Mitigation Measures

Impacts and mitigation measures described in the OCP EIR are incorporated below, with corresponding analysis pertaining to the proposed Willow Creek and Hidden Canyon Residential Project. Impacts identified in the OCP EIR are compared with those that are anticipated to occur under the proposed Neighborhoods of Willow Creek and Hidden Canyon Project.

Threshold: Would the project violate any water quality standards or waste discharge requirements.
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Impact WR-1 CONSTRUCTION ACTIVITIES ASSOCIATED WITH SPECIFIC PLAN DEVELOPMENT COULD DEGRADE WATER QUALITY THROUGH INCREASED RATES OF EROSION AND SEDIMENTATION. COMPLIANCE WITH NPDES PERMIT REQUIREMENTS, THE REQUIRED SWPPP AND APPLICABLE BMPs, AND THE COUNTY'S GRADING ORDINANCE AND APPLICABLE OCP DEVELOPMENT STANDARDS WOULD ENSURE THAT POTENTIAL WATER QUALITY IMPACTS DURING PROJECT CONSTRUCTION WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The site specific analysis for Key Site 21 included in the OCP EIR states that a maximum of 150 single family residential units could be constructed on 211-acres of the site. This development would be clustered on APNs 113-250-015, -016, -017. The number of residential units proposed (146 units) under the Specific Plan is fewer than what was anticipated in the OCP EIR. With less site disturbance and development, the overall construction activity would be less for the proposed Specific Plan than the construction activity required for buildout under the OCP. Nevertheless, Specific Plan development would involve grading operations that would result in cut and fill of approximately 111,398 cubic yards (cy) of soil material (the sum of total net cut and total net fill, as shown in Table 2-2 in Section 2.0, Project Description). Grading operations would increase the potential for erosion and sedimentation into nearby drainages and Orcutt Creek. If construction grading in the Specific Plan area occurs during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported to the drainages within and adjacent to Key Site 21. Uncontrolled discharges of sediment are considered a significant impact to water quality. Loose soils have the potential to erode and enter Orcutt Creek and its tributaries, which could result in excessive sediment loads and degrade water quality.

Construction projects of one or more acres are subject to NPDES Phase II (non-point source) permit requirements. Under these requirements, all construction activities would be subject to the General Permit for Storm Water Discharge Associated with Construction and Land Disturbance Activities, which require preparation of a SWPPP to control the discharge of pollutants, including sediment, into local surface water drainages. The SWPPP is designed to minimize water quality degradation through storm water monitoring, establish BMPs, implement erosion control measures, and implement spill prevention and containment measures. As described in Section 4.14.3(a), projects determined by the County to potentially impact stormwater quality are required to prepare and implement a SWQMP to minimize water quality degradation through storm water monitoring, establishment of BMPs, implementation of erosion control measures and implementation of spill prevention and containment measures during the life of the project.

In addition to NPDES permit requirements, construction activities would be subject to the County's grading ordinance and applicable OCP development standards to minimize erosion and associated impacts to water quality. The grading ordinance requires a grading permit and an Erosion and Sediment Control Plan for all new grading, excavations, fills, cuts, borrow pits, stockpiling, compaction of fill, and land reclamation projects on privately owned land where the transported amount of materials exceeds 50 cubic yards or the cut or fill exceeds three feet in vertical distance to the natural contour of the land. The County accepts a SWPPP in lieu of an Erosion and Sediment Control Plan, as long as the SWPPP contains the requirements of the County's Erosion and Sediment Control Plan. In addition, a master drainage plan is required as part of the grading plan for all grading permit applications. The project would also conform to OCP Dev Std FLD-O-3.1 and FLD-O-3.2, which require the installation of sedimentation traps and other BMPs to prevent erosion and siltation of waterways.

Compliance with NPDES permit requirements, the required SWPPP and applicable BMPs, and the County's grading ordinance and applicable OCP development standards would ensure that potential water quality impacts during project construction would be adverse, but less than significant (Class III).

Mitigation Measures

No mitigation is required. Compliance with NPDES permit requirements, the required SWPPP and applicable BMPs, and the County's grading ordinance and applicable OCP development standards would ensure that potential water quality impacts during project construction would be adverse, but less than significant (Class III).

Threshold:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
Threshold:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
Threshold:	Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
Threshold:	Would the project otherwise substantially degrade water quality?

Impact WR-2 NEW IMPERVIOUS SURFACES WOULD ALTER EXISTING DRAINAGE PATTERNS AND INCREASE STORMWATER RUNOFF. COMPLIANCE WITH APPLICABLE PROGRAMMATIC MITIGATION MEASURES FROM THE OCP EIR, DESIGN GUIDELINES, APPLICABLE SBCFCD REQUIREMENTS FOR POST-DEVELOPMENT PEAK STORMWATER FLOWS AND BMPs AND MAINTENANCE REQUIREMENTS DESCRIBED IN THE PROPOSED PROJECT'S STORMWATER CONTROL PLANS WOULD ENSURE THAT POTENTIAL FLOODING IMPACTS AND IMPACTS TO ON-SITE AND OFF-SITE DRAINAGE WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The Specific Plan area is currently undeveloped and is located at the outer edges of the RMGC and in between the golf course fairways at the base of the northern flanks of the east-west trending Casmalia Hills. The Specific Plan area topography consists of gentle slopes that reach 420 feet in elevation along the southern perimeter of the site dropping to 220 feet in elevation at the northwest corner of the property. Three unnamed drainages flow in a northwesterly direction and are tributaries to Orcutt Creek, located to the north. Other small ravines and gullies bisect the site in places, eventually draining toward Orcutt Creek.

Specific Plan development would increase impervious surfaces on Key Site 21 by an estimated 62.7 acres (residential development and roads), redirecting the drainage of surface flow during storm events. Surface water flows travel faster as they run along impermeable surfaces and channelized drainages, which can result in increased peak discharge flows, erosion, stormwater runoff and risk of flooding. As stormwater runoff increases in flow speed, discharge points into Orcutt Creek can lead to increased soil erosion and sedimentation, degrading water quality. In addition, oils, chemicals, and other contaminants from vehicles, pesticides, fertilizers, pet waste, dust contaminants, and other urban runoff could be transported to Orcutt Creek and area storm drains during rain events, resulting in potential water quality impacts.

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

The anticipated increase in impervious surfaces from the proposed development represents an 18 percent increase on the 341-acre Key Site 21, and a 33 percent increase in the 190-acre project site area. This increase would exceed the County's Environmental Thresholds and Guidelines Manual threshold of 25 percent increases in impervious surfaces for the project site area, but would not exceed the 25 percent threshold for Key Site 21 as a whole.

Compared to the OCP, the proposed project would construct fewer homes on Key Site 21, and approximately 97 acres of undisturbed natural open space would remain in the project site area (in addition to the existing 21 acres of open space on Key Site 21 outside of the project site area), which is greater than the 25 acres anticipated for Key Site 21 under the OCP. With decreased impervious surface area, more natural infiltration would occur than anticipated in the OCP EIR, resulting in lower volume and acceleration of stream flows. As a result, drainage impacts associated with increased storm flows from the proposed project would be less than anticipated in the OCP EIR.

As discussed in Section 4.14.2, the OCP EIR identified measures that would minimize potential hydrological impacts, including fair share contribution to installation and maintenance for a regional retention basin and other design and maintenance requirements for regional retention basins (FLD 3.1 through 3.5). Since these measures were required in the OCP EIR, the Central Coast RWQCB has prohibited runoff from being managed on a regional level and requires that runoff be managed on-site for each approved project. Additionally, the Santa Barbara County Flood Control District (SBCFCD) requires that post-development peak stormwater flows not exceed pre-development flows for 2-, 5-, 10-, 25-, 50-, and 100-year storm events. The Specific Plan includes on-site bio-retention facilities and Low Impact Design (LID) features, including recirculating, point-of-use water heaters, low flow plumbing fixtures, drought tolerant landscaping, water-efficient irrigation systems, and efficient use of water from roof drains for landscape irrigation, designed to comply with these requirements. The proposed retention facilities implement applicable OCP mitigation measures, including FLD-7, FLD-8, and FLD-10, and would reduce peak flows, with overflow captured in desilting/retention basins. The proposed LID features would divert drainage to landscaped areas to promote infiltration. Excess runoff would follow the historical drainage course that runs south-to-north along the center of the Specific Plan area.

The Basin Hydrology Reports for the Willow Creek and Hidden Canyon Neighborhoods in the Specific Plan area (Appendix L) include modeling of site hydrology and runoff under pre- and post-development conditions, using the HydroCAD modeling software in accordance with requirements of the SBCFCD. These reports document that the proposed retention facilities would attenuate the 2-, 5-, 10-, 25-, 50-, and 100-year storm events and discharge at or below existing drainage conditions, consistent with SBCFCD's post-development runoff criteria. The Stormwater Control Plans for the Willow Creek and Hidden Canyon Neighborhoods in the Specific Plan area (Appendix L) summarize the findings of the Basin Hydrology Reports and describe LID features and Stormwater Control Measures (SCMs) as well as stormwater facility maintenance procedures to ensure that the proposed retention facilities maintain the required reduced flow rates and minimize discharge of stormwater contaminants into off-site drainages. These measures would be required to be implemented as a condition of project approval. The Basin Hydrology Reports and Stormwater Control Plans are included in Appendix L.

Compliance with existing design guidelines, applicable SBCFCD requirements for post-development peak stormwater flows and BMPs and maintenance requirements described in the Neighborhood Stormwater Control Plans would ensure that potential flooding impacts and impacts to on-site and off-site drainage would be adverse, but less than significant (Class III).

Mitigation Measures

No mitigation is required because impacts are less than disclosed in the OCP EIR. Compliance with applicable programmatic mitigation measures from the OCP EIR, design guidelines, applicable SBCFCD requirements for post-development peak stormwater flows and BMPs and maintenance requirements described in the proposed project’s Stormwater Control Plans would ensure that potential flooding impacts and impacts to on-site and off-site drainage would be adverse, but less than significant (Class III).

Threshold:	Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?
Threshold:	Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Impact WR-3 SPECIFIC PLAN DEVELOPMENT WOULD RESULT IN A PROJECTED NET INCREASE IN WATER DEMAND. THE USE OF GROUNDWATER TO SERVE THE DEVELOPMENT WOULD NOT RESULT IN FURTHER OVERDRAFT OF THE SANTA MARIA GROUNDWATER BASIN. HOWEVER, GROUNDWATER WELLS IN KEY SITE 21 MAY PRODUCE GROUNDWATER WITH A TOTAL DISSOLVED SOLIDS CONCENTRATION THAT WOULD EXCEED THE ORCUTT COMMUNITY PLAN’S 425 MG/L STANDARD PER POLICY WAT-O-5. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION (CLASS II).

Water Demand

Projected water demand for the Specific Plan is described in Table 4.14-1.

Table 4.14-1 Projected Specific Plan Water Demand

Residential			
Neighborhood	No. of Units	AFY/Unit¹	AFY/Total
Hidden Canyon	56	0.97	54.5
Willow Creek	90	0.97	87.7
Total Gross Residential Demand			142.2
Homeowners Association Maintained Irrigated Demand			
	Acres	AFY/Acre	Irrigated AFY
	23	1.5 ²	34.5
Total Gross HOA Irrigated Demand			34.5
Total Project Gross Water Demand			176.7
Total Project Net Water Demand³			106.0

¹ The Estate lot average size of 15,000 sf. An interpolated AFY/unit value was determined using the County of Santa Barbara Environmental Thresholds and Guidelines Manual for 13,400 sf lots and 20,000 sf lots.

² County of Santa Barbara Environmental Thresholds and Guidelines Manual for miscellaneous landscaping, average “Green Lawns” and “Not So Green Lawns” and gardens.

³ County of Santa Barbara Environmental Thresholds and Guidelines Manual for net consumptive use: Gross Demand × C.U. Factor (0.60) for Orcutt Area – Sandy Soil.

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

As shown in Table 4.14-1, the total water demand for the proposed project would exceed the County's standard threshold of withdrawals from the SMGB of 25 AFY, creating potentially significant impacts to water supplies. The OCP EIR concluded that residual impacts on water resources, including cumulative water resource impacts, would be feasibly mitigated (Class II) if a commitment were made by the involved water purveyors and agencies to purchase out-of-basin permanent supplemental supplies to offset the new demand associated with buildout under the OCP. Residual impacts would be significant and unavoidable (Class I) if no commitments were made.

OCP Policy WAT-O-2 requires that the water demand for projects in the OCP area be offset by supplemental water supplies that do not result in further overdraft of the ground water basin. Policy WAT-O-2 defines "supplemental water" as a "source of water other than groundwater, unless:

1. The groundwater basin has been determined to be no longer in overdraft, or
2. The use of groundwater is consistent with the final water rights judgment entered in the Basin adjudication (Santa Maria Valley Water Conservation District vs. City of Santa Maria, et. al [Superior Court, County of Santa Clara, Case no. 770214])."

In compliance with this measure, since 1996, supplemental water has been imported to the County through the State Water Project, reducing potentially significant cumulative impacts to water resources as a result of buildout of the OCP area to less than significant (Class II).

The Specific Plan area overlies the SMGB and is within the SMVMA. As discussed in Section 4.14.1 regarding the Santa Maria Basin water rights adjudication, under the Santa Maria Groundwater Basin Adjudication Stipulation, all overlying owners that are also stipulating parties have a prior and paramount overlying right, whether or not yet exercised. The water rights for the proposed Specific Plan area are covered by this settlement agreement. Therefore, the use of native groundwater to serve the proposed project is consistent with the final water rights judgment, and meets the definition of "supplemental water" for purposes of satisfying the objectives of Policy WAT-O-2. The project's water demand is legally considered to be offset by long-term supplemental water supplies, adequately mitigating potentially significant impacts resulting from increased overdraft to the SMGB (impacts WAT-1 and WAT-2) to a less than significant level (Class III).

To further reduce overall water demand, the proposed project would be required to comply with standard OCP Policy design guidelines, which include a modified list of the landscape design recommendations identified in the OCP EIR (Section 5.6-13) and additional indoor design measures. Exterior water use design measures include:

- Turf shall constitute less than 25% of the total landscaped area;
- No turf shall be allowed on slopes over 4%;
- Require appropriate turf types – warm season grasses;
- Extensive mulching (2-inch minimum depth) shall be used in all landscaped areas to improve the water holding capacity of the soil by reducing evaporation and compaction;
- Soil moisture sensing devices and rain shutoff devices shall be installed to prevent unnecessary irrigation. Training and advise in how to properly use these systems should be provided; Provide information about efficient watering techniques (especially in sandy soil) and how to use weather information to schedule irrigations (there is a weather monitoring station in the Santa Maria Area);
- Distribute information brochures on design (plants, irrigation systems) and irrigation techniques to home buyers;

- Intermittent permeable surfaces such as French drains shall be used for parking areas and driveways; and
- Separate landscaping water meters shall be installed.

Implementation of the above standard guidelines would further reduce water demand. Therefore, the impact on water resources would be adverse, but less than significant (Class III).

Water Infrastructure and Groundwater Quality

Long-term water supply to the Specific Plan area would be provided through a newly formed mutual water company. The project includes a new community water system that would include two proposed on-site water wells, new waterlines to each of the proposed neighborhoods, a hydro-pneumatic tank system, water treatment, and a storage tank facility. Kear Groundwater prepared a water well feasibility analysis for the project in February 2018 to evaluate the potential for wells in the Specific Plan area to provide a long-term source for future water demand. The water well feasibility analysis is included in Appendix L.

Based on the estimated gross project water demand of approximately 177 AFY, a pumping demand of 424 gallons per minute would need to be met at a 75 percent use factor, 282 gallons per minute at a 100-percent use factor, and 565 gallons per minute at a 50-percent time use factor. The water well feasibility analysis recommends drilling two wells – a primary well and a backup well – in the highly-permeable Paso Robles formation on the northern portion of Key Site 21. The recommended well locations account for proximity to the Santa Maria Valley syncline axis, the valley’s dominant geologic structure, as well as logistical considerations including existing RMGC golf course operations and planned development. Based on current hydrological conditions, each well would individually be capable of meeting the anticipated project water demand requirements (Appendix L).

Existing wells in the vicinity of the Specific Plan area are characterized by a range of water quality resulting from the differences between aquifers. Wells in the Paso Robles Formation have generally higher-quality water than shallower or deeper formations. Water quality data from 2008 to 2012 for the nearby existing RMGC golf course well indicate a calcium-sulfate groundwater character with a TDS concentration of 615 mg/L and a pH of 7.3 to 7.4. Nitrate (a problem elsewhere in the Santa Maria Basin, especially in shallower aquifer zones) was detected at 1.57 mg/L as N (with a maximum contaminant level of 10 mg/L). These characteristics are reasonably expected to reflect water quality at the recommended well locations (Appendix L).

The proposed water system would be permitted by Santa Barbara County Environmental Health Services (EHS). EHS will require a Water Quality Chemical Analysis to be completed for primary and secondary drinking water standards. The results must fall below the maximum contaminant levels as excerpted from California Domestic Water Quality Monitoring Regulations (Chapter 15 of Title 22 of the California Code of Regulations). This includes 0.01 mg/L for arsenic, 10.0 mg/L for nitrates, 1,000 mg/L for total dissolved solids (TDS), and 8.5 units for PH. OCP Policy WAT-O-5 requires water used to serve new development in Orcutt to have TDS concentrations no greater than 425 mg/L. This is less than half than the 1,000 mg/L TDS maximum contaminate level required per California Domestic Water Quality Monitoring Regulations, and about a 30% reduction from the concentrations observed at the existing RMGC golf course well. The intent of this policy is to reduce overall TDS levels in the wastewater in Orcutt, and thereby reduce the level of potential groundwater contamination from dispersal of this wastewater. Mitigation Measure WR-3 described below requires the installation of a reverse-osmosis (RO) treatment facility if produced water

exceeds 425 mg/L. The inclusion of this mitigation measure would reduce potentially significant water quality impacts to less than significant (Class II).

Well Interference

As described in Table 4.14-1, the total gross water demand for the project would be approximately 177 AFY. Long-term water supply would be provided by two proposed on-site water wells drawing from the SMGB. As discussed above, the Specific Plan's water demand is legally considered to be offset by long-term supplemental water supplies and would not result in further overdraft of the SMGB. The water well feasibility analysis (Appendix L) modeled the effect of anticipated pumping at rates between 104 gallons per minute (gpm) and 416 gpm from the proposed wells on proximal existing wells. Pumping the primary and backup wells continuously at 104 gpm would induce a gentle cone of depression with an estimated <1 foot drawdown at 260 feet from the well and <0.5 foot drawdown at 2,175 feet from the well. Pumping the primary and backup wells at 416 gpm for 6 hours would result in an estimated <4 foot drawdown at 130 feet from the well, <3 foot drawdown at 375 feet, and <1 foot drawdown at 3,150 feet from the well. Most existing wells in the vicinity of the Specific Plan area, including the RMGC well, would have induced drawdowns between 1 foot and 3 feet. The greatest effects are estimated to occur when wells are pumped at high rates and longer durations. Since the higher rates would meet project demands in shorter durations, these values represent a conservative estimate of potential drawdown. A drawdown of 10-ft or less is considered to be a less than significant impact (Jordan Kear, personal communication 2019).

Additionally, due to local variations within the Paso Robles Formation, there is generally indirect correlation of aquifer units in between the proposed wells and existing wells to the north or south, including the RMGC well. The RMGC well, located north of the proposed well locations, extracts groundwater from a deeper stratigraphic section than the proposed wells would, even though they may be of approximately equal vertical depth. Based on the analysis in the water well feasibility analysis, potential well interference impacts between the proposed wells and existing wells in the vicinity, including the RMGC well, would be adverse, but less than significant (Class III).

Mitigation Measures

WR-3 Modern Drilling, Analysis, and Well Construction Techniques

Using geologic, geophysical, and water quality data, wells shall be designed using modern drilling, analysis, and well construction methods, including, but not limited to:

- Discrete perforation intervals adjacent to the best quality aquifer materials (should zones between perforations indicate poor quality groundwater, intermediate cement or clay seals shall be installed to prevent poorer quality water from entering the production stream);
- After development, step-drawdown and constant-rate pumping tests shall be conducted at the wells, with water quality samples collected at various rates and durations to optimize the blend of water quality;
- If produced water quality exceeds the 425 mg/L standard a reverse-osmosis (RO) above-ground treatment facility shall be implemented. The RO facility would divert high-quality stream to residential uses. The resulting brine solution may be disposed at a discharge facility approved by Planning & Development, or other method approved by the Central Coast Regional Water Quality Control Board.

Plan Requirements and Timing. Prior to zoning clearance issuance the owner/applicant shall submit proof of water system permits to Planning and Development. These requirements shall be reflected on the water system plans.

Monitoring. The Owner/Applicant shall demonstrate that the submitted plans conform to the required conditions. Santa Barbara County Environmental Health Services shall permit the water system and review plans to ensure compliance. Planning & Development staff will review building plans for compliance prior to issuance of building permits. Building inspectors shall ensure compliance in the field.

Significance After Mitigation

The project would not result in significant impacts to existing well users, and the residual impact related to water resources would be adverse, but less than significant (Class III). Impacts to the overdrafted SMGB would be adverse, but less than significant without mitigation (Class III). Implementation of Mitigation Measure WR-3 would ensure new wells would meet the OCP Policy WAT-O-5 standard for TDS concentrations of 425 mg/L (Appendix L). Therefore, Mitigation Measure WR-3 would reduce impacts related to groundwater quality to a less than significant level (Class II).

c. Cumulative Impacts

Drainage, Flooding, and Sedimentation

Cumulative development in the northern part of Santa Barbara County would increase impervious surfaces throughout the Orcutt area, redirecting the drainage of surface flow during storm events, and increasing peak flows, erosion, sedimentation, and risk of flooding. The OCP EIR identified potentially significant impacts resulting from OCP buildout due to increased storm flows, erosion and sedimentation, flooding, personal injury and property damage.

Implementation of the policies and development standards in the OCP related to drainage and water quality, as well as compliance with applicable Santa Barbara County standards, would minimize these potentially significant cumulative impacts. Buildout of the Specific Plan, as well as other projects in the Orcutt area, would be subject to SBCFCD review and approval relative to accommodating surface flows and retention of runoff on-site. Implementation of Santa Barbara County design guidelines as well as the NPDES Phase II SWPPP water quality ordinances would ensure that incremental buildout of development throughout the Orcutt area occurs based on BMPs designed to address drainage and surface water quality protection. Therefore, cumulative impacts to drainage, flooding, and sedimentation in the Orcutt area would be adverse, but less than significant (Class III).

Water Demand/Water Quality

Cumulative development in the northern part of Santa Barbara County includes approximately 1,260 new residential units and 280 commercial units that are currently proposed, in process, approved, or under construction, in addition to approximately 973,500 square feet of commercial, winery, and institutional development. Additional water demand would occur with population growth associated with buildout of the OCP. The OCP EIR determined that the potential increase in groundwater pumpage above current levels due to buildout of the OCP would represent a potentially significant impact, as it would constitute a substantial contribution to ongoing overdraft of the SMGB.

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

As discussed in Sections 4.14.1(d) and 4.14.2, the OCP includes policies and development standards regarding water supply and groundwater consumption. Specifically, Policy WAT-O-2 requires that future development under the OCP must offset water demand with supplemental water supplies in order to prevent any impacts to the SMGB. Future development within the Orcutt area would be subject to OCP EIR Mitigation Measures WAT-1 through WAT-4, which would also reduce cumulative impacts to water supply. In addition, according to the 2015 Orcutt Urban Water Management Plan, the water supplies available to the Orcutt system are sufficient to meet the projected water demand for each multiple-dry year period because groundwater and purchased water can supply reliable water through 2040. GSWC estimates population using the Santa Barbara County Association of Governments (SBCAG) population, housing, and employment data. The Orcutt System's metered water use in 2015 was calculated to be 5,588 acre-feet per year (AFY). Per capita water use has dropped from over 250 gallons per capita per day (GPCD) based on 10- to 15-year average baseline data to 157 GPCD in 2015 based on 5-year average baseline data (GSWC 2016). As discussed in Impact WR-3, the proposed Specific Plan would result in development of fewer homes on Key Site 21 than the Specific Plan evaluated in the OCP EIR and proposed at the time of the final water rights Stipulation entered in the SMGB adjudication. As discussed under Impact WR-3, the Specific Plan's water demand is legally considered to be offset by long-term supplemental water supplies and would not result in further overdraft of the SMGB. Therefore, cumulative impacts to water supply and groundwater resources would be adverse, but less than significant (Class III).

4.15 Effects Found Not to be Significant

In accordance with the *CEQA Guidelines*, a Notice of Preparation (NOP) and Environmental Scoping Document (Scoping Paper) for this SEIR was distributed for review by affected agencies and the public on March 27, 2018. The NOP, responses received during the NOP comment period, and Scoping Paper are presented in Appendix A of this report. Based on comments received during the public scoping meeting and NOP comment period, the County of Santa Barbara determined that there was no substantial evidence that the project would cause or otherwise result in significant environmental effects in the following resource areas:

- Forest Resources;
- Hazards and Hazardous Materials;
- Historic Resources;
- Mineral Resources, and;
- Population and Housing.

No further environmental review of these issues is necessary for the reasons summarized in the following discussion. In addition, the SEIR evaluation identified checklist questions from Appendix G of the State CEQA Guidelines where the project would not result in significant environmental effects in the following issue areas:

- Biological Resources;
- Geologic Processes, and;
- Land Use.

These issues are also briefly described herein. The substantiation for determining that these issues would result in no impact or a less-than-significant impact is described in further detail in the NOP and Scoping Paper in Appendix A, pursuant to §15128 of the State *CEQA Guidelines*.

4.15.1 Biological Resources

Potential Environmental Effects

- Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?

Reasons Why Effects Were Not Found Significant

The project site is not part of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans, and no impact would occur.

4.15.2 Forest Resources

Potential Environmental Effects

- Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?
- Would the project result in the loss of forest land, or conversion of forest land to non-forest use significant impacts could result?

Reasons Why Effects Were Not Found Significant

The project site is zoned Planned Residential Development with an existing land use designation of Planned Development. The project site does not contain any forest land, timberland, or timberland zoned Timberland Production. Therefore, the project would not result in any impacts to forest or timberland resources.

4.15.3 Geologic Processes

Potential Environmental Effects

- Would the project be located on soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Reasons Why Effects Were Not Found Significant

The project would involve residential connections to existing utility services for wastewater, and would not require septic tanks or alternative wastewater disposal system. Therefore, the project would result in no impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

4.15.4 Hazards and Hazardous Materials

Potential Environmental Effects

- Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or environment?

- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Reasons Why Effects Were Not Found Significant

Use, Storage, and Handling of Hazardous Materials

The Santa Barbara County Fire Department (SBCFD) Hazardous Materials Unit has been designated as the administering agency for Certified Unified Program Agency (CUPA) within the County of Santa Barbara. Accordingly, the County Fire Department compiles and maintains the Hazardous Materials Business Plan Program which requires businesses handling hazardous materials in quantities in excess of specified quantities to submit inventories of those materials to the CUPA, and to develop appropriate employee training and emergency procedures. The Hazardous Materials Business Plan Program maintains a list of businesses that meet the threshold criteria for use, storage, or disposal of hazardous materials, compressed gases and/or hazardous waste. Threshold quantities are defined as hazardous materials equal to or exceeding 55 gallons of a liquid, 500 pounds of a solid, 200 cubic feet of compressed gas, and/or hazardous waste in any amount. The CUPA maintains the inventory and emergency contact information submitted from businesses in a computerized data management system. The CUPA, in turn provides this information to emergency response agencies.

A review was conducted of the SBCFD Hazardous Materials Unit Business Plan list for the Orcutt area. No sites that store hazardous materials were identified within a one-mile radius of the site. Small quantities of hazardous materials may be used in conjunction with the proposed residential uses on site, such as typical solvents, paints, chemicals used for cleaning, and landscaping supplies. However, these materials would be limited in type and quantity such that they would not create a hazard to the public or environment. Therefore, impacts related to the use, storage, and handling of hazardous materials would be less than significant.

Agricultural Contamination

Key Site 21 currently consists of undeveloped land, portions of which were previously used for agricultural purposes. Given the historic agricultural use of the northern and eastern portions of the site, there is potential for presently-banned pesticides and/or herbicides from historic cultivation to be present in the soil. Ground disturbing activities during construction could expose construction workers to residual agricultural chemicals in on-site soil via direct contact or inhalation of dust particles. All projects involving earthmoving activities are required to implement standard Santa Barbara County Air Pollution Control District (SBCAPCD) dust control measures. In addition, project construction activities would be subject to the County's grading ordinance to minimize fugitive dust emissions. Implementation of these standard measures during project construction activities would minimize worker exposure to dust and associated agricultural chemicals via inhalation. Improper handling and disposal of contaminated soils could result in a health risk to workers handling on-site soil. Consistent with Santa Barbara County Environmental Health Services (EHS) requirements, the Owner/Applicant would be required to complete any identified necessary remediation in accordance with applicable regulatory requirements prior to development of sites determined to have potential hazards. Impacts associated with residual agricultural chemicals on Key Site 21 would be less than significant.

Freeways

Hazardous wastes in both solid and liquid form are transported by trucks through Santa Barbara County to treatment and recycling facilities. The nearest major highway used for the transport of hazardous materials is U.S. Highway 101 (U.S. 101), located approximately 4.5 miles east of Key Site 21. Trucks using U.S. 101 transport thousands of tons of hazardous materials each year. While accidents can result in spills of such materials, potential health risks are generally limited to residents and businesses in closest proximity to hazardous material transportation routes. In addition, numerous federal, state and local regulations control the transportation of hazardous materials throughout the County. These regulations limit potential hazards associated with accidents and potential releases in proximity to populated areas. Therefore, and impacts due to freeway hazard-related risk of upset would be less than significant.

Airports

The project site is not located within an airport planning area or Airport Area of Influence (AIA). Therefore, there would be no impact associated with aviation-related hazards.

Cumulative Impacts from Hazardous Materials

Continued urban development in the Santa Maria-Orcutt Area will cumulatively increase the potential for exposure to existing hazards and hazardous materials. If soil and groundwater contamination is found to be present on planned and future development sites, impacts associated with such contamination would be limited to the individual development site and immediate vicinity and would not contribute to a cumulative health and safety impact in the community. In accordance with applicable regulatory requirements, any necessary remediation would be required to be completed prior to development of any sites determined to have significant hazards. Therefore, the project's contribution to potential cumulative hazardous materials impacts would not be cumulatively considerable.

4.15.5 Historic Resources

Potential Environmental Effects

- Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Reasons Why Effects Were Not Found Significant

The project site is currently vacant and undeveloped. No structures or formal landscape features identified as historic resources currently exist on the project site. Therefore, the project would not result in any impacts to historic resources.

4.15.6 Mineral Resources

Potential Environmental Effects

- Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Reasons Why Effects Were Not Found Significant

According to the County's Environmental Resource Management Map for the Santa Maria-Orcutt area, there are no locally identified mineral resources on the project site (County of Santa Barbara 2009). Therefore, the project would not result in the loss of availability of a valuable known mineral resource or locally important mineral resource recovery site. Potential impacts to mineral resources would be less than significant.

4.15.7 Land Use

Potential Environmental Effects

- Would the project physically divide an established community?

Reasons Why Effects Were Not Found Significant

The project site is undeveloped. Therefore, no residents would be displaced as a result of development of the site. The site is zoned Planned Residential Development (PDR) and would not result in land use conflicts with the surrounding recreational and agricultural land uses. No project components would divide an established community. Therefore, this impact would be less than significant.

4.15.8 Population/Housing

Potential Environmental Effects

- Would the project induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Reasons Why Effects Were Not Found Significant

Upon buildout and occupancy of additional units provided by changing residential land use and zoning designations in the planning area, the Orcutt Community Plan (OCP) would directly increase the population in Orcutt. The OCP anticipated an addition of up to 150 residential units for Key Site 21. Based on an average household size of 2.95 persons per dwelling unit in the Orcutt Planning Area (SBCAG 2012), anticipated residential growth under the OCP projections would result in a population increase of 443. The project includes the development of 146 new residential units and would result in a population increase of approximately 431. Therefore, the population growth as a result of the project would not exceed the population growth projections for buildout of the site accounted for in the OCP. In addition, the project would not displace any housing or people, as the project site is currently undeveloped. Therefore, there is no need for the construction of replacement housing elsewhere. Overall, there would be no impacts related to population growth or displacement of housing or people.

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5 Other CEQA Required Discussions

This section discusses other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Section 4, *Environmental Impact Analysis*. These additional issues include the potential to induce population growth and/or economic expansion; establishment of a precedent setting action; development or encroachment in an isolated or adjacent area of open space; removal of obstacles to growth; and significant and irreversible impacts on the environment.

5.1 Growth Inducement

Section 15126.2(d) of the *CEQA Guidelines* requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth.

Generally speaking, a project may be considered growth inducing if it results in one of the five conditions identified below:

1. Induces population growth.
2. Induces economic expansion.
3. Establishes a precedent setting action (e.g. an innovation, a radical change in zoning or general plan designation).
4. Results in development or encroachment in an isolated or adjacent area of open space (i.e. being distinct from “infill” development).
5. Removes an impediment to growth (e.g. the establishment of an essential public service or the provision of new access to an area).

The impacts identified below are based on buildout of the proposed project. The 150 units of residential growth anticipated for Key Site 21 in the 1995 adoption of the Orcutt Community Plan exceeds that of the 146-unit residential growth that would be facilitated by the proposed project.

5.1.1 Population Growth

As discussed in Section 2, *Project Description*, the proposed project would result in the development of 146 single family residential units in the proposed Willow creek and Hidden Canyon neighborhoods.

Based on an average household size of 2.95 persons per unit in the Orcutt Plan Area (SBCAG 2012), the proposed 146 residential units would result in up to 431 new residents in the Orcutt area. Using this same person per household size, the 150 residential units anticipated for the site in the Orcutt Community Plan (OCP) would result in approximately 443 new residents. As such, the proposed project would result in less population growth than development anticipated on the project site in the OCP. Nevertheless, the potential environmental impacts associated with population growth as a result of the project are evaluated throughout Sections 4.1 through 4.15 of this Subsequent EIR.

5.1.2 Economic Growth

The proposed project would result in new residential development in the Orcutt area. The development of 146 residential units in the community of Orcutt would not exceed the residential growth projections for buildout of the site accounted for in the OCP. As such, the proposed project would not directly contribute to economic growth by providing additional commercial space for business or result in economic growth that is not anticipated by the OCP. However, the project may indirectly contribute to local economic growth as a result of the additional population increasing demand on the local economy for general goods. Increased demand for economic services would be accommodated by existing businesses in the Santa Maria-Orcutt area and could result in economic growth for certain types of economic activity related to the residential development (such as food service and other retail uses) as a result of the proposed development. The physical effects of any new commercial development that occurs in the region would depend upon the size, type, and location of such development. Any environmental impacts relating to new commercial development that would serve the project would be addressed as part of separate environmental review of specific development projects. Therefore, the project would not result in impacts related to substantial economic growth.

5.1.3 Precedent Setting Action

The proposed project would result in residential development of one of the key sites identified for future development under the OCP. The OCP, as a long-term land use plan, is intended to reduce the potential for uncontrolled growth from specific development proposals and associated environmental impacts of such growth. The project site is currently vacant and undeveloped and has an existing land use designation of Planned Development (PD), 150 units maximum/Visitor Serving Commercial. The PD designation is intended for large areas within urban boundaries that are appropriate for residential development but require comprehensive site planning to account for existing opportunities and constraints on the site, such as existing visitor-serving activities, biology, view corridors, slopes, and flood and fire hazards. The proposed new residential development under the project would facilitate development expected under the OCP and requires no changes in zoning or general plan designations. As such, the proposed project would not present a precedent that would have growth-inducing impacts in the area.

5.1.4 Development of Open Space/Vacant Land

Development of open space is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. Key Site 21 is located within an Existing Developed Rural Neighborhood (EDRN), as designated by the County's Land Use Element. The EDRN designation applies to neighborhood areas that have developed historically with lots smaller than those found in the surrounding rural lands. The purpose of the designation is to keep pockets of rural residential development from expanding onto adjacent agricultural lands. The project site is in a rural area discontinuous from the existing urban uses in the Orcutt area north and east of Key Site 21. The OCP has identified several key sites within its boundaries that are designated for residential development. Key Site 21, including the project site, is designated as a key site for future development in the OCP and would not extend into land outside of the Urban Boundary Line identified in the OCP. The OCP EIR concluded that the OCP would induce growth by extending the Urban Boundary Line, transforming rural areas to urban uses in the Orcutt area. The 146-unit project would result in less new growth than the 150 units of residential growth anticipated for Key Site 21 in the OCP. In addition, the project includes approximately 97 acres of undisturbed open

space, a trail staging area, and public recreational trail that would be located along the eastern project boundary (shown on the OCP Area Parks, Recreation, and Trails Map), as discussed in Section 4.11, *Public Services and Recreation*.

5.1.5 Removal of Obstacles to Growth

The project site is surrounded on all sides by agricultural and open space uses with some scattered residences nearby. Key Site 22, located north of the project site, is zoned for residential uses (RR-20, 20-acre minimum lot size) but is currently used for cultivated agriculture. As outlined in the OCP EIR, the proposed designation and zoning for Key Site 22 is Planned Residential/PRD (2,000 units maximum). This designation would allow for the construction of up to 2,000 residential units of various densities, a community center, supporting commercial facilities, two elementary schools, and a junior high school.

The proposed residential development would be located within Key Site 21, which is identified in the OCP as a site for the future development of up to 150 residential units. Key Site 21 is located within an EDRN (Existing Developed Rural Neighborhood). According to the Santa Barbara County Comprehensive Plan Land Use Element, an EDRN is a neighborhood area that has developed historically with lots smaller than those in the surrounding rural or inner rural lands. The purpose of the neighborhood boundary is to keep pockets of rural residential development from expanding onto adjacent agricultural lands. Within the rural neighborhood boundary, infilling of parcels at densities specified on the land use plan maps is permitted.

Water for the proposed development would be provided through a newly formed mutual water company for the project. Sewer service for the proposed development would be provided by the Laguna County Sanitation District through the installation of a new sewer line across Key Site 22 to the north of the project site. The project includes a private water system, and future development would connect to existing sewer lines located on Key Site 22 to the north of Key Site 21. Therefore, implementation of the proposed project would not extend water or wastewater infrastructure through undeveloped areas in the Orcutt Planning Area, or otherwise open areas between the site and other developed areas in the western Orcutt Planning Area (see Section 4.11, *Public Services and Recreation* for further discussion of this topic). Therefore, the project would not remove any obstacle to development in these areas. The areas where pressure for development would be greatest as a result of project buildout are the agricultural areas north of the project site between the site and existing residential development north and east of the Key Site 21. The site north of SR 1 is identified in the OCP as Key Site 22 and is currently designated as Rural Residential under the County's Comprehensive Plan, and are zoned "RR-20," with a 20-acre minimum parcel size. Therefore, the County's Comprehensive Plan has planned on these parcels being developed with low density residential uses sometime in the future. Development of the areas north and east of Key Site 21 would result in potential environmental effects similar to the proposed project, depending on the type and level of construction. Residential development would have the potential to result in significant impacts in such areas as traffic, air quality, noise, biological and cultural resources, and land use compatibility relating to the direct interface with agricultural uses.

Access to the project site would be provided from three new entry drives off SR 1 and the existing entrance road to the RMGC public golf course. These entry drives would serve the new residents of the proposed development and would not serve as major connections to any other areas. The project would not include any other new, major transportation or circulation routes that would result in a removal of an obstacle in the circulation/transportation system that would prompt growth in the area.

Overall, the project would not induce new development north and east of the project site, or otherwise remove any existing impediment to growth.

5.2 Significant Unavoidable Effects

CEQA Guidelines Section 15126(b) requires that an EIR identify those significant impacts that cannot be reduced to a less than significant level with the application of mitigation measures. The implications and reasons why the project is being proposed, notwithstanding, must be described.

As discussed in Section 4.1, *Aesthetics/Visual Resources*, Section 4.4, *Biological Resources*, Section 4.11, *Public Services and Recreation*, and Section 4.12, *Transportation and Circulation*, implementation of the proposed project would result in significant, unavoidable impacts associated with the following issues:

- Aesthetic changes due to the conversion of semi-rural land uses to urban land uses;
- Potential impacts to the federally and State listed California tiger salamander (CTS) Santa Barbara County distinct population segment (DPS);
- Contribution to cumulative loss of sensitive habitats, in particular to loss of upland and potentially suitable aquatic habitat for the federally and State listed CTS Santa Barbara County DPS and federally listed California red-legged frog (CRLF) in northern Santa Barbara County;
- Project-level and cumulative contribution to solid waste generation; and
- Contribution to cumulative traffic conditions that would result in an unacceptable Level of Service (LOS) at the Foxenwood Lane/Clark Avenue Intersection.

5.3 Significant Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(c) requires a discussion of any significant irreversible environmental changes which would be caused by the project should it be implemented. Such significant irreversible environmental changes may include the following:

- Use of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use unlikely.
- Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) which generally commit future generations to similar uses.
- Irreversible damage which may result from environmental accidents associated with the project.

Development of housing under the project would result in the permanent conversion of open, undeveloped lands to a residential use. Development facilitated by the project would also require building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to the project. The addition of new residential units would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the OCP are expected to offset the demand to some degree. It is not anticipated that growth facilitated by the project would substantially affect local or regional energy supplies. Section 4.14, *Energy*, includes a full analysis of

potential impacts related to energy resources by construction and operation of the proposed project.

Growth accommodated by the project would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. As discussed in Section 4.11, *Public Service and Recreation*, the proposed project would contribute a significant amount of solid waste to local landfills and would, therefore, result in a significant and irreversible environmental impact.

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6 Alternatives

6.1 Introduction

Section 15126.6 of the *CEQA Guidelines* provides guidance for the identification and evaluation of project alternatives in an EIR. The *CEQA Guidelines* state that an “EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” *CEQA Guidelines* Section 15126.6(a) also states that “an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the Project. Other alternatives can be considered but are not required to satisfy the requirements of CEQA.

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

As required by Section 15126.6 of the *CEQA Guidelines*, this Subsequent EIR examines a range of reasonable alternatives to the proposed Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project that would attain most of the basic project objectives (stated in Section 2, *Project Description*, of this Subsequent EIR) but would avoid or substantially lessen the following significant adverse impacts identified for the project:

- Change in visual character due to conversion of semi-rural land uses to urban land uses;
- Solid waste generation in exceedance of County solid waste thresholds for construction and operation;
- Project contribution of new vehicle trips to cumulative traffic conditions that would result in an unacceptable level of service at the Foxenwood Lane/Clark Avenue intersection; and
- Project contribution to cumulative loss of sensitive habitats in general, and in particular to loss of upland and potentially suitable aquatic habitat for the federally and State listed California tiger salamander Santa Barbara County DPS and federally listed California red-legged frog in northern Santa Barbara County.

6.2 Alternatives Analysis

This discussion focuses on alternatives to the project, including alternatives which were considered and rejected. These alternatives have been selected for their ability to comply with the County’s Comprehensive Plan and Orcutt Community Plan (OCP), and substantially reduce or eliminate one or more of the adverse impacts associated with the project, while still meeting basic project objectives.

Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

The Subsequent EIR also evaluates a No Project alternative. Consistent with the *CEQA Guidelines* (Section 15126.6[e]), the “no project” analysis discusses the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistency with available infrastructure and community services. This analysis includes only on-site alternatives, on the basis that there are no feasible off-site alternatives that would attain the basic objectives of the project, and because Key Site 21 was specifically identified in the OCP for future development in the OCP area (refer to Section 6.2.2 for a more detailed discussion of alternatives considered, but eliminated from further analysis herein).

This analysis considers the three alternatives to the OCP that were previously analyzed in the OCP EIR (95-EIR-01), as well as three project-specific alternatives that have been developed in response to specific impacts identified in this Subsequent EIR. As required by CEQA, this section also includes a discussion of the “environmentally superior alternative” among those studied. The alternatives evaluated in this Subsequent EIR include:

OCP EIR Alternatives

- OCP EIR Alternative 1 (No Project Alternative)
- OCP EIR Alternative 2 (Low Buildout)
- OCP EIR Alternative 3 (High Buildout)

Alternatives Considered in this SEIR

- Alternative 1: No Project Alternative
- Alternative 2: Only Hidden Canyon Neighborhood Development
- Alternative 3: Only Willow Creek Neighborhood Development
- Alternative 4: Reduced Units in Willow Creek and Hidden Canyon Neighborhoods

6.2.1 Summary of Alternatives and Impacts Identified in the OCP EIR for Key Site 21

This discussion focuses on the project that was previously evaluated in the OCP EIR, as well as the three alternatives to the OCP that were analyzed in the 1995 OCP EIR. These alternatives provide a conceptual comparison of different levels of buildout on the project site that were anticipated in the OCP, but do not provide specific potential development scenarios (such as the potential arrangement of development on the site, access, or other infrastructure). Therefore, discussion of these alternatives is provided at a conceptual level, primarily based on the potential buildout of uses on the project site, relative to the currently proposed project. Alternatives to the currently proposed project, which have been developed to respond to specific environmental impacts identified in this EIR, and which are partially based on the buildout levels of these alternatives from the OCP EIR, are discussed in detail in Section 6.2.3.

Key Site 21 Project Evaluated in OCP EIR

As discussed in Section 1, *Introduction*, the OCP EIR was prepared as a programmatic EIR that analyzed the general environmental effects of the OCP as a whole. For Key Site 21, the OCP EIR analyzed the development of up to 150 units and designated the areas along the southern and western boundaries of the site as subject to the Open Space Overlay. The OCP EIR included an evaluation of potential impacts to Biological Resources and Visual Resources/Open Space specific to

Key Site 21, as well as Plan-area evaluation of other environmental issues including contribution of Key Site 21 development to significant and unavoidable programmatic impacts associated with full OCP buildout. The OCP EIR found impacts associated with the loss of vegetation and habitat on Key Site 21 to be less than significant with mitigation (Class II). Impacts to wildlife and impacts related to Visual Resources/Open Space on Key Site 21 were found to be significant and unavoidable (Class I). A summary of significant and unavoidable programmatic and site-specific impacts associated with buildout of Key Site 21 identified in the OCP EIR and applicable mitigation from the OCP EIR is included in the discussions of "Previous Environmental Review" in each of the individual environmental issue area discussions in Section 4, *Environmental Impact Analysis* (Sections 4.1 through 4.15).

OCP EIR Alternative 1 (No Project Alternative)

With the OCP EIR "No Project" alternative, the DR-3/Res 3.3 zoning and land use designations in place at the time of the OCP EIR's preparation in 1995 would be retained, allowing for the construction of up to 625 residential units on 127 acres at an effective density of 5.5 units per acre. Under this alternative, residential lots would be approximately 7,000 square feet. It should be noted that this alternative assumed development of the site under the zoning and land use designations that were in effect prior to the adoption of the OCP. As such, the alternative no longer exists because there is no scenario where the DR-3/Res 3.3 zoning and land use designations would apply on the site in the absence of the project.

Impact Summary

Due to the substantial increase in residential buildout under this alternative, the OCP EIR anticipated that regional impacts associated with groundwater demand, traffic/circulation, air quality, schools, fire protection, solid waste, and wastewater treatment would increase significantly. Impacts to biological habitat and wildlife identified for the OCP were anticipated in the OCP EIR to increase under this alternative due to the increased development density throughout the site. Therefore, these impacts were determined to remain significant and unavoidable (Class I) under this alternative when compared to the OCP. Impacts to visual resources/open space were also determined to remain significant and unavoidable (Class I) because this alternative, like the OCP, would change the character of the area from semi-rural to urban land uses, and would result in the loss of visual open space as well as visual impacts to the State Route (SR 1) scenic corridor.

OCP EIR Alternative 2 (Low Buildout)

The OCP EIR Low Buildout alternative assumed that the Rancho Maria Golf Club (RMGC) golf course would be rezoned to REC and the land use designation would be changed to Existing Public or Private Recreation and/or Open Space, and the remainder of Key Site 21 would be rezoned to RR-5 (Residential Ranchette 5-acre parcel size) with a corresponding Residential Ranchette land use designation. This alternative also assumed that an Open Space Overlay would be applied to the southern canyon and central and western drainages on Key Site 21. When compared to the potential development of Key Site 21 evaluated in the OCP, this alternative would decrease the density of on-site development to one unit per five acres to create a ranchette community and would allow for the development of up to 41 units. Alternative 2, the Only Hidden Canyon Neighborhood Development Alternative, and Alternative 3, the Only Willow Creek Neighborhood Development Alternative, have been adapted from this OCP EIR Low Buildout alternative and is described in Section 6.2.3.

Impact Summary

As described in the OCP EIR, the reduction in residential development potential under this alternative would have proportionately decreased the extent of regional impacts associated with groundwater demand, traffic/circulation, air quality, schools, fire protection, solid waste, and wastewater treatment. Although this alternative would still result in a change in character of the area, impacts associated with the loss of visual open space and impacts to the SR 1 scenic corridor would be reduced to a less than significant level (Class II) with implementation of project mitigation measures. Impacts to wildlife remained significant and unavoidable (Class I), but the severity of the impact would decrease slightly due to the lower number of units which would be constructed near the riparian corridor of drainages on the project site. Impacts associated with the loss of habitat and riparian vegetation would be reduced to a less than significant (Class II) level.

OCP EIR Alternative 3 (High Buildout)

The OCP EIR High Buildout alternative assumed that the RMGC would be rezoned to REC with an Open Space land use designation, parcel 17 onsite would be rezoned from Planned Residential Development (PRD) to C-V (visitor commercial) with a Resort/Visitor Serving Commercial land use designation, and the remainder of Key Site 21 would be rezoned from PRD to RR-5 with a Residential Ranchette land use designation. This alternative would allow the construction of up to 26 residential units and a large resort containing approximately 250 rooms and associated facilities. This alternative is not evaluated in detail as it would result in greater overall impacts than those identified for the project, as discussed in the impact summary below.

Impact Summary

As described in the OCP EIR, the substantial increase in the development potential under this alternative would proportionally increase regional impacts associated with groundwater demand, traffic/circulation, air quality, schools, fire protection, solid waste, and wastewater treatment. However, these impacts were not analyzed in detail as part of the OCP EIR. Impacts to biological habitat and wildlife identified for the OCP were anticipated in the OCP EIR to increase under this alternative due to the increased development density throughout the site. Therefore, these impacts were determined to remain significant and unavoidable (Class I) under this alternative when compared to the OCP. Impacts to visual resources/open space were also determined to remain significant and unavoidable (Class I) because this alternative, like the OCP, would change the character of the area from semi-rural to urban land uses, and would result in the loss of visual open space as well as visual impacts to the SR 1 scenic corridor.

6.2.2 Alternatives Considered but Rejected from Further Evaluation

As discussed above, Section 15126.6(c) of the *CEQA Guidelines* requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the *CEQA Guidelines*, the selection of alternatives for this Subsequent EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of

infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

CEQA Guidelines Section 15126.6(a) also states that “an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” Other alternatives may be considered but are not required to satisfy the requirements of CEQA.

For the project, characteristics used to reject alternatives from further consideration include:

- Failure to meet basic project objectives;
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with County policies, including the Comprehensive Plan and OCP;
- Potential for inconsistency with adopted agency plans and policies; and
- Reasonableness of the alternative when compared to other alternatives under consideration.

The following alternative was considered but eliminated from further analysis by the County due to one or more of these factors.

Alternative Site/Alternative Location on Key Site 21

This alternative would include all of the land area within Key Site 21, allowing for development of components of the proposed Willow Creek and Hidden Canyon neighborhoods on all assessor parcels included in the project (Assessor Parcel Numbers [APNs] 113-250-015, -016, -017) as well as APN 113-250-014 on Key Site 21, which includes the RMGC public golf course fairways, clubhouse, and associated facilities. This alternative would include all components of the project that would facilitate residential development and associated infrastructure on these four parcels on Key Site 21.

This alternative may shift the location of residential development within Key Site 21 with the intention of addressing land use compatibility issues and impacts to sensitive resources, consistent with OCP DevStd KS21-8 requiring siting development to preserve natural landforms and minimize grading, and OCP DevStd KS21-7 and DevStd KS21-10 providing for development that accommodates and is compatible with continued use of the public golf course. Development on APN 113-250-014 under this alternative could preclude use of portions of the RMGC that are currently in operation, resulting in new, potential land use conflicts associated with the golf course operations and viability of this existing use. The OCP EIR did not include site-specific analysis of land use impacts on Key Site 21 and did not identify any potentially significant impacts associated with development on Key Site 21 resulting in compatibility issues with the golf course. Similarly, this SEIR did not identify any potentially significant land use impacts associated with the proposed project that would result in compatibility issues with the public golf course. Therefore, this alternative would not reduce any identified significant and unavoidable environmental impacts not already addressed by project alternatives discussed in Section 6.2.3. This alternative also presents feasibility concerns relative to the economic viability of the existing public golf course use and the applicant’s lack of control/access to APN 113-250-014. As a result of these considerations, this alternative was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

6.2.3 Description of Alternatives Evaluated for the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project

Alternative 1: No Project (No Build) Alternative

This alternative assumes the project is not approved and none of the proposed components, including the Specific Plan, two Vesting Tentative Tract Maps (VTTM), two Final Development Plans, two Minor Conditional Use Permits, road naming, and a Comprehensive Plan Amendment, are implemented. Under this alternative, the project site would retain the existing land use designation of Planned Development (PD), 150 units maximum/Visitor Serving Commercial, and designation in the OCP as an Existing Developed Rural Neighborhood (EDRN). The project site would also retain the current PRD zoning. This alternative assumes the project site is not developed with the proposed project and remains vacant and undeveloped. Accordingly, this alternative would not provide access from the site and SR 1 to neighboring foothills or the Orcutt regional trail system, as envisioned in the OCP under OCP Key Site 21 Design Standard KS 21-5. The site would remain accessible from the existing RMCG golf course access road, but no additional site access would be developed.

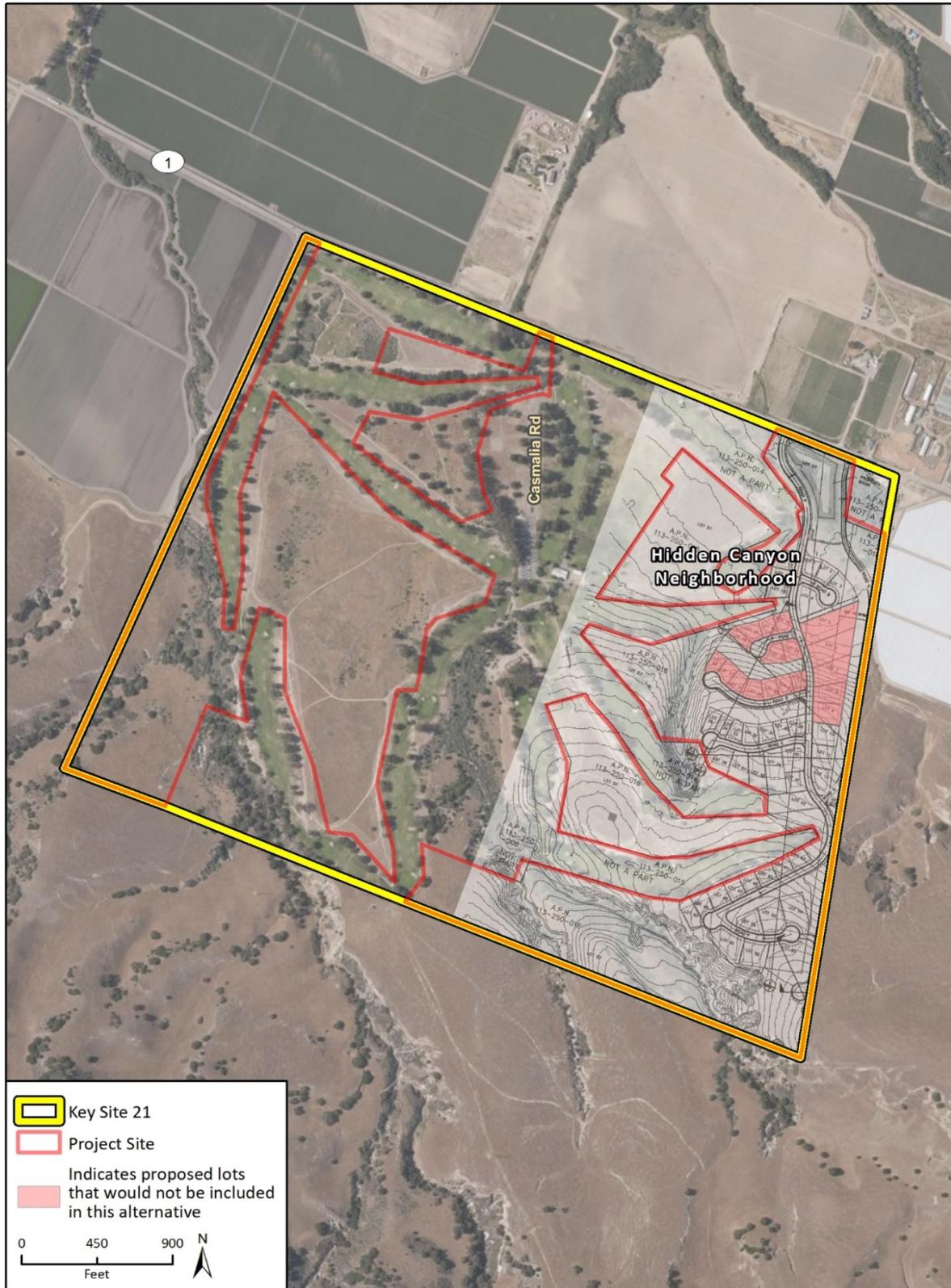
Alternative 2: Only Hidden Canyon Neighborhood Development

This alternative examines the reduced development potential associated with developing only one of the two neighborhoods proposed for the project. Developing only the Hidden Canyon neighborhood would provide for buildout comparable to buildout under the OCP EIR Low Buildout alternative. The Hidden Canyon neighborhood also encompasses an area with generally fewer sensitive biological resources than the Willow Creek neighborhood development area.

This alternative would include only those components of the project that would facilitate development of the proposed Hidden Canyon neighborhood, including the Specific Plan, a VTTM, a Final Development Plan, two Minor Conditional Use Permits for development of a new community water system and an entrance monument sign for the Hidden Canyon neighborhood, road naming, and a Comprehensive Plan Amendment. This alternative would not include any entitlements that would facilitate development of the Willow Creek neighborhood. This alternative would also eliminate 18 lots on steep slopes of 30 percent or greater in the Hidden Canyon neighborhood, reducing the proposed number of single family lots from 56 to 38. This alternative would be consistent with the OCP's Low Growth alternative, which evaluated development on Key Site 21 with 40 residential units.

Similar to the proposed project, Hidden Canyon neighborhood improvements under this alternative would include a public hiking trail connection, hiking trail, and trailhead staging area with parking for up to six vehicles. Development under this alternative would include two new private roads constructed approximately 1,100 and 1,900 feet east of the existing golf course entry to provide primary and secondary access to the home sites in the Hidden Canyon neighborhood. Without development of the Willow Creek neighborhood and elimination of lots on steep slopes, this alternative would result in 108 fewer residential units than the proposed project. Figure 6-1 shows a conceptual development plan for Alternative 2, including shading to indicate areas where residential lots would be eliminated to avoid steep slopes of 30 percent or greater. As shown on Figure 6-1, the main roadway providing access to the southern neighborhood areas would still be constructed on steep slopes to connect the southern and northern portions of the Hidden Canyon neighborhood

Figure 6-1 Conceptual Design of Alternative 2: Only Hidden Canyon Neighborhood Development



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Fig. 6-1 Alternative 2 - Hidden Canyon Only

and maintain adequate internal circulation. It should be noted that the lot layout shown on Figure 6-1 is a conceptual example of how the intentions of Alternative 2 may be met; if this alternative were ultimately selected for development, the project applicant would have flexibility in developing a final lot layout that would meet the requirements of this alternative.

Alternative 3: Only Willow Creek Neighborhood Development

This alternative examines the reduced development potential associated with developing only the Willow Creek neighborhood. This alternative would include only those components of the project that would facilitate development of the proposed Willow Creek neighborhood, including the Specific Plan, a VTTM, a Final Development Plan, two Minor Conditional Use Permits for development of a new community water system and an entrance monument sign for the Willow Creek neighborhood, road naming, and a Comprehensive Plan Amendment. This alternative would not include any entitlements that would facilitate development of the Hidden Canyon neighborhood. This alternative would also eliminate 15 lots on steep slopes of 30 percent or greater in the Willow Creek neighborhood. Therefore, under this alternative, the Willow Creek neighborhood would allow for development of approximately 75 single family lots.

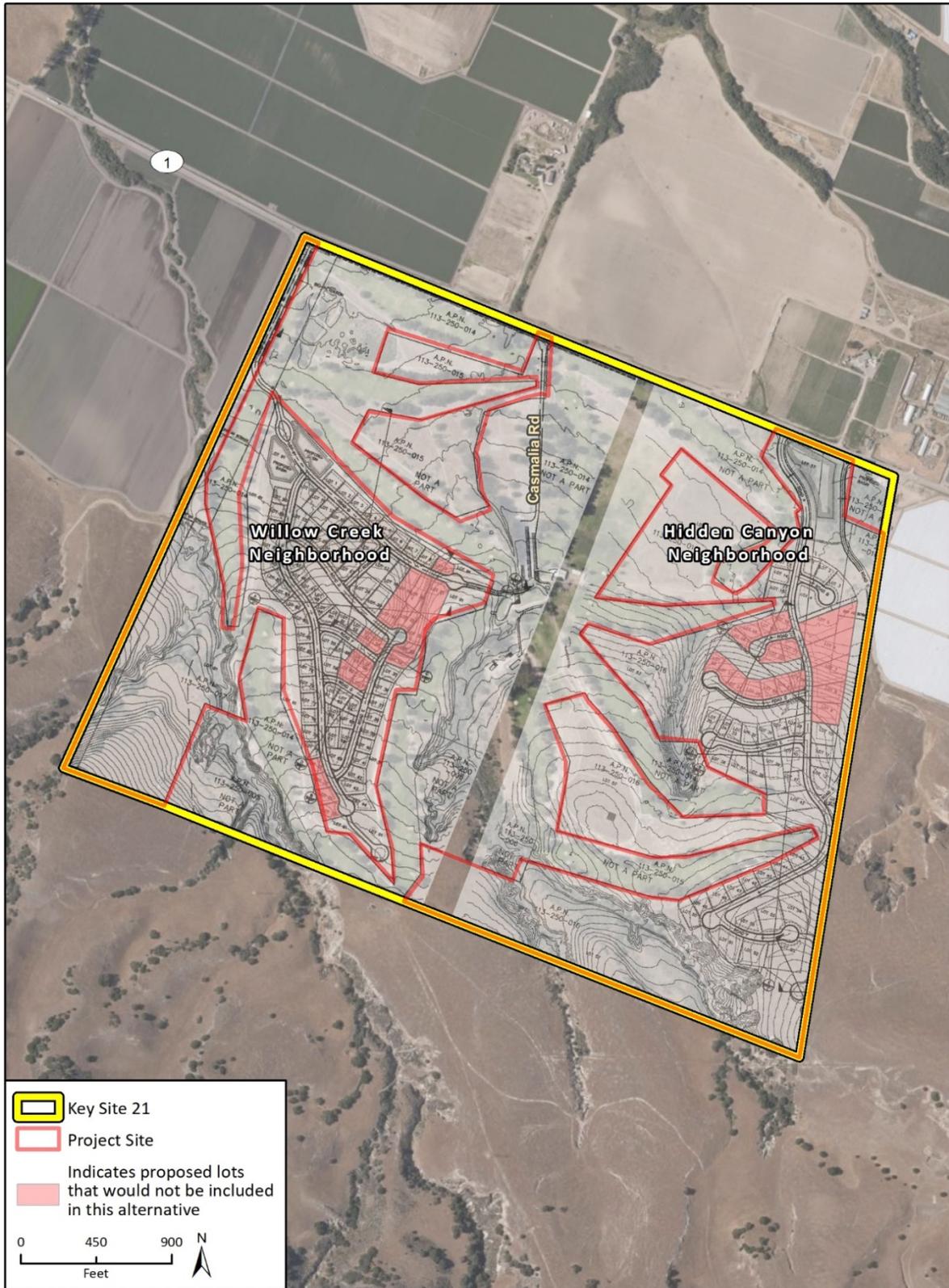
Development under this alternative would include a new private road constructed approximately 1,200 feet west of the main entrance to the golf course for primary access and a private secondary access road through the golf course with gated egress out to SR 1. Without development of the Hidden Canyon neighborhood and elimination of lots on steep slopes, this alternative would result in 71 fewer residential units than the proposed project. Figure 6-2 shows a conceptual development plan for Alternative 3, including shading to indicate areas where residential lots would be eliminated to avoid steeper slopes of 30 percent or greater. It should be noted that the lot layout shown on Figure 6-2 is a conceptual example of how the intentions of Alternative 3 may be met; if this alternative were ultimately selected for development, the project applicant would have flexibility in developing a final lot layout that would meet the requirements of this alternative.

Alternative 4: Reduced Units in Willow Creek and Hidden Canyon Neighborhoods

This alternative would eliminate lots on steep slopes of 30 percent or greater in the Willow Creek and Hidden Canyon neighborhoods. This would reduce the Willow Creek neighborhood development by approximately 15 lots near at the northeast corner of the proposed development area and would reduce the Hidden Canyon neighborhood development by approximately 18 lots near the center of the development area. The major components of the Development Plans related to architecture, landscaping, lighting, fencing, lot standards, access and circulation, emergency access, parking standards, sustainable design features, open space areas, public trails, affordable housing, water and sewer services, and agricultural buffers would be the same as described for the project in Section 2, *Project Description*.

Grading amounts for the proposed neighborhoods, including roadways and building pads for the proposed residences, would be reduced under this alternative when compared to the proposed project. Without development on steep slopes of 30 percent or greater, this alternative would result in 33 fewer residential units than the project. Figure 6-3 shows conceptual development plans, including shading to indicate the lots that would be eliminated from each of the proposed neighborhoods under this alternative. As shown on Figure 6-3, the primary roadways in each

Figure 6-3 Conceptual Design of Alternative 4: Reduced Units in Willow Creek and Hidden Canyon



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Fig 6-2 Alternative 3 - Reduced Building

neighborhood would still be constructed to maintain adequate internal circulation and connect the various areas of each of the proposed neighborhoods. It should be noted that the lot layout shown on Figure 6-3 is a conceptual example of how the intentions of Alternative 4 may be met; if this alternative were ultimately selected for development, the project applicant would have flexibility in developing a final lot layout that would meet the requirements of this alternative.

Table 6-1 provides a comparison of the proposed project and each of the alternatives to the project evaluated herein based on the buildout characteristics of each alternative.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

Feature	Proposed Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Total Area	Hidden Canyon: 107 acres Willow Creek: 70 acres	341 acres	107 acres	70 acres	Hidden Canyon: 107 acres Willow Creek: 70 acres
Residential Development Area	Hidden Canyon: 56 single family lots: 39 acres Willow Creek: 90 single family lots: 37 acres	No new residential uses: 0 acres	38 single family lots: 32 acres	75 single family lots: 33 acres	Hidden Canyon: 38 single family lots: 32 acres Willow Creek: 75 single family lots: 33 acres
Other Uses	Hidden Canyon: One open space/private roadway lot Willow Creek: One open space/private roadway lot Total open space: 198 acres	Open space: 341 acres	One open space/private roadway lot Total open space: 114 acres	One open space/private roadway lot Total open space: 87 acres	Hidden Canyon: One open space/private roadway lot Willow Creek: One open space/private roadway lot Total open space: 209 acres

6.3 Impact Analysis

The classification of potential environmental impacts associated with each of the three project alternatives focuses on the development potential of Key Site 21 property consistent with the project-level analysis of each environmental issue area in this Subsequent EIR.

Table 6-2 depicts a comparison of the environmental impacts of development of the project to each of the three proposed alternatives. The comparative analysis of the relative impacts of the proposed project and the alternatives is provided in Sections 6.3.1 through 6.3.4.

Table 6-2 Comparison of Environmental Impacts

Environmental Issue	Impact Classification				
	Proposed Key Site 21 Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Aesthetics/Visual Resources					
Scenic vistas	III	III	III	III	III
Visual quality and character	I	III	II	II	I
Light and glare	II	III	II	II	II
Cumulative visual resources	I	III	II	II	I
Agricultural Resources					
Farmland conversion and conflicts with existing zoning	III	III	III	III	III
Cumulative agricultural resources	III	III	III	III	III
Air Quality					
2016 Ozone Plan consistency	III	III	III	III	III
Construction emissions	III	III	III	III	III
Operational emissions	III	III	III	III	III
Odor or other emissions	III	III	III	III	III
Cumulative air quality	III	III	III	III	III
Biological Resources					
Special status species	I	III	I	I	I
Sensitive habitats	II	III	II	II	II
Wetlands	II	III	II	II	II
Wildlife movement	II	III	II	II	II
Protected trees	II	III	II	II	II
Sensitive Vegetation	II	III	II	II	II
Cumulative biological resources	I	III	I	I	I
Cultural and Tribal Cultural Resources					
Archaeological resources and human remains	II	III	II	II	II
Tribal cultural resources	II	III	II	II	II
Cumulative cultural resources	II	III	II	II	II
Energy					
Energy consumption	III	III	III	III	III
Consistency with energy plans	III	III	III	III	III
Cumulative energy consumption	III	III	III	III	III

Environmental Issue	Impact Classification				
	Proposed Key Site 21 Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Fire Protection					
Wildland fire hazards	III	III	III	III	III
Fire protection services and facilities	III	III	III	III	III
Cumulative fire protection	III	III	III	III	III
Geologic Processes					
Groundshaking	III	III	III	III	III
Steep slopes	II	III	II	II	II
Long-term erosive runoff and sedimentation	II	III	II	II	II
Expansive soils	II	III	II	II	II
Paleontological resources	II	III	II	II	II
Cumulative geologic hazards	II	III	II	II	II
Greenhouse Gas Emissions					
Temporary and long-term increases in GHG emissions	II	III	II	II	II
Consistency with GHG reduction plans and regulations	II	III	II	II	II
Cumulative GHG emissions	II	III	II	II	II
Land Use					
Quality of life compatibility	II	III	II	II	II
Consistency with OCP	III	III	III	III	III
Cumulative land use	III	III	III	III	III
Noise					
Construction noise	II	III	II	II	II
Noise sensitive receptor exposure	III	III	III	III	III
Traffic noise	III	III	III	III	III
Cumulative noise	III	III	III	III	III
Public Services and Recreation					
Schools	III	III	III	III	III
Wastewater treatment capacity and facilities, stormwater drainage facilities, and other utilities	III	III	III	III	III
Solid waste	I	III	I	I	I
Police protection services	III	III	III	III	III
Recreational facilities	III	III	III	III	III
Cumulative public services	I	III	I	I	I

Environmental Issue	Impact Classification				
	Proposed Key Site 21 Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Transportation and Circulation					
Intersection operations	III	III	III	III	III
Roadway segment operations	III	III	III	III	III
Traffic safety hazards	III	III	III	III	III
Cumulative traffic conditions	I	III	I	I	I
Water Resources and Flooding					
Water quality	III	III	III	III	III
Flooding and stormwater runoff	III	III	III	III	III
Water supply resources	II	III	II	II	II
Cumulative water resources	III	III	III	III	III

6.3.1 Alternative 1: No Project (No Build) Alternative

Under this alternative, the project site would not be developed with the proposed project and would remain vacant and undeveloped. Therefore, this alternative would result in no new residential units on the project site and would retain the site in open space. This alternative would not result in any increase in population in the Orcutt area, or any associated vehicle trips, criteria pollutant and GHG emissions, energy consumption, noise, solid waste generation, or water consumption. This alternative would result in any conversion of open space or rural landscape to developed uses; therefore, this alternative would not result in impacts associated with visual resources, biological resources, cultural resources, or geologic hazards. Therefore, the magnitude of potential impacts would be reduced in comparison to the impacts identified for the proposed project. This alternative would not trigger the need for any of the mitigation measures identified in this EIR. Overall, the No Project (No Build) Alternative would result in reduced physical environmental impacts when compared to the proposed project. However, this alternative would not fulfill the policy goals of the OCP with regard to future development of Key Site 21 and would not be consistent with the OCP designation of the project site as an EDRN.

6.3.2 Alternative 2: Only Hidden Canyon Neighborhood Development

Aesthetics/Visual Resources

This alternative would reduce the overall number of new residential units on the project site from 146 units to 38 units, or by approximately 74 percent, and would focus development east of the RMGC in a single neighborhood development. The reduction in residential units would reduce the amount of open space and rural landscape converted to low density housing and would reduce impacts to the scenic view corridor on the southern side of SR 1 between Black Road and Solomon Road. This alternative would also allow for increased open spaces and agricultural buffers on Key Site 21 when compared to the proposed project. This would reduce potential impacts to the visual quality and open space character of the site. Implementation of Mitigation Measures AES-1 through AES-4, which implement OCP EIR Mitigation Measures VIS-3 and VIS-4, would be required for this

alternative. These mitigation measures include requirements for development adjacent to the open space overlay; retention basin, median, and landscape design requirements; and infrastructure screening. These measures would minimize the reduction in and fragmentation of open space on the project site, reduce alteration of identified scenic resources, and reduce conversion of semi-rural land uses to urban land uses. Due to the reduction in new residential units by 74 percent and eliminating development on the west side of the project site, this alternative would result in a less than significant impact to the visual character of the project area with incorporation of mitigation, in contrast to the proposed project. Mitigation Measure AES-5 (which implements OCP EIR Mitigation Measure VIS-2) would reduce potential light and glare impacts to a less than significant level. This alternative would result in reduced overall impacts to aesthetics/visual resources as compared to those identified for the proposed project.

Agricultural Resources

This alternative would reduce the overall development on the project site by approximately 74 percent and focus development in a single neighborhood development, reducing potential impacts associated with the conversion of agricultural lands or conflicts with agricultural zoning. This alternative would result in similar, less than significant, impacts to agricultural resources as the project.

Air Quality

The development of 118 fewer residential lots on the site under this alternative represents a 74 percent reduction in new residential lots on the site compared to the proposed project. This would proportionately reduce both temporary construction emissions and long-term operational emissions when compared to the proposed project. Alternative 2 would result in less than significant air quality impacts, as with the proposed project.

Biological Resources

Development under this alternative may result in impacts to special status plant and animal species, sensitive habitats, state and federally protected wetlands, wildlife movement, protected trees, and environmentally sensitive vegetation in the Hidden Canyon neighborhood development area on the eastern portion of Key Site 21. Due to the elimination of development in the Willow Creek neighborhood and associated infrastructure and improvements west of the RMGC, this alternative would reduce the overall area of impacts to biological resources when compared to the project by approximately 74 percent. This alternative would avoid impacts to perennial rye grass grassland, which only occurs west of the RMGC public golf course and would reduce the amount of purple needle grass grassland impacted because the largest patches of this native grassland also occur west of the public golf course. The potential to impact biological resources within the Hidden Canyon neighborhood, including California tiger salamander (CTS), remains with this alternative, and mitigation measures described in Section 4.4, *Biological Resources*, would be required. Potential impacts to CTS would remain significant and unavoidable. However, the mitigation requirements for impacts to sensitive communities, including grasslands, may be reduced relative to the reduction in resources that would be impacted by this alternative in comparison to the project. Overall, this alternative would impact approximately 74 percent less area and as a result, fewer sensitive biological resources than the project.

Cultural and Tribal Cultural Resources

The project site does not contain any known cultural resource sites. This alternative would focus development in a single neighborhood and include fewer units than the proposed project, and therefore would not result in disturbance beyond the development areas identified for the project. Accordingly, this alternative would result in similar, less than significant, direct impacts to cultural and tribal cultural resources identified for the project. Mitigation measures described in Section 4.5, *Cultural and Tribal Cultural Resources*, would be required to ensure that potential resources are avoided during construction or appropriately documented and curated in the event that avoidance cannot be ensured, and are also protected from indirect impacts. The magnitude of potential impacts would be reduced compared to the proposed project, but would remain less than significant with mitigation, as with the proposed project.

Energy

This alternative would result in 74 percent fewer residential units than the proposed project and would utilize proportionately less energy resources. Construction and operation of development under this alternative would still require temporary and long-term consumption of energy resources. However, as determined for the project, construction and operation of development under this alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. In addition, this alternative would be consistent with the Santa Barbara County ECAP and would therefore not conflict with or obstruct a state or local plan for renewable energy of energy efficiency. Therefore, the magnitude of potential impacts associated with consumption of energy resources would be reduced with this alternative, and less than significant impacts would result, as with the proposed project.

Fire Protection

Although this alternative would result in fewer residential lots than the project, this alternative would still create additional sources and increased risk of wildland fires in a high fire hazard area, and would be subject to compliance with SBCFD requirements, applicable OCP development standards, and Conditions of Approval pertaining to fire management to ensure that potential impacts associated with wildland fire hazards would be less than significant. In addition, as with the proposed project, this alternative would increase demand on the Santa Barbara County Fire Department, resulting in a reduction in the fire protection service ratio, and subject to the Orcutt Planning Area fire mitigation fee, which provides funding for new fire stations and acquisition of new equipment and apparatus required to serve new development. Therefore, the magnitude of potential impacts associated with wildland fire hazards and fire protection would be reduced compared to the proposed project but would remain less than significant as with the proposed project.

Geologic Processes

This alternative would reduce the number of residential lots and focus development on the east side of Key Site 21, reducing potential impacts associated with geologic hazards when compared to the proposed project. In addition, this alternative would eliminate residential development on steep slopes of 30 percent or greater, avoiding potential impacts resulting from locating development on unstable soils. Nevertheless, this alternative would require mitigation similar to that required for the proposed project (Mitigation Measure GEO-1) to ensure that future roadway development that would occur on steep slopes is engineered in such a manner to reduce potential impacts resulting

from cut slopes exceeding 15 feet in height. In addition, development under this alternative would be required to implement Mitigation Measure GEO-2 to ensure fill material is sufficiently compacted to reduce the potential for soil erosion and sedimentation into drainages. With elimination of residential development from steep slopes and implementation of these mitigation measures under this alternative, impacts associated with geologic process would be less than significant. Therefore, this alternative would result in reduced geologic impacts in comparison to the proposed project.

Greenhouse Gas Emissions

As described in the Air Quality discussion above, this alternative would result in 74 percent fewer residential units than the proposed project and would generate proportionately lower GHG emissions. Therefore, the annual GHG emissions in this alternative would be approximately 434 MT CO₂e/year, which does not exceed the identified GHG significance threshold of 1,100 MT/year. The per capita annual GHG emissions rate would be approximately 3.9 MT CO₂e/SP/year, similar to the project, and would exceed the project-specific efficiency threshold of 3.3 MT CO₂e/SP/year. Therefore, similar to the proposed project, this alternative would result in less than significant impacts associated with greenhouse gas emissions with incorporation of mitigation.

Land Use

No major design changes are assumed in the Hidden Canyon neighborhood under this alternative except for the elimination of units on steep slopes. Setbacks and buffers as set forth in the OCP would be required for development under this alternative, as for the proposed project. This alternative would reduce the overall number of new residential units on the project site by approximately 74 percent, resulting in fewer residences developed adjacent to the RMGC golf course and proportionately lower potential for land use impacts, including quality of life impacts related to overall compatibility with adjacent land uses. The magnitude of potential land use impacts would be reduced compared to the proposed project, but would remain less than significant with mitigation, as with the proposed project.

Noise

Temporary construction-related noise impacts would be reduced with this alternative as a result of the reduced amount of new residential development, but sensitive receptors are located to the north and west, and would still be exposed to similar levels of temporary construction noise due to their proximity to the Hidden Canyon neighborhood. Mitigation Measures N-1(a) and N-1(b) would still be required to reduce potential impacts to a less than significant level. This alternative would result in less project-generated traffic on area roadways, reducing potential traffic noise impacts as a result of the project. Therefore, this alternative would result in overall reduced noise impacts when compared to the project but would still be subject to mitigation to avoid temporary construction noise impacts to sensitive receptors in the vicinity of the project site.

Public Services and Recreation

Development of 38 residences under this alternative would result in a reduced demand on schools, water infrastructure, wastewater infrastructure, solid waste collection and disposal services, and other public service facilities in comparison to the project. Development under this alternative would be subject to standard development fees and school fees to ensure that incremental impacts to these facilities are offset by new development. This alternative would increase the population of the Orcutt area by an estimated 112 residents, which would result in approximately 108 tons of new

solid waste per year and, in contrast to the project, would not exceed the County's 196 tons per year threshold for solid waste generation. Based on an estimated minimum residential unit size of 1,500 square feet, development of 38 single-family residences would result in approximately 57,000 square feet of new construction, exceeding the County's construction waste threshold of 47,000 square feet for new construction and resulting in a potentially significant impact on solid waste services, as with the proposed project. Overall, impacts of this alternative to public services and facilities would be less than the proposed project, but this alternative would still result in a significant and unavoidable impact associated with solid waste generation during construction. As with the project, this alternative would not significantly increase the demand for recreational facilities or require the construction or expansion of recreational facilities that may have an adverse physical effect on the environment.

Transportation/Circulation

This alternative would result in 74 percent fewer residential units than the proposed project and would generate proportionately fewer vehicle trips that would be added to area roadways. Under this alternative, similar to the project, all study area intersections would operate at acceptable levels of service and all study area roadway segments are forecast to operate within the County's acceptable capacity under existing + project conditions. In addition, this alternative would include two new private roads constructed approximately 1,100 and 1,900 feet east of the existing golf course entry to provide primary and secondary access to the residential lots in the Hidden Canyon neighborhood. Access and design for circulation under this alternative would not result in new or exacerbated safety issues at these locations. As with the project, this alternative would contribute new vehicle trips to cumulative traffic conditions that would result in an unacceptable level of service at the Foxenwood Lane/Clark Avenue intersection, and the significant and unavoidable cumulative impact identified for the project would remain with the alternative. Overall, this alternative would generate fewer vehicle trips than the project and would reduce the magnitude of impacts to roadways and intersections but would result in similar impact levels.

Water Resources/Flooding

The development of only the Hidden Canyon neighborhood and elimination of residential units on steep slopes under this alternative would reduce site disturbance compared to the proposed project by approximately 74 percent, and impacts related to hydrology and water quality would be proportionately reduced. As with the proposed project, development under this alternative would be subject to compliance with NPDES permit requirements, the required SWPPP and applicable BMPs, the County's grading ordinance and applicable OCP development standards, compliance with existing design guidelines, applicable SBCFCD requirements for post-development peak stormwater flows, and BMPs and maintenance requirements described in the Neighborhood Stormwater Control Plans. Development under this alternative would result in incrementally less water use than the project and would not exceed the final water rights Stipulation entered in the Santa Maria Groundwater Basin adjudication. Therefore, buildout under this alternative would be offset by long-term supplemental water supplies and would not result in further overdraft of the Santa Maria Groundwater Basin, similar to the proposed project. The magnitude of potential impacts associated with water resources and flooding would be reduced with this alternative, resulting in less than significant impacts with mitigation, as with the proposed project.

6.3.3 Alternative 3: Only Willow Creek Neighborhood Development

Aesthetics/Visual Resources

This alternative would reduce the overall number of new residential units on the project site from 146 units to 75 units, or by approximately 49 percent, and would focus development west of the RMGC in a single neighborhood development. The reduction in residential units would reduce the amount of open space and rural landscape converted to low density housing and would reduce impacts to the scenic view corridor on the southern side of SR 1 between Black Road and Solomon Road. This alternative would also allow for increased open spaces and agricultural buffers on Key Site 21 when compared to the proposed project. This would reduce potential impacts to the visual quality and open space character of the site. Implementation of Mitigation Measures AES-1 through AES-4, which implement OCP EIR Mitigation Measures VIS-3 and VIS-4, would be required for this alternative. These mitigation measures include requirements for development adjacent to the open space overlay; retention basin, median, and landscape design requirements; and infrastructure screening. These measures would minimize the reduction in and fragmentation of open space on the project site, reduce alteration of identified scenic resources, and reduce conversion of semi-rural land uses to urban land uses. Due to the reduction in new residential units by 49 percent and eliminating development on the east side of the project site, this alternative would result in a less than significant impact to the visual character of the project area with incorporation of mitigation, in contrast to the proposed project. Mitigation Measure AES-5 (which implements OCP EIR Mitigation Measure VIS-2) would reduce potential light and glare impacts to a less than significant level. This alternative would result in reduced overall impacts to aesthetics/visual resources as compared to those identified for the proposed project.

Agricultural Resources

This alternative would reduce the overall development on the project site by approximately 49 percent and focus development in a single neighborhood development, reducing potential impacts associated with the conversion of agricultural lands or conflicts with agricultural zoning. This alternative would result in similar, less than significant, impacts to agricultural resources as the proposed project.

Air Quality

The development of 71 fewer residential lots on the site under this alternative represents a 49 percent reduction in new residential lots on the site compared to the proposed project. This would proportionately reduce both temporary construction emissions and long-term operational emissions when compared to the proposed project. This alternative would result in less than significant air quality impacts, as with the proposed project.

Biological Resources

Development under this alternative may result in impacts to special status plant and animal species, sensitive habitats, state and federally protected wetlands, wildlife movement, protected trees, and environmentally sensitive vegetation in the Willow Creek neighborhood development area on the western portion of Key Site 21. Due to the elimination of development in the Hidden Canyon neighborhood and associated infrastructure and improvements west of the RMGC, this alternative

would reduce the overall area of impacts to biological resources when compared to the proposed project by approximately 51 percent. Nevertheless, this alternative would still impact biological resources within the Willow Creek neighborhood, including perennial rye grass grassland and purple needle grass grassland, which occur west of the public golf course. The potential to impact biological resources within the Willow Creek neighborhood, including California tiger salamander (CTS), remains with this alternative, and mitigation measures described in Section 4.4, *Biological Resources*, would be required. Potential impacts to CTS would remain significant and unavoidable. However, the mitigation requirements for impacts to sensitive communities, including grasslands, may be reduced relative to the reduction in resources that would be impacted by this alternative in comparison to the project. Overall, this alternative would impact approximately 51 percent less area and as a result, fewer sensitive biological resources than the proposed project.

Cultural and Tribal Cultural Resources

The project site does not contain any known cultural resource sites. This alternative would focus development in a single neighborhood and include fewer units than the proposed project, and therefore would not result in disturbance beyond the development areas identified for the project. Accordingly, this alternative would result in similar, less than significant, direct impacts to cultural and tribal cultural resources identified for the project. Mitigation measures described in Section 4.5, *Cultural and Tribal Cultural Resources*, would be required to ensure that potential resources are avoided during construction or appropriately documented and curated in the event that avoidance cannot be ensured, and are also protected from indirect impacts. The magnitude of potential impacts would be reduced compared to the proposed project, but would remain less than significant with mitigation, as with the proposed project.

Energy

This alternative would result in 49 percent fewer residential units than the proposed project and would utilize proportionately less energy resources. Construction and operation of development under this alternative would still require temporary and long-term consumption of energy resources. However, as determined for the project, construction and operation of development under this alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. In addition, this alternative would be consistent with the Santa Barbara County ECAP and would therefore not conflict with or obstruct a state or local plan for renewable energy of energy efficiency. Therefore, the magnitude of potential impacts associated with consumption of energy resources would be reduced with this alternative, and less than significant impacts would result, as with the proposed project.

Fire Protection

Although this alternative would result in fewer residential lots than the project, this alternative would still create additional sources and increased risk of wildland fires in a high fire hazard area, and would be subject to compliance with SBCFD requirements, applicable OCP development standards, and Conditions of Approval pertaining to fire management to ensure that potential impacts associated with wildland fire hazards would be less than significant. In addition, as with the proposed project, this alternative would increase demand on the Santa Barbara County Fire Department, resulting in a reduction in the fire protection service ratio, and subject to the Orcutt Planning Area fire mitigation fee, which provides funding for new fire stations and acquisition of new equipment and apparatus required to serve new development. Therefore, the magnitude of

potential impacts associated with wildland fire hazards and fire protection would be reduced compared to the proposed project but would remain less than significant as with the proposed project.

Geologic Processes

This alternative would reduce the number of residential lots and focus development on the east side of Key Site 21, reducing potential impacts associated with geologic hazards when compared to the proposed project. In addition, this alternative would eliminate residential development on steep slopes of 30 percent or greater, avoiding potential impacts resulting from locating development on unstable soils. Nevertheless, this alternative would require mitigation similar to that required for the proposed project (Mitigation Measure GEO-1) to ensure that future roadway development that would occur on steep slopes is engineered in such a manner to reduce potential impacts resulting from cut slopes exceeding 15 feet in height. In addition, development under this alternative would be required to implement Mitigation Measure GEO-2 to ensure fill material is sufficiently compacted to reduce the potential for soil erosion and sedimentation into drainages. With elimination of residential development from steep slopes and implementation of these mitigation measures under this alternative, impacts associated with geologic process would be less than significant. Therefore, this alternative would result in reduced geologic impacts in comparison to the proposed project.

Greenhouse Gas Emissions

As described in the Air Quality discussion above, this alternative would result in 49 percent fewer residential units than the proposed project and would generate proportionately lower GHG emissions. Therefore, the annual GHG emissions in this alternative would be approximately 857 MT CO₂e/year, which does not exceed the identified GHG significance threshold of 1,100 MT/year. The per capita annual GHG emissions rate would be approximately 3.9 MT CO₂e/SP/year, similar to the project, and would exceed the project-specific efficiency threshold of 3.3 MT CO₂e/SP/year. Therefore, similar to the proposed project, this alternative would result in less than significant impacts associated with greenhouse gas emissions with incorporation of mitigation.

Land Use

No major design changes are assumed in the Willow Creek neighborhood under this alternative except for the elimination of units on steep slopes. Setbacks and buffers as set forth in the OCP would be required for development under this alternative, as for the proposed project. This alternative would reduce the overall number of new residential units on the project site by approximately 49 percent, resulting in fewer residences developed adjacent to the RMGC golf course and proportionately lower potential for land use impacts, including quality of life impacts related to overall compatibility with adjacent land uses. The magnitude of potential land use impacts would be reduced compared to the proposed project, but would remain less than significant with mitigation, as with the proposed project.

Noise

Temporary construction-related noise impacts would be reduced with this alternative as a result of the reduced amount of new residential development. Sensitive residential receptors are located to the northwest and west and would be exposed to reduced levels of temporary construction noise due to their increased distance from the Willow Creek neighborhood. Nevertheless, patrons at the RMGC clubhouse would be exposed to construction-phase noise from grading and construction

activities that may exceed County standards. Mitigation Measures N-1(a) and N-1(b) would still be required to reduce potential impacts to a less than significant level. This alternative would result in less project-generated traffic on area roadways, reducing potential traffic noise impacts as a result of the project. Therefore, this alternative would result in overall reduced noise impacts when compared to the project but would still be subject to mitigation to avoid temporary construction noise impacts to sensitive receptors in the vicinity of the project site.

Public Services and Recreation

Development of 75 residences under this alternative would result in a reduced demand on schools, water infrastructure, wastewater infrastructure, solid waste collection and disposal services, and other public service facilities in comparison to the project. Development under this alternative would be subject to standard development fees and school fees to ensure that incremental impacts to these facilities are offset by new development. This alternative would increase the population of the Orcutt area by an estimated 221 residents, which would result in approximately 212 tons of new solid waste per year and similar to the project, would exceed the County's 196 tons per year threshold for solid waste generation. Based on an estimated minimum residential unit size of 1,500 square feet, development of 75 single-family residences would result in approximately 112,500 square feet of new construction, exceeding the County's construction waste threshold of 47,000 square feet for new construction and resulting in a potentially significant impact on solid waste services, as with the proposed project. Overall, impacts of this alternative to public services and facilities would be less than the proposed project, but this alternative would still result in a significant and unavoidable impact associated with solid waste generation during construction. As with the project, this alternative would not significantly increase the demand for recreational facilities or require the construction or expansion of recreational facilities that may have an adverse physical effect on the environment.

Transportation/Circulation

This alternative would result in 49 percent fewer residential units than the proposed project and would generate proportionately fewer vehicle trips that would be added to area roadways. Under this alternative, similar to the project, all study area intersections would operate at acceptable levels of service and all study area roadway segments are forecast to operate within the County's acceptable capacity under existing + project conditions. In addition, this alternative would include a new private road constructed approximately 1,200 feet west of the main entrance to the golf course to provide primary access to the residential lots in the Willow Creek neighborhood. Secondary access would be provided by a private secondary access road with gated egress from the Willow Creek neighborhood through the golf course and out to SR 1. Access and design for circulation under this alternative would not result in new or exacerbated safety issues at these locations. As with the project, this alternative would contribute new vehicle trips to cumulative traffic conditions that would result in an unacceptable level of service at the Foxenwood Lane/Clark Avenue intersection, and the significant and unavoidable cumulative impact identified for the project would remain with the alternative. Overall, this alternative would generate fewer vehicle trips than the project and would reduce the magnitude of impacts to roadways and intersections but would result in similar impact levels.

Water Resources/Flooding

The development of only the Willow Creek neighborhood and elimination of residential units on steep slopes under this alternative would reduce site disturbance compared to the proposed project by approximately 49 percent, and impacts related to hydrology and water quality would be proportionately reduced. As with the proposed project, development under this alternative would be subject to compliance with NPDES permit requirements, the required SWPPP and applicable BMPs, the County's grading ordinance and applicable OCP development standards, compliance with existing design guidelines, applicable SBCFCD requirements for post-development peak stormwater flows, and BMPs and maintenance requirements described in the Neighborhood Stormwater Control Plans. Development under this alternative would result in incrementally less water use than the project and would not exceed the final water rights Stipulation entered in the Santa Maria Groundwater Basin adjudication. Therefore, buildout under this alternative would be offset by long-term supplemental water supplies and would not result in further overdraft of the Santa Maria Groundwater Basin, similar to the proposed project. The magnitude of potential impacts associated with water resources and flooding would be reduced with this alternative, resulting in less than significant impacts with mitigation, as with the proposed project.

6.3.4 Alternative 4: Reduced Units in Willow Creek and Hidden Canyon Neighborhoods

Aesthetics/Visual Resources

This alternative would reduce the overall number of new residential units on the project site from 146 to 113 (23%) by eliminating the residential lots in the Willow Creek and Hidden Canyon neighborhoods in areas with steep slopes. The reduction in residential units would reduce the amount of open space and rural landscape converted to low density housing and would reduce impacts to the scenic view corridor on the southern side of SR 1 between Black Road and Solomon Road. However, this alternative would result in development distributed in the same general areas as the project and result in similar changes to the visual character of the site from semi-rural to a more urbanized condition. Similar to the proposed project, implementation of Mitigation Measures AES-1 through AES-4 (which implement OCP EIR Mitigation Measures VIS-3 and VIS-4) would reduce potential impacts to the project site's visual character, and implementation of Mitigation Measure AES-5 (which implements OCP EIR Mitigation Measure VIS-2) would reduce potential light and glare impacts. However, the overall impact related to the change in visual character of the project site under this alternative would remain significant and unavoidable similar to the proposed project.

Agricultural Resources

This alternative would reduce the overall amount of residential development on the project site by approximately 16 percent, reducing potential impacts associated with the conversion or agricultural lands or conflicts with agricultural zoning. However, the distribution of uses and associated development area would be similar to that of the project. This alternative would result in similar, less than significant, impacts to agricultural resources as the proposed project.

Air Quality

The development of 33 fewer residential lots on the site under this alternative represents a 23 percent reduction in new residential lots on the site compared to the proposed project. This would proportionately reduce both temporary construction emissions and long-term operational emissions

when compared to the proposed project. This alternative would result in less than significant air quality impacts, as with the proposed project.

Biological Resources

Development under this alternative may result in impacts to special status plant and animal species, sensitive habitats, state and federally protected wetlands, wildlife movement, protected trees, and environmentally sensitive vegetation on the project site. However, due to the overall reduction of residential development area by approximately 16 percent, this alternative would reduce the overall level of impacts to biological resources when compared to the project. Nevertheless, because this alternative would still impact biological resources within each of the neighborhood development areas, mitigation measures described in Section 4.4, *Biological Resources*, would be required. Potential impacts to CTS would remain significant and unavoidable. Overall, this alternative would impact less area containing biological resources than the proposed project but would result in similar level of impacts.

Cultural and Tribal Cultural Resources

The project site does not contain any known cultural resource sites. This alternative would reduce the number of units in the Willow Creek and Hidden Canyon neighborhoods, reducing the overall area of development by approximately 16 percent, and therefore would not result in disturbance beyond the development areas identified for the project. Accordingly, this alternative would result in similar, less than significant, direct impacts to cultural and tribal cultural resources identified for the project. Mitigation measures described in Section 4.5, *Cultural and Tribal Cultural Resources*, would be required to ensure that potential resources are avoided during construction or appropriately documented and curated in the event that avoidance cannot be ensured, and are also protected from indirect impacts. The magnitude of potential impacts would be reduced compared to the proposed project, but would remain less than significant with mitigation, as with the proposed project.

Energy

This alternative would result in 23 percent fewer residential units than the proposed project and would utilize proportionately less energy resources. Construction and operation of development under this alternative would still require temporary and long-term consumption of energy resources. However, as determined for the project, construction and operation of development under this alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. In addition, this alternative would be consistent with the Santa Barbara County ECAP and would therefore not conflict with or obstruct a state or local plan for renewable energy of energy efficiency. Therefore, the magnitude of potential impacts associated with consumption of energy resources would be reduced with this alternative, and less than significant impacts would result, as with the proposed project.

Fire Protection

Although this alternative would result in fewer residential lots than the project, this alternative would still create additional sources and increased risk of wildland fires in a high fire hazard area, and would be subject to compliance with SBCFD requirements, applicable OCP development standards, and Conditions of Approval pertaining to fire management to ensure that potential impacts associated with wildland fire hazards would be less than significant. In addition, as with the

proposed project, this alternative would increase demand on the Santa Barbara County Fire Department, resulting in a reduction in the fire protection service ratio, and subject to the Orcutt Planning Area fire mitigation fee, which provides funding for new fire stations and acquisition of new equipment and apparatus required to serve new development. Therefore, the magnitude of potential impacts associated with wildland fire hazards and fire protection would be reduced compared to the proposed project but would remain less than significant as with the proposed project.

Geologic Processes

This alternative would reduce the number of residential lots developed on the project site, reducing potential impacts associated with geologic hazards when compared to the project. In addition, this alternative would eliminate residential development on steep slopes, avoiding potential impacts resulting from locating development on unstable soils. Nevertheless, this alternative would require mitigation similar to that required for the proposed project (Mitigation Measure GEO-1) to ensure that future roadway development that would occur on steep slopes to maintain internal circulation within the neighborhoods, is engineered in such a manner to reduce potential impacts resulting from cut slopes exceeding 15 feet in height. In addition, development under this alternative would be required to implement Mitigation Measure GEO-2 to ensure fill material is sufficiently compacted to reduce potential for soil erosion and sedimentation into drainages. With elimination of residential development from steep slopes and implementation of these mitigation measures under this alternative, impacts associated with geologic process would be less than significant. Therefore, this alternative would result in reduced geologic impacts in comparison to the proposed project.

Greenhouse Gas Emissions

As described in the Air Quality discussion above, this alternative would result in 23 percent fewer residential units than the proposed project and would generate proportionately lower GHG emissions. Therefore, the annual GHG emissions in this alternative would be approximately 1,285 MT CO₂e/year, which would exceed the identified GHG significance threshold of 1,100 MT/year. The per capita annual GHG emissions rate would be approximately 3.9 MT CO₂e/SP/year, similar to the project, and would exceed the project-specific efficiency threshold of 3.3 MT CO₂e/SP/year. Therefore, similar to the proposed project, this alternative would result in less than significant impacts associated with greenhouse gas emissions with incorporation of Mitigation Measure GHG-1.

Land Use

No major design changes are assumed in the Willow Creek and Hidden Canyon neighborhoods under this alternative except for the elimination of units on steep slopes and directly abutting the RGMC golf course fairway. Setbacks and buffers as set forth in the OCP would be required for development under this alternative, as for the proposed project. This alternative would reduce the overall number of new residential units on the project site by approximately 23 percent, resulting in fewer residences developed adjacent to the RMGC golf course and proportionately lower potential for land use impacts, including quality of life impacts related to overall compatibility with adjacent land uses. The magnitude of potential land use impacts would be reduced compared to the proposed project, but would remain less than significant with mitigation, as with the proposed project.

Noise

Temporary construction-related noise impacts would be reduced with this alternative as a result of the reduced amount of new residential development, but sensitive receptors are located to the north and west would still be exposed to similar levels of temporary construction noise due to their proximity to the Hidden Canyon neighborhood. Mitigation Measures N-1(a) and N-1(b) would still be required to reduce potential impacts. This alternative would result in less project-generated traffic on area roadways, reducing potential traffic noise impacts as a result of the project. Therefore, this alternative would result in overall reduced noise impacts when compared to the project but would still be subject to mitigation to avoid temporary construction noise impacts to sensitive receptors in the vicinity of the project site.

Public Services and Recreation

Development of 113 residences under this alternative result in a reduced demand on schools, water infrastructure, wastewater infrastructure, solid waste collection and disposal services, and other public service facilities, in comparison to the project. Development under this alternative would be subject to standard development fees and school fees to ensure that incremental impacts to these facilities are offset by new development. This alternative would increase the population of the Orcutt area by an estimated 333 residents, which would result in approximately 322 tons of new solid waste per year and, similar to the project, would exceed the County's 196 tons per year threshold for solid waste generation. Based on an estimated minimum residential unit size of 1,500 square feet, development of 113 single-family residences would result in approximately 169,500 square feet of new construction, exceeding the County's construction waste threshold of 47,000 square feet for new construction and resulting in a potentially significant impact on solid waste services, as with the proposed project. Overall, impacts of this alternative to public services and facilities would be less than the proposed project, but this alternative would still result in a significant and unavoidable impact associated with solid waste generation during construction. As with the project, this alternative would not significantly increase the demand for recreational facilities or require the construction or expansion of recreational facilities that may have an adverse physical effect on the environment.

Transportation/Circulation

This alternative would result in 23 percent fewer residential units than the proposed project and would generate proportionately fewer vehicle trips that would be added to area roadways. Under this alternative, similar to the proposed project, all study area intersections would operate at acceptable levels of service and all study area roadway segments are forecast to operate within the County's acceptable capacity under existing + project conditions. As with the project, this alternative would include two new full-access connections and one new secondary access connection to State Route 1. Access and design for circulation under this alternative would not result in new or exacerbated safety issues at these locations. This alternative would also contribute new vehicle trips to cumulative traffic conditions that would result in an unacceptable level of service at the Foxenwood Lane/Clark Avenue intersection and the significant and unavoidable cumulative impact identified for the project would remain with the alternative. Overall, this alternative would generate fewer vehicle trips than the project and would reduce the magnitude of impacts to roadways and intersections but would result in similar impact levels.

Water Resources/Flooding

The development of only the Hidden Canyon neighborhood and elimination of residential units on steep slopes under this alternative would reduce site disturbance compared to the proposed project by approximately 16 percent, and impacts related to hydrology and water quality would be proportionately reduced. As with the proposed project, development under this alternative would be subject to compliance with NPDES permit requirements, the required SWPPP and applicable BMPs, the County's grading ordinance and applicable OCP development standards, compliance with existing design guidelines, applicable SBCFCD requirements for post-development peak stormwater flows, and BMPs and maintenance requirements described in the Neighborhood Stormwater Control Plans. Development under this alternative would result in incrementally less water use than the project and, would not exceed the final water rights Stipulation entered in the Santa Maria Groundwater Basin adjudication. Therefore, buildout under this alternative would be offset by long-term supplemental water supplies and would not result in further overdraft of the Santa Maria Groundwater Basin, similar to the proposed project. The magnitude of potential impacts associated with water resources and flooding would be reduced with this alternative, resulting in less than significant impacts with mitigation, as with the proposed project.

6.4 Environmentally Superior Alternative

This discussion identifies the environmentally superior alternative by assessing the degree to which each alternative avoids significant and unavoidable environmental impacts. In some cases, an alternative will avoid one or more significant and/or unavoidable impacts identified for the proposed project but then introduce one or more new significant impacts. Therefore, selection of the Environmentally Superior Alternative requires an overall assessment of the changes in the number and type of significant impacts.

The *CEQA Guidelines* do not define a specific methodology for determining the Environmentally Superior Alternative. For the purposes of this analysis, the three project alternatives have been compared within each issue area to the proposed project, and a determination has been made as to whether the alternative was superior, inferior, or similar to the proposed project (Refer to Table 6-2). For the purpose of this Subsequent EIR, the analysis assumes that each impact is equally weighted. Decision makers and the community in general may choose to emphasize one issue or another, which could lead to differing conclusions regarding environmental superiority. If the No Project Alternative is identified as the Environmentally Superior Alternative for a given issue area, the development scenario among the remaining alternatives that results in the lowest environmental impact is noted, in accordance with CEQA.

The No Project (No Build) Alternative (Alternative 1) would result in the fewest adverse environmental effects. However, since this is the "No Project" alternative, CEQA requires that a separate alternative also be identified as the Environmentally Superior Alternative.

The Only Hidden Canyon Neighborhood Development Alternative (Alternative 2) and Only Willow Creek Neighborhood Development Alternative (Alternative 3) would result in the fewest significant and unavoidable impacts as compared to both the proposed project and to the original alternatives analyzed in the OCP EIR. Between these two alternatives, the Only Hidden Canyon Neighborhood Development Alternative (Alternative 2) would result in reduced impacts to biological resources, because it would avoid more perennial rye grass grassland and purple needle grass grassland west of the public golf course. Therefore, Alternative 2 would be considered environmentally superior overall.

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As described in the analysis of alternatives in this section, Alternative 2 would avoid the project's significant and unavoidable project-specific impact to visual character, with incorporation of mitigation, and reduce overall impacts associated with development on steep slopes, adverse effects on sensitive species, demand on public services, and transportation/circulation. In addition, this alternative would avoid or reduce impacts on native plant communities, such that the associated mitigation measures and ratios may be reduced under this alternative. Furthermore, Alternative 2 does not present any new significant impacts that were determined to be less than significant in the analysis of the proposed project nor would it increase the severity of impacts identified for the proposed project. For these reasons, the Only Hidden Canyon Neighborhood Development Alternative (Alternative 2) is identified as the Environmentally Superior Alternative.

The Reduced Units in Willow Creek and Hidden Canyon Neighborhoods Alternative (Alternative 4) would result in similar significant and unavoidable impacts as compared to both the proposed project and to the original alternatives analyzed in the OCP EIR. As described in the analysis of alternatives in this section, this alternative would reduce overall impacts associated with development on steep slopes, adverse effects on sensitive species, demand on public services, and transportation/circulation. In addition, Alternative 4 does not present any new significant impacts that were determined to be less than significant in the analysis of the proposed project nor would it increase the severity of impacts identified for the proposed project. For these reasons, the Reduced Units in Willow Creek and Hidden Canyon Neighborhoods Alternative (Alternative 4) is considered environmentally superior to the project, but would not be environmentally superior to Alternative 2, which avoid the project's significant and unavoidable project-specific impact to visual character.

Although the Only Hidden Canyon Neighborhood Development Alternative (Alternative 2) is identified as the Environmentally Superior Alternative, it would not meet some of the objectives for the project, as described in Section 2.6 of this SEIR. Specifically, this alternative would not be consistent with the overall development vision for Key Site 21 in the OCP and would provide substantially fewer residential units than the proposed project, which would not be consistent with the project objective to address the current State-wide housing shortage of two million units.

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