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September 16, 2020
Project No: 18-05780

Sean Stewart, J.D., Planner
County of Santa Barbara, Planning and Development, North County Office
123 East Anapamu Street
Santa Barbara, California 93101
Via email: sreese@co.santa-barbara.ca.us

Subject: Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project, Final Subsequent Environmental Impact Report (SCH #2018031077) Revision Letter Project Case No. 19EIR-00000-00002

Mr. Stewart:

Please find attached a comparison of the revised project description for the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project to the original project evaluated in the Final Subsequent Environmental Impact Report (Final SEIR) prepared by Rincon Consultants on behalf of the County of Santa Barbara.

The Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project evaluated in the Final SEIR involved a Specific Plan, a Comprehensive Plan Amendment, two Vesting Tentative Tract Maps, two Final Development Plans, two Minor Conditional Use Permits, and a road naming application, and Comprehensive Plan Amendment 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. Since the Draft SEIR was circulated for public review in 2019, the project description has been revised to adjust the proposed lot lines to reduce the number of proposed residential lots from 146 to 143 and reduce the overall residential development footprint of the project. The revised project's potential to generate new vehicle miles traveled are also discussed, consistent with the requirements CEQA Guidelines Section 15064.3.

As described, the requested revisions to the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project would not result in any new or revised environmental impacts, as compared to the project as evaluated in the Final SEIR.

Sincerely,
Rincon Consultants, Inc.

A handwritten signature in black ink, appearing to read "CB", written over a light blue horizontal line.

Chris Bersbach, MESM
Senior Environmental Planner/Program Manager

A handwritten signature in black ink, appearing to read "Richard Daulton", written over a light blue horizontal line.

Richard Daulton, MURP
Principal/Vice President

Attachments

Attachment 1 Revision Letter

Neighborhoods of Willow Creek and Hidden Canyon
(Key Site 21) Project
Final Subsequent Environmental Impact Report
Revision Letter

SCH #2018031077
Project Case No. 19EIR-00000-00002

September 2020

Prepared by:

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I. Introduction

The proposed Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project evaluated in the Final Subsequent Environmental Impact Report (Final SEIR) involves the following entitlements:

- 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;
- Two Vesting Tentative Tract Maps (VTTM) (Case Nos. 16TRM-00000-00003 and 16TRM-00000-00004) to subdivide two lots of approximately 107 gross acres and 70 gross acres;
- 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;
- A Minor Conditional Use Permit (Case No. 17CUP-00000-00030) for the development of a new community water system;
- 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);
- 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; and
- 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, and to amend Orcutt Community Plan Policy DevStd KS21-1 to specify, “No applications for development shall be ~~accepted~~ approved prior to approval of a specific plan for the entire site.”

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 Draft SEIR was circulated for a 45-day public review period that began on June 16, 2019 and ended on August 5, 2019. Since the Draft SEIR was circulated for public review, the project description has been revised to reduce the number of proposed residential lots from 146 to 143 (a reduction of two residential lots in the proposed Hidden Canyon neighborhood and one residential lot in the proposed Willow Creek neighborhood) and to adjust the proposed lot lines

to accommodate this change and reduce the overall residential development footprint of the project. These revisions to the Final SEIR project description were made by the project applicant to avoid residential lots on slopes exceeding 30 percent.

Other important changes since public circulation of the Draft SEIR include updated regulatory requirements and revised CEQA Guidelines associated with transportation impact analysis and vehicle miles traveled (VMT) and new County of Santa Barbara guidance to address VMT impacts. As a result of these changes, there is a need for additional discussion of potential transportation impacts and VMT to support the County's determination regarding the potential transportation impacts of the project. This document describes and compares the potential environmental effects of the revised project to the original project evaluated in the Final SEIR.

II. Background

A Draft SEIR (SCH #2018031077) for the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project was circulated for a 45-day public review period that began June 16, 2019 and concluded on August 5, 2019. On July 11, 2019 County Staff conducted a public comment hearing at the Betteravia Government Center in Santa Maria regarding the Draft SEIR for the Orcutt Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project. The Final EIR is comprised of the revised Draft EIR, in combination with comments received and responses to all written and verbal comments received on the Draft EIR.

Based on feedback from the County of Santa Barbara Planning and Development staff, the project applicant has proposed revisions to the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project which are generally consistent with Alternative 4 described in the Final SEIR. These changes are discussed in detail in Section IV.A below. This Revision Letter has been prepared to update the Final SEIR to describe the proposed project modifications, as well as to provide the required environmental context and information to demonstrate that the Final SEIR analysis is complete and accurate for the modified project. Pursuant to CEQA Guidelines Section 15088.5, these project modifications, associated environmental context, and information documented in this Revision Letter do not require recirculation of the Draft SEIR because they do not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

III. California Environmental Quality Act Update

New regulatory requirements, as well as substantive and technical updates to the CEQA Guidelines, have come into effect since the Draft EIR was circulated for public review in 2019. The CEQA Guidelines are updated annually by the California Natural Resources Agency, with the most recent update certified and adopted in January 2020.

The Final SEIR transportation analysis relied on the County's adopted thresholds of significance for traffic impacts, contained in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (March 2018), to determine whether the project would result in potential traffic impacts. The 2019 CEQA Guidelines include new criteria for determining the significance of a project's transportation impacts. CEQA Guidelines Section 15064.3(a) identifies VMT as the

most appropriate measure of transportation impacts. Section 15064.3(b) provides guidance for determining the significance of transportation impacts. With this change, the County may no longer use automobile delay as the basis for determining the significance of transportation impacts. While Lead Agencies were allowed to immediately apply Section 15064.3 of the updated Guidelines, statewide application was not required until July 1, 2020. The County is currently updating the methodologies and thresholds of significance for transportation impacts to shift from LOS to VMT-based metrics. The County expects to adopt the update in fall 2020. In the interim, the County has published draft guidelines that recommend, but do not require, that CEQA documents distributed for public review before July 1, 2020 use VMT-based metrics to analyze the significance of a project's transportation impacts, consistent with the requirements of Section 15064.3(b). Because the Draft EIR was publicly circulated in 2019, the County determined that the Environmental Thresholds and Guidelines Manual thresholds of significance remained the appropriate metric to use to analyze traffic impacts. Therefore, this Revision Letter compares the revised project to the same thresholds of significance used in the Final SEIR, but also supplements the Final SEIR with a discussion of the project's potential to generate VMT, pursuant to Section 15064.3(b). The supplemental discussion does not include a quantitative comparison of project-generated VMT to quantitative thresholds of significance for transportation impacts using a VMT-based metric, since the County has not yet adopted such thresholds.

Additional information regarding substantive and technical updates to the CEQA Guidelines can be found at <https://www.opr.ca.gov/ceqa/updates/guidelines/>.

IV. Revisions to the Final SEIR Impact Discussions

IV.A. Modified Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project Development Plan

The proposed modification to the Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project is a revision to the proposed VTTMs to avoid residential lots on slopes exceeding 30 percent. This change is intended to ensure consistency with the Orcutt Community Plan Development Standard GEO-O-2.2, which limits development on steep, unstable, and highly-erosive slopes:

DevStd GEO-O-2.2. *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.*

This modification to the project would reduce the number of new residential units from 146 single-family residences to 143 single-family residences (a reduction of two residential lots in the proposed Hidden Canyon neighborhood and one residential lot in the proposed Willow Creek neighborhood), and would reduce the number of lots in the proposed VTTMs from 148 to 145 lots. The reduction in residential lots would also reduce the overall development footprint

of the project, increasing the project's amount of private undisturbed open space from 96.7 acres to 109.9 acres. Managed open space, including the landscape, trailhead, public hiking trails, and fuel modification areas, would be reduced from 29.8 acres to 20.5 acres. The revised proposed lot lines are shown in Figure 1 and Figure 2. These figures highlight the portions of the proposed tract maps planned for residential development in the original version of the project evaluated in the Final SEIR that have since been removed from the proposed residential lots.

On a development-wide basis, grading operations for the revised project would result in 1,148 cubic yards (net) of cut in the proposed Hidden Canyon neighborhood and 4,562 cubic yards (net) of cut in the proposed Willow Creek neighborhood, as compared to 84,367 cubic yards (net) of cut in the Hidden Canyon neighborhood and 27,031 cubic yards (net) of fill in the Willow Creek neighborhood required for the original project. As with the original project, no offsite import or export of grading material is anticipated.

IV.B. Environmental Discussion of Proposed Project Revision

The following discussion compares the potential impacts of the revised Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project to the original project evaluated in the Final SEIR.

Aesthetics/Visual Resources

The revised project would result in three fewer new single-family residences than the original project evaluated in the Final SEIR (a reduction of two residential lots in the proposed Hidden Canyon neighborhood and one residential lot in the proposed Willow Creek neighborhood). The proposed lot lines are revised to reduce the overall residential development footprint of the project, but the size and scale of future residential units would not be changed. The location of the eliminated lots would be visible from portions of the Rancho Maria Golf Club (RMGC) public golf course but would not be visible from State Route 1.

For the revised project, applicable OCP EIR Mitigation Measures VIS-3 and VIS-4 would be implemented by Final SEIR Mitigation Measures AES-2(a) through AES-2(d), which describe design requirements for development near the open space overlay, retention basin design, landscape design, and infrastructure screening. Final SEIR Mitigation Measures AES-3 would continue to apply to the revised project, requiring exterior lighting to direct light overflow away from the open space areas. Overall, potential impacts to scenic vistas, scenic resources, and potential impacts associated with lighting and glare would remain less than significant with mitigation incorporated, as described in the Final SEIR. Final SEIR Mitigation Measures AES-2(a) through AES-2(d) would minimize potential impacts to the visual quality and open space character of the project site, but this impact would remain significant and unavoidable, as described in the Final SEIR.

Agricultural Resources

The revised project would result in three fewer new single-family residences on a smaller footprint than the original project, which is a reduction in proposed residential development of approximately two percent. Similar to the original project evaluated in the Final SEIR, the revised project would not result in conversion of FMMP-designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), would not conflict with existing

Figure 1 Willow Creek Tract Map Modification Exhibit

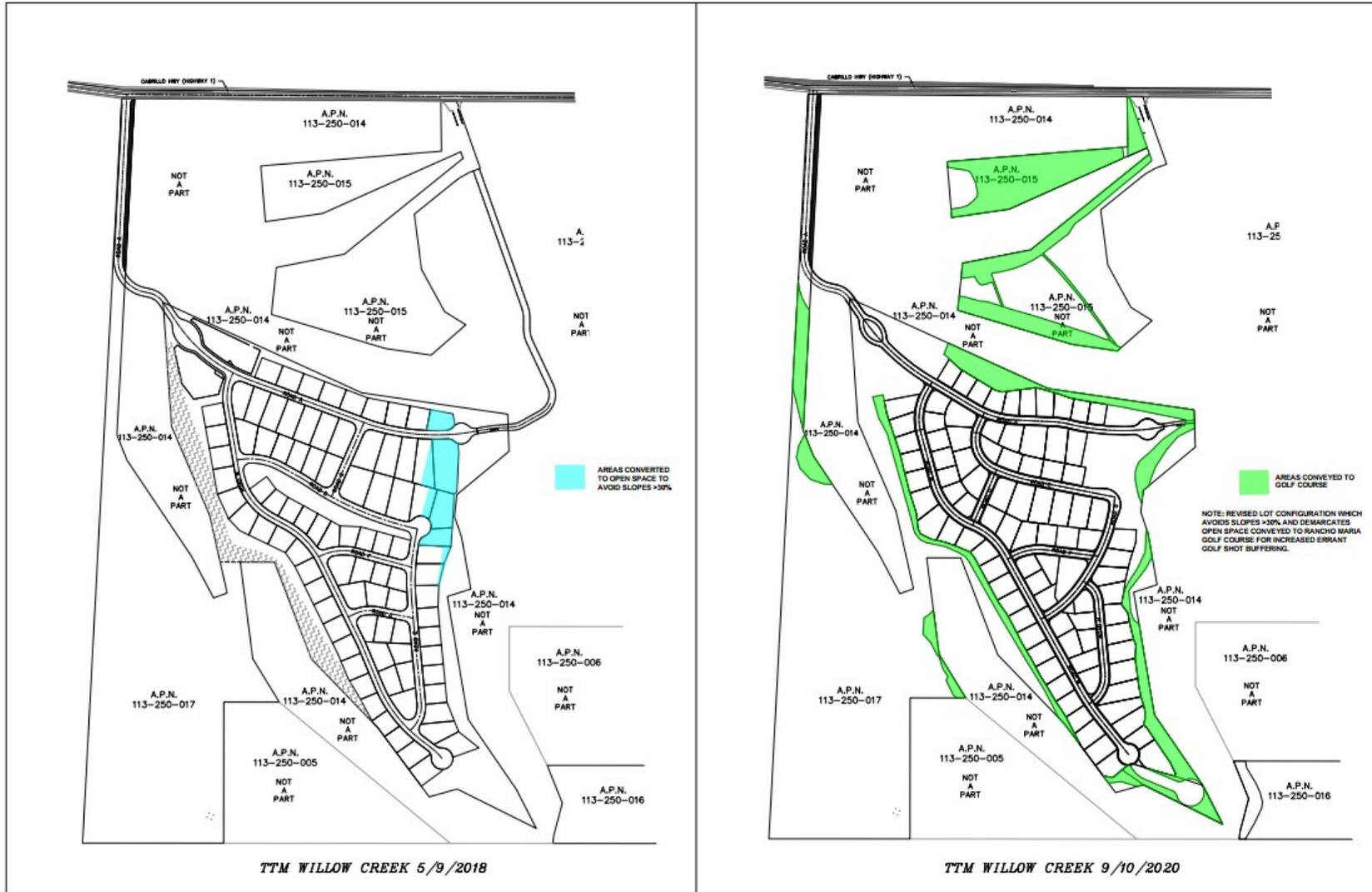
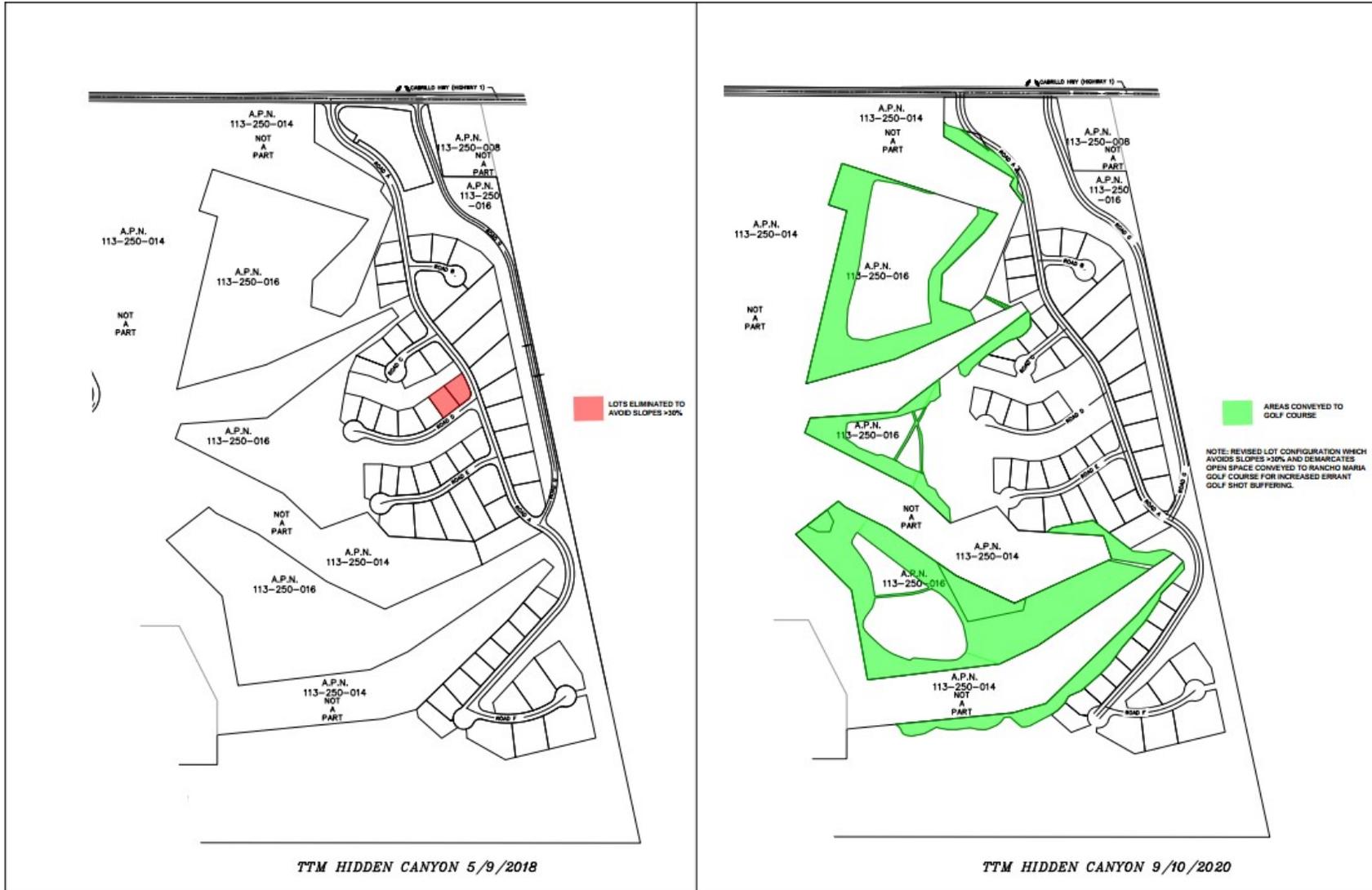


Figure 2 Hidden Canyon Tract Map Modification Exhibit



zoning for agricultural use or a Williamson Act contract and would not involve any other changes that would convert farmland to non-agricultural use. Overall, potential impacts to agricultural resources associated with the revised project would be less than significant, as described in the Final SEIR.

Air Quality

The revised project would result in three fewer new single-family residences on a smaller footprint than the original project, constituting a reduction in proposed residential development of approximately two percent. The reduced development footprint would proportionally reduce emissions and potential dust generation during the site preparation and grading phases of project construction. The California Emissions Estimator Model (CalEEMod) was used to estimate criteria pollutant emissions resulting from the proposed project. The CalEEMod results (see Appendix B to the Final SEIR for calculations) provide the average travel distance, vehicle trip numbers, and vehicle fleet mix estimated for the project. The revised project would result in a 3 percent increase in gross grading operations but would decrease net grading operations by 61 percent and would eliminate the need to truck soil between the Hidden Canyon and Willow Creek neighborhood sites. Consistent with the original project analyzed in the Final SEIR, no offsite import or export of grading material is anticipated. The reduction in net on-site grading activity and elimination of soil hauling trips between the proposed neighborhoods would also decrease short-term construction emissions during the construction period.

The analysis, conclusions, and mitigation requirements described in Section 4.3, Air Quality, of the Draft SEIR are consistent with the requirements described in the most recent Scope and Content of Air Quality Sections in Environmental Documents (June 2017). Long-term impacts from operational emissions would be proportionally reduced when compared to the original project. Overall, project-specific and cumulative regional air quality impacts associated with the revised project would be less than significant, as described in the Final SEIR.

Biological Resources

The revised project would reduce the number of residential lots from 146 to 143, resulting in an incremental reduction in the development footprint in comparison to the original project. The project's amount of private, undisturbed open space in the two neighborhoods would increase from 96.7 acres to 109.9 acres, reducing biological impacts as compared to the original project. As with the original project, the revised project would result in potential impacts to special status plant species, special status animal species including the federally and State listed California tiger salamander (CTS) Santa Barbara County Distinct Population Segment (DPS), sensitive habitats including riparian areas, state and federally protected wetlands, wildlife movement, protected trees, and environmentally sensitive vegetation. The list of special status species that could potentially be affected by the project remains consistent with the special status species evaluated in Section 4.4, *Biological Resources*, of the Final SEIR (refer to Impact BIO-1 and Impact BIO-2 of the Final EIR).

Implementation of Final SEIR Mitigation Measures BIO-1(a) through BIO-1(b), BIO-2(a) through BIO-2(k), BIO-3(a) through BIO-3(d), BIO-4(a) through BIO-4(d), BIO-5(a) through BIO-5(d), BIO-6(a) through BIO-6(b), and BIO-7 would reduce biological impacts to a less than significant level by requiring avoidance, minimization, and restoration of sensitive resources, incorporation of

species protection measures into the Open Space Management Plan (OSMP), wetland and drainage avoidance and mitigation, pre-construction surveys, resources agency consultation, preparation of the tree replacement plan, preparation of Worker Environmental Awareness Program (WEAP), preparation of the fuel management plan, and construction Best Management Practices. With the exception of potential impacts to CTS, implementation of these required mitigation measures would ensure that the revised project would have a less than significant impact on biological resources, as described in the Final SEIR. Due to lack of available off-site locations for CTS compensatory mitigation within the West Santa Maria/Orcutt metapopulation area, potential impacts to CTS would remain significant and unavoidable. Cumulative biological resources impacts would remain significant and unavoidable, due to cumulative loss of sensitive habitats in general, and in particular to loss of upland and potentially suitable aquatic habitat for CTS and federally listed California red-legged frog (CRLF) in northern Santa Barbara County, as described in the Final SEIR.

Cultural Resources and Tribal Cultural Resources

As identified in the Final SEIR, new development on the project site has the potential to result in direct and/or indirect impacts to known and previously undiscovered archaeological resources and tribal cultural resources. The revised project would reduce the number of residential lots from 146 to 143, resulting in an incremental reduction in the development footprint in comparison to the original project. While the revised project would reduce the development footprint and would proportionally reduce potential impacts to archaeological and tribal cultural resources, new residential development on Key Site 21 would still be subject to Final SEIR Mitigation Measures CUL-1 (a) through CUL-1(c) and CUL-2, which require avoidance of CA-SBA-1169/H, archaeological monitoring during construction, and tribal cultural resources consultation and preservation in the event that previously undiscovered tribal cultural resources are identified during implementation of the project. Due to the overall sensitivity of the project area, construction monitoring and discovery measures consistent with the County Cultural Resource Guidelines would reduce impacts to unknown cultural resources and tribal cultural resources to a less than significant level. Project-specific and cumulative impacts to cultural resources and tribal cultural resources would remain significant but mitigable.

Energy

The revised project would result in three fewer new single-family residences than the original project, reducing the proposed residential development by approximately two percent and resulting in proportionally reduced energy demand. Section 4.6, Energy, of the Final SEIR includes an estimate of the original project's estimated energy demand, including fuel consumed by passenger vehicles; natural gas consumed for heating residences; and electricity consumed in residences for functions including, but not limited to, lighting, water conveyance, and air conditioning.

The proposed residences would require permanent grid connections for electricity and natural gas. Construction of the proposed residences would comply with the 2019 California Building Energy Efficiency Standards for Residential Buildings and CalGreen (California Code of Regulations Title 24, Parts 6 and 11). These standards require the provision of electric vehicle supply equipment, water-efficient plumbing fixtures and fittings, recycling services, and other energy-efficient measures. In addition, consistent with the requirements of Section 150.1(c)14

of the 2019 California Building Energy Efficiency Standards, new residential structures are required to install solar panels with annual electrical output equal to or greater than the dwelling's annual electrical usage.

As described above, in comparison to the original project evaluated in the Final SEIR, the revised project would result in two percent fewer single-family residences and would therefore result in proportionally reduced electricity and natural gas consumption, as well as reduced vehicle travel. Therefore, the revised project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

As with the original project, 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. As described in the Final SEIR, no mitigation measures are required because the impacts related to energy were found to be less than significant.

Fire Protection

Section 4.7, Fire Protection, of the Final SEIR evaluates the project's potential to impact fire protection services or exacerbate wildfire risks and concludes the project would result in less than significant impacts. The revised project would result in three fewer new single-family residences than the original project, reducing the proposed residential development by approximately two percent and resulting in proportionally reduced demand for fire protection services. The reduced project footprint would incrementally reduce potential wildfire risks, although the location of the reduced lots would generally be in the interior of Key Site 21, and would not substantially modify the distance between proposed single-family residences and Moderate, High, or Very High Fire Hazard Severity Zones in comparison to the original project. Overall, the impacts of the revised project with regard to fire protection services and wildfire risks would be less than significant, as described in the Final SEIR.

Geologic Processes

As identified in the Final SEIR, new development on the project site has moderate potential for damage due to expansive soils that pose a risk for settlement and would involve grading activities on steep slopes which create a potential for landslides and other soil stability hazards. The revised project would reduce the number of residential lots from 146 to 143 and adjust the proposed lot lines to avoid residential units on slopes exceeding 30 percent. This change is intended to ensure consistency with the Orcutt Community Plan Development Standard GEO-O-2.2, which limits development on steep, unstable, and highly-erosive slopes. While the revised project would reduce development on steep slopes, proposed residential lots would still be located on slopes that may exceed 20 percent. Therefore, the revised project would be subject to similar geologic hazards and implementation of Final SEIR Mitigation Measures GEO-2, GEO-3, and GEO-4 would reduce potential impacts associated with slope stability, erosion, and expansive soils to a less than significant level by requiring future development to be engineered according to the requirements of the Soils Engineering Report and Engineering Geology Investigation, and compact fill to a minimum relative density of 95 percent.

The revised project's reduced footprint would incrementally reduce potential impacts to paleontological resources. However, Final SEIR Mitigation Measures GEO-5(a) and GEO-5(b)

would require construction management practices that would ensure potential impacts to paleontological resources during construction would remain less than significant. Similar to the original project, project-level impacts associated with geologic hazards would be significant but mitigable, as described in the Final SEIR.

Greenhouse Gas Emissions

Section 4.6, Greenhouse Gas Emissions, of the Final SEIR identifies that the original project would result in approximately 1,668.5 MT CO₂e/year. Based on a service population of 431 new residents, this annual total equates to 3.9 MT CO₂e/SP/year. The annual per-SP estimate of the project's emissions was found to exceed the locally-appropriate 2024 project-specific threshold of 3.3 MT CO₂e/SP/year used in the Final SEIR.

As described in the Air Quality discussion above, the revised project would result in three fewer new single-family residences than the original project, reducing the proposed residential development by approximately two percent and generating proportionally lower greenhouse gas (GHG) emissions. However, the annual GHG emissions of the revised project would still exceed the locally-appropriate 2024 project-specific threshold of 3.3 MT CO₂e/SP/year used in the Final SEIR. As with the original project, Mitigation Measure GHG-1 would reduce GHG emission rates to below the significance criteria by requiring the project developer to prepare a GHG Reduction Program including specific GHG reduction measures and carbon offsets as needed to reduce the project's emissions below the identified significance criteria. Mitigation Measure GHG-1 includes the option of purchasing GHG reduction credits to achieve emission-reduction requirements. Therefore, the revised project's potential impacts associated with GHG emissions and climate change would be less than significant with mitigation, as described in the Final SEIR.

Land Use

The revised project would result in three fewer residential lots than the original project evaluated in the Final SEIR. The revised project would be required to comply with applicable policies and developments standards in the Orcutt Community Plan. Land use impacts related to overall compatibility of the revised project with adjacent land uses would be similar to the original project. Mitigation measures related to visual resource changes that could result in long-term compatibility conflicts, including Final SEIR Mitigation Measures AES-2(a) through AES-2(d), and AES-3 would continue to apply. These measures describe design requirements for development near the open space overlay, retention basin design, landscape design, infrastructure screening, and exterior lighting. Therefore, the revised project's land use impacts would be less than significant with mitigation, as described in the Final SEIR.

Noise

The revised project would result in less construction-related noise than the original project because fewer new single-family residences would be developed on the project site. Sensitive receptors nearest to the project site include single-family residences located approximately 75 feet north and 500 feet north of the Key Site 21 boundary at the northeast corner of the site. The adjacent 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 were evaluated in the Final SEIR.

Construction of the revised project would continue to require Final SEIR Mitigation Measures N-1(a) and N-1(b) to prevent significant construction noise impacts with construction hour limitations and construction noise control measures for stationary construction equipment.

The layout of residential development in the Hidden Canyon and Willow Creek neighborhoods would be similar to the original project, except the number of residential lots has been reduced from 146 to 143, and lot lines have been adjusted to ensure new development would not occur on slopes exceeding 30 percent. Long-term noise impacts and traffic noise impacts associated with the original project were found to be less than significant in the Final SEIR, and the revised project would not substantially affect or modify this conclusion. Overall, the revised project's potential noise impacts would be less than significant with mitigation, consistent with the conclusions of the Final SEIR.

Public Services and Recreation

The revised project would result in three fewer new single-family residences than the original project evaluated in the Final SEIR, which would reduce demand on public service facilities, including schools, water infrastructure, wastewater infrastructure, and solid waste collection and disposal services. The revised project would revise the proposed lot lines but would not result in any changes to planned utilities in a manner that would substantially alter the Final SEIR conclusions for these topics. The reduction in proposed residential development of approximately two percent under the revised project would proportionally reduce demand for public services including schools, water and wastewater infrastructure, solid waste capacity, recreational resources, and police protection services. Overall, project-specific impacts to schools, water infrastructure, wastewater infrastructure, recreation, and police protection would be less than significant, as described in the Final SEIR. Similar to the original project, the revised project would result in significant and unavoidable solid waste and cumulative solid waste impacts.

Transportation and Circulation

As with the original project, the revised project would contribute new peak hour vehicle trips onto area roadways. The revised project would result in three fewer single-family residences, a reduction in proposed residential development of approximately two percent, and would therefore result in proportionally fewer vehicle trips from new development in comparison to the original project evaluated in the Final SEIR. The reduced vehicle trips associated with the revised project would not represent a substantial reduction in the overall volume of new vehicle trips when compared to the original project. The discussion that follows compares the revised project's potential to generate new vehicle trips to the County's adopted Environmental Thresholds and Guidelines Manual thresholds of significance, similar to the Final SEIR analysis of transportation impacts. This discussion does not include a quantitative comparison of project-generated VMT to quantitative thresholds of significance for transportation impacts using a VMT-based metric, since the County has not yet adopted such thresholds. However, this discussion does include a description of the revised project's potential to generate new VMT, pursuant to Section 15064.3(b), for informational purposes.

The Traffic and Circulation Study prepared for the Final SEIR (May 2019, Final SEIR Appendix K) includes traffic counts for the study area, which is 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. Based on County Level of Service (LOS) standards, new peak hour trips added to the Foxenwood Lane/Clark Avenue intersection, which is forecast to operate at LOS F during the AM and PM peak traffic hours under cumulative conditions, would constitute a potentially significant transportation impact. Similar to the original project, the revised project would be required to pay transportation fees to the County to offset the project's contributions to the cumulative Orcutt Transportation Improvement Plan (OTIP) impacts on traffic and circulation. 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 has implemented left-turn restrictions by installing flexible posts along the Clark Avenue median. Public Works will be studying the impacts of left-turn restrictions and use that information for the final median improvement design the County will be installing. While implementation of the left-turn restrictions would increase the intersection's operation to acceptable levels of service under cumulative conditions, this has not been identified as a permanent solution, and no project is approved or funded for this intersection. Therefore, for the purpose of the Final SEIR analysis, signalization of the Foxenwood Lane/Clark Avenue intersection was found to be potentially infeasible. As a result of this conclusion, the project contribution to cumulative impacts would remain significant and unavoidable (Class I), as was the case with the original project.

The County is currently updating the methodologies and thresholds of significance for transportation impacts to shift from LOS to VMT-based metrics. The County expects to adopt the update in fall 2020. In the interim, the County has published draft guidelines that recommend, but do not require, that CEQA documents distributed for public review before July 1, 2020 use VMT-based metrics to analyze the significance of a project's transportation impacts, consistent with the requirements of CEQA Guidelines Section 15064.3(b). Because the Draft EIR was publicly circulated in 2019, the County may determine the appropriate metric to use to analyze traffic impacts pursuant to Section 15064.3(b).

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. 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. As with the analysis for the original project, project access and design would not result in new or exacerbated safety issues at these locations.

For informational purposes, the Final SEIR includes an estimate of the VMT that would be generated by the project. The CalEEMod results (see Appendix B and Appendix H to the Final SEIR for the Air Quality Analysis and Greenhouse Gas Emissions Technical Reports, which include

VMT calculations) provide the average travel distance, vehicle trip numbers, and vehicle fleet mix estimated for the project. The trip generation rates calculated in the project Traffic and Circulation Study (Appendix K to the Final SEIR) were used as inputs in CalEEMod. These values represent a reasonable basis on which to estimate the project's annual VMT. As described in Appendix B and Appendix H to the Final SEIR, the original project would result in approximately 2,533,770 annual VMT. As described above, the revised project would result in two percent fewer new single-family residences and would therefore result in proportionally fewer VMT than the original project.

Water Resources and Flooding

The reduction of the development footprint and reduced number of new single-family residences would result in a proportional reduction of water consumption, as well as potential impacts to water quality and hydrologic resources. The reduction in grading operations would reduce potential water quality impacts during construction of the revised project. Construction activity would still be subject to the requirements of an NPDES permit and would require preparation of a SWPPP and compliance with the County's grading ordinance and standard County conditions of approval.

Although the total area of impermeable surfaces created by development of the revised project would be incrementally reduced in comparison to the original project, the project includes 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 Santa Barbara County Flood Control District (SBCFCD) requirements.

The reduction in proposed residential development of approximately two percent under the revised project would proportionally reduce water demand. Mitigation Measure WR-3, which requires modern drilling, analysis and well construction techniques to ensure new wells would meet the OCP Policy WAT-O-5 standard for TDS concentrations of 425 mg/L, would continue to be required. Impacts to the overdrafted Santa Maria groundwater basin (SMGB) would remain adverse, but less than significant. Overall, the revised project's impacts to water resources would be less than significant, as described in the Final SEIR. Cumulative impacts to water resources would remain less than significant.

Other CEQA Required Discussions/Effects Found Not to be Significant

The Final SEIR determined that there is no substantial evidence the original project would cause or otherwise result in significant environmental effects in the following resource issue areas: Forest Resources, Hazards and Hazardous Materials, Historic Resources, Mineral Resources, and Population and Housing, and growth inducing effects. The conditions on the project site with respect to these issue areas would not change under the revised project such that new or previously unidentified significant impacts would occur. The reduced development footprint for the revised project does not contain any significant forest land, hazardous materials sites, historic resources, or mineral resources. The reduction in the number of new single-family residences and overall development footprint under the revised project would result in less than significant impacts to each of these environmental topics, as described in the Final SEIR.

Policy Consistency

Table 1 and Table 2 show the Santa Barbara County Comprehensive Plan and Orcutt Community Plan policies for which the revised project would result in one or more revisions to the consistency analysis contained in Appendix I of the Final SEIR. Changes in text are signified by strikeouts (strikeouts) where text is removed and by bold font (bold font) where text is added. As shown, the revised project would not result in any new inconsistencies with the Santa Barbara County Comprehensive Plan or Orcutt Community Plan goals, policies, actions, and development standards that were not identified in the Final SEIR.

Table 1 Santa Barbara County Comprehensive Plan Policy Consistency

Goals, Policies, Actions, and Development Standards	Consistency Discussion
Land Use Element – Land Use Development Policies	
<p>Policy 2. The densities specified in the Land Use Plan are maximums and may be reduced if it is determined that such reduction is warranted by conditions specifically applicable to a site, such as topography, geologic or flood hazards, habitat areas, or steep slopes. However, density may be increased under programs of the Housing Element.</p>	<p>Consistent. As described in Section 2, <i>Project Description</i>, buildout of Key Site 21 would result in 146 143 dwelling units. The OCP identifies the project site as Planned Residential Development, 150 unit maximum (PDR). Therefore, the proposed project would result in development within the allowable density in the OCP.</p>
Land Use Element – Hillside and Watershed Protection Policies	
<p>Policy 1. Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</p> <p>Policy 2. All development shall 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 an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</p>	<p>Consistent. The project would involve grading operations that would result in cut and fill of approximately 1,007,916 1,037,570 cubic yards (cy) of soil material. The proposed grading would be planned to be balanced between the Hidden Canyon and Willow Creek 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.</p> <p>In both neighborhoods, grading plans have been designed to minimize grading and site preparation operations by contouring slopes to provide smooth transitions between the graded areas and the adjacent natural land contours. Retaining walls outside of the building footprints would not exceed four feet in height. As discussed in Section 4.8, <i>Geologic Processes</i>, the project would require grading on slopes exceeding 20 percent for approximately 32 residential lots and approximately 11 road segments and would require grading on slopes exceeding 30 percent for 13 residential lots and six approximately five road segments. 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. Mitigation Measure GEO-1 GEO-2 would be required to reduce</p>

impacts resulting from locating development on unstable soils. Project grading activities would be subject to the County's grading ordinance, which requires a grading permit and an Erosion and Sediment Control Plan. Areas of the site which are not suitable for development are identified to remain as undeveloped open space.

Land Use Element – Parks/Recreation Policies

Policy 3. Future development of parks should emphasize meeting the needs of local residents.

Consistent. As discussed in Section 4.12, *Public Services and Recreation*, the proposed project would provide on-site recreational components, including approximately ~~96.7~~ **109.9** acres of undisturbed open space and ~~29.8~~ **20.5** acres of privately managed open space that would include **landscape, fuel modification areas**, a trail staging area, and public recreational trail that would be located along the eastern project boundary. In addition, the applicant would be required to pay Quimby Act park fees.

Land Use Element – Visual Resource Policies

Policy 3. In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.

Consistent. The project site is located within the OCP area. The OCP provides a blueprint for the future development of the Orcutt community located in northern Santa Barbara County. The project site is located on Key Site 21, one of 45 designated "Key Sites" that were identified in the OCP as areas where future development would occur in the community. Key Site 21 is designated in the OCP as an Existing Developed Rural Neighborhood, an area within which development has occurred historically with lots smaller than those found in the surrounding Rural or Inner Rural Areas. The project site is zoned Planned Residential Development. 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.

The proposed project would provide ~~146~~ **143** new residential units on Key Site 21, as anticipated by the County and in the OCP, and consistent with the policies and development standards set forth in the OCP. The housing types included in the project include ~~56~~ **54 larger** home sites within the Hidden Canyon neighborhood with lot sizes averaging **approximately 18,080** square feet. The Willow Creek neighborhood would be higher in density and would provide ~~90~~ **89** lots of an average size of **approximately 11,375** square feet.

Housing Element

Policy 1.1. Promote new housing opportunities adjacent to employment centers, and the revitalization of existing housing to meet the needs of all economic segments of the community, including extremely low income households, while bolstering the County's rural heritage and supporting each unincorporated community's unique character.

Policy 2.1. Encourage housing that meets the requirements of special needs households, as identified per State law, and promotes housing diversity (i.e., size, type, tenure, location, and affordability levels).

Policy 3.1. Promote equal housing opportunities for all persons in all housing types (ownership and rental, market-rate and assisted).

Consistent. The project site is located within the OCP area. The OCP provides a blueprint for the future development of the Orcutt community located in northern Santa Barbara County. The project site is located on Key Site 21, one of 45 designated "Key Sites" that were identified in the OCP as areas where future development would occur in the community. Key Site 21 is designated in the OCP as an Existing Developed Rural Neighborhood, an area within which development has occurred historically with lots smaller than those found in the surrounding Rural or Inner Rural Areas. The project site is zoned Planned Residential Development. 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.

The project site is not located adjacent to an employment center. However, the project site is located within close proximity to Old Town Orcutt which may provide employment opportunities. The proposed project would provide ~~146~~ **143** new residential units on Key Site 21, as anticipated by the County and in the OCP, and consistent with the policies and development standards set forth in the OCP. The housing types included in the project include ~~56~~ **54** larger home sites within the Hidden Canyon neighborhood with lot sizes averaging ~~approximately 18,000~~ **approximately 18,080** square feet. The Willow Creek neighborhood would be higher in density and would provide ~~90~~ **89** lots of an average size of **approximately 11,375** square feet. The County's Regional Housing Needs Allocation (RHNA) for the 2014-2022 RHNA projection period is 661 units. To plan for an adequate housing supply for all economic segments of the population, the RHNA is separated into four broad income categories: 159 extremely low/very low-income units, 106 low-income units, 112 moderate-income units, and 284 above moderate-income units. Appendix B of the 2015-2023 Housing Element includes an inventory of housing sites that are zoned and suitable to accommodate the RHNA within all income categories. The proposed project is part of the land inventory with a potential housing production of ~~146~~ **143** above-moderate income units. The proposed residences would be required to meet ADA requirements relative to access. Payment of standard County in-lieu housing fees would contribute to the construction of affordable units throughout the Santa Maria HMA and would meet the Project's affordable housing requirement.

Seismic Safety and Safety Element – Geologic and Seismic Goals

Policy 1. The County shall minimize the potential effects of geologic, soil, and seismic hazards through the development review process.

Consistent. As discussed in Section 4.8, *Geological Resources*, the site is subject to seismic groundshaking and soil stability hazards. The project would be required to comply with all applicable provisions of the California Building Code to ensure that impacts from groundshaking would be less than significant. In addition, Mitigation Measures ~~GEO-3~~ **GEO-2 and GEO-3** ~~is are~~ also required to ensure all recommendations contained in the Soils Engineering Report and Engineering Geology Investigation (are fully implemented. ~~Of the~~ **The** project would locate residential lots and roadway segments on slopes exceeding slopes exceeding 20 ~~and 30~~ percent gradients. As a result, Mitigation Measure ~~GEO-1~~ **GEO-2** would be required to reduce potential impacts resulting from cut slopes exceeding 15 feet in height. Measures to minimize potential geologic, soil, and seismic hazards would require review and approval by the County prior to implementation of the project.

Table 2 Orcutt Community Plan Policy Consistency

Goals, Policies, Actions, and Development Standards	Consistency Discussion
Land Use	
<p>Policy LU-O-8. In order to preserve the semi-rural character of Orcutt, protect natural resources, and avoid development in hazardous areas, the County shall provide for large useable areas of (public or private) open space within the community. Appropriate planning tools should be explored and adopted which provide for the clustering or relocation of development from hazardous, environmentally sensitive or visually prominent areas, or other sites which are deemed unsuitable for development, to areas appropriate for development.</p>	<p>Consistent. The project would include 96.7 109.9 acres of undisturbed open space and 29.8 20.5 acres of privately managed open space that would include landscape, fuel modification areas, a trail staging area, and public recreational trail in the two proposed neighborhoods. These undisturbed open spaces comprise approximately 51 69 percent of the overall 190-acre project site area. The project also includes approximately 29.8 acres of privately managed open space that includes landscape, trailhead, trails, and fuel modification areas. The proposed trail 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.</p>
Residential	
<p>Policy LUR-O-1. Consistent with the Housing Element, the County shall encourage the provision of a mix of affordable units on parcels within the Orcutt Planning Area.</p>	<p>Consistent. The proposed project would provide 146 143 new residential units on Key Site 21, as anticipated by the OCP. The County’s Regional Housing Needs Allocation (RHNA) for the 2014-2022 RHNA projection period is 661 units. To plan for an adequate housing supply for all economic segments of the population, the RHNA is separated into four broad income categories: 159 extremely low/very low-income units, 106 low-income units, 112 moderate-income units, and 284 above</p>

moderate- income units. Appendix B of the 2015-2023 Housing Element includes an inventory of housing sites that are zoned and suitable to accommodate the RHNA within all income categories. The proposed project is part of the land inventory with a potential housing production of ~~146~~ **143** above-moderate income units. Payment of standard County in-lieu housing fees would contribute to the construction of affordable units throughout the Santa Maria HMA and would meet the Project's affordable housing requirement.

Park, Recreation, Trails, and Open Space

Policy PRT-O-1. Diverse passive and active recreational activities shall be developed in Orcutt.

Consistent. The project would include approximately ~~96.7~~ **109.9** acres of undisturbed open space and ~~29.8~~ **20.5** acres of privately managed open space that would include **landscape, fuel modification areas**, a trail staging area, and public recreational trail that would be located along the eastern project boundary. 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.

Policy OS-O-3. Private open space within designated open space corridors shall be sited, designed, and managed to protect the natural resources and/or recreation potential of these corridors, consistent with the Open Space, Park, Recreation, & Trails, and Biological Resources of the OCP.

Consistent. The project would include ~~96.7~~ **109.9** acres of undisturbed open space and ~~29.8~~ **20.5** acres of privately managed open space that would include **landscape, fuel modification areas**, a trail staging area, and public recreational trail that would be located along the eastern project boundary. These areas would be designed to maximize natural resource protection and passive recreational use consistent with the Open Space, Park, Recreation & Trails and Biological Resources sections of the OCP, specifically 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 and 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. The project includes an Open Space Management Plan that describes requirements for future management of on-site open space areas.

DevStd OS-O-3-3.1. Where lands within open space corridors remaining private open space, at the time of discretionary development approval the County should consider acquiring open space easements or using other mechanisms to ensure management of the natural resources in these corridors consistent with the goals of the Open Space Plan.

The proposed internal open space area would remain in private ownership. The County could consider acquiring the open space as an easement or ensuring its ongoing maintenance through the recordation of CC&Rs. As the proposed project does not conflict with this development standard, it would be consistent.

Policy OS-O-4. Development adjacent to, or within designated open space areas, shall be sited and designed to protect and enhance the natural resources of these areas, and accommodate appropriate recreation opportunities as identified in the Parks, Recreation and Trails section of this Plan.

Policy OS-O-6: The County should acquire the open space lands prioritized for public acquisition through dedication by working with property owners and interested groups, or through purchase. Where dedication is required, the County shall offset fees as required. If dedication is not required,

Consistent. The proposed project includes ~~96.7~~ **109.9** acres of undisturbed open space and ~~29.8~~ **20.5** acres of privately managed open space. The County could consider acquiring the remaining private open space areas as an easement, but these are not located within the area designated by the

the County may consider purchase, use of the TDC program or permitting the property to remain as private open space, consistent with the standards of this plan for natural resource protection and provision of passive and active recreation opportunities.

OCP as open space that should be dedicated to the public.

Schools

Policy SCH-O-2. New recreational facilities should be located near or adjacent to school facilities as much as possible to allow for joint-use by schools and the community.

Consistent. As discussed in Section 4.12, *Public Services and Recreation*, the proposed project would provide on-site recreational components, including approximately ~~96.7~~ **109.9** acres of undisturbed open space and ~~29.8~~ **20.5** acres of privately managed open space that would include **landscape, fuel modification areas**, a trail staging area, and public recreational trail that would be located along the eastern project boundary. In addition, the applicant would be required to pay Quimby Act park fees.

Biological Resources

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.

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 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

Consistent. The project would retain approximately ~~96.7~~ **109.9** acres of the project site in undisturbed open space and ~~29.8~~ **20.5** acres of the site in privately managed open space that ~~includes~~ **would include** landscape, ~~trailhead~~ **a trail staging area, public recreational** trails, and fuel modification areas. The project includes an Open Space Management Plan that describes requirements for future management of on-site open space areas. As discussed in Section 4.4, *Biological Resources*, the project would be subject to mitigation requirements to minimize impacts to sensitive biological resources. Mitigation Measures BIO-1(a) and BIO-1(b) would reduce impacts to special status plant species that may be adversely affected by the project to a less than significant level through pre-construction surveys and avoidance, minimization, and mitigation, including habitat restoration. Mitigation Measures BIO-3(a) through BIO-3(c) would reduce impacts to sensitive communities to a less than significant level through compensation for sensitive natural communities and riparian habitat and habitat restoration. Mitigation Measures BIO-4(a) through BIO-4(c) would reduce potential impacts to jurisdictional areas including wetlands to less than significant levels through avoidance and habitat restoration. Mitigation Measure BIO-6 would reduce impacts to protected trees to a less than significant level through tree protection and replacement. Implementation of these required measures would minimize impacts to important natural resources without preventing reasonable development of the Key Site 21 property.

Additionally, the project would result in indirect impacts to wildlife movement. Mitigation Measures BIO-5(a) through BIO-5(c) would reduce indirect impacts to wildlife movement to a less than significant level.

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.

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.

Policy BIO-O-5. New facilities in Orcutt, including roads, bikepaths/trails, sewer lines and retention basins, shall to the maximum extent feasible be 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.

Consistent. The project would include ~~96.7~~ **109.9** acres of undisturbed open space ~~and 29.8~~ **20.5** acres of privately managed open space ~~in the two proposed neighborhoods.~~ This area and the resources within it would be left undisturbed. Mitigation Measure BIO-6 requires applicant submittal of 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. For the trees proposed for removal, 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.

Consistent. The project includes approximately ~~96.7~~ **109.9** acres of undisturbed open space ~~and 29.8~~ **20.5** acres of privately managed open space. Also refer to discussions of project consistency with Policy BIO-O-1 and DevStd BIO-O-1.1.

As discussed in Section 4.12, *Public Services and Recreation*, the proposed Comprehensive Plan Amendment would include relocation of a trail staging area from SR 1 to the proposed Hidden Canyon neighborhood development area. The project would also include a public recreational trail that would **be** located along the eastern project boundary. 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. These trails would be constructed by the applicant and dedicated to the **County and for public access.**

Geology, Topography, and Soils

Policy GEO-O-1. Development shall be sited to avoid geologically hazardous areas.

Consistent. As discussed in Section 4.8, *Geological Resources*, the site is subject to seismic groundshaking and soil stability hazards. The project would be required to comply with all applicable provisions of the California Building Code to ensure that impacts from groundshaking would be less than significant. In addition, Mitigation Measure GEO-3 is also required to ensure all recommendations contained in the Soils Engineering Report and Engineering Geology Investigation (are fully implemented. of the project would locate residential lots and roadway segments on slopes exceeding slopes exceeding 20 and 30 percent gradients. As a result, Mitigation Measure ~~GEO-1~~ **GEO-2** would be required to reduce potential impacts resulting from cut slopes exceeding 15 feet in height.

Policy GEO-O-2. In areas of high erosion potential, development shall be sited and designed to minimize increased erosion.

Consistent. The location and fill requirements of the project could result in long-term erosive runoff and sedimentation in nearby waterways. Compliance with existing County BMPs, as well as OCP policies and development standards, would reduce erosion potential. Implementation of Mitigation Measures ~~GEO-1 and GEO-2~~ and implementation of applicable Santa Barbara County erosion control BMPs, as well as OCP policies and development standards, would reduce impacts associated with the potential for soil erosion and sedimentation into drainages resulting from buildout of the project to as less than significant level. With implementation of these mitigation measures, the project would be consistent with this policy.

DevStd GEO-O-2.1. 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.

Consistent. The proposed project would not grade to enhance or create views. However, the project would require grading to construct new roadways and residences throughout the project site. As discussed in Section 4.8, *Geologic Processes*, the project would require grading on slopes exceeding 20 percent for approximately 32 residential lots and approximately 11 road segments and would require grading on slopes exceeding 30 percent for ~~13 residential lots and six~~ **approximately five** road segments. 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. Mitigation Measure ~~GEO-1~~ **GEO-2** would be required to reduce impacts resulting from locating development on unstable soils to a less than significant level.

DevStd GEO-O-2.2. 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.

Key Site 21

Policy KS21-1. Parcel 113-250-14 is designated Open Space and zoned REC. The remainder of Key Site 21 is designated PD and Resort Visitor Serving Commercial and is zoned PRD (maximum 150 units). Any proposed development on KS-21 shall comply with the following standards (DevStd KS21-1 through DevStd KS21-11).

DevStd KS21-4. The area depicted in Figure KS21-1 shall remain in natural, undeveloped open space. No development except trails or a roadway parcel to 113-250-17 and/or the existing parking lot shall be permitted within this open space and no structures shall be permitted within 50 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.

DevStd KS21-8. All development shall be sited to preserve the natural landforms of the site and minimize grading.

Potentially Consistent (pending approval of applicant-requested OCP amendment). The applicant has requested ~~an amendment to the OCP, which would modify this policy to facilitate approval of a Specific Plan, two Vesting Tentative Tract Maps (VTTM), two Final Development Plans, two Minor Conditional Use Permits, and road naming, and a Comprehensive Plan Amendment to develop 146~~ **a Comprehensive Plan Amendment to the OCP, which would modify this policy to facilitate approval of a Specific Plan, two Vesting Tentative Tract Maps (VTTM), two Final Development Plans, two Minor Conditional Use Permits, and road naming, and a Comprehensive Plan Amendment to develop 143** residential units in two residential neighborhoods on Key Site 21. With the approval of the requested Comprehensive Plan Amendments, revising the location of the trail head staging area and the proposed text amendment to DevStd KS 21-1, the project is consistent with Development Standards DevStd KS21-1 through DevStd KS 21-11.

Consistent. The proposed Specific Plan includes ~~96.7~~ **109.9** acres of undisturbed open space ~~29.8~~ **20.5** acres of privately managed open space **that would include landscape, fuel modification areas, a trail staging area, and public recreational trails 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~~ **69** percent of the ~~overall 190-acre Specific Plan project site area. The project also includes approximately 29.8 acres of privately managed open space that includes landscape, trailhead, trails, and fuel modification areas.~~ As discussed in Section 4.14, *Water Resources and Flooding*, the project does not include development within the Orcutt Creek floodplain, which ranges from 250 to 2,000 feet wide along Orcutt Creek. Therefore, no structures associated with the project would occur within the required 50-foot setback from the top of the creek bank.

Consistent. The project would involve grading operations that would result in cut and fill of approximately ~~1,007,916~~ **1,037,570** cy of soil material. The grading was designed to result in a balance of cut and fill between the two neighborhoods, and slopes would be contoured to the extent possible to provide smooth transitions between the graded areas and the adjacent natural land contours. Project construction activities would also be subject to the County's grading ordinance, which requires a grading permit and an Erosion and Sediment Control Plan.

IV.C. Summary of Impacts

Table 3 summarizes the impact classifications from the original project and compares them to the revised project. As shown in this summary, neither the revised project nor the changes in environmental regulatory requirements would result in a change in the levels of impact identified in the existing analysis contained in the Final SEIR for any environmental topic.

Table 3 Impact Comparison Summary for Original and Revised Project

Environmental Topic	Level of Impact	
	Original Key Site 21 Project	Revised Key Site 21 Project
Aesthetics/Visual Resources		
Scenic Vistas/Scenic Resources	III	III
Visual Character	I	I
Light/Glare	II	II
Cumulative Impacts	I	I
Agricultural Resources		
Prime Farmland	III	III
Cumulative Impacts	III	III
Air Quality		
Clean Air Plan Consistency	III	III
Construction Emissions	III	III
Operational Emissions	III	III
Toxic Air Contaminants	III	III
Odors	III	III
Cumulative Impacts	III	III
Biological Resources		
Special Status Plants	II	II
Special Status Animals (CTS)	I	I
Sensitive/Riparian Habitat Disturbance	II	II
State/Federally Protected Wetlands	II	II
Wildlife Movement	II	II
Protected Trees	II	II
Fuel Management (Vegetation)	II	II
Cumulative Habitat Loss (CRLF/CTS)	I	I
Cultural Resources and Tribal Cultural Resources		
Direct/Indirect Impacts to Cultural Resources	II	II
Previously Undiscovered Cultural Resources	II	II
Tribal Cultural Resources	II	II
Cumulative Impacts	II	II
Energy		
Use of Energy	III	III
Energy Plan Compatibility	III	III
Fire Protection and Wildfires		
Wildland Fire Hazards	III	III
Fire Protection Service	III	III
Cumulative Impacts	III	III
Geologic Processes		
Groundshaking	III	III
Slope Stability	II	II

Runoff/Erosion	II	II
Expansive Soils	II	II
Paleontological Resources	II	II
Cumulative Impacts	II	II
Greenhouse Gas Emissions and Climate Change		
Operational & Construction GHG Emissions	III	III
GHG Reduction Plan Consistency	III	III
Land Use		
Change in Character/Scale	II	II
Land Use Consistency	III	III
Cumulative Impacts	III	III
Noise		
Construction Noise Exposure	II	II
On-site Noise Conflicts	III	III
Roadway Noise Exposure	III	III
Cumulative Noise	III	III
Public Services and Recreation		
Schools	III	III
Wastewater	III	III
Solid Waste	I	I
Police Protection	III	III
Recreation	III	III
Cumulative Impacts (Solid Waste)	I	I
Transportation and Circulation		
Operational-Levels of Service	III	III
CEQA Guidelines Section 15064.3(b) Consistency	III	III
Cumulative Traffic Impacts	I	I
Water Resources and Flooding		
Construction Water Quality Impacts	III	III
Drainage, Flooding, and Sedimentation	III	III
Water Demand	II	II
Cumulative Water Resources Impacts	III	III
Other CEQA Required Discussions/Effects Found Not to be Significant		
Forest Resources	III	III
Hazards and Hazardous Materials	III	III
Historic Resources	III	III
Mineral Resources	III	III
Population/Housing	III	III
Growth Inducement	III	III

Class I: Potentially significant and unavoidable impact

Class II: Potentially significant but mitigable impact

Class III: Less than significant impact:

V. Findings

It is the recommendation of the County of Santa Barbara that based on the evidence described above and original analysis in the Final SEIR, impacts resulting from implementation of the revised Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project would not otherwise result in a change in the levels of impact identified in the existing analysis contained in the Final SEIR. As such, the Final SEIR may be used to fulfill the environmental review requirements for the revised Neighborhoods of Willow Creek and Hidden Canyon (Key Site 21) Project, and the information contained herein does not require recirculation of the Draft SEIR pursuant to CEQA Guidelines Section 15088.5.