RICHARDS RANCH ANNEXATION

PARTIALLY RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT

PREPARED FOR

City of Santa Maria
Community Development Department
110 South Pine Street, Suite 101
Santa Maria, CA 93458

January 2024

PREPARED BY

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Prepared for

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Acronyms and Abbreviations

Acronym	Term
2019 Standards	2019 Building Energy Efficiency Standards
2022 Standards	2022 Building Energy Efficiency Standards
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AB	Assembly Bill
ACM	asbestos-containing material
ADL	aerially deposited lead
ADU	accessory dwelling unit
AF	acre-feet
AFY	acre-feet per year
AHERA	Asbestos Hazard Emergency Response Act
AIA	Airport Influence Area
Air Toxics Hot Spots Act	Air Toxics Hot Spots Information and Assessment Act
Airport	Santa Maria Public Airport
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
ALUP	Airport Land Use Plan
AMBIENT	AMBIENT Air Quality and Noise Consulting
APN	Assessor's Parcel Number
Applicant	Richards Ranch, LLC
APS	alternative planning strategy
ASR	Archaeological Survey Report
ATE	Associated Transportation Engineers
ATP	Santa Maria Active Transportation Plan
BAAQMD	Bay Area Air Quality Management District
Basin	Santa Maria River Valley Groundwater Basin
Basin Plan	Water Quality Control Plan for the Central Coastal Basin
BMP	best management practice
BRA	Biological Resources Assessment
C-2	General Commercial zoning
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	corporate average fuel economy [standards]
Cal EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Cal NAGPRA	California Native American Graves Protection and Repatriation Act of 2001
Cal/OSHA	California Division of Occupational Safety and Health Administration
CalARP	California Accidental Release Prevention Program

Acronym	Term
CalEEMod	California Emissions Estimator Model
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCCE	Central Coast Community Energy
CCIC	Central Coast Information Center
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CDOG	California Division of Oil, Gas, and Geothermal Resources
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CHP	California Highway Patrol
City	City of Santa Maria
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of Santa Barbara
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel(s)

Acronym	Term
dBA	A-weighted decibel(s)
DBH	diameter at breast height
DNL	day-night average sound level
DPM	diesel particulate matter
DPS	Distinct Population Segment
DTSC	California Department of Toxic Substance Control
DWE	David Wolff Environmental, LLC
DWR	California Department of Water Resources
EAP	Energy Action Plan
EIR	Environmental Impact Report
EO	Executive Order
ESA	Environmental Site Assessment
EV	electric vehicle
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
Flood District	County of Santa Barbara Flood Control and Water Conservation District
FTA	Federal Transit Administration
GHG	greenhouse gas
Golden State Water	Golden State Water Company
gpd	gallons per day
GWP	global warming potential
H_2S	hydrogen sulfide gas
HAP	Hazardous Air Pollutant
HFC	hydrofluorocarbon
HSC	Health and Safety Code
HUD	U.S. Department of Housing and Urban Development
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
ICU	intersection capacity utilization
in/sec	inches per second
ISO	International Organization for Standardization
IWMF	Integrated Waste Management Facility
kBTU	kilo British thermal unit
kWh	kilowatt-hour

Acronym	Term
LAFCO	Local Agency Formation Commission
LCSD	Laguna County Sanitation District
L_{dn}	day-night average sound level
L_{eq}	equivalent sound level
LID	Low-Impact Development
L_{max}	maximum sound level
LOS	level of service
LT	long-term noise measurement
MBTA	Migratory Bird Treaty Act
MGD	million gallons per day
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MMBTU	million British thermal units
MMT	million metric tons
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
$MTCO_2e$	metric tons of carbon dioxide equivalent
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act of 1990
NAHC	California Native American Heritage Commission
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NF_3	nitrogen trifluoride
NHMLA	Natural History Museum of Los Angeles County
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O_3	ozone
OCP	Orcutt Community Plan
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OUSD	Orcutt Union School District
Pb	lead

Acronym	Term
PBDB	Paleobiology Database
PCB	polychlorinated biphenyl
PD	Planned Development
PFC	perfluorocarbon
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
ppb	parts per billion
ppm	parts per million
ppv	peak particle velocity
PRC	Public Resources Code
PRDEIR	Partially Recirculated Draft Environmental Impact Report
project	Richards Ranch Annexation Project
PV	photovoltaic
R-3	High Density Residential zoning
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Allocation
RME	City of Santa Maria General Plan Resources Management Element
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAF	State Alternative Fuels
SB	Senate Bill
SBCAG	Santa Barbara County Association of Governments
SBCAPCD	Santa Barbara County Air Pollution Control District
SBCFD	Santa Barbara County Fire Department
SBLAFCO	Santa Barbara County Local Agency Formation Commission
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SDC	Sierra Delta Consultants LLC
SDWA	Safe Drinking Water Act
SEL	sound-exposure level
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SLCP	short-lived climate pollutant
SLCP Strategy	Short-Lived Climate Pollutant Reduction Strategy
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMFD	Santa Maria Fire Department

Acronym	Term
SMJUHSD	Santa Maria Joint Union High School District
SMPD	Santa Maria Police Department
SMVMA	Santa Maria Valley Management Area
SO_2	sulfur dioxide
SOC	Standards of Cover
SoCalGas	Southern California Gas Company
SOI	Sphere of Influence
SP	service population
SR	State Route
SSC	Species of Special Concern
ST	short-term noise measurement
STC	Sound Transmissions Class
Stipulation	2005 Stipulated Judgment by the Superior Court of the State of California, County of Santa Clara
Strategic Plan	FY 2022-2066 EPA Strategic Plan
SVP	Society of Vertebrate Paleontology
SWCA	SWCA Environmental Consultants
SWP	California State Water Project
SWPPP	Stormwater Pollution Protection Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
Tanner Act	Tanner Air Toxics Act
TDS	total dissolved solids
TMDL	total maximum daily load
TSCA	Toxic Substances Control Act
U.S.	U.S. Route
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	U.S. Department of Agriculture
USDOT	U.S. Department of Transportation
USEIA	U.S. Energy Information Administration
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UVP	Union Valley Parkway
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WWRP	wastewater reclamation plant

CHAPTER 1. INTRODUCTION

1.1 BACKGROUND AND PURPOSE OF THIS DOCUMENT

On December 22, 2022, the City of Santa Maria (City) released the Draft Environmental Impact Report (Draft EIR) for the Richards Ranch Annexation Project (project). The Draft EIR evaluated the environmental impacts associated with the proposed annexation, pre-zoning, and conceptual development of approximately 44 acres of property in unincorporated Santa Barbara County, California. The Draft EIR public review period ended on March 7, 2023.

This Partially Recirculated Draft EIR (PRDEIR) replaces portions of Section 4.3, Biological Resources, and Chapter 5, Alternatives Analysis, of the Draft EIR. Comments received on the Draft EIR brought new information to the City's attention regarding the analyses in Section 4.3, Biological Resources. Adjustments are also warranted to Chapter 5, Alternatives Analysis.

The revised biological resources and alternatives analyses in this PRDEIR are being recirculated for public comment pursuant to the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

1.2 PROJECT LOCATION AND SUMMARY

1.2.1 Project Location

The project site is located in Santa Barbara County, California, in the community of Orcutt, approximately 10.5 miles east of the Pacific Ocean and 4 miles south of downtown city of Santa Maria (Figure 1-1). The project site is adjacent to the southeastern Santa Maria city limits and lies within the City's Sphere of Influence (SOI).[1]

The project site includes four parcels—Assessor's Parcel Numbers (APNs) 107-250-19, 107-250-20, 107-250-21, and 107-250-22—which total 43.75 acres and are situated to the northeast and southeast of the intersection of State Route (SR) 135 and Union Valley Parkway (UVP). APNs 107-250-019 and -020 are bounded on the west by the SR 135 right-of-way, on the east by Orcutt Road, and on the north and south, respectively, by UVP. APNs 107-250-021 and -022 are bounded on the west by Orcutt Road, and on the south and north, respectively, by UVP (Figure 1-2).

1.2.2 Summary of the Proposed Project

This section provides an overview of the proposed project to provide context to the PRDEIR. However, this is not intended to be a full description of the proposed project. Refer to Chapter 2, Project Description, of the Draft EIR for a more detailed description.

[1] A sphere of influence is a planning boundary outside of an agency's legal boundary (such as the city limit line) that designates the agency's probable future boundary and service area. Factors considered in a sphere of influence review focus on the current and future land use, the current and future need and capacity for service, and any relevant communities of interest (California Association of Local Agency Formation Commissions 2022).

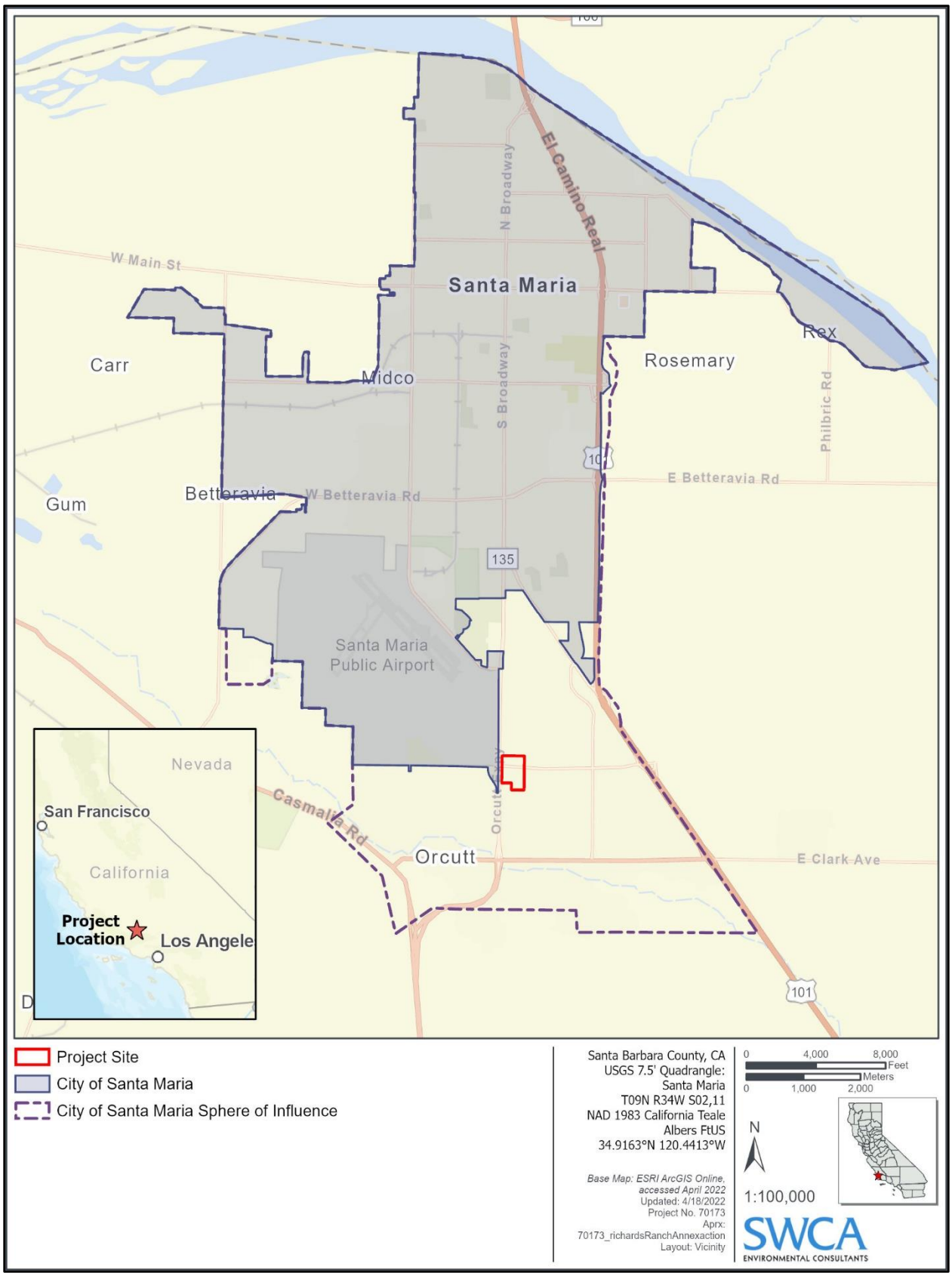

Figure 1-1. Project vicinity map.

Figure 1-2. Project location.

The project, as proposed by Richards Ranch, LLC (Applicant), includes the annexation, pre-zoning, and conceptual development of four parcels (43.75 acres) located in unincorporated Santa Barbara County by the City, and annexation of the property into the Santa Maria city limits. The proposed development resulting from the annexation would include a mix of apartments and townhomes and retail commercial uses, such as proposed grocery store, restaurants, and mini-storage uses.

For lands to be considered for annexation into a city, the land must be within the city's designated SOI; as previously noted, the project site is within the City of Santa Maria's SOI. Annexation of the project site into the city is a formal municipal reorganization action that would require approval by the Santa Barbara County Local Agency Formation Commission (SBLAFCO). Under state law, Local Agency Formation Commissions are responsible for coordinating and overseeing logical and timely changes to local government agency boundaries. The SBLAFCO is authorized to approve (with or without amendments) or to disapprove proposals for annexation. Under the State CEQA Guidelines, the City is acting as the CEQA Lead Agency and must make an environmental determination prior to any authorization for annexation application to SBLAFCO. SBLAFCO is a responsible agency under CEQA.

If approved, the proposed annexation would formally transfer local governmental powers and municipal services pertaining to the project site from the County of Santa Barbara (County) to the City of Santa Maria (City). Upon annexation, the City would be responsible for providing land use and public works services, police and fire protection, and library and general government services. Water would be provided to the site by Golden State Water Company (GSWC), which has existing water lines adjacent to the site. A Preliminary Can and Will Serve Letter dated September 21, 2023, has been issued by GSWC to the project applicant indicating that GSWC will be able to provide domestic and fire protection water service to the site. Per this letter, the applicant is required to purchase supplemental water from the City of Santa Maria through a supplemental water agreement.. Wastewater would continue to be the responsibility of the Laguna County Sanitation District (LCSD), per an availability letter from LCSD dated May 17, 2022.

Pre-zoning is a required component of the annexation process. California Government Code Section 65859 allows the City to adopt (i.e., pre-zone) a zoning designation for land outside its city limits in anticipation of annexation and development. Table 1-1 summarizes the parcels proposed to be annexed, acreages, and the proposed pre-zone designation.

Table 1-1. Project Parcels and Proposed General Plan Land Use and Pre-Zone Designations

APN	Acreage	Proposed Pre-Zone Designation
107-250-019	2.33	General Commercial (PD/C-2)
107-250-020	1.86	General Commercial (PD/C-2)
107-250-021	12.16	General Commercial (PD/C-2)
107-250-022	27.40	High Density Residential (PD/R-3)
Total	**43.75**	

Note: Acreage totals for APN obtained from the property Title Report prepared for the project (Stewart Title Guaranty Company Commercial Services [San Diego] 2021).

The current County General Plan land use designations for the project site are General Commercial/Office and Professional/Planned Development-3.3, which is intended for mixed-use development with a maximum of 3.3 dwelling units per acre. In addition, because the project site is located within the City's planning area and SOI, it is also identified for planned development by the City (City of Santa Maria 2020). The City currently provides a land use designation of Commercial/Professional Office for the site, which allows for office development for medical, legal, travel agencies, insurance, and real estate

services, as well as a complementary mixed-use including residential and commercial uses. With the proposed development scenario and proposed pre-zoning, the City would need to also amend the General Plan land use designation for the site. For this reason, the project also includes a General Plan Amendment to apply a High Density Residential (HDR-22) and Community Commercial (CC) land use designation to the site.

See Chapter 2, Project Description, of the Draft EIR for a more detailed description of the proposed project.

1.2.3 Conceptual Development Plan

The Applicant has developed a conceptual plan for future development to provide for the evaluation of potential environmental impacts of the eventual development of the site if the proposed annexation and pre-zoning were to be approved. The conceptual development plan includes retail commercial, mini-storage, and high-density residential uses (Figure 1-3). This conceptual plan shows the potential future development that could occur consistent with the project's proposed pre-zone designations and provides the basis for the environmental evaluations in the Draft EIR and the PRDEIR. The conceptual development plan would allow a maximum buildout of 106,800 square feet of commercial uses and a 39,500–square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres (Table 1-2).

Table 1-2. Summary of Proposed Conceptual Development Plan Buildout

Proposed Zoning Category	Acreage	Percentage of Total	Potential Buildout
General Commercial (PD/C-2)	16.35	37%	106,800 square feet commercial 39,500 square feet mini-storage
High Density Residential (PD/R-3)	18.20	42%	400 apartments
High Density Residential (PD/R-3)	9.20	21%	95 townhomes
Total	**43.75**	**100%**	

Source: RRM Design Group Site Plans (2022)

Future project buildout of any of these uses within the project site would require individual Planned Development Permit applications for development of each of the proposed residential and commercial projects. Only if the City and SBLAFCO approve the annexation would the Planned Development Permit applications then be discretionarily reviewed by the City.

1.3 CEQA STANDARDS FOR RECIRCULATION OF THE EIR

1.3.1 Overview of Recirculation

State CEQA Guidelines Section 15088.5 establishes that a lead agency is required to recirculate an EIR when significant new information is added to the EIR after it is released for public review under Section 15087 but before certification. "Recirculation" simply means that the public is provided an opportunity to comment on the new or revised sections of the EIR.

Figure 1-3. Conceptual development plan.

As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives 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. "Significant new information" requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043).

1.3.2 Basis for Partial Recirculation of the Draft EIR

Following the release of the Draft EIR, new information was obtained regarding the monarch butterfly (*Danaus plexippus*) and overwintering habitat for the species.

For these reasons, the City determined that the portions of the Draft EIR related to biological resources and alternatives should be revised and the partial revisions to the Draft EIR should be recirculated for public comment.

1.4 SUMMARY OF REVISIONS TO DRAFT EIR

State CEQA Guidelines Section 15088.5(g) requires that the PRDEIR summarize the revisions made to the previously circulated Draft EIR. This PRDEIR includes revisions to Section 4.3, Biological Resources, and Chapter 5, Alternatives Analysis, of the Draft EIR.

The Xerces Society and the California Department of Fish and Wildlife (CDFW) have identified the stand of eucalyptus trees along the southern side of Union Valley Parkway as a Western Monarch Overwintering Site (mapped as #2688, 7.63 acres). Further, the CDFW has indicated that this eucalyptus grove is an important inland overwintering grove of the monarch butterfly and that it has high conservation value (CDFW 2023). Based on this new information presented by CDFW, the City is revising its findings regarding the existing 7.63-acre overwintering site that is within the project site boundaries. Because of the new information provided, revisions to the recommended mitigation measures for the monarch butterfly are warranted. As well, the conclusion regarding the impacts following implementation of the mitigation measures requires revision. Development of the proposed project, or any project similar in density to the proposed project, would necessitate the removal of the overwintering habitat that exists on the project site. Removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. The City determines that feasible mitigation measures are not available to reduce impacts to a less-than-significant level. Thus, residual impacts to monarch butterflies would continue to be significant and unavoidable with development of the proposed project or any project on the project site similar in density to the proposed project. These changes are included in the new Section 4.3, Biological Resources, which is included Chapter 2 of this PRDEIR.

The changes to the biological resources analysis and conclusions also necessitate changes to the alternatives analysis. Further, the County, in their comments on the Draft EIR, indicated that an additional No Project Alternative be considered. Per these comments, the County requests that an alternative be analyzed that considers the continuation of the County plans and policies that apply to the site by projecting what could be developed under the current County Specific Plan (Richard's Specific Plan [83-SP-1]). To respond to this County comment, the City has added Alternative 4, No Project/No Annexation with Orcutt Community Plan Buildout, to the alternatives analysis. Under this alternative, the project as proposed by the Applicant would not be developed and annexation of the project site into the city of Santa Maria would not occur. Instead, the project site would remain in the jurisdictional boundaries of the County. Under this alternative, allowable development of the project site would be consistent with the land use and zoning as described in the County's Orcutt Community Plan (2022). In this plan, the project site is identified as Key Site 26 with an approved Specific Plan (Richard's Specific Plan [83-SP-1]) having planned land use designations of General Commercial, Office and Professional, and Planned Residential Development 3.3 (allows 3.3 dwelling units per acre) (County of Santa Barbara 2022). The City has also considered the potential environmental effects of this alternative as compared to the proposed project. These changes are included in the new Draft EIR Chapter 5, Alternatives Analysis, which is included in this PRDEIR within Chapter 2.

1.5 RECIRCULATED DRAFT EIR PROCESS

1.5.1 Public Review Process

This PRDEIR will be subject to review and comment by the public, as well as all responsible agencies and other interested parties, agencies, and organizations, for a period of 45 days. The public comment period will run from January 31 to March 15, 2024.

During this 45-day period, the PRDEIR and all technical appendices will be available for review on the City's website: https://www.cityofsantamaria.org/services/departments/community-development/planning-division/planning-policies-and-regulations/environmental-impact-reports

The documents are also available for review at:

City of Santa Maria
Community Development Department
110 South Pine Street, Suite 101
Santa Maria, CA 93458

Comments on the PRDEIR should be submitted to:

City of Santa Maria
Community Development Department
Attn: Dana Eady, Planning Division Manager
110 South Pine Street, Suite 101
Santa Maria, CA 93458

Email: deady@cityofsantamaria.org

Written responses to all significant environmental issues raised will be prepared and included as part of the Final EIR and the administrative record for consideration by decision-makers for the project.

1.5.2 Limitation on Public Comments

State CEQA Guidelines Section 15088.5(f)(2) establishes that:

> When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.

Based on this regulatory directive, the City requests that commenters limit their written comments to the new information regarding biological resources and the considered alternatives presented in this PRDEIR.

1.5.3 Final EIR

When the public comment period for this PRDEIR concludes on March 15, 2024, the City will prepare written responses to the comments received on both the Draft EIR and the PRDEIR. The Final EIR will consist of the Draft EIR, the PRDEIR, comments received on both the Draft EIR and PRDEIR, and the responses to those comments.

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CHAPTER 2. REVISED DRAFT EIR SECTIONS

Modifications to these sections of the Draft EIR for the Richards Ranch Annexation Project (project) have been made in response to comments received on the Draft EIR through the review process. New text added to the EIR is shown as underlined text and deleted text is shown as ~~strikethrough~~ text.

Section 5 of the Draft EIR Summary included Table S-2, which summarized the impacts and associated mitigation measures identified in the Draft EIR. Based on the information presented in this Partially Recirculated Draft EIR (PRDEIR), Section 5 of the Draft EIR Summary and Table S-2 have been updated to address the significant impacts to the stand of eucalyptus trees along the southern side of Union Valley Parkway, which is a Western Monarch Overwintering Site (mapped as #2688, 7.63 acres). Because of the new information provided, revisions to the recommended mitigation measures for the monarch butterfly (*Danaus plexippus*) are warranted. As well, the conclusion regarding the impacts following implementation of the mitigation measures requires revision. Only the portions of Section 5 of the Draft EIR Summary where revisions are warranted are provided in this chapter. The entirety of Table S-2 has not been reproduced.

This chapter also presents the City of Santa Maria's (City's) revisions to Section 4.3, Biological Resources and Chapter 5, Alternatives Analysis, of the Draft EIR. These two sections of the Draft EIR are reproduced completely to provide a clear contextual understanding of the sections.

REVISIONS TO DRAFT EIR SUMMARY, SECTION 5

Section 5 of the Draft EIR Summary and Table S-2 have been updated to address the significant impacts to the stand of eucalyptus trees along the southern side of Union Valley Parkway, which is a Western Monarch Overwintering Site (mapped as #2688, 7.63 acres). Only the portions of Section 5 of the Summary where revisions are warranted are provided in this chapter. The entirety of Table S-2 has not been reproduced.

5 SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED

Impacts of the proposed project are classified using the categories described below:

- **Significant and Unavoidable:** An impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less-than-significant level through compliance with existing federal, state, and local laws and regulations, and for which there are no feasible mitigation measures that would bring the level to less than significant impact with mitigation.
- **Less than significant impact with mitigation:** An adverse impact that would cause a substantial adverse effect that meets or exceeds the applicable significance criteria thresholds for a particular resource but can be reduced to a less than significant through successful implementation of identified mitigation measures.
- **Less than significant impacts:** Less than significant impacts means the effect does not meet or exceed the applicable significance criteria thresholds for a particular resource. No mitigation measures are required for less than significant impacts.

The term "significance" is used throughout the EIR to characterize the magnitude of the projected impact. For the purpose of this EIR, a significant impact is a substantial or potentially substantial change to resources in the local proposed project area or the area adjacent to the proposed project. In the discussions of each issue area, thresholds are identified that are used to distinguish between significant impacts and impacts that are less than significant. Mitigation measures have been identified to reduce project impacts to less than significant. CEQA requires that public agencies should not approve projects as proposed if there are feasible mitigation measures available which would substantially lessen the environmental effects of such projects (CEQA Statute Section 21002).

Table S-2. Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Residual Impacts
Biological Resources		
BIO Impact 2: The project could directly impact monarch butterflies.	Implement **Mitigation Measures BIO/mm-1.1** through **BIO/mm-1.5**. ~~**BIO/mm-2.1:** If possible, site disturbance and construction activity that would impact eucalyptus trees onsite shall not occur during the monarch butterflies' fall and winter migration (October 15 through February 29) period. If tree or vegetation removal or site disturbance is required during the monarch butterflies' fall and winter migration, a City-approved biologist shall conduct a preconstruction survey for monarch butterflies that could be using the eucalyptus trees on the site for overwintering within 7 days of proposed vegetation removal or site disturbance or when known monarch overwintering is occurring at other locations within the region. If monarch butterflies are detected, development shall be postponed until after the overwintering period or until a City-approved biologist determines monarch butterflies are no longer using the trees for overwintering.~~ The developer shall ensure the following actions are undertaken to minimize potential direct and indirect impacts to western monarch butterflies: a. If possible, site disturbance and construction activity that would impact eucalyptus trees onsite shall not occur during the monarch butterflies' fall and winter migration period (October 15 through February 29). b. If tree or vegetation removal or site disturbance is required during the monarch butterflies' fall and winter migration period (October 15 through February 29), a City-approved biologist familiar with monarchs and monarch overwintering habitat shall conduct focused surveys for monarch colonies within the identified overwintering site and will identify any colonies found within 7 days of proposed vegetation removal or site disturbance or when known monarch overwintering is occurring at other locations within the region. If monarch butterflies are detected, development shall be postponed until after the overwintering period or until the City-approved biologist determines monarch butterflies are no longer using the trees for overwintering. c. To provide further protection to non-overwintering populations and/or adjacent over-wintering populations, no Asclepias curassavica (tropical milkweed) will be allowed in any planting palettes for the project. Native milkweed species, such as	~~Less than Significant with Mitigation~~ Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
	Asclepias fascicularis (narrowleaf milkweed) are also not recommended by the USFWS to be planted adjacent to existing overwintering sites as this may interfere with normal migrating behavior (USFWS 2023b). To contribute to local monarch butterfly conservation efforts, native nectar-providing plant species will be incorporated into landscaping following construction activities, such as those recommended in the Monarch Butterfly Nectar Plant List for Conservation Plantings, to enhance local nectar sources (Xerces Society 2018). d. Prior to the approval of a Planned Development permit and prior to the removal of any trees within the overwintering site, the developer shall hire a City-approved biologist familiar with monarchs and monarch overwintering habitat to prepare and implement a monarch butterfly habitat enhancement plan. At a minimum, the plan shall identify area(s) on the property appropriate for onsite habitat enhancement to partially address the direct impacts of tree removal within the approximately 7.6-acre western monarch butterfly overwintering site. The recommendations in this plan shall be included within the project's future project's landscaping plans for review and approval by the City prior to implementation. e. Prior to the approval of a Planned Development permit, the developer shall identify appropriate local land management conservation organizations and provide a donation in order to assist with the organization's overwintering monarch butterfly conservation goals. This donation may be for conservation activities for known and mapped overwintering sites in the immediate vicinity of the project site, or a donation may be provided to a local non-profit organization focused on monarch butterfly conservation. The developer will work with the City and local conservation organizations to provide funding for 5 years of conservation research and/or maintenance and management activities for an area equivalent to that impacted on the project site (approximately 7.6 acres).	

Impacts	Mitigation Measures	Residual Impacts
BIO Impact 13: The project could result in cumulatively considerable impacts to biological resources.	Implement **Mitigation Measures BIO/mm-1.1** through **BIO/mm-1.5**, **BIO/mm-2.1**, **BIO/mm-3.1**, **BIO/mm-4.1**, and **BIO/mm-5.1**.	~~Less than Significant with Mitigation~~ Significant and Unavoidable

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4.3 BIOLOGICAL RESOURCES

This section presents an analysis of potential impacts to biological resources resulting from implementation of the project. The technical information in this section, including biological survey results and habitat mapping, relies on a Biological Resources Assessment (BRA) prepared for the project by David Wolff Environmental, LLC (DWE 2022), including a waters of the U.S./State jurisdictional determination and wetland delineation and California tiger salamander site assessment report. These technical analyses are provided in Appendix F. The information in the BRA and BRA Addendum were peer-reviewed by SWCA Environmental Consultants and existing conditions were verified during a site visit on February 9, 2022.

4.3.1 Existing Conditions

Union Valley Parkway (UVP) and Orcutt Road intersect the project site, forming a four-way signalized intersection in the northwestern portion of the project site approximately 400 feet east of the UVP/State Route (SR) 135 intersection. The project site is bordered on the west by SR 135 with residential development, the recently approved Santa Maria Airport Business Park project, the Santa Maria Airport, and active agricultural lands generally located farther west of SR 135.

Surrounding land uses to the north generally include residential uses with limited commercial uses along Orcutt Road. Airport facilities and runways for the Santa Maria Airport are located to the northwest along with active agriculture lands, some of which have been recently approved for commercial development as part of the Santa Maria Airport Business Park project. Residential uses, commercial services, offices, and school uses within the community of Orcutt are located to the south of the project site. A church property is adjacent to the southwest corner of the site. A mix of undeveloped lands are located to the east and residential uses border the southeastern portion of the project site.

The site is mostly flat, gently sloping downward from east to west, along with manufactured embankments and fill slopes from adjacent residential development and UVP construction. Roadside drainage from UVP construction and Orcutt Road realignment is managed through several constructed rocked ditches leading to culverts under Orcutt Road. No natural drainage features are present on the project site and there is no riparian context or natural drainages associated with the onsite roadside drainage ditches. The site is mostly non-native annual grassland, disturbed coastal scrub, and stands of non-native eucalyptus and landscape trees. There are several coast live oaks around the site, but they do not constitute oak woodland habitat. The site appears to have been substantially and regularly disturbed over time from UVP construction, and vegetation management (mowing/discing).

The existing conditions section, along with the analysis of the presence/absence of special-status plant and wildlife species, is based on data collected by DWE Principal Ecologist David Wolff from background data searches and during biological field surveys of the project site conducted on December 17, 2021, January 5, 2022, and March 7, 2022. Surveys were conducted by walking the entirety of the proposed project site recording plant and wildlife species observed and general site characteristics. Conditions for the site survey were conducive to the purpose of documenting plant and wildlife habitat to establish existing conditions. The March 7, 2022, field survey included a wetland delineation and jurisdictional determination of potential wetlands or other waters. The overall purpose of the field surveys was to document existing conditions in terms of habitat for plant and wildlife species, suitability for presence/absence of special-status plant or wildlife species, and the potential to support wetland and/or riparian habitats and/or other jurisdictional waters.

4.3.1.1 Soils

The Natural Resources Conservation Service (NRCS) generally characterizes soil types within the project site as follows (NRCS 2022; U.S. Department of Agriculture Soil Conservation Service 1972; see Figure 4.6-1 in Section 4.6, Geology and Soils):

- Betteravia loamy sand 0 to 2 percent slopes (BmA), is a moderately well drained soil on terraces formed from eolian (windblown) sands parent material. It is not a hydric (wetland) soil.
- Marina sand 0 to 2 percent slopes (MaA), is a somewhat excessively drained soil on terraces formed from eolian deposits (windblown) parent material. It is not a hydric (wetland) soil.
- Oceano sand 2 to 15 percent slopes severely eroded (OcD3), is an excessively drained soil on dunes formed from eolian (windblown) sands parent material. It is not a hydric (wetland) soil.

Observations of surface soils, gopher mounds, ground squirrel burrows, and 24-inch-deep wetland delineation soil test pits corroborate the very sandy characteristics of these mapping units on the project site (DWE 2022).

4.3.1.2 Habitat Types

Plant communities are generally described by the assemblages of plant species that occur together in the same area forming habitat types. Community alliance and alliance codes used in this environmental impact report section and the BRA follow *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009) and California Department of Fish and Wildlife (CDFW) *California Natural Communities List* (CDFW 2021a), where possible. Landscaped vegetation communities or plant communities dominated by non-native species do not always fall into a *Manual of California Vegetation* or CDFW category. Plant names used in this section follow *The Jepson Manual, Vascular Plants of California, Second Edition* (Baldwin et al. 2012). The project site habitat types were described by the aggregation of plants and wildlife based on the composition and structure of the dominant vegetation observed at the time the field reconnaissance was conducted and a review of multiple years of aerial photography.

The project site supports four main plant communities: wild oats non-native grassland, eucalyptus tree stands, disturbed coastal scrub, and what is being called an ornamental "wood" (a stand of non-native trees). There are 15 coast live oak trees at various locations on the site. Figure 4.3-1 provides a habitat map showing the locations and extent of the habitat types (DWE 2022). The BRA prepared for the project includes a set of onsite representative photographs from field surveys and a series of aerial photographs over time demonstrating periodic site disturbances, mostly from what appears to be construction of UVP and the realignment of Orcutt Road (DWE 2022; see Appendix F).

Table 4.3-1. Habitat Types

Habitat Type	Area (acres)
Wild oats non-native grassland	32.5
Eucalyptus tree stands	7.6
Disturbed coastal scrub – coyote brush scrub / silver bush lupine scrub	4.2
Ornamental tree stands	2.4
Developed	4.5
Total	**51.2**

Source: DWE (2022).

Note: Discrepancy in acreage between Chapter 2 and Table 4.3-1 is from the inclusion of the developed areas of UVP and Orcutt Road.

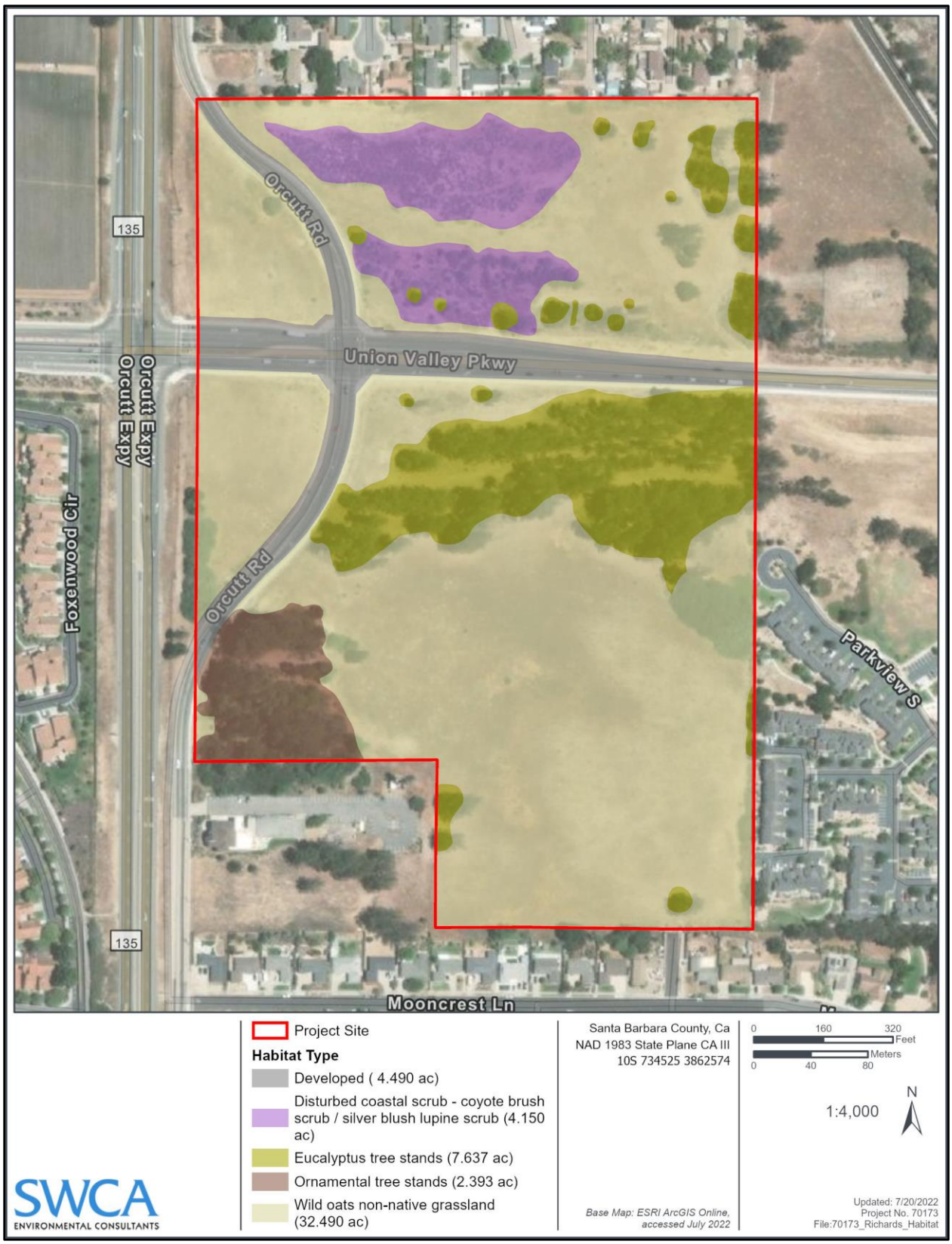

Figure 4.3-1. Habitat map.

WILD OATS NON-NATIVE GRASSLAND

The wild oats non-native grassland or *Avena (barbata, fatua) Semi-Natural Herbaceous Stands Avena spp. – Bromus spp. Herbaceous Semi-Natural Alliance* (CDFW 2021a), is best described as disturbed non-native annual grassland habitat from the past disturbance and regular weed suppression discing over time. The disturbed non-native annual grassland habitat covers most of the project site. Dominant plant species in the disturbed annual grassland habitat include oats (*Avena* spp.), ripgut brome (*Bromus diandrus*), and veldtgrass (*Ehrharta calycina*). Other associated grasses and herbaceous broadleaf species include soft chess (*Bromus hordeaceus*), filaree (*Erodium* spp.), wild radish (*Raphanus sativus*), croton (*Croton californicus*), telegraph weed (*Heterotheca grandiflora*), thistles, and mustards. The few wildflowers observed included fiddleneck (*Amsinckia intermedia*), California poppy (*Eschscholzia californica*), miniature lupine (*Lupinus nanus*), and popcornflower (*Plagiobothrys nothofulvus*).
The entirety of the annual grassland habitat had been recently disced, as evidenced by discing furrows throughout. Approximately 32.5 acres of disturbed non-native annual grassland habitat occurs on the project site. On the north side of UVP within the disturbed non-native annual grassland habitat there are 10 oak trees and along Orcutt Road. In total, approximately 0.33 acre of coast live oak canopy is included within the mapped annual grassland habitat (DWE 2022).

DISTURBED COASTAL SCRUB – COYOTE BRUSH SCRUB / SILVER BUSH LUPINE SCRUB

The coastal scrub or coyote brush scrub / *Baccharis pilularis – Artemisia californica* Shrubland Alliance (CDFW 2021a), is considered a subtype of central Lucian coastal scrub. It differs primarily by the dominance of coyote brush. This scrub type habitat classification consists of coyote brush and California sagebrush shrubs with non-native grassland understory herbaceous species. However, on the project site, silver bush lupine (*Lupinus albifrons*) comprises a large component of the coastal scrub habitat.
The disturbed coastal scrub occurs on the north side of UVP with what appears to be disturbance and removal between 2012 and 2015, possibly associated with UVP construction, with regrowth over time. More recently in 2021, a patch of dense disturbed coastal scrub was removed to discourage homeless encampments. The BRA prepared for the project provides a series of aerial photographs showing the removal and regrowth of the coastal scrub habitat areas over an approximately 27-year period (DWE 2022; see Appendix F). Approximately 4.2 acres of disturbed coastal scrub habitat was mapped on the project site based on aerial photographs from January 2021 and verified during the January 2022 site visit (DWE 2022).

NON-NATIVE EUCALYPTUS TREE STANDS

The project site has several stands (wind rows) and individual blue gum or eucalyptus trees (*Eucalyptus globulus*), mostly along the south side and north side of UVP frontage, and along the eastern border of the site north of UVP. The *Manual of California Vegetation* (Sawyer et al. 2009) vegetation alliance is a much broader habitat alliance referred to as *Eucalyptus* spp. *– Ailanthus altissima – Robinia pseudoacacia* Woodland Semi-Natural Alliance, however, no tree of heaven (*Ailanthus altissima*) or black locust (*Robinia pseudoacacia*) trees are present onsite. For this reason, the *Manual of California Vegetation* is not used to describe this habitat class at the project site. In total, there are around 100 individual eucalyptus trees in this area. There is an understory of non-native grassland amongst the typical accumulated eucalyptus leaf litter and bark debris. The non-native eucalyptus tree stand encompasses approximately 7.6 acres of the project site.

ORNAMENTAL TREE STANDS

The southwest corner of the project site supports an approximately 2.4-acre stand of ornamental trees composed of a variety of mostly non-native trees and shrubs. Non-native tree species include Chinese elm

(*Ulmus parvifolia*), liquid amber (*Liquidambar* sp.), Bailey's acacia (*Acacia baileyana*), African sumac (*Searsia lancea*), eucalyptus, olive (*Olea* sp.), and lemon (*Citrus limon*). There are a few native plant species present and these include three coast live oak trees, coyote brush, and California blackberry (*Rubus ursinus*). While most of the trees are generally considered ornamental species, this stand appears as an unmaintained mix of trees and shrubs, therefore, it was not classified as landscaped vegetation.

DEVELOPED

Developed areas include the paved roads of UVP and Orcutt Road and their sidewalks.

4.3.1.3 Habitat Suitability for Wildlife

The vegetation at the project site includes oats, ripgut brome, and veldtgrass-dominated non-native grassland and coastal scrub habitats mowed and disced annually for fire/weed suppression. The site is generally surrounded by urban residences and the SR 135 corridor. Thus, the project site provides minimal quality habitat for locally common wildlife species that have become adapted to the human residential environment. Common wildlife expected to use the site include raccoons (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), Botta's pocket gopher (*Thomomys bottae*), California ground squirrel (*Otospermophilus beecheyi*), and Old World rats and mice. Bird species observed (mostly around the stands of eucalyptus) included acorn woodpecker (*Melanerpes formicivorus*), northern flicker (*Colaptes auratus*), Audubon's warbler (*Setophaga auduboni*), Anna's hummingbird (*Calypte anna*), red-tailed hawk (*Buteo jamaicensis*), and turkey vultures (*Cathartes aura*) (DWE 2022). The site could potentially provide suitable habitat for ground/grassland/shrub-nesting songbird species such as sparrows and finches, however, regular discing for fire and weed suppression has diminished the suitability of the habitat for these species.

4.3.1.4 Waters of the U.S., Wetlands, and Waters of the State

No jurisdictional wetlands or other waters of the U.S./State or riparian habitat under any regulatory authority or definition occur on the project site.

There is a series of constructed rock-lined stormwater ditches and culverts receiving upland and roadside runoff from storm drain inlets on UVP and Orcutt Road. The varied network of rock-lined roadside drainage ditches did not support any wetland vegetation, only sporadic non-wetland non-native grasses. These ditches likely only flow in immediate response to impervious road-surface runoff during rainfall. The current Rapanos guidance for definition of waters of the U.S. directs the U.S. Army Corps of Engineers to not take jurisdiction over ditches (including roadside ditches) excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water. The review of aerial photography over time demonstrates that the onsite drainage ditches are excavated in uplands and are only draining uplands mostly as a result of UVP and Orcutt Road realignment construction.

Two patches of arroyo willow (*Salix lasiolepis*) associated with mesic (moist) areas from upland and roadway runoff were once present at the project site but were removed in 2021 to discourage homeless encampments (Figure 4.3-2). Therefore, they are not considered part of the existing conditions that were present at the site in February 2022. Based on analysis of 2021 aerial photography, these two willow patches totaled approximately 0.96 acre. One patch (0.55 acre) was located along the eastern property border south of UVP and the second (0.41 acre) was located along SR 135 south of UVP. Neither willow patch was associated with any recent or historic natural drainageway and neither has any riparian context as a classified plant community or habitat type. A wetland delineation and jurisdictional determination report detailing these findings is included in the BRA (DWE 2022; see Appendix F). Figure 4.3-2 provides the jurisdictional determination map.

Based on review of aerial photographs, the larger patch located along the eastern property border appears to have formed after the construction of the adjacent residential development. The National Wetlands Inventory (NWI; U.S. Fish and Wildlife Service [USFWS] 2022) has a Freshwater Emergent Wetland polygon mapped within this patch of willows (Figure 4.3-2). The NWI is a broad view aerial photograph mapping of potential wetlands that requires field verification. Collection of data at two data observation points in this willow removal area found that while the presumed 100% cover of arroyo willow (Facultative Wetland [FACW]) meets the hydrophytic (wetland) vegetation criteria, the site lacks hydric soils and lacks any primary or secondary indicators of wetland hydrology. Furthermore, there was no evidence of a drainage feature, culvert outfall, or other evidence of a drainageway or basin topography through the area. The mesic (moist) conditions that supported the establishment of willows was likely due to stormwater runoff from the adjacent residential development.

The second patch of willows, along SR 135, appears to have been supported by road runoff from ditches, storm drain inlets, and culverts under the roadways. One small oak tree of unknown size occurred with these willows. Based on review of aerial photographs, this patch appears to be persistent in location and extent from upland and roadside runoff from 1994 to 2021. Collection of data at this location found no hydric soil indicators or indicators of wetland hydrology (DWE 2022).

The State Water Resources Control Board (SWRCB) recently issued policies and procedures, including a State definition of wetlands, to regulate discharge of dredged or fill material into waters of the State (SWRCB Procedures). In brief, the SWRCB Procedures define wetlands as waters of the State consistent with the federal three-parameter definition requiring the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. As described above, the project site does not support any three-parameter wetlands, and there are no State wetlands present on the project site. The SWRCB Procedures are silent on artificial ditches constructed wholly in and draining only uplands, which is the case for the network of roadside ditches constructed mostly for the recent UVP extension and Orcutt Road realignment. There is no evidence of any historical natural drainage through the project site, so the ditches do not represent realigned natural drainages, and do not represent a bed, bank, or channel of a river or stream. As such, the network of roadside drainage ditches does not represent waters of the State.

4.3.1.5 Sensitive Natural Communities

"Sensitive Natural Community" is a state-wide designation given by the CDFW to specific vegetation associations of ecological importance. Rarity and ranking of Sensitive Natural Communities involves the knowledge of range and distribution of a given type of vegetation, and the proportion of occurrences that are of good ecological integrity (CDFW 2021b). Evaluation is conducted at both the Global (G) and State (S) levels, resulting in a rank ranging from 1 for very rare and threatened to 5 for demonstrably secure. Natural Communities with ranks of S1–S3 are considered Sensitive Natural Communities in California need to be addressed in the environmental review processes of California Environmental Quality Act (CEQA).

The California Natural Diversity Database (CNDDB) identifies the recorded occurrences of five Sensitive Natural Communities within a 10-mile radius of the project site. These Sensitive Natural Communities are: Central Dune Scrub, Central Foredunes, Coastal and Valley Freshwater Marsh, Southern Vernal Pool, and Southern California Three-spine Stickleback Stream. There are no aquatic natural communities onsite, as it is an entirely upland project site dominated by non-native annual grassland, disturbed coastal scrub, and stands of non-native trees. While the site contains predominantly eolian (windblown) sands in origin, the patches of disturbed coastal scrub habitat do not represent a sensitive dune community (DWE 2022). No Sensitive Natural Communities were identified at the project site.

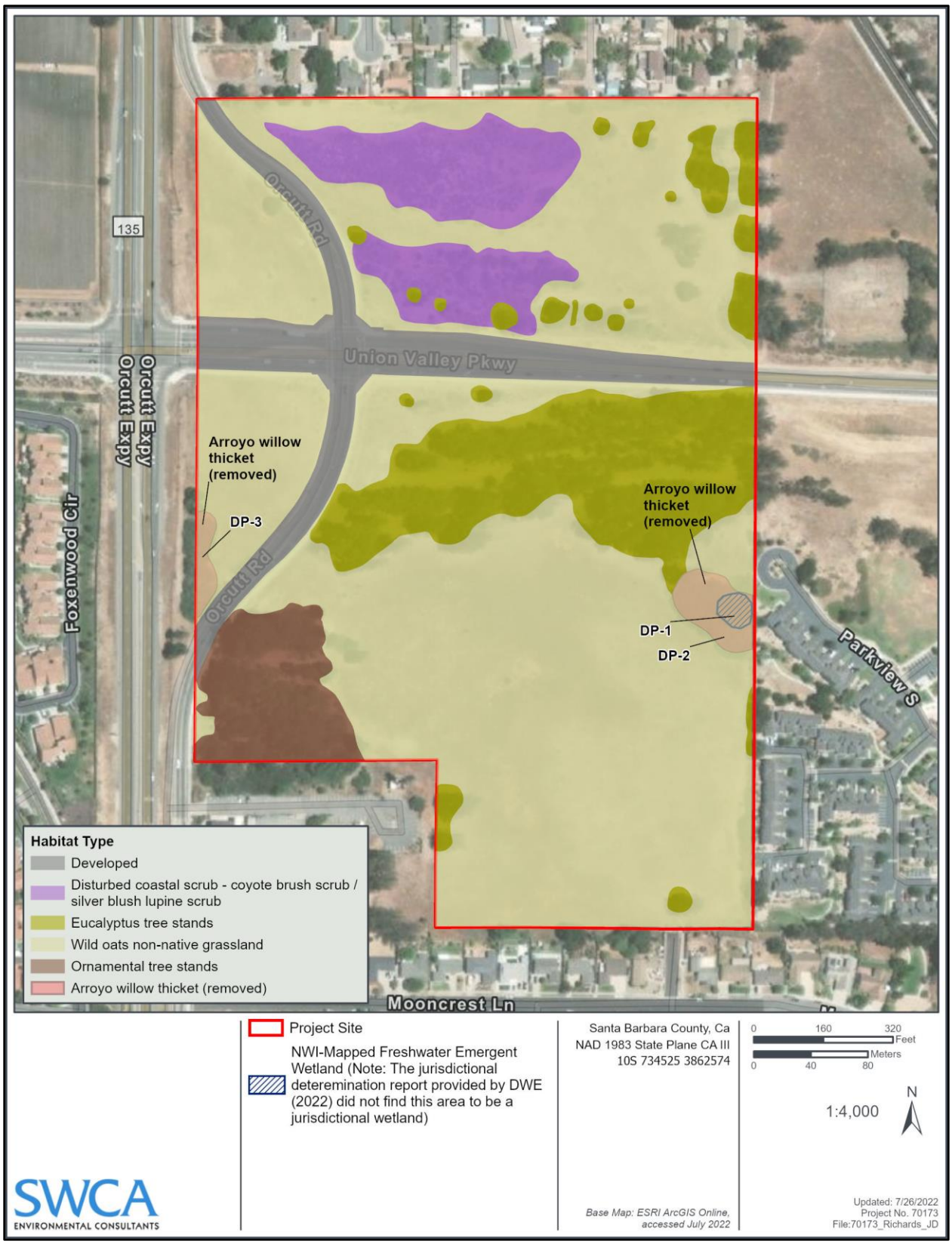

Figure 4.3-2. Jurisdictional determination map.

4.3.1.6 Special-Status Plant Species

For the purposes of this section, special-status plant species are defined as the following:

- Plants listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (FESA) (50 Code of Federal Regulations [CFR] Section 17.12 for listed plants and various notices in the *Federal Register* for proposed species).
- Plants that are candidates for possible future listing as threatened or endangered under the FESA.
- Plants that meet the definitions of rare or endangered species under CEQA (State CEQA Guidelines Section 15380).
- Plants considered by California Native Plant Society (CNPS) to be "rare, threatened, or endangered" in California (CNPS California Rare Plant Rank [CRPR] 1, 2, and 3).
- Plants listed by CNPS as plants about which we need more information and plants of limited distribution (CNPS CRPR 4).
- Plants listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA) (14 California Code of Regulations [CCR] Section 670.5).
- Plants listed under the California Native Plant Protection Act (California Fish and Game Code [CFGC] Section 1900 et seq.).
- Plants considered sensitive by other federal agencies (i.e., U.S. Forest Service, Bureau of Land Management), state and local agencies, or jurisdictions.

A search of the CNDDB revealed the recorded occurrences of 33 special-status plant species within a 10-mile radius of the project site, eight of which are formally listed under the FESA or CESA with the remainder being noted with a CNPS rank suggesting rarity. Table 4.3-2 provides a list of species known to occur in the vicinity of the project and their potential to occur on the project site.

Table 4.3-2. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/CNPS	Rationale for Expecting Presence or Absence
Hoover's bent grass *Agrostis hooveri*	Sandy sites in chaparral, cismontane woodland, and valley and foothill grassland. Elevation: 197–1,969 feet (60–600 meters [m]).	April–July	--/--/1B.2	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the active disking and disturbance on the project site may preclude the presence of this species. Surveys conducted in 2022 did not identify this species on the site.
Aphanisma *Aphanisma blitoides*	Coastal bluff scrub, coastal dunes, coastal scrub. On bluffs and slopes near the ocean in sandy or clay soils. Elevation: 10–1,000 feet (3–305 m). Channel Islands and immediate coast.	Feb–Jun	--/--/1B.2	**Suitable Conditions Absent, Species Absent:** Although sandy soils are present, periodic site disturbance and yearly weed suppression discing renders the site unsuitable. Not recorded on the inland site and not observed during 2022 floristic inventory and rare plant survey.
La Purisima manzanita *Arctostaphylos purissima*	Perennial evergreen shrub; sandy soil among chaparral and coastal scrub. Elevation: 197–1,280 feet (60–390 m).	November–May	--/--/1B.1	**Suitable Conditions Present, Species Absent:** No *Arctostaphylos* species were observed in the project area during surveys. Periodic site disturbance and yearly discing for weed suppression renders the site unsuitable.
Refugio manzanita *Arctostaphylos refugioensis*	Perennial evergreen shrub; occurs on sandstone among chaparral. Elevation: 197–2,510 feet (60–765 m).	December–March (May)	--/--/1B.2	**Suitable Conditions Absent, Species Absent:** Site does not contain sandstone. No *Arctostaphylos* species were observed in the project area during surveys.
sand mesa manzanita *Arctostaphylos rudis*	Evergreen shrub; maritime chaparral and coastal scrub with sandy soils. Elevation: 82–1,056 feet (25–322 m).	November–February	--/--/1B.2	**Suitable Conditions Present, Species Absent:** No *Arctostaphylos* species were observed in the project area during surveys. Periodic site disturbance and yearly discing for weed suppression renders the site unsuitable.
marsh sandwort *Arenaria paludicola*	Marshes and swamps, grows through dense mats of *Typha*, *Juncus*, *Scirpus*, etc. in freshwater marsh. Elevation: 33–558 feet (10–170 m).	May–August	FE/SE/1B.1	**Suitable Conditions Absent, Species Absent:** The project site does not support the appropriate mesic conditions for this species. Not observed during 2022 surveys.
Mile's milk-vetch *Astragalus didymocarpus* var. *milesianus*	Annual herb; coastal scrub on clay soils. Elevation: 66–295 feet (20–90 m).	March–June	--/--/1B.2	**Suitable Conditions Absent, Species Absent:** The project site does not support clay soils or the appropriate community. The disking and disturbance of the project site may also preclude the presence of this species. Surveys conducted in 2022 did not identify this species on the site.

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/CNPS	Rationale for Expecting Presence or Absence
Santa Barbara ceanothus *Ceanothus impressus* var. *impressus*	Perennial shrub; chaparral on sandy soils. Elevation: 131–1,542 feet (40–470 m).	February–April	--/--/1B.2	**Suitable Conditions Present, Species Absent:** This perennial species would have been noticeable and identifiable throughout the year and was not observed during 2022 field surveys. Periodic site disturbance and yearly discing for weed suppression renders the site unsuitable.
coastal goosefoot *Chenopodium littoreum*	Annual herb; coastal dunes. Elevation: 33–98 feet (10–30 m).	April–August	--/--/1B.2	**Suitable Conditions Present, Species Absent:** Periodic site disturbance and yearly discing for weed suppression renders the site unsuitable. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
straight-awned spineflower *Chorizanthe rectispina*	Chaparral, cismontane woodland, and coastal scrub, often on granite in chaparral. Elevation: 1,165–3,396 feet (355–1,035 m).	April–July	--/--/1B.3	**Suitable Conditions Absent, Species Absent:** The project site is at a lower elevation than the documented range of this species. Soils onsite are not conducive to this species. Not observed during 2022 floristic inventory and rare plant survey.
Bolander's water-hemlock *Cicuta maculata* var. *bolanderi*	Perennial herb that occurs in marshes and swamps and coastal, fresh or brackish water. Elevation: 0–656 feet (0-200 m).	July–September	--/--/2.1	**Suitable Conditions Absent, Species Absent:** The project site does not contain any coastal marshes or swamps.
surf thistle *Cirsium rhothophilum*	Coastal dunes, coastal bluff scrub, and open areas in central dune scrub; usually in coastal dunes. Elevation: 10–197 feet (3–60 m).	April–June	--/ST/1B.2	**Suitable Conditions Present, Species Absent:** Periodic site disturbance and yearly discing for weed suppression renders the site unsuitable. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
La Graciosa thistle *Cirsium scariosum* var. *loncholepis*	Cismontane woodland, coastal dunes, coastal scrub, marshes and swamps (brackish), and valley and foothill grassland; usually in mesic, sandy soils. Elevation: 13–722 feet (4–220 m).	May–August	FE/ST/1B.1	**Suitable Conditions Absent, Species Absent:** The project site does not support mesic conditions necessary for this species. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
California sawgrass *Cladium californicum*	Rhizomatous herb; meadows and seeps, and marshes and swamps (alkaline or freshwater). Elevation: 197–1,969 feet (60–600 m).	June–September	--/--/2B.2	**Suitable Conditions Absent, Species Absent:** The project site does not support mesic conditions necessary for this species.
seaside bird's-beak *Cordylanthus rigidus* ssp. *littoralis*	Annual herb; closed-cone coniferous forest, chaparral, cismontane woodland, coastal dunes, and coastal scrub with sandy soils; often found in disturbed sites. Elevation: 0–1,394 feet (0–425 m).	April–October	--/SE/1B.1	**Marginally Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/CNPS	Rationale for Expecting Presence or Absence
Gaviota tarplant *Deinandra increscens* ssp. *villosa*	Annual herb in the Asteraceae family; coastal bluff scrub, coastal scrub, and valley and foothill grassland, typically associated with sandy soils. Elevation: 115–1,411 feet (35–430 m).	May–October	FE/SE/1B.1	**Marginally Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, it is outside of its known range. The regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
paniculate tarplant *Deinandra increscens* ssp. *villosa*	Coastal scrub, valley and foothill grassland, coastal bluff scrub. Known from coastal terrace near Gaviota; sandy blowouts amid sandy loam soil; grassland/coast scrub ecotone. Elevation: 33–1,411 feet (10-430 m).	May–Oct	--/--/4.2	**Marginally Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
dune larkspur *Delphinium parryi* ssp. *blochmaniae*	Perennial herb; maritime chaparral and coastal dunes with sandy or rocky soils. Elevation: 0–656 feet (0–200 m).	April–May	--/--/1B.2	**Marginally Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
beach spectaclepod *Dithyrea maritima*	Coastal dunes, coastal scrub, seashores, sand dunes, and sandy places near the shore. Elevation: 10–164 feet (3–50 m).	March–May	--/ST/1B.1	**Marginally Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
Blochman's dudleya *Dudleya blochmaniae* ssp. *blochmaniae*	Coastal scrub, chaparral, and valley and foothill grassland habitats on rocky outcrops in clay or serpentine soils. Elevation: 16–1,476 feet (5–450 m).	April–June	--/--/1B.1	**Suitable Conditions Absent, Species Absent:** The project site does not contain rocky outcrops, clay soil, or serpentine soil.
Blochman's leafy daisy *Erigeron blochmaniae*	Perennial rhizomatous herb; coastal dunes and coastal scrub on sandy soils. Elevation: 10–148 feet (3–45 m).	July–August	--/--/1B.2	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
Lompoc yerba santa *Eriodictyon capitatum*	Ever green shrub; closed-cone coniferous forest and maritime chaparral with sandy soil. Elevation: 131–2,953 feet (40–900 m).	May–August	FE/SR/1B.1	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/CNPS	Rationale for Expecting Presence or Absence
mesa horkelia *Horkelia cuneata* ssp. *puberula*	Perennial herb; chaparral, cismontane woodlands, and coastal scrub in sandy or gravelly sites. Elevation: 230–2,658 feet (70–810 m).	February–September	--/--/1B.1	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
Kellogg's horkelia *Horkelia cuneata* ssp. *sericea*	Perennial herb; closed-cone coniferous forest, maritime chaparral, and coastal scrub with sandy or gravelly openings. Elevation: 33–656 feet (10–200 m).	April–September	--/--/1B.1	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
Beach layia *Layia carnosa*	Coastal dunes, coastal scrub. On sparsely vegetated, semi-stabilized dunes, usually behind foredunes. Elevation: 10–98 feet (3–30 m).	(Mar)May–Jun	--/--/1B.1	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
Pale-yellow layia *Layia heterotricha*	Cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland. Alkaline or clay soils; open areas. Elevation: 295–5,906 feet (90–1,800 m).	Mar–Jul	--/--/1B.1	**Suitable Conditions Absent, Species Absent:** The project site does not contain clay or alkaline soils. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
southern curly-leaved monardella *Monardella sinuata* ssp. *sinuata*	Annual herb; sandy soil among chaparral, cismontane woodland, coastal dunes, and coastal scrub with openings. Elevation: 0–984 feet (0–300 m).	April–September	--/--/1B.2	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
crisp monardella *Monardella undulata* ssp. *crispa*	Perennial and rhizomatous herb; coastal dunes among coastal scrub and maritime chaparral. Elevation: 33–394 feet (10–120 m).	April–August	--/--/1B.2	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
San Luis Obispo monardella *Monardella undulata* ssp. *undulata*	Perennial and rhizomatous herb; coastal dunes among coastal scrub and maritime chaparral on sandy substrates. Elevation: 33–656 feet (10–200 m).	May–September	--/--/1B.2	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/CNPS	Rationale for Expecting Presence or Absence
Gambel's water cress *Nasturtium gambelii*	Rhizomatous herb; marshes and swamps (freshwater or brackish). Elevation: 16–1,083 feet (5–330 m).	April–October	FE/ST/1B.1	**Suitable Conditions Absent, Species Absent:** The project site does not support mesic conditions necessary for this species.
Sand almond *Prunus fasciculata* var. *punctata*	Perennial shrub that occurs in chaparral and coastal scrub on coastal dunes. Elevation: 49–656 feet (15–200 m).	March–April	--/--/4.3	**Suitable Conditions Present, Species Absent:** This perennial species would have been noticeable and identifiable throughout the year and was not observed during the 2021 and 2022 surveys.
black-flowered figwort *Scrophularia atrata*	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, riparian scrub; around swales and in sand dunes; and sand, diatomaceous shale, and soils derived from other parent material. Elevation: 33–820 feet (10–250 m).	March–April	--/--/1B.2	**Suitable Conditions Present, Species Absent:** Although soils are appropriate for this species, the regular disking of the project site likely precludes the presence of this species on the site. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.
San Bernardino aster *Symphyotrichum defoliatum*	Rhizomatous herb; meadows and seeps, cismontane woodland, coastal scrub, and foothill grassland. Vernally mesic grassland or near ditches and springs. Elevation: 7–6,693 feet (2–2,040 m).	July–November	--/--/1B.2	**Suitable Conditions Absent, Species Absent:** No suitable wetland habitat occurs onsite. Not recorded on the site and not observed during 2022 floristic inventory and rare plant survey.

Sources: Baldwin et al. (2012). All plant descriptions paraphrased from CNPS (2022).

Status Codes:

-- = No status

Federal: FE = Federal Endangered; FT = Federal Threatened

State: SE = State Endangered; ST= State Threatened; SR = State Rare

CNPS CRPR: ***1B*** **=** rare, threatened, or endangered in California and elsewhere; ***2*** **=** rare, threatened, or endangered in California, but more common elsewhere; ***3*** **=** plants that about which more information is needed; ***4*** **=** a watch list plants of limited distribution

Threat Code: ***0.1*** **=** Seriously endangered I California (over 80% of occurrences threatened / high degree and immediacy of threat); ***0.2*** **=** Fairly endangered in California (20%–80% occurrences threatened); ***0.3*** **=** Not very endangered in California (<20% of occurrences threatened or no current threats known)

Rationale Terms: ***Species Present:*** Species was or has been observed in the survey area. ***Species Absent:*** Based on appropriate survey efforts, absence of the species was confirmed. ***Suitable Conditions Present:*** The appropriate habitat, soils, and elevation are present in the survey area. ***Marginal Conditions Present:*** The appropriate habitat and/or soils are present but other factors (past disturbances, elevation range) may preclude species occurrence. ***Suitable Conditions Absent:*** The survey area did not support the appropriate habitat, soils, and/or elevation for the species.

Of the 33 special-status plant species, it was determined that the site contains potentially suitable habitat for 16 species. Of these 16, eight were perennial species that were not observed onsite during field surveys. The project site was determined to be outside of the range of one of the plant species: Gaviota tarplant (*Deinandra increscens* ssp. *villosa*). Seven sandy soil-associated annual species were determined to have a low potential to occur in the disturbed coastal scrub habitat on the project site. These species include Hoover's bent grass (CNPS CRPR 1B.2), seaside bird's beak (State Endangered and CNPS CRPR 1B.1), paniculate tarplant (CNPS CRPR 4.2), Blochman's leafy daisy, three species of monardella that are CNPS CRPR 1.B2 species, and black-flowered figwort (CNPS CRPR 1B.2). None of these species were observed during 2022 botanical surveys. Therefore, there would be no impact to special-status plant species.

4.3.1.7 Special-Status Wildlife Species

For the purposes of this section, special-status wildlife species are defined as the following:

- Wildlife listed or proposed for listing as threatened or endangered under the FESA (50 CFR 17.11 for listed animals and various *Federal Register* notices for proposed species).
- Wildlife that are candidates for possible future listing as threatened or endangered under the FESA.
- Wildlife that meets the definitions of rare or endangered species under CEQA (State CEQA Guidelines Section 15380).
- Wildlife listed or proposed for listing by the State of California as threatened and endangered under CESA (14 CCR 670.5).
- Wildlife listed as Species of Special Concern (SSC) by the CDFW.
- Wildlife species that are fully protected in California (CFGC Sections 3511 [birds], 4700 [mammals], and 5050 [reptiles and amphibians]).

The CNDDB database query conducted for a 10-mile radius of the project site revealed the recorded occurrences of 24 special-status wildlife species. Eight species are formally listed under the FESA and one (monarch butterfly) is a candidate for listing (DWE 2022). Four species are formally listed under CESA (three of which are also federally listed). The remainder are CDFW SSC. Special-status wildlife species known to occur within the project vicinity were evaluated for their potential to occur within the project site. Table 4.3-3 provides the listing status, habitat details, and potential to occur on the project site for ~~each of these~~ species included in the CNDDB and other species of note. The project site supports at least marginal habitat for eight special-status wildlife species:

- monarch butterfly (*Danaus plexippus*)
- California tiger salamander (*Ambystoma californiense*)
- California red-legged frog (*Rana draytonii*)
- western spadefoot (*Spea hammondii*)
- Northern California legless lizard (*Anniella pulchra*)
- Blainville's horned lizard (*Phrynosoma coronatum*)
- western red bat (*Lasiurus blossevillii*)
- American badger (*Taxidea taxus*)
- Nesting migratory birds and raptors

The potential for each of these species to occur on the project site is discussed in more detail below.

Table 4.3-3. Special-Status Animal Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/ State/CDFW	Rationale for Expecting Presence or Absence
Insects			
monarch butterfly *Danaus plexippus*	Occur along coast from northern Mendocino to Baja California, Mexico. Winter roosts in wind-protected tree groves (eucalyptus, Monterey pine [*Pinus radiata*], and cypress [*Cupressus* spp.]), with nectar and water sources nearby.	FC/--/SA	**Conditions Present, Species Present:** The eucalyptus trees on the project site historically supported winter roosting monarchs.~~, but recent~~ Recent counts dropped abruptly in 1999~~, and now the project site supports only a small number of individuals~~ (see Table 4.3-4). However, the eucalyptus grove located on the site to the south of UVP continues to be considered important overwintering habitat.
vernal pool fairy shrimp *Branchinecta lynchi*	Occur in vernal pool habitats, including depressions in sandstone, to small swale, earth slump, or basalt-flow depressions with a grassy or, occasionally, muddy bottom in grassland.	FT/-- /--	**Suitable Conditions Absent**: The project site does not support vernal pools.
Crotch's bumble bee *Bombus crotchi*	Typically nests in undisturbed ground by using existing burrows from other animals or downed debris as they do not excavate their own nests. Areas subject to surface disturbance become unsuitable for this species. They are generalist forages on a wide variety of flowering plants and require a steady source of nectar and pollen from wildflowers during the flight season suggested as late February to late October.	--/SCE/--	**Suitable Conditions Absent:** The project site is unsuitable for the Crotch's bumble bee and it would not be expected to occur. Field surveys over the entirety of the project site at different time of the year did not have any observations of any bumble bee nests. The project site is at the outer edge of the predicted historic and current range established by the Xerces Society listing petition. The project site as disturbed annual grassland dominated by non-native grasses with little wildflower resources. The site is disced annually for fire suppression on the infill parcel resulting in surface soil disturbance. The project site is bordered by roads and urban development with surrounding lands either under ongoing cultivation of annual crops or urban development (DWE 2024).
Fish			
tidewater goby *Eucyclogobius newberryi*	Occur in brackish shallow lagoons and lower stream reaches where water is fairly still, but not stagnant.	FE/--/SSC	**Suitable Conditions Absent:** The project site does not support aquatic habitats capable of supporting this species.

Species Name	Habitat and Distribution	Legal Status Federal/ State/CDFW	Rationale for Expecting Presence or Absence
unarmored threespine stickleback *Gasterosteus aculeatus williamsoni*	Small freshwater fish (up to 5 centimeters, standard length); inhabit slow-moving reaches or quiet-water streams and rivers. Favorable habitats are usually shaded by dense and abundant vegetation. Current range is restricted to upper Santa Clara River and its tributaries in Los Angeles County, San Antonio Creek on Vandenberg Air Force Base in Santa Barbara County, and Shay Creek vicinity in San Bernardino County (U.S. Fish and Wildlife Service 2009).	FE/SE/FP	**Suitable Conditions Absent:** The project site does not support aquatic habitats capable of supporting this species.
arroyo chub *Gila orcuttii*	Small freshwater fish that occur in coastal waters of southern California. Typically occur on sandy and muddy bottoms of flowing pools, creeks, intermittent streams, and small to medium rivers. Known populations occur in Malibu Creek, Santa Clara, San Luis Rey, and Santa Margarita River.	--/--/SSC	**Suitable Conditions Absent:** The project site does not support aquatic habitats capable of supporting this species.
Southern California steelhead Distinct Population Segment (DPS) *Oncorhynchus mykiss irideus*	Occur in clear, cool water with abundant in-stream cover, well-vegetated stream margins, relatively stable water flow, and 1:1 pool-to-riffle ratio.	FT, PCH /--/SSC	**Suitable Conditions Absent:** The project site does not support aquatic habitats capable of supporting this species.
South-Central California Coast steelhead DPS *Oncorhynchus mykiss irideus*	Occur in clear, cool water with abundant in-stream cover, well-vegetated stream margins, relatively stable water flow, and 1:1 pool-to-riffle ratio.	FT, PCH /--/SSC	**Suitable Conditions Absent:** The project site does not support aquatic habitats capable of supporting this species.
Amphibians			
California tiger salamander *Ambystoma californiense* – Santa Barbara DPS	Occur in grasslands or oak woodlands that support natural ephemeral pools or ponds that mimic them. Require seasonal water for breeding and small mammal burrows, crevices in logs, piles of lumber, and shrink-swell cracks in ground for refuges. To be suitable, aquatic sites must retain at least 30 centimeters of water for minimum of 10 weeks in winter.	FE/ST/SSC	**Marginally Suitable Upland Habitat Present, Species Absent:** The project site contains suitable upland habitat for the species. Although it is within the dispersal distance from known CTS breeding ponds, Orcutt Road and SR 135 are a barrier to CTS movement to the site from these ponds. Regular disking of the project site further precludes the presence of this species.
arroyo toad *Anaxyrus californicus*	Inhabit coastal southern California from Salinas River Basin in Monterey and San Luis Obispo Counties to Arroyo San Simón in northern Baja California, Mexico. Occupy riparian habitats with sandy streambeds and adjacent pools. Typical vegetation may include cottonwood (*Populus* spp.), sycamore (*Platanus* spp.), and willow (*Salix* spp.) trees. Some populations occur in streams within coniferous forests.	FE/--/SSC	**Suitable Conditions Absent:** The project site does not support sandy riverine or other aquatic habitats capable of supporting this species.

Species Name	Habitat and Distribution	Legal Status Federal/ State/CDFW	Rationale for Expecting Presence or Absence
California red-legged frog *Rana draytonii*	Occur in aquatic habitats with little or no flow and surface water depths to at least 2.3 feet (0.7 meters [m]). Presence of fairly sturdy underwater supports, such as cattails (*Typha* spp.).	FT /-- /SSC	**Marginally Suitable Upland Habitat Present, Species Absent:** No aquatic breeding ponds are on the site. The project site is within the dispersal distance of documented breeding ponds and contains marginal upland habitat. Infill site surrounded by developments and roads renders it unsuitable for any California red-legged frog dispersal opportunity.
western spadefoot *Spea hammondii*	Inhabit vernal pools in primarily grassland, but also in valley and foothill hardwood woodlands.	--/--/SSC	**Marginally Suitable Upland Habitat Present, Species Absent:** No breeding ponds occur on the site. Nearest occurrence extirpated from construction of UVP. Periodic site disturbance and yearly weed suppression discing renders the site unsuitable.
Reptiles			
Northern California legless lizard *Anniella pulchra*	Occur from southern edge of San Joaquin River in northern Contra Costa County south to Ventura County. Occur in scattered locations in San Joaquin Valley, along southern Sierra Nevada mountains, and on desert side of Tehachapi Mountains and part of San Gabriel Mountains. Sandy or loose loamy soils with high moisture content under sparse vegetation.	--/--/SSC	**Marginal Conditions Present, Species Absent**: Suitable sandy soils onsite. Low quality marginal habitat from periodic site disturbance and yearly weed suppression discing renders the site unsuitable. Not recorded on the site and not observed during 2022 focused surveys.
western pond turtle *Emys marmorata*	Occur in quiet waters of ponds, lakes, streams, and marshes. Typically, in deepest parts with an abundance of basking sites.	--/--/SSC	**Suitable Conditions Absent:** The project site does not support freshwater habitat with basking structures.
coast horned lizard *Phrynosoma coronatum (blainvillii* population)	Frequent a wide variety of habitats, commonly occurring in lowlands along sandy washes, coastal sage scrub, and chaparral in arid and semi-arid climate conditions. Prefer friable, rocky, or shallow sandy soils.	--/--/SSC	**Marginal Conditions Present, Species Absent**: Suitable sandy soils onsite. Low quality marginal habitat from periodic site disturbance and yearly weed suppression discing renders the site unsuitable. Not recorded on the site and not observed during 2022 focused surveys.
two-striped garter snake *Thamnophis hammondii*	Occur in coastal California from Salinas to Baja California and at elevations up to 7,000 feet (2,134 m). Found along streams with rocky beds and permanent freshwater.	--/--/SSC	**Suitable Conditions Absent:** The project site does not support aquatic habitats capable of supporting this species.
Birds			
tricolored blackbird *Agelaius tricolor*	(Nesting colony); require open water, protected nesting substrate, such as cattails or tall rushes (*Juncus* spp.), and foraging area with insect prey.	MBTA/--/SSC	**Suitable Conditions Absent:** The project site does not support freshwater marsh habitat for nesting.
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	MBTA/--/WL	**Suitable Conditions Absent:** The project site is not sloped and does not support the appropriate habitats.

Species Name	Habitat and Distribution	Legal Status Federal/ State/CDFW	Rationale for Expecting Presence or Absence
burrowing owl *Athene cunicularia*	Occur in open, dry grasslands, deserts, and scrublands. Subterranean nester, dependent on burrowing mammals.	MBTA/-- /SSC	**Suitable Conditions Absent:** Suitable ground squirrels burrows onsite. Low quality marginal habitat from periodic site disturbance and yearly weed suppression discing renders the site unsuitable. Not recorded on the site and not observed during 2022 surveys.
yellow warbler *Setophaga petechia*	Usually found in riparian deciduous habitats in summer. Stays among cottonwoods, willows, alders (*Alnus* spp.), and other small trees and shrubs. Nest is an open cup placed 2–16 feet (0.6–4.9 m) aboveground in a deciduous sapling or shrub.	--/--/SSC	**Suitable Conditions Absent:** The project site does not support riparian habitats.
least Bell's vireo *Vireo bellii pusillus*	Summer resident of southern California. Occur in low riparian areas in vicinity of water or in dry river bottoms below 2,000 feet (610 m) elevation. Nest along margins of bushes or twigs of willow, *Baccharis*, or mesquite.	FE/SE/--	**Suitable Conditions Absent:** The project site does not support riparian habitats.
Class Aves Other migratory bird species (nesting)	Annual grasslands, coastal scrub, chaparral, and oak woodlands may provide nesting habitat.	MBTA/--/--	**Suitable Conditions Present:** Suitable nesting habitat occurs in the eucalyptus and ornamental tree stands on the fringes of the project site. The site could potentially provide suitable habitat for ground/grassland/shrub-nesting songbird species such as sparrows and finches, however, regular discing for fire and weed suppression has diminished the suitability of the habitat for these species.
Mammals			
pallid bat *Antrozous pallidus*	Prefer rocky outcrops, cliffs, and crevices with access to open habitats for foraging. Day roosts are in caves, crevices, mines, and occasionally in hollow trees and buildings. Night roosts may be in more open sites, such as porches and buildings.	--/--/SSC	**Suitable Conditions Absent**: The site does not support rocky outcrops or crevices for roosting.
Townsend's big-eared bat *Corynorhinus townsendii*	Occur in a wide variety of habitats; most common in mesic (wet) sites. May use trees for day and night roosts; however, require caves, mines, rock faces, bridges, or buildings for maternity roosts. Maternity roosts are in relatively warm sites.	--/--/SSC	**Suitable Conditions Absent:** The lack of mesic conditions, rock faces, caves, bridges, and other structures on the project site precludes this species from roosting on the project site.
western red bat *Lasiurus blossevillii*	Roost primarily in trees, often in edge habitats adjacent to streams, fields, or urban areas (Zeiner et al. 1990). Mating occurs in August and September and young are born from late May through early July.	--/--/SSC	**Marginal Conditions Present:** Marginal suitable habitat conditions present in eucalyptus trees. Not recorded from site.

Species Name	Habitat and Distribution	Legal Status Federal/ State/CDFW	Rationale for Expecting Presence or Absence
American badger *Taxidea taxus*	Occur in open stages of shrub, forest, and herbaceous habitats; need uncultivated ground with friable soils.	--/--/SSC	**Marginal Conditions Present**: Suitable sandy soils onsite. Low quality marginal habitat from periodic site disturbance and yearly weed suppression discing renders the site unsuitable. Not recorded on the project site and not observed during 2022 focused surveys.

Source: Unless otherwise noted, all habitat and distribution data provided by the CNDDB (CDFW 2021c).

Status Codes:

-- = No status

Federal: FE = Federal Endangered; FT = Federal Threatened; FC = Federal Candidate; CH = Federal Critical Habitat; PCH = Proposed Federal Critical Habitat; MBTA = Protected by Federal Migratory Bird Treaty Act

State: SE = State Endangered; ST = State Threatened; SCT = State Candidate Threatened, SCE = State Candidate Endangered

CDFW: SSC = Species of Special Concern; FP = Fully Protected Species; SA = Not formally listed but included in CDFW Special Animals List; WL = Watch List

Rationale Terms: ***Species Present:*** Species was or has been observed in the survey area. ***Suitable Conditions Present:*** Survey area is within the species' range and supports the appropriate habitat, soils, elevation, and other habitat requirements. ***Marginal Conditions Present:*** Survey area is in the species' range and supports the appropriate habitat but other factors (past disturbances, presence of predators, etc.) may preclude species occurrence. ***Suitable Conditions Absent:*** Survey area is not in the species' range and/or does not support the appropriate habitat, soils, elevation, and/or other habitat requirements.

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MONARCH BUTTERFLY

The monarch butterfly (*Danaus plexippus*) is a candidate for listing under the FESA and on CDFW's Special Animals list (CDFW 2022). It uses coastal woodlands and eucalyptus/pine tree stands for fall and winter roosts, typically from October through January. The project site supports stands of trees that have been observed with a small aggregation of fall/winter roosting monarch butterflies dating back to 1998. The original 1998 record recorded 176 individuals. Currently ~~only~~ 34 were recorded in 2021/2022 (Table 4.3-4).

Table 4.3-4. Monarch Butterfly Overwintering Roost Counts—CNDDB Occurrence #354; Xerces Union Valley Parkway Site ID 2688

Survey Date	Count
CNDDB Occurrence #354 Counts	
November 1998	71
December 1998	176
February 1999	119
March 1999	5
Xerces Society Community Science Counts	
Year 2010	Not Counted
Year 2011	Not Counted
Year 2012	Not Counted
Year 2013	Not Counted
Year 2014	Not Counted
Year 2015	19
Year 2016	30
Year 2017	18
Year 2018	2
Year 2019	0
Thanksgiving Count 2021	28
New Year's Count 2021–2022	34

Sources: CNDDB (CDFW 2021c) accessed March 2022; Xerces Society for Invertebrate Conservation Western Monarch Count Community Science Program (2022)

No monarch butterflies were observed on the project site during the December 17, 2021, field survey under sunny conditions with little wind. Similar conditions for observing monarch butterflies occurred during DWE's second survey on January 5, 2022; four monarch butterflies were observed in flight and stationary on the east edge of the eucalyptus stand on the south side of the project site.

The Xerces Society community science program (Xerces Society Western Monarch Thanksgiving Count 2022) recorded 28 monarchs in November 2021, and 34 during the "Thanksgiving" counts (Table 4.3-4). The BRA (DWE 2022) provides a detailed breakdown of the results of survey data over multiple years. Based on this, there appears to have been a sizable overwintering population in 1998, then a sharp decline to five individuals in 1999. Subsequent surveys between 2015 and 2022 yielded between 0 and 34 butterflies (DWE 2022). Based on the results of these surveys, the Xerces Society has identified the stand

of eucalyptus trees along the southern side of UVP as a Western Monarch Overwintering Site (mapped as #2688).

Regardless of the small survey counts between 2015 and 2022, the eucalyptus grove that is south of UVP is an important inland overwintering grove of the monarch butterfly. The stands of eucalyptus trees to the north of UVP could provide additional support to the southern overwintering grove by providing a wind break to the southern grove. The CDFW has designated the area of the project site to the south of UVP as an area of high conservation value for monarch butterflies (Area of Conservation Concern HEX ID 50049) (CDFW 2023).

The majority of roosts supporting overwintering monarchs in Santa Barbara County from 2016 to 2022, tracked by CDFW and the Xerces Society, contain an average of 451 individuals. Of these Santa Barbara County data, many sites had a low population count of zero for many years, and the highest population was recorded at 34,000 individuals at The Nature Conservancy preserve in 2022 (CDFW 2023). Inland winter roosts in the Santa Maria area contain lower numbers of monarch butterflies than coastal roosts but are still biologically significant resources for this species. The inland Santa Maria overwintering sites have always been aggregations of smaller numbers of individuals but provide a valuable ecological niche to the species. Removal of smaller overwintering roosts could force the congregation of monarchs into larger colonies where stochastic events (disease, fire, grove removal, climate change) could significantly impact the species. Multiple overwintering sites that are widely distributed buffers the species against catastrophic loss and extinction. For these reasons, the existing 7.63-acre overwintering site that is within the project site is considered significant habitat (CDFW 2023).

~~The Pismo Beach monarch butterfly preserve was visited prior to conducting the December and January field surveys as a reference site for potential monarch butterfly winter use of the project site. The 2021–2022 season documented over 22,000 monarch butterflies at the Pismo Beach preserve, which was considered an excellent year compared to recent years. Hundreds of monarch butterflies were readily observable in flight and roosting at the Pismo Beach preserve the same days surveys were conducted for the project site. No monarch butterflies were observed on the project site during the December 17, 2021, field survey under ideal sunny conditions with little wind. Similarly idyllic conditions for observing monarch butterflies occurred during DWE's second survey on January 5, 2022, but only four monarch butterflies were observed in flight and stationary on the east edge of the eucalyptus stand on the south side of the project site.~~

~~The Xerces Society community science program (Xerces Society Western Monarch New Year's Count 2022) recorded 28 monarchs in November 2021, and 34 during the "New Years" counts (Table 4.3-4). The BRA (DWE 2022) provides a detailed breakdown of the results of survey data over multiple years. Based on this, there appears to have been a sizable winter roosting population in 1998, then a sharp decline to only five individuals in 1999. Subsequent surveys between 2015 and 2022 only yielded between 0 and 34 butterflies (DWE 2022). The most recent observations of less than 40 monarch butterflies do not represent a substantial occurrence of a roosting site compared to other Xerces Society monitoring sites, which contain numbers ranging from 500 and upwards to 20,000 individuals at winter roost sites. Based on recent data, the eucalyptus stands onsite do not constitute a winter roosting site; however, individual butterflies do occur onsite.~~

CALIFORNIA TIGER SALAMANDER

The California tiger salamander (*Ambystoma californiense*) Santa Barbara County Distinct Population Segment (DPS) is listed as endangered under the FESA and threatened under CESA. It spends most of its life in upland underground refuges in small mammal burrows and can disperse upwards of 1.3 miles from its temporary (seasonal) breeding ponds. There are known breeding ponds approximately 1.4 miles west

of SR 135 on airport lands and elsewhere mostly to the south. There was a closer breeding occurrence west of SR 135, but it has been extirpated. The entire area north of Foster Road all the way west to Blosser Road has been planted in strawberries (see DWE 2022; see Appendix F). There is substantial residential development, active agriculture, and the four-lane SR 135 separating the project site from any known or potential breeding ponds, which are barriers to any California tiger salamander dispersal onto the project site. The USFWS maps the project site as outside of the western Santa Maria/Orcutt metapopulation and potential distribution (USFWS 2016). Additionally, curbs along Orcutt Road and portions of UVP represent additional barriers to California tiger salamander movement. For these reasons, the project site does not support upland dispersal or refuge habitat for the California tiger salamander. A complete California tiger salamander site assessment report substantiating these findings was provided by DWE as an appendix to the BRA (DWE 2022; see Appendix F). After reviewing the California tiger salamander site assessment report, USFWS has also provided feedback to the City that the agency is in agreement with the assessment report. Specifically, USFWS indicates that UVP, SR 135, and other developed lands between the project and the breeding ponds west of SR 135 create an impermeable barrier for California tiger salamander dispersal and that the project area is not California tiger salamander upland habitat (USFWS 2023a).

CALIFORNIA RED-LEGGED FROG

The California red-legged frog (*Rana draytonii*) is listed as threatened under the FESA and is a State SSC. The CNDDB has recorded occurrences of the California red-legged frog in the vicinity of the project site to the west of SR 135 in ditches and ponds around the Santa Maria Airport, and agricultural ponds and ditches mostly to the west around Highway 1 and Black Road. There is no aquatic habitat on the project site that may attract a California red-legged frog from other areas. In addition, while the California red-legged frog may disperse across uplands between breeding sites, SR 135 creates a barrier to movement of frogs from the west, and there are no breeding sites in the urbanized development around the project site that might prompt movement across the site. Therefore, there is no suitable breeding or dispersal habitat on the project site for the California red-legged frog.

WESTERN SPADEFOOT

The western spadefoot (*Spea hammondii*) is listed as a CDFW SSC. The CNDDB search identified a 2011 western spadefoot occurrence of 50 adults in a rain-filled pool at the southeast corner of Hummel Drive and UVP, over 600 feet east of the project site. Intervening upland habitat between Hummel Drive and the project site was removed during construction of UVP and a detention basin. No suitable seasonal pools occur on the project site. Given the site's proximity (600 feet) to a recently (2011) extirpated breeding site, there is a very low likelihood that an estivating western spadefoot could still occur on the project site.

NORTHERN CALIFORNIA LEGLESS LIZARD

The northern California legless lizard (*Anniella pulchra*), a CDFW SSC, is closely associated with sandy or very friable loamy soils under coastal scrub or woodland vegetation with soil moisture and vegetative cover being essential. Lizard population densities have been reported associated with certain plant species that provide leaf litter and strong root structures attracting preferred prey and offering cover. Large lupines (*Lupinus arboreus*, *L. chamissonis*, *L. albifrons*), mock heather (*Ericameria ericoides*), and coast live oak (*Quercus agrifolia*) are among the most common indicators for this species (Kuhnz et al. 2005). There are three CNDDB records within 2 miles of the project site. One, less than 1 mile from the project site, was found during clearing the site for construction along UVP (Occurrence # 85). A second record, approximately 1.6 miles southeast, was found in the backyard of a residential development (Occurrence # 314). The third record, approximately 1.75 miles east of the project site, was found along a sandy dirt

access road by an environmental monitor during trenching activities. The sandy soils on the project site and remnants of disturbed coastal scrub represent suitable habitat for this species. However, regular mowing/discing of the site and periodic removal of shrubs has likely reduced their population numbers. Field surveys conducted by DWE on March 7 and April 27, 2022, which included raking around the coastal scrub habitat, did not result in any observations of the northern California legless lizard (DWE 2022). This species is rarely observed aboveground, requires extensive search efforts to find, and can be easily missed. Therefore, this species could still potentially occur onsite.

BLAINVILLE'S (COAST) HORNED LIZARD

The Blainville's (coast) horned lizard (*Phrynosoma blainvillii*), a CDFW SSC, occurs in a wide variety of habitats, requiring sandy soils, abundant ant colonies for food, open areas for sunning, and shrubs for cover. Sandy loam or loamy sand and alkali soils are key predictors for the presence of Blainville's horned lizards in the San Joaquin Valley (Gerson 2011). Appropriate habitat for Blainville's horned lizard must include an abundance of the native harvester ant (*Pogonomyrmex* and *Messor* sp.). Non-native Argentine ants (*Linepithema humile*) are detrimental to Blainville's horned lizard food resources, as they outcompete the native harvester ant, and the lizard will not eat the Argentine ant (CDFW 2007, 2021c; Gerson 2011). There are no CNDDB occurrences within the urban areas of Santa Maria. The closest CNDDB occurrence is approximately 4.15 miles southeast of the project site and is likely extirpated from development (Occurrence # 619). The remainder of the CNDDB occurrences in the vicinity of Santa Maria are associated with the Santa Maria River. While the project site does contain sandy soils, gopher burrows, and shrubs for cover, this species is unlikely to be in an infill parcel such as this because of the lack of their primary prey source, native ants. Urban environments are heavily dominated by invasive Argentine ant. Field surveys conducted by DWE on March 7 and April 27, 2022, did not result in any observations of horned lizards (DWE 2022). While it is a cryptic species and difficult to spot, it was determined that this species is unlikely to occur on the project site.

WESTERN RED BAT

The western red bat (*Lasiurus blossevillii*) is a CDFW SSC. The closest CNDDB occurrences are located approximately 6 miles south on Vandenberg Air Force Base and are associated with either Barka slough or San Antonio Creek (CDFW 2021c). Western red bats roost on the underside of overhanging leaves (Pierson et al. 2002). In the Central Valley, they were found to be more abundant in remnant stands of cottonwood/sycamore riparian habitats, but also roosted extensively in orchards and were observed roosting in planted eucalyptus stands (Pierson et al. 2006). On Vandenberg Air Force Base, western red bats were primarily associated with creek drainages (Pierson et al. 2002). The eucalyptus and ornamental tree stands have the potential to provide roosting habitat for the western red bat. However, the isolated and infill nature of the site, along with the lack of proximity to water, particularly riparian areas for foraging, make it an unlikely area for roosting. Nevertheless, no focused bat surveys were conducted for the property, so their presence cannot be ruled out.

AMERICAN BADGER

The American badger (*Taxidea taxus*), a CDFW SSC, is a grassland species needing abundant small mammal prey; they are easily detected by their distinctive half-moon shaped burrows. There was no evidence of badger use observed on the project site during DWE field surveys that included close inspection of burrows with the obvious tailings from ground squirrels. Very little evidence of small mammal use was observed onsite, suggesting the isolated infill site has low suitability for the American badger.

4.3.2 Regulatory Setting

4.3.2.1 Federal

ENDANGERED SPECIES ACT

The FESA provides the legal framework for the listing and protection of species (and their habitats) identified as being endangered or threatened with extinction. "Critical Habitat" is a term in the FESA designed to guide actions by federal agencies and is defined as "an area occupied by a species listed as threatened or endangered within which are found physical or geographical features essential to the conservation of the species, or an area not currently occupied by the species which is itself essential to the conservation of the species." Actions that jeopardize endangered or threatened species and/or critical habitat are considered a "take" under FESA. "Take" under federal definition means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

Projects that would result in "take" of any federally listed threatened or endangered species, or critical habitats, are required to consult with the USFWS through either FESA Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan), depending on the level of federal government involvement in permitting and/or funding of the project. The FESA does not protect plants unless there is a federal nexus. Plants may not be removed from lands under federal jurisdiction, and activities with a federal nexus have the consultation requirement described above (16 United States Code 1536 – Interagency Cooperation).

MIGRATORY BIRD TREATY ACT

All migratory, non-game bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR 10.13), as amended under the Migratory Bird Treaty Reform Act of 2004. The MBTA makes it illegal to purposefully take (pursue, hunt, shoot, wound, kill, trap, capture, or collect) any migratory bird, or the parts, nests, or eggs of such a bird, except under the terms of a valid federal permit. Migratory non-game native bird species are protected by international treaty under the federal MBTA.

4.3.2.2 State

CALIFORNIA ENDANGERED SPECIES ACT

The CESA, like the FESA, contains a process for listing of species and regulating potential impacts to listed species. State threatened and endangered species include both plants and wildlife, but do not include invertebrates. The designation "rare species" applies only to California native plants. State threatened and endangered plant species are regulated largely under the Native Plant Preservation Act in conjunction with the CESA. State threatened and endangered animal species are legally protected against "take." The CESA authorizes the CDFW to enter into a memorandum of agreement for take of listed species to issue an incidental take permit for a state-listed threatened and endangered species only if specific criteria are met. Section 2080 of the CESA prohibits the take of species listed as threatened or endangered pursuant to the Act. Section 2081 allows CDFW to authorize take prohibited under Section 2080 provided that: 1) the taking is incidental to an otherwise lawful activity; 2) the taking will be minimized and fully mitigated; 3) the applicant ensures adequate funding for minimization and mitigation; and 4) the authorization will not jeopardize the continued existence of the listed species.

CALIFORNIA FISH AND GAME CODE

CFGC Section 3511 includes provisions to protect Fully Protected species, such as: 1) prohibiting take or possession "at any time" of the species listed in the statute, with few exceptions; 2) stating that "no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to "take" the species; and 3) stating that no previously issued permits or licenses for take of the species "shall have any force or effect" for authorizing take or possession. The CDFW is unable to authorize incidental take of "fully protected" species when activities are proposed in areas inhabited by those species. CFGC Sections 3503 and 3503.5 state that it is unlawful to take, possess, or destroy the nest or eggs of any bird, with occasional exceptions. In addition, Section 3513 states that it is unlawful to take or possess any migratory bird as designated in the MBTA or any part of such migratory birds except as provided by rules and regulations under provisions of the MBTA. The CDFW also manages the California Native Plant Protection Act of 1977 (CFGC Section 1900, et seq.), which was enacted to identify, designate, and protect rare plants. In accordance with CDFW guidelines, CNPS 1B list plants are considered "rare" under the CESA, and are evaluated in CEQA documents.

OTHER SECTIONS OF THE CALIFORNIA FISH AND GAME CODE

Fully Protected species may not be taken or possessed without a permit from the Fish and Game Commission and/or CDFW. Information on these species can be found within Section 3511 (birds), Section 4700 (mammals), Section 5050 (reptiles and amphibians), and Section 5515 (fish) of the CFGC.

CALIFORNIA FISH AND GAME CODE SECTION 1602

CFGC Section 1602 requires any person, state or local government agency, or public utility proposing a project that may affect a river, stream, or lake to notify the CDFW before beginning the project. If activities would result in the diversion or obstruction of the natural flow of a stream, substantially alter its bed, channel, or bank, impact riparian vegetation, or adversely affect existing fish and wildlife resources, a Streambed Alteration Agreement is required. A Streambed Alteration Agreement lists the CDFW conditions of approval relative to the proposed project and serves as an agreement between an applicant and the CDFW for a term of not more than 5 years (for standard agreements) for the performance of activities subject to this section. Implementation of the proposed project may require a Section 1602 Streambed Alteration Agreement for any impacts within the banks of drainages and extending to the outer edge of riparian vegetation (whichever is greater) if these areas are determined to be jurisdictional by CDFW.

4.3.2.3 Local

CITY OF SANTA MARIA GENERAL PLAN RESOURCES MANAGEMENT ELEMENT

The *City of Santa Maria General Plan Resources Management Element* (RME) was adopted by the City Council on April 4, 1981, updated and readopted in 1996, and contains amendments through January 16, 2001. The biological resources section of the RME identifies biological resources as vegetation and wildlife in the city inclusive of plant species, wildlife species, and their habitats. The RME recognizes biological resources to provide ecological, educational, historic, scientific, and aesthetic value to the people of the Santa Maria Valley.

The RME also identifies the urban forest as having ecological value. The RME defines an urban forest as the planted environment within a city. It includes both public and private open space areas planted with trees, shrubs, lawns, and other forms of vegetation. Street trees, landscaped easements and medians, and parks are also part of the urban forest.

Goal 3 – Preserve natural biological resources and expand Santa Maria's urban forest.

Policy 3. Protect and preserve biological resources, and expand the urban forest within the Planning Area[1] in order to enhance the quality of life in the Santa Maria Valley.

Objective 3.1.a - Plant and Animal Taxa and Habitats. Ensure that all development near sensitive habitats avoids significant impacts to these areas.

Implementation Program 5. Require street trees to be incorporated into the design and plans of new developments.

Implementation Program 6. Preserve and maintain existing trees along and in public streets and parking lots.

Implementation Program 7. Enforce the tree replacement standards contained in Chapter 44 of Title 12 of the Municipal Code.

Implementation Program 9. Enforce the existing ordinance that requires developers of new buildings to plant trees and shrubs to improve energy efficiency and to preserve existing trees on building sites.

CITY OF SANTA MARIA MUNICIPAL CODE

The City of Santa Maria's (City's) Municipal Code is designed to preserve and expand the urban forest by requiring replacement trees for those proposed for removal. Section 12-44.04 provides specific landscape design standards and mitigation ratios as follows:

Section 12-44.04. Specific landscape design standards. The location, size and species of all existing trees in excess of six (6) inches in diameter and any existing street trees, shall be indicated on landscape plans submitted to the City. Existing trees shall be retained unless the finding can be made by the City Parks Department staff that the preservation of the tree presents a hazard to the health, safety and general welfare of the public or cannot be reasonably accommodated by the proposed development.

1) The grades around existing trees designated to remain shall not be altered more than three (3) inches within the area from the trunk to the canopy dripline.
2) Pavement within the canopy dripline of existing trees should not exceed twenty-five percent (25%) of the area of the canopy.
3) Existing trees that are approved for removal shall be replaced by suitable species sized as follows or as approved by the Zoning Administrator:

Size of Tree Removed	Replace With
Trunk diameter: 6 to 8 inches	Two 24-inch box size trees (height 4 feet 6 inches) (3- to 5-inch trunk diameter)
Trunk diameter: 9 to 12 inches	Four 24-inch box size trees (height 4 feet 6 inches) (3- to 5-inch trunk diameter)
Trunk diameter: 12+ inches	Six 24-inch box size trees (height 4 feet 6 inches) (3- to 5-inch trunk diameter)

[1] The General Plan (City of Santa Maria 1996), which includes the RME, uses the term Planning Area to describe the area within the city limits and the Sphere of Influence of the City of Santa Maria.

4.3.3 Thresholds of Significance

The following thresholds of significance for the effects on biological resources are based on Appendix G of the State CEQA Guidelines. An impact is considered significant if the project would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

b. Have a substantial adverse effect on any riparian habitat or other Sensitive Natural Community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Each of these thresholds is discussed under Section 4.3.5, Project-Specific Impacts and Mitigation Measures, below.

4.3.4 Impact Assessment Methodology

The impact assessment focuses on identifying potential impacts associated with implementation of the project and is based on the site's existing conditions, the regulatory setting, and the project description. The emphasis is on determining the potential effects of the project on federal, state, and locally regulated species and habitats on the project site. Adverse impacts could occur if the project could result in temporary or permanent modification of sensitive communities, or habitats occupied by special-status species, or directly affect special-status species. The impact assessment is based on the results of technical studies prepared for the project by David Wolff Environmental, LLC (DWE 2022; see Appendix F).

4.3.5 Project-Specific Impacts and Mitigation Measures

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Based on the special-status species assessment, it was determined that three special-status wildlife species (monarch butterfly, northern California legless lizard, and western red bat) and nesting migratory birds and raptors could potentially occur on the project site (DWE 2022).

CONSTRUCTION-PERIOD IMPACTS – PROJECT SITE

Project construction activities, including tree removal, grading, utility installation, paving, etc., could potentially result in impacts to special-status wildlife if they are present on the 43.75-acre project site. Direct impacts could include trampling, being exposed to desiccation and/or predation, being collected, being entombed, and loss of habitat. Indirect impacts could include stress and loss of reproductive success among relocated individuals, excessive noise resulting in site or nest abandonment, or increased human activity resulting in changes to wildlife movement and behaviors. The potential for direct and indirect impacts to special-status animal species resulting from construction-period impacts would be *significant without mitigation*.

BIO Impact 1	
The project could directly or indirectly impact special-status wildlife species during project construction.	
Mitigation Measures	
Implement Mitigation Measures BIO/mm-2.1, BIO/mm-3.1, BIO/mm-4.1, BIO/mm-5.1, and BIO/mm-11.1.	
BIO/mm-1.1	***Prohibition of Invasive Plants.*** *The landscape architect shall provide a signed statement on the landscape plans that the planting plan does not include any plant that occurs on the California Exotic Pest Plant Council and the California Invasive Plant Council Lists 1, 2, and 4. Plants considered to be invasive by the California Exotic Pest Plant Council and the California Invasive Plant Council shall not be used onsite.*
BIO/mm-1.2	***Biological Monitor.*** *Prior to grading or building permit issuance for any future development within the project site, the developer shall retain a City-approved project biologist to provide monitoring services for all measures requiring biological mitigation. The biologist shall be responsible for ensuring that compliance with biological resource mitigation measures occurs, conducting construction crew training regarding sensitive species that have the potential to occur, maintaining the authority to stop work, and outlining actions in the event of non-compliance. Biological monitoring shall be conducted full time during the initial disturbances (site clearing) and be reduced to monthly following initial disturbances, or more frequently, if necessary, as determined by the City-approved project biologist.*
BIO/mm-1.3	***Worker Environmental Training Program.*** *Prior to implementation of construction activities (including staging and mobilization), the developer shall ensure all personnel associated with project construction attend a training to facilitate Worker Environmental Training. The Worker Environmental Training shall be conducted by a City-approved biologist to help workers recognize special-status plants and animals to be protected in the project site. The training program shall include identification of relevant sensitive species and habitats, description of the regulatory status and general ecological characteristics of sensitive resources, documentation of each employee's participation in trainings and information presented. Any future contractor and/or subcontractor with employees working at the project site shall set aside time for the City-approved biologist to provide Worker Environmental Training for all employees that will be onsite. Topics will include regulatory framework and best practices to avoid and minimize impacts to protected plants, animals, and their habitats. Each group of new personnel or individuals shall be provided with an environmental briefing by the City-approved project biologist.*

BIO Impact 1	
BIO/mm-1.4	***Cover Excavations.*** *During construction, all trenches, holes, and other excavations with sidewalls steeper than a 1:1 (45 degree) slope and 2 or more feet deep shall be covered when workers or equipment are not actively working in the excavation. If any such excavations remain uncovered, they shall have an escape ramp of earth or a non-slip material with a 1:1 (45 degree) slope or flatter. All excavated areas shall be inspected by the City-approved biologist before backfilling.*
BIO/mm-1.5	***Biodegradable Erosion Control.*** *During construction, use erosion control products made of natural fiber (biodegradable) to prevent wildlife from getting ensnared or strangled by monofilament, coir rolls, erosion control mats or blankets, straw or fiber wattles, or similar erosion control products.*
Residual Impacts	
With implementation of the identified mitigation measures, and additional species-specific mitigation measures listed below, residual impacts to special-status species would be less than significant with mitigation.	

MONARCH BUTTERFLY

Monarch butterflies are a candidate for listing under the FESA. The project site supports stands of trees that have historically supported an aggregation of winter roosting monarch butterflies; this site is located to the south of UVP and is 7.63 acres. There was a sudden drop in the use of this site in 1999, and since then, the counts have ranged between 0 and 34. The recorded count for 2021/2022 was 34 (Table 4.3-4; CNDDB and Xerces Society monarch butterfly counts [DWE 2022]). However, the Xerces Society and CDFW have identified the stand of eucalyptus trees along the southern side of UVP as a Western Monarch Overwintering Site (mapped as #2688). Additionally, the CDFW letter dated March 14, 2023, states that the site is designated as an area of high conservation value for monarch butterflies as an important inland overwintering grove for the monarch butterfly (Area of Conservation Concern HEX ID 50049) (CDFW 2023). Inland winter roosts in the Santa Maria area contain lower numbers of monarch butterflies than coastal roosts but are still biologically significant resources for this species. The inland Santa Maria overwintering sites have always been aggregations of smaller numbers of individuals but provide a valuable ecological niche to the species. Removal of smaller overwintering roosts could force the congregation of monarchs into larger colonies where stochastic events (disease, fire, grove removal, climate change) could significantly impact the species. Multiple overwintering sites that are widely distributed buffers the species against catastrophic loss and extinction. For these reasons, the existing 7.63-acre overwintering site that is within the project site is considered significant habitat (CDFW 2023).

CDFW recommends that future development of the property be planned to avoid removal of trees used by western monarchs for over-wintering. As well, CDFW has indicated that the stands of eucalyptus trees to the north of UVP could provide support to the southern overwintering grove by providing a wind break to the southern grove. Full build out of the site per the conceptual development plan provided with this EIR would require all of the eucalyptus trees onsite to be removed. If monarchs were found to be present in the eucalyptus trees during construction, they could be directly impacted by construction activities. Direct adverse impacts could include direct mortality of overwintering monarch butterflies; indirect adverse impacts could include excessive noise from construction equipment prompting the overwintering monarchs to abandon the site. As well, removal of the eucalyptus trees, including the overwintering grove south of UVP, would result in complete removal of this important inland habitat for the monarch butterfly. The potential for direct and indirect impacts to monarch butterflies during project construction would be *significant*.

~~Monarch butterflies are a candidate for listing under the ESA. The project site supports stands of trees that have historically supported an aggregation of winter roosting monarch butterflies. There was a sudden drop in the use of the site in 1999, and since then, the counts have only ranged between 0 and 34. The recorded count for 2021/2022 was 34 (Table 4.3-4; CNDDB and Xerces Society monarch butterfly counts [DWE 2022]). All the eucalyptus trees onsite are proposed to be removed by the project. Since these trees are not currently used as a winter roost site, impacts from the tree removal will be low. However, a few monarchs do show up each year, and if present in the eucalyptus trees during construction, they could be directly impacted by construction activities. Direct adverse impacts could include direct mortality of overwintering monarch butterflies; indirect adverse impacts could include excessive noise from construction equipment prompting the overwintering monarchs to abandon the site. The potential for direct and indirect impacts to monarch butterflies during project construction would be *significant*.~~

BIO Impact 2	
The project could directly impact monarch butterflies.	
Mitigation Measures	
Implement Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5.	
BIO/mm-2.1	~~*If possible, site disturbance and construction activity that would impact eucalyptus trees onsite shall not occur during the monarch butterflies' fall and winter migration (October 15 through February 29) period. If tree or vegetation removal or site disturbance is required during the monarch butterflies' fall and winter migration, a City-approved biologist shall conduct a preconstruction survey for monarch butterflies that could be using the eucalyptus trees on the site for overwintering within 7 days of proposed vegetation removal or site disturbance or when known monarch overwintering is occurring at other locations within the region. If monarch butterflies are detected, development shall be postponed until after the overwintering period or until a City-approved biologist determines monarch butterflies are no longer using the trees for overwintering.*~~ *The developer shall ensure the following actions are undertaken to minimize potential direct and indirect impacts to western monarch butterflies:* a. *If possible, site disturbance and construction activity that would impact eucalyptus trees onsite shall not occur during the monarch butterflies' fall and winter migration period (October 15 through February 29).* b. *If tree or vegetation removal or site disturbance is required during the monarch butterflies' fall and winter migration period (October 15 through February 29), a City-approved biologist familiar with monarchs and monarch overwintering habitat shall conduct focused surveys for monarch colonies within the identified overwintering site and will identify any colonies found within 7 days of proposed vegetation removal or site disturbance or when known monarch overwintering is occurring at other locations within the region. If monarch butterflies are detected, development shall be postponed until after the overwintering period or until the City-approved biologist determines monarch butterflies are no longer using the trees for overwintering.* c. *To provide further protection to non-overwintering populations and/or adjacent over-wintering populations, no* Asclepias curassavica *(tropical milkweed) will be allowed in any planting palettes for the project. Native milkweed species*, such as Asclepias fascicularis *(narrowleaf milkweed) are also not recommended by the USFWS to be planted adjacent to existing overwintering sites as this may interfere with normal migrating behavior (USFWS 2023b). To contribute to local monarch butterfly conservation efforts, native nectar-providing plant species will be incorporated into landscaping following construction activities, such as those recommended in the Monarch Butterfly Nectar Plant List for Conservation Plantings, to enhance local nectar sources (Xerces Society 2018).*

BIO Impact 2
d. *Prior to the approval of a Planned Development permit and prior to the removal of any trees within the overwintering site, the developer shall hire a City-approved biologist familiar with monarchs and monarch overwintering habitat to prepare and implement a monarch butterfly habitat enhancement plan. At a minimum, the plan shall identify area(s) on the property appropriate for onsite habitat enhancement to partially address the direct impacts of tree removal within the approximately 7.6-acre western monarch butterfly overwintering site. The recommendations in this plan shall be included within the project's future project's landscaping plans for review and approval by the City prior to implementation.* e. *Prior to the approval of a Planned Development permit, the developer shall identify appropriate local land management conservation organizations and provide a donation in order to assist with the organization's overwintering monarch butterfly conservation goals. This donation may be for conservation activities for known and mapped overwintering sites in the immediate vicinity of the project site, or a donation may be provided to a local non-profit organization focused on monarch butterfly conservation. The developer will work with the City and local conservation organizations to provide funding for 5 years of conservation research and/or maintenance and management activities for an area equivalent to that impacted on the project site (approximately 7.6 acres).*
Residual Impacts
~~*With implementation of the identified mitigation measures, residual impacts to monarch butterflies would be less than significant with mitigation.*~~ *Development of the site under the conceptual development plan or any project of a similar density would necessitate the removal of the 7.63-acre monarch overwintering site (mapped as #2688) that exists on the project site. Removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. CDFW is concerned that the loss of trees used by monarch butterflies for overwintering could contribute to extirpation of western monarch populations and has indicated that off-site mitigation is not feasible for the loss of overwintering habitat at the project site. Impacts could not be fully mitigated because there is a lack of information regarding the ability to develop off-site mitigation, there are no known local mitigation banks for monarch butterfly overwintering habitat, there is significant risk that restored off-site habitat would not be used by the monarch for overwintering, and there would be a significant temporal loss of the habitat while created overwintering habitat matures. For these reasons, the City determines that feasible mitigation measures are not available to reduce potentially significant impacts to the monarch butterfly from loss of habitat to a less-than-significant level. Thus, residual impacts to monarch butterflies would continue to be significant and unavoidable with the build out of the conceptual development plan or of a project on the project site that is similar in density.*

NORTHERN CALIFORNIA LEGLESS LIZARD

The sandy soils on the project site and remnants of disturbed coastal scrub represent suitable habitat for the northern California legless lizard, a CDFW SSC. Even though the project site is regularly disced for weed suppression, and surveys during 2022 did not detect them, there is still potential for them to occur in low numbers. The nearby CNDDB occurrences were of individuals uncovered during construction activities and one was found in the backyard of a residence. Project activities such as grading and other excavation could result in direct impacts, loss of habitat, and mortality. The potential for direct and indirect impacts to northern California legless lizard during construction of the project would be *significant*.

BIO Impact 3	
The project could directly and indirectly impact northern California legless lizards during project construction.	
Mitigation Measures	
Implement Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5.	
BIO/mm-3.1	*Within 30 days prior to and during initial ground disturbance of the coastal scrub and grassland habitat onsite, a City-approved biologist shall conduct surveys for northern California legless lizards within suitable habitat areas within the development footprint and any adjacent staging areas. Prior to initial ground disturbance, the City-approved biologist shall identify an appropriate receptor site with suitable habitat for any northern California legless lizards that may be found during the survey. The biologist shall use hand search or cover board methods in areas of disturbance where legless lizards are expected to be found (e.g., under shrubs, other vegetation, or debris). If cover board methods are used, they shall commence at least 30 days prior to the start of construction. Hand search surveys shall be completed immediately prior to and during disturbances to the vegetated areas. During vegetation-disturbing activities, the biologist shall walk behind the equipment to capture northern California legless lizards that are unearthed by the equipment. The biologist shall capture and relocate any legless lizards or other reptiles observed during the survey effort. The captured individuals shall be relocated from the construction area and released at the predetermined receptor site.*
Residual Impacts	
With implementation of the identified mitigation measures, residual impacts to northern California legless lizard would be less than significant.	

NESTING BIRDS

All the vegetation onsite has the potential to support nesting birds. If the trees or other vegetation were removed while birds were nesting, the nesting individuals could be directly or indirectly impacted by the vegetation removal. The potential for direct impacts may include physically destroying an active nest and the nest's occupants. Indirect impacts may include excessive noise or movement causing nest abandonment. Direct and indirect impacts to nesting birds and raptors during construction of the project would be *significant*.

BIO Impact 4	
The project could directly and indirectly impact nesting birds during project construction.	
Mitigation Measures	
Implement Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5.	
BIO/mm-4.1	*Vegetation removal and initial site disturbance shall be conducted between September 1 and January 31 outside of the nesting season for birds. If vegetation and/or tree removal is planned for the bird nesting season (February 1 to August 31), then preconstruction nesting bird surveys shall be conducted by a City-approved biologist to determine if any active nests would be impacted by project construction. If no active nests are found, then no further mitigation shall be required. If any active nests are found that would be impacted by construction, then the nest sites shall be avoided with the establishment of a non-disturbance buffer zone around active nests as determined by the City-approved biologist. Nest sites shall be avoided and protected with the non-disturbance buffer zone until the adults and young of the year are no longer reliant on the nest site for survival, as determined by the monitoring biologist.*

BIO Impact 4
Residual Impacts
With implementation of the identified mitigation measures, residual impacts to nesting birds would be considered less than significant with mitigation.

WESTERN RED BATS

The eucalyptus trees onsite have the potential to support roosting western red bats (a CDFW SSC). If bats were roosting in the trees at the time the trees were removed, the bats could be directly impacted by the tree removal. Impacts to bats could include disrupting a maternal roost, loss of roosting habitat, and/or crushing or otherwise physically harming individuals. The potential for direct and indirect impacts to roosting western red bats during construction of the project would be *significant*.

BIO Impact 5	
The project could directly and indirectly impact roosting western red bats during project construction.	
Mitigation Measures	
BIO/mm-5.1	*The developer shall retain a qualified biologist to conduct roosting bat surveys prior to any tree removal. Pre-disturbance surveys for bats shall include two daytime and two dusk surveys no more than 30 days prior to the tree removal to determine if bats are roosting in the trees. The biologist(s) conducting the preconstruction surveys shall identify the nature of the bat utilization of the area (i.e., no roosting, night roost, day roost, maternity roost). If bats are found to be roosting in the project area, the developer shall develop the project in such a way that avoids the bat roost. If avoidance of the bat roost is not feasible, tree removal shall be delayed until the bats have left the area.*
Residual Impacts	
With implementation of the identified mitigation measure, residual impacts to western red bat would be less than significant.	

OPERATIONAL IMPACTS – PROJECT SITE

Upon completion of construction activities associated with the buildout of the project site, the project site would mainly consist of a built urban environment with landscaped areas, several parks, and one or more stormwater detention basins. Landscaped areas and parks would include planted trees and vegetation that would be maintained in accordance with the City's Landscape Standards provided in the City's Municipal Code (Chapter 12 Section 44). Based on the developed nature of the environment and limited habitat features, the project site would provide negligible quality habitat onsite to support locally common wildlife species, and no special-status plant or wildlife species would be expected to reside within the project site.

The project site is generally surrounded by residential developments to the north, east, and south, and SR 135 and active agricultural cultivation to the west. Some of the active agricultural fields to the west of the project site have been recently approved for commercial development. Connectivity within the project site is further fragmented by UVP, which bisects the project site. Based on the developed urban uses and heavily traveled roadways that surround the project site, wildlife movement through the project site and

immediately surrounding area would be extremely limited. Locally common bird species may move through the project site, but nesting activities would not be expected due to the ongoing noise and other disturbances commonly associated with developed areas and limited tree canopy available onsite.

Based on the developed nature of the project site and surrounding urban land uses, operational impacts to special-status species and their habitats would be *less than significant*.

BIO Impact 6
Project operation would not directly or indirectly impact special-status wildlife species.
Mitigation Measures
No mitigation is required.
Residual Impacts
Impacts to biological resources during project operation would be less than significant.

OFF-SITE INFRASTRUCTURE IMPROVEMENTS

The project would require several utility infrastructure improvements that would result in work outside of the boundaries of the 43.75-acre project site. Off-site infrastructure improvements associated with the project would include upsizing of the existing water lines under Orcutt Road and UVP and upsizing of an existing wastewater pipeline from the Laguna County Sanitation District (LCSD) sewer manhole MH1010, located near the northwest corner of the project site in Orcutt Road, to Foster Road (approximately 675 feet of pipeline). Based on the best available information provided by Golden State Water Company, it is assumed that the water main upgrades would be limited to pipelines that would be replaced underneath paved roads and/or within existing roadway rights-of-way.

Similar to conditions within the project site, none of the proposed off-site improvement areas overlay existing surface waterways or riparian vegetation. In addition, the off-site improvement areas are all located east of SR 135, which functions as a movement barrier for California red-legged frogs that may travel upland from documented breeding ponds located west of SR 135. Due to the close proximity of the proposed off-site improvements to the project site, same climate conditions, and underlying sandy soils, these off-site improvement areas have the potential to support suitable habitat to the same special-status species as the project site, with the exception of overwintering habitat for monarch butterflies, as there are no mature eucalyptus trees located within or immediately adjacent to proposed off-site disturbance areas.

Proposed off-site improvements would occur within existing paved roadways and unpaved road shoulder areas within roadway rights-of-way. Paved areas would have no potential for natural vegetation to occur. Based on the heavily disturbed and ruderal nature of the unpaved roadway shoulder areas, and the absence of special-status plant species within the adjacent 43.75-acre project site, special-status plant species are not expected to occur within the off-site improvement areas and potential impacts would be less than significant.

Special-status wildlife species that may have the potential to be impacted by proposed off-site improvements include California legless lizard, nesting birds, and roosting bats. Direct impacts could include trampling, being exposed to predation, being collected, being entombed, and loss of habitat. Indirect impacts could include stress and loss of reproductive success among relocated individuals, excessive noise resulting in site or nest abandonment, increased human activity resulting in changes to

wildlife movement and behaviors, increased vehicle use of the area exacerbating road kills, or introduction of invasive plant species that could change habitat conditions to open space preserved onsite. While construction and installation of off-site utility improvements are not anticipated to require removal of any existing trees, indirect impacts to nesting birds and roosting may occur during grading, construction, or installation of off-site utility infrastructure.

With implementation of Mitigation Measures BIO/mm-1.2 through BIO/mm-1.5, and BIO/mm-3.1, BIO/mm-4.1, and BIO/mm-5.1, potential impacts to special-status species would be *less than significant with mitigation*.

BIO Impact 7
The development of the infrastructure improvements beyond the 43.75-acre project site boundary could directly or indirectly impact special-status wildlife species.
Mitigation Measures
Implement Mitigation Measures BIO/mm-1.2 through BIO/mm-1.5, BIO/mm-3.1, BIO/mm-4.1, and BIO/mm-5.1.
Residual Impacts
With implementation of Mitigation Measures, potential impacts to special-status wildlife species would be less than significant with mitigation.

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 U.S. Fish and Wildlife Service?

No riparian habitat or other sensitive natural communities were mapped on the project site (DWE 2022); therefore, there would be *no impact* to sensitive habitats.

BIO Impact 8
There is no riparian habitat or other sensitive natural communities located within the project site; no impact would occur.
Mitigation Measures
No mitigation is required.
Residual Impacts
There would be no impacts to sensitive habitats.

Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No jurisdictional wetlands or other waters of the U.S./State or riparian habitat under any regulatory authority or definition occur on the project site. The very deep, excessively drained sandy soils of the project site have rapid permeability with low water capacity. A small area on the eastern edge of the project site—where there was once a stand of willows prior to its removal in 2021—in mapped in the NWI as a freshwater emergent marsh (USFWS 2022); however, a detailed wetland delineation and jurisdictional determination report provided by DWE (2022) did not find this area to be a jurisdictional wetland. Therefore, there would be *no impact* to federally protected wetlands.

BIO Impact 9
There are no jurisdictional wetlands located within the project site; no impact would occur.
Mitigation Measures
No mitigation is required.
Residual Impacts
There would be no impacts to jurisdictional wetlands.

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?

The project site does not support any significant surface water resources with potential to support aquatic species, migratory corridors, or nursery sites. The project site is not located within an Essential Connectivity Area based on the California Essential Habitat Connectivity Project (CDFW 2021d). Furthermore, the proposed project site is an infill parcel surrounded by residential developments to the north, east, and south and SR 135 and active agriculture to the west. Some of the active agricultural field across from SR 135 has been recently approved for commercial development. Connectivity within the project site is further fragmented by UVP, which bisects the project site. The Orcutt Road realignment also fragments the project site. The proposed project would not significantly restrict the movement of any native resident or migratory fish or wildlife species, or established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites; therefore, *no impact* would occur.

BIO Impact 10
No impacts would occur to migratory wildlife corridors or native wildlife nurseries.
Mitigation Measures
No mitigation is required.
Residual Impacts
No impacts would occur to migratory wildlife corridors or native wildlife nursery sites.

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City of Santa Maria RME identifies biological resources as vegetation and wildlife in the city inclusive of plant species, wildlife species, and their habitats. The RME recognizes biological resources to provide ecological, educational, historic, scientific, and aesthetic value to the people of the Santa Maria Valley. The RME also identifies the urban forest as having ecological value. The RME defines an urban forest as the planted environment within a city. It includes both public and private open space areas planted with trees, shrubs, lawns, and other forms of vegetation. Street trees, landscaped easements and medians, and parks are also part of the urban forest.

The proposed project site supports mature eucalyptus tree stands, scattered coast live oak trees, and a stand of ornamental trees (see Figure 4.3-1). These trees provide biological habitat for nesting birds and monarch butterflies. The City's RME Policy 3 states, "Protect and preserve biological resources, and expand the urban forest […]." The project's potential impacts to special-status wildlife species would be reduced through implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5, BIO/mm-2.1, BIO/mm-3.1, BIO/mm-4.1, and BIO/mm-5.1, as described in detail above.

The City's RME Objective 3.1.a requires proposed development to avoid impacts to sensitive habitats if possible. Implementation Program 9 under this objective states that the City will enforce the existing Municipal Code requirements to preserve existing trees on building sites. City Municipal Code Chapter 12 Section 44.4 dictates "Existing trees shall be retained unless the finding can be made by the City Parks Department staff that the preservation of the tree presents a hazard to the health, safety and general welfare of the public or cannot be reasonably accommodated by the proposed development."

Under the development plan for the project, the entire project site would be graded and developed, which would result in the removal of all of the trees on the property. An arborist report has not been prepared for the project at this time; therefore, the precise number, size, and species of tree to be removed has not been quantified. However, if all existing trees located onsite are removed, in whole or in part, the project would have the potential to result in a conflict with RME Objective 3.1.a and Implementation Program 9 of the City RME and Section 12-44.04 of the City Municipal Code. Mitigation Measure 11.1 has been identified to require preparation of a tree protection, replacement, and monitoring program to ensure compliance with the City RME and Municipal Code. This program would include preservation of existing trees onsite to the greatest extent feasible, subject to the review and approval of City Parks Department staff. In accordance with the City Municipal Code requirements, the project would include planting of replacement trees for every tree with a trunk of 6 inches in diameter or greater (see City of Santa Maria Municipal Code Chapter 12-44, Landscape Standards) that is removed as a result of project activities. These new tree plantings would be maintained until they are fully established and would become a part of the city's urban forest.

With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5, BIO/mm-2.1, BIO/mm-3.1, BIO/mm-4.1, BIO/mm-5.1, and BIO/mm-11.1, the project's potential impacts associated with conflicts with local policies and ordinances protecting biological resources would be *less than significant with mitigation*.

BIO Impact 11	
The project could result in conflicts with local policies and ordinances protecting biological resources, specifically considerations under the City's RME and Municipal Code.	
Mitigation Measures	
Implement Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5, BIO/mm-2.1, BIO/mm-3.1, BIO/mm-4.1, and BIO/mm-5.1.	
BIO/mm-11.1	*Prior to approval of a Planned Development Permit, the developer shall retain a City-approved biologist or arborist to prepare a tree protection, replacement and monitoring program or another mechanism that ensures consistency with RME Goal 3 and Policy 3, and compliance with the City's Municipal Code.* *The tree protection, replacement, and monitoring program shall include a tree survey report identifying the number, size, species, and status (live, dead, diseased, etc.) of trees to be protected in place, trees to be trimmed and/or pruned, and trees to be removed. The program shall demonstrate protection of existing trees with a trunk diameter of 6 inches or greater to the greatest extent feasible, in accordance with Municipal Code Section 12-44.4.* *Trees to be protected in place shall have high-visibility exclusion fencing placed around their critical root zone during project site disturbance, grading, and construction activities. Pavement within the canopy dripline of existing trees to be protected in place should not exceed twenty-five percent (25%) of the area of the canopy. All trees planted as mitigation shall have an 80% survival rate after 5 years. If the survival rate is not at least 80%, then enough trees shall be replanted to bring the total number of survived specimens to at least 80% of the original number of trees planted, as measured 5 years after the replanting. Annual monitoring reports that evaluate tree survivability, health and vigor shall be prepared by a qualified specialist and submitted to the City by October 15 each year, for 5 years. The project shall comply with City of Santa Maria Municipal Code Chapter 12-44 as it pertains to tree protection. Requirements shall include but not be limited to: construction setbacks to protection retained trees; construction fencing around trees; grading limits around the base of trees as required; and a replacement plan for trees removed.* *The final report shall include the final number of replacement trees utilizing the City's replacement ratio identified above. The developer shall submit a copy of the building and grading plans to the City for review and approval prior to the issuance of building or grading permits. Prior to site occupancy trees shall be planted, fenced, and appropriately irrigated.* *City Parks Department staff or a City-approved biologist shall verify that the tree protection, replacement, and monitoring program is adequate. The City shall conduct site inspections throughout all phases of development to ensure compliance with and evaluate all tree preservation and replacement measures.*
Residual Impacts	
With implementation of the identified mitigation measure, residual impacts related to consistency of the project with RME Goal 3, RME Objective 3.1.a, Implementation Program 9, and the City Municipal Code related to protection of biological resources, expansion of the city's urban forest, and tree preservation and replacement requirements would be less than significant.	

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Based on the records and literature research conducted for the project, the project does not overlap with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plans. Therefore, the project would not conflict with any approved state, regional, or local habitat conservation plans, and *no impacts* would occur.

BIO Impact 12
The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.
Mitigation Measures
No mitigation is required.
Residual Impacts
There would be no conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impacts would occur.

4.3.6 Cumulative Impacts

The proposed project's contribution to cumulative impacts on biological resources is based on the loss of open space and associated wildlife habitat within the project region. The proposed project site is an infill parcel, which limits its ability to support wildlife and wildlife movement. Despite the disturbed nature of the site and location surrounded by developed urban land uses, the proposed project site does provide marginal habitat for ~~monarch butterflies,~~ northern California legless lizard, nesting birds and raptors, and roosting bats. In addition, the project site provides eucalyptus grove habitat, including overwintering habitat, for the monarch butterfly. The City anticipates the following five notable development projects located in the vicinity of the proposed project to occur in the near term:

- Lakeview Mixed Use project at the southeast corner of Mercury Drive and Auto Park Drive on an undeveloped parcel.
- People's Self Help Housing residential development project to include 49 new single-family residences at 3170 Santa Maria Way on a developed parcel.
- Northman Residential project located east of Santa Maria Way and north of Koval Lane on an undeveloped parcel.
- Park Edge Apartments at the southeast corner of Santa Maria Way and South Miller Street on a primarily undeveloped parcel.
- Santa Maria Studios Senior Apartments located at the northeast corner of Santa Maria Way and South Miller Street on a primarily undeveloped parcel.

In addition, the County anticipates the following ~~nine~~ eight notable development projects located in the vicinity of the proposed project to occur in the near term:

- AMG & Associates, LLC Affordable Housing located at 1331 East Foster Road.

- Oasis Meeting Center (Key Site 18) located on Clark Avenue west of Foxenwood Lane.
- Key Site 3 Multi-Family Residential Project located south of the intersection of Clark Avenue and U.S. 101.
- Orcutt Public Marketplace (Key Site 1) located in the northwest corner of the intersection of U.S. 101 and Clark Avenue.
- Orcutt Gateway Retail Center (Key Site 2) located south of Clark Avenue between U.S. 101 and Stillwell Road.
- Orcutt Union Plaza Phase II Amendment located at 201 South Broadway Street.
- OUSD Senior Housing (Key Site 17) Development Plan located on West Rice Ranch Road bordered to the north by Soares Avenue between South 1st Street and Dyer Street.
- The Neighborhoods of Willow Creek and Hidden Canyon Specific Plan (Key Site 21) residential project located on Highway 1 between Solomon Road and Black Road.

Based on a desktop review of each of these 13 proposed development projects using Google Earth (imagery dated May 5, 2023), the publicly available Map of Monarch Butterfly Overwintering Sites (Xerces Society for Invertebrate Conservation 2023), and the CNDDB (CDFW 2021c), none of these projects should have an impact on overwintering monarch butterfly populations or habitat. Eleven of these projects would not be in or near known overwintering populations. Two proposed projects in Santa Barbara County are each located within 900 feet of CNDDB overwintering site records and numbered western monarch overwintering sites (Xerces Society for Invertebrate Conservation 2023), as follows:

- OUSD Senior Housing (Key Site 17) Development Plan. This site does not appear to support overwintering monarch habitat, but is located approximately 900 feet north of Overwintering Site 2819. This site has no Thanksgiving Counts recorded and the CNDDB record is from 1983. Santa Barbara County prepared a staff report in 2013 that included a summary of the final impact and mitigation measures for the project; no impacts to monarch butterflies or their habitat were noted in this summary (Santa Barbara County 2013). The County Planning Commission approved this project in December 2022.
- The Neighborhoods of Willow Creek and Hidden Canyon Specific Plan (Key Site 21) residential project. This is a large site that should necessitate surveys for determination of appropriate habitat onsite, but based on preliminary review, does not appear to support overwintering monarch. This site is located approximately 900 feet north-northeast of Overwintering Site 2692. During Thanksgiving Counts recorded at the site between 2016 and 2021, six monarchs were recorded in 2017 with no counts documented any other year. The CNDDB record corresponds with these findings but has an observation of 1,000 at this site in 1990. Further, in the Supplemental EIR for the project, the County found that the project site provides suitable roosting habitat in the form of large mixed eucalyptus windbreaks in the central, central-northern, and central-eastern portions of the site and that the Neighborhoods of Willow Creek project would permanently impact approximately 0.49 acre of eucalyptus stands on the site. Due to the small overall area of impact (0.49 acres of impact to the total 5.08 acres of eucalyptus stands on Key Site 21), the impact was found to be minimal and less than significant (Santa Barbara County 2019). This project is currently in review by the County of Santa Barbara and has not been approved.

In summary, these ~~These~~ projects have the potential to convert undeveloped lands to urban development. The lands in question are also infill parcels and, like the project site, only provide marginal habitat for wildlife. While the proposed Neighborhoods of Willow Creek and Hidden Canyon project has some potential to remove monarch habitat, the County documents that this removal would be small, overall, because most of the eucalyptus stand would be preserved with development of this particular project.

Regardless, when considering these projects in the cumulative context, the sites do support some habitat for ~~Despite the poor habitat conditions on the project site and the three sites mentioned above, the sites do support marginal habitat for~~ special-status species. Development of these sites would result in a loss of available wildlife habitat in the area.

Similar to the proposed project, development projects within the city would be subject to review for consistency with the goals and policies of the RME and the City's Municipal Code, which includes provisions for avoidance of sensitive habitats and retention of existing trees when they can be reasonably accommodated by future development. Development projects within the unincorporated areas of the county would be subject to review for consistency with the goals and policies of the Santa Barbara County Comprehensive Plan, including, but not limited to, the Conservation Element which includes recommendations regarding ecological systems as well as an Oak Tree Protection supplemental document. In addition, development projects with the potential to result in significant impacts to biological resources would be subject to review under CEQA and mitigation measures similar to the measures identified in this section would likely be required, as applicable.

Although the proposed project in conjunction with the projects mentioned above would contribute to the cumulative loss of wildlife habitat in the area, the quality of habitat in these areas is marginal and the project's contribution to this cumulative impact would be minimized through implementation of mitigation measures identified above. These measures include biological monitoring, worker environmental training, special-status species surveys and protection measures, and preparation and implementation of a tree protection, replacement, and monitoring program. ~~Therefore, the anticipated cumulative loss of wildlife habitat that the project would contribute to would be less than cumulatively considerable and *less than significant with mitigation*.~~

While the application of the mitigation measures previously identified would reduce impacts to most species to less-than-significant levels, this is not the case for the monarch butterfly. As noted previously, the Xerces Society has identified the stand of eucalyptus trees along the southern side of UVP as a Western Monarch Overwintering Site (mapped as #2688). Regardless of the small survey counts between 2015 and 2022, the eucalyptus grove that is south of UVP is an important inland overwintering grove of the monarch butterfly. The CDFW has designated the project site as an area of high conservation value for monarch butterflies (Area of Conservation Concern HEX ID 50049) (CDFW 2023). The inland Santa Maria overwintering sites, which includes the overwintering site south of UVP at the Richards Ranch site, have always been aggregations of smaller numbers of individuals. However, they still provide a valuable ecological niche to the species. Removal of smaller overwintering roosts could force the congregation of monarchs into larger colonies where stochastic events (disease, fire, grove removal, climate change) could significantly impact the species. For these reasons, the existing 7.63-acre overwintering site that is within the project site is considered significant habitat (CDFW 2023) and any removal or reduction of the grove would be considered *cumulatively considerable and significant*.

BIO Impact 13
The project could result in cumulatively considerable impacts to biological resources.
Mitigation Measures
Implement Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5, BIO/mm-2.1, BIO/mm-3.1, BIO/mm-4.1, and BIO/mm-5.1.

BIO Impact 13
Residual Impacts
With implementation of the identified mitigation measures, most residual cumulative biological resource impacts would be less than significant. However, development of the site under the conceptual development plan or any project of a similar density would necessitate the removal of the 7.63-acre monarch overwintering site (mapped as #2688) that exists on the project site. Removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. CDFW is concerned that the loss of trees used by monarch butterflies for overwintering could contribute to extirpation of western monarch populations and has indicated that off-site mitigation is not feasible for the loss of overwintering habitat at the project site. Impacts could not be fully mitigated because there is a lack of information regarding the ability to develop off-site mitigation, there are no known local mitigation banks for monarch butterfly overwintering habitat, there is significant risk that restored off-site habitat would not be used by the monarch for overwintering, and there would be a significant temporal loss of the habitat while created overwintering habitat matures. For these reasons, the City determines that feasible mitigation measures are not available to reduce potentially significant impacts to the monarch butterfly from loss of habitat to a less-than-significant level. Thus, residual cumulative impacts to monarch butterflies would continue to be significant and unavoidable with the build out of the conceptual development plan or of a project on the project site that is similar in density.

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CHAPTER 5. ALTERNATIVES ANALYSIS

5.1 INTRODUCTION

Section 15126.6(a) of the California Environmental Quality Act (CEQA) requires an EIR to "describe a reasonable range of alternatives to a project, or to the location of a project, which could 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." This chapter discusses a range of alternatives to the proposed Richards Ranch project, including alternative designs, and a No Project Alternative. The State CEQA Guidelines provide direction for the discussion of alternatives to the project, including the following guidance:

- "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." (Section 15126.6(a))
- "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Section 15126.6(b))
- "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison." (Section 15126.6(d))
- "The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the project with the impacts of not approving the project." (Section 15126.6(e))
- "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." (Section 15126.6(e)(2))
- "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." (Section 15126.6(f))
- "Only [alternative] locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (Section 15126.6(f)(2)(A))

Given the CEQA mandates listed above, this section: (1) describes the range of reasonable alternatives to the project, including the No Project Alternative; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified and compares the impacts of the alternatives to those of the project; and (3) identifies the Environmentally Superior Alternative.

5.2 ALTERNATIVES SELECTION

In accordance with the State CEQA Guidelines, appropriate alternatives for EIR analysis are those that meet most of the basic project objectives and avoid or substantially lessen any of the significant environmental effects of the project. Consequently, this section reviews the objectives that were identified for the project and any significant unavoidable environmental effects.

5.2.1 Project Objectives

As described in Chapter 2, Project Description, the primary project objectives identified include the following:

- To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria (City) to ~~allow for~~ facilitate the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.
- Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.
- Develop this infill property while respecting the surrounding existing neighborhoods. The project will include setback and landscaping buffers.
- Provide high-density housing to meet the needs of the city and help address the current Regional Housing Needs Allocation (RHNA). The various types of housing units will be available for rent while others will be for-sale units.
- Provide commercial uses that will serve the daily needs of the new residents and the surrounding community including those traveling on Union Valley Parkway (UVP).
- Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.
- Include architectural and landscaping amenities along UVP and State Route (SR) 135 to address the visual resources along these travelways.
- Create uses that are consistent with the noise, height, and safety guidelines of the Santa Barbara County Association of Governments (SBCAG) adopted *Santa Maria Airport Land Use Compatibility Plan* (Santa Maria ALUCP). ~~*Santa Barbara County Airport Land Use Plan* (1993 ALUP) and the Draft Santa Maria Airport Land Use Compatibility Plan (Draft 2022 ALUCP).~~
- Assure the orderly development of the City of Santa Maria General Plan planning area by providing the effective and efficient development of public facilities, infrastructure, and services appropriate for the planning area.
- Provide the City with increased sales tax and property tax.
- Conform to Santa Barbara County Local Agency Formation Commission (SBLAFCO) requirements to allow for approval of the annexation of the site to the city limits.

5.2.2 Significant Impacts Resulting from the Project

Alternatives to be considered under CEQA are those that would avoid or substantially lessen one or more of the significant environmental effects identified during evaluation of the project. For this project, ~~all~~ most of the adverse environmental impacts described in Chapter 4, Environmental Impacts Analysis, were judged to be less than significant or less than significant with the incorporation of identified mitigation.

One impact was found to be significant and unavoidable. Specifically, development of the proposed project, or any project on the project site similar in density to the proposed project, would necessitate the removal of the overwintering habitat that exists on the project site. The CDFW is concerned that the loss of trees used by monarch butterflies for overwintering could contribute to extirpation of western monarch populations. Additionally, the CDFW has indicated that off-site mitigation is not feasible for the loss of overwintering habitat at the project site. Impacts cannot be fully mitigated because there is a lack of information regarding the ability to develop off-site mitigation, there are no known local mitigation banks for monarch butterfly overwintering habitat, there is significant risk that restored off-site habitat would not be used by the monarch for overwintering, and there would be a significant temporal loss of the habitat while created overwintering habitat matures. Thus, residual impacts to monarch butterflies would continue to be significant and unavoidable with development of the proposed project or any project on the project site similar in density to the proposed project. ~~There were no environmental impacts found to be significant and unavoidable for this project.~~

~~The project's potentially significant but mitigated environmental impacts are related to the following:~~ The other potential impacts of the project that have been identified as significant, but that can be mitigated to less-than-significant levels, are in the following resource topics: air quality and greenhouse gas (GHG) emissions; biological resources; cultural and tribal cultural resources; energy; geology and soils; hazards and hazardous materials; hydrology and water quality; and noise and vibration. Potentially significant environmental impacts of the project that can be mitigated with the incorporation of mitigation measures identified in this EIR are primarily construction-related and would likely occur in varying degrees with any development of the project site. A detailed summary of impacts and associated mitigation measures identified for the project are provided in the Summary, Table S-2, Summary of Impacts and Mitigation Measures.

5.2.3 Alternatives Development and Analysis Process

In defining the feasibility of alternatives, the State CEQA Guidelines state: "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 (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." If an alternative was found to be infeasible, as defined above, then it was dropped from further consideration in this analysis.

In addition, State CEQA Guidelines Section 15126.6 states that alternatives should "…attain most of the basic objectives of the project…". As further explained by the California Supreme Court:

> "[A]n EIR should not exclude an alternative from detailed consideration merely because it 'would impede to some degree the attainment of the project objectives.' But an EIR need not study in detail an alternative that is infeasible or that the lead agency has reasonably determined cannot achieve the project's underlying fundamental purpose . . .
>
> Although a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal." (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings, 43 Cal.4th 1143, 1165-1166 [2008]).

The alternatives selected for further analysis have been evaluated against the project to provide a comparison of environmental effects and to identify the Environmentally Superior Alternative. Note that the significance of impacts associated with the project, and the determination of impacts presented in this

section for comparative purposes, are based on the respective identified changes in conditions relative to the environmental baseline (as described in Chapter 4, Environmental Impacts Analysis).

The alternatives analysis includes a preliminary alternatives screening process and alternative project evaluation process, as described below.

5.2.4 Preliminary Alternatives Screening Process

The alternatives analysis begins with a screening and evaluation of a list of preliminary alternatives to determine which alternatives will be selected for further analysis in the EIR. In order to maximize the range of alternatives considered and provide flexibility during project approval, the EIR evaluated a total of seven variations of the project aimed at reducing the significant but mitigated environmental impacts related to the following: air quality and GHG emissions; biological resources; cultural and tribal cultural resources; energy; geology and soils; hazards and hazardous materials; hydrology and water quality; and noise and vibration.

Each of the identified alternatives was preliminarily assessed to determine which of the alternatives met the requirements of a viable alternative under CEQA by considering whether the alternative: (1) would be feasible; (2) would avoid or substantially lessen any of the significant effects of the project; and (3) could feasibly attain most of the basic objectives of the project. Those alternatives that met these three criteria were carried forward for more detailed review in the EIR.

All alternatives carried forward for analysis in this EIR would include annexation of the project site into the city of Santa Maria, with the exception of the No Project Alternative. Given that the City is the Lead Agency for this project, exploration of additional alternatives that do not include annexation would not meet the basic objectives of the project.

5.2.5 Alternative Project Evaluation Process

The environmental impacts of the alternatives carried forward for review in the EIR, including the No Project Alternative, were then compared against the impacts of the project for each environmental issue area discussed in Chapter 4, Environmental Impacts Analysis, of this EIR. A significance determination was made about each alternative for each issue area, and a basis for that determination has been provided. The determination of comparative impacts used the following criteria:

- **No Impact:** The significance criteria do not apply, or no impact would result.
- **Similar:** Impacts would be identical or would be of the same general extent and severity as the impacts associated with the project; therefore, the significance determination would be the same.
- **Increased:** New potentially significant impacts or a substantial increase in the severity of the impacts associated with the project would occur; therefore, the significance determination would be greater.
- **Decreased:** Potentially significant impacts would be avoided or a substantial reduction in the severity of the impacts associated with the project would occur; therefore, the significance determination would be reduced.

As a result of this evaluation and comparison of potentially significant environmental impacts, an Environmentally Superior Alternative has been identified.

5.3 ALTERNATIVES CONSIDERED BUT ELIMINATED

State CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and eliminated along with a brief explanation of the reason for elimination. Factors used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts.

The following ~~three~~ two alternatives were considered but eliminated from further analysis.

5.3.1 Affordable Housing Component Alternative

To explore how the project could potentially address the RHNA, City staff and the project team considered an alternative that would include an affordable housing component to maximize the density potential allowed under the High-Density Residential District (R-3) zoning designation. The R-3 designation allows for 22 units per acre, but additional housing density can be included under this designation if the project were to be a dedicated senior project (up to 30 units per acre per the City Municipal Ordinance) or if the project were to provide an affordability component pursuant to California Government Code Section 65915. Under this scenario, the conceptual development plan for the commercial elements would remain as presented in Chapter 2, Project Description. However, the portions of the project site with proposed R-3 pre-zoning designation would include additional units as allowed through bonus density provisions.

This alternative scenario would not reduce any identified significant impacts and thus would not meet CEQA requirements for an evaluated alternative. While construction-related impacts would be similar to the project, the magnitude of the project's operational impacts related to issues such as traffic, air quality, and GHG emissions would increase due to the increase in residential units. Therefore, the Affordable Housing Component Alternative was rejected from further consideration in this EIR. It is important to note that a later application could be submitted for this type of development and the City could consider an addendum or supplemental analysis to this EIR at that time.

~~5.3.2 No Annexation with Orcutt Community Plan Buildout Alternative~~

~~A No Annexation with Orcutt Community Plan Buildout Alternative was also considered but rejected for this project. In this alternative, the project as presented would not be developed and annexation of the project site into the city of Santa Maria would not occur. Instead, the project site would remain in the jurisdictional boundaries of the County of Santa Barbara and would include development consistent with the land use and zoning as described in the County's Orcutt Community Plan (2020). In this plan, the project site is identified as Key Site 26 with planned land use designations of General Commercial, Office Professional, Planned Residential Development 3.3 (allows 3.3 dwelling units per acre). The County's associated zoning designation for the site is General Commercial. As such, development of the project site could allow for up to 60,000 square feet of general commercial, 30,000 square feet of office-professional spaces, and 141 single-family residential or multifamily units, as described in Chapter 2, Project Description. This would result in a buildout scenario of 354 fewer residential units, 64,750 fewer square feet of commercial uses, and a change/additional 30,000 square feet of office-professional uses.~~

~~Since this alternative would not involve annexation of the project site into the city of Santa Maria, it would fail to meet several basic objectives of the project (e.g., annexation, increase sales tax and revenue for the City). In addition, development of the project site consistent with this scenario would be unlikely due to water supply constraints involving supplemental water rights needed by the County in order to develop the site. Further, development of the project site in accordance with the Orcutt Community Plan~~

~~would likely not reduce any of the identified significant impacts as these are primarily construction related. Due to this alternative's inability to meet basic project objectives, its likely infeasibility due to water supply constraints, and lack of reduced environmental impacts, the No Annexation with Orcutt Community Plan Buildout Alternative was rejected from further consideration in this EIR.~~

5.3.2 Alternative Location

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant.

There are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). In the event land could be purchased of suitable size and developmental characteristics, based on the known general conditions in the southern portion of the city, an alternative site would likely have similar impacts after mitigation as the project. Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was rejected from further consideration in this EIR.

5.4 ALTERNATIVES IMPACTS ANALYSIS

Criteria used to develop preliminary project alternatives included: (1) whether the alternative would avoid or substantially lessen identified significant impacts; (2) whether the alternative would generally meet the project objectives and underlying fundamental purpose; and (3) whether implementation of the alternative would be feasible.

The following project alternatives are considered and evaluated in this section:

- No Project/No Build Alternative
- Alternative 1: Existing City of Santa Maria General Plan Buildout
- Alternative 2: Tree Preservation and Reduced Housing Density
- Alternative 3: Mixed Use with Additional Commercial Uses
- <u>Alternative 4: No Project/No Annexation with Orcutt Community Plan Buildout</u>

Each of the project alternatives is described in further detail in the sections below with a description of each scenario, its relationship to the project objectives, and analyses of impacts with regards to each environmental resources area. A comparison of the environmental impacts resulting from each considered alternative and the project is provided in Table 5-<u>9</u>~~8~~ with the discussion of the Environmentally Superior Alternative.

5.4.1 No Project Alternative

Section 15126.6(e) of the State CEQA Guidelines requires analysis of the No Project Alternative. In accordance with the State CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed

as provided by Section 15126.6(e)(3)(B) of the State CEQA Guidelines. Section 15126.6(e)(3)(B) provides that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." As stated in Section 15126.6(e)(2), "The 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

In the No Project/No Build Alternative, implementation of the project would not occur and future buildout of the project site would also not occur. This alternative assumes no new development or changes would be introduced to the project site to provide a clear comparison of the project to existing (undeveloped) conditions. Additionally, the project site would not be annexed into the city of Santa Maria and would stay within the jurisdiction of the County of Santa Barbara (County). Annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water could be provided at the discretion of the City of Santa Maria. ~~Current water supply constraints at the project site would remain unchanged.~~

5.4.1.1 Relationship to Project Objectives

The No Project/No Build Alternative would meet one of the project objectives, related to airport compatibility. Table 5-1 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 2, Project Description.

Table 5-1. Attainment of Project Objectives: No Project/No Build Alternative

Project Objective	Alternative's Consistency with Project Objective
To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to ~~allow for~~ facilitate the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.	Undetermined. The project site would not be developed or annexed into the city of Santa Maria. However, annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water is provided at the discretion of the City of Santa Maria. ~~No. The project site would not be developed or annexed into the city of Santa Maria. Current water supply constraints at the project site would remain.~~
Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.	No. The project site would remain undeveloped and would not create housing or commercial uses compatible with the surrounding community.
Develop this infill property while respecting the surrounding existing neighborhoods. The project would include setback and landscaping buffers.	No. The project site would remain undeveloped.
Provide high-density housing to meet the needs of the city and help address the current RHNA. The various types of housing units will be available for rent while others will be for-sale units.	No. Without development of the site, there would be no opportunity to increase the local inventory or meet the current RHNA.
Provide commercial uses that would serve the daily needs of the new residents and the surrounding community, including those traveling on UVP.	No. The project site would remain undeveloped and would not create commercial uses to serve those traveling on UVP.
Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.	No. The project site would not undergo any changes to address the onsite stormwater retention needs.
Include architectural and landscaping amenities along UVP and SR 135 to address the visual resources along these travelways.	No. No development would occur; therefore, no changes would occur to the viewshed along UVP and SR 135 that would require architectural and landscaping amenities to be added.

Project Objective	Alternative's Consistency with Project Objective
Create uses that are consistent with the noise, height, and safety guidelines of the adopted Santa Maria ALUCP. ~~1993 ALUP and the Draft 2022 ALUCP.~~	Yes. The project site would remain in its current undeveloped state and would not be developed. As such, no new uses would be introduced that would conflict with the guidelines of the Santa Maria ~~adopted 1993 ALUP and the Draft 2022~~ ALUCP.
Assure the orderly development of the City of Santa Maria General Plan planning area by providing the effective and efficient development of public facilities, infrastructure, and services appropriate for the planning area.	No. Without annexation of the project site into the city of Santa Maria or development, no new considerations for public facilities, infrastructure, and services appropriate for the planning area would occur.
Provide the City with increased sales tax and property tax.	No. Without development and annexation of the project site, no additional sales or property taxes would be generated.
Conform to Santa Barbara County Local Agency Formation Commission (SBLAFCO) requirements to allow for approval of the annexation of the site to the city limits.	Not Applicable. Because annexation is not included in this alternative, consistency with SBLAFCO annexation and boundary change requirements would not be necessary.

5.4.1.2 Comparison of Significant Effects of Alternative to the Project

Under the No Project/No Build Alternative, physical changes to the environment would not occur, and potentially significant impacts would be reduced in comparison to the project. However, this alternative would not meet most of the project objectives.

AESTHETICS

In the No Project/No Build Alternative, the project would not be implemented, and development of the project site would not occur. Like the project, this alternative would not have a substantial effect on a scenic vista or damage scenic resources within a State Scenic Highway, as no such resources have been identified within the vicinity of the project site and no development would occur onsite. The project site would remain in its undeveloped condition and no change to the existing visual character of the project site and surroundings would occur. This alternative would also avoid adding new sources of light and glare on the project site.

Therefore, impacts of the No Project/No Build Alternative related to aesthetics and visual resources would be *decreased* in comparison to the project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

This alternative would not result in an increase in criteria pollutant emissions or odors because no construction would occur, and no new operational sources would be created. This alternative would avoid the project's potentially significant impact related to exposing nearby residential development to toxic air contaminants from the use of off-road diesel equipment during project construction. All other air quality and odor impacts associated with the project would be avoided under this alternative.

The No Project/No Build Alternative would also not generate GHG emissions as no construction would occur, and no permanent sources of emissions would be established. In addition, this alternative would not introduce development that has the potential to be inconsistent with goals and objectives of the SBCAG's *Fast Forward 2040 SBCAG Regional Transportation Plan and Sustainable Communities Strategy* (2017) (2040 RTP/SCS) or the State's long-term climate goals set forth in California Air Resources Board (CARB) California's Draft 2022 Scoping Plan Update.

Therefore, impacts of the No Project/No Build Alternative related to air quality and greenhouse gas emissions would be *decreased* in comparison to the project.

BIOLOGICAL RESOURCES

In the No Project/No Build Alternative, no grading or construction activities would take place on the project site and all existing vegetation and mature trees, including the eucalyptus grove that provides monarch butterfly (*Danaus plexippus*) overwintering habitat, would remain undisturbed. This alternative would avoid potentially significant direct and indirect impacts related to construction activities to special-status wildlife species identified in Section 4.3, Biological Resources, including the Northern California legless lizard (*Anniella pulchra*), monarch butterfly ~~(*Danaus plexippus*)~~, western red bat (*Lasiurus blossevillii*), and nesting migratory birds and raptors. Additionally, this alternative would not involve the development of infrastructure improvements beyond the 43.75-acre project site boundary so it would not directly or indirectly impact special-status wildlife species. As previously stated, all existing trees would remain as is on the project site and support the local policies and ordinances protecting biological resources, specifically considerations under the City's General Plan Resources Management Element (RME) and Municipal Code related to the urban forest. This alternative would also avoid the significant impact to monarch butterfly overwintering habitat, which cannot be avoided with development of the proposed project.

Therefore, impacts of the No Project/No Build Alternative related to biological resources would be *decreased* in comparison to the project.

CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

In the No Project/No Build Alternative, ground disturbance would not occur and there would be no potential to disturb known or unknown cultural resources, including human remains, within the project site. Therefore, mitigation would not be required to reduce the significance of potential impacts related to cultural resources.

Therefore, impacts of the No Project/No Build Alternative related to cultural and tribal cultural resources would be *decreased* in comparison to the project.

ENERGY

The No Project/No Build Alternative would not involve development of the site and would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation. It would also not involve the construction activities or implement development that would result in the consumption of energy resources associated with electricity, water use (i.e., water pumping, heating, etc.), or natural gas. As no development would be introduced on the project site, there would be no conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency under this alternative.

Therefore, impacts of the No Project/No Build Alternative related to energy would be *decreased* in comparison to the project.

GEOLOGY AND SOILS

The No Project/No Build Alternative would not introduce new habitable buildings and structures to the project site that would be susceptible to risk involving seismic-related or other ground-failure events. This alternative would not require any ground-disturbing activities that could increase erosion and loss of topsail at the project site. In addition, this alternative would not result in potentially significant impacts to paleontological resources because no earthwork activities would occur that would cut into the geologic units within which fossils are buried and physically destroy the fossil remains. Compliance with the

California Building Code (CBC) and implementation of mitigation identified for the project would not be required to reduce the significance of potential impacts related to geology and soils.

Therefore, impacts of the No Project/No Build Alternative related to geology and soils impacts would be *decreased* in comparison to the project.

HAZARDS AND HAZARDOUS MATERIALS

Under the No Project/No Build Alternative, no physical changes to the project site would occur. Further, the utility improvements proposed under the project would not occur (i.e., water main below SR 135 and capacity increase of the sewer main below Orcutt Road). As such, the use of construction-related hazardous materials during project construction would not occur and compliance with existing policies to reduce the risk related to use of hazardous materials would not be required. Ground disturbance would not occur, which would eliminate the potential to release aerially deposited lead (ADL) or other soil contaminants, and mitigation would not be required to reduce the significance of these potential impacts. Since no development would occur, this alternative would not create land uses that have the potential to be inconsistent with the applicable airport land use policies or create a potential safety hazard for land uses located within ~~Safety Area 2 of the 1993 ALUP or~~ Safety Areas 2 or 4 of the ~~2022 Draft~~ Santa Maria Airport Land Use Compatibility Plan (Santa Maria ALUCP) (SBCAG 2023).

Therefore, impacts of the No Project/No Build Alternative related to hazards and hazardous materials impacts would be *decreased* in comparison to the project.

HYDROLOGY AND WATER QUALITY

In this alternative, development of the project site would not occur. As a result, no physical changes to the existing drainage conditions at the site would occur and no new impervious surfaces would be introduced. As such, the potential for substantial increases in soil erosion and sediment transport affecting water quality from runoff during construction and project operation would not occur. In addition, no new source pollutants or non-stormwater discharges that could adversely impact water quality would occur. Project impacts related to groundwater recharge would not occur. Compliance with existing state water quality protection regulations as well as the project-specific mitigation measures would not be required to reduce the significance of potential impacts related to hydrology and water quality.

Therefore, impacts of the No Project/No Build Alternative related to hydrology and water quality would be *decreased* in comparison to the project,

LAND USE AND PLANNING

Similar to the project, the No Project/No Build Alternative would not result in new features that could physically divide an established community. Under this alternative, implementation of project and future buildout of the site would not occur, and the project would not facilitate annexation of the site into the city of Santa Maria. However, since no physical changes to the project site would occur, this alternative would not be inconsistent with any plans, policies, or ordinances related to protection of the environmental resources. Conversely, the land use planning benefits of the project (creating a range of new commercial uses to serve the needs of surrounding residents and travelers along UVP, creating new housing opportunities with interconnected pedestrian and bicycle paths, improving infrastructure serving the project site, etc.) would not be realized under this alternative.

Overall, impacts of the No Project/No Build Alternative related to land use and planning would be *decreased* in comparison to the project.

NOISE

The No Project/No Build Alternative would not facilitate the development of new residential or commercial land uses within the project site that could contribute to the existing ambient noise environment of the project area. Mitigation would not be required to ensure consistency with the City's interior and exterior noise standards during construction. There would also be no new long-term, permanent increases in ambient noise levels primarily associated with potential increases in vehicle traffic on nearby roadways as well as onsite activities in this alternative. There also would be no potential for interior noise impacts from aircraft noise associated with operations at Santa Maria Airport because no noise-sensitive residences would be constructed onsite.

Therefore, impacts of the No Project/No Build Alternative related to noise would be *decreased* in comparison to the project.

POPULATION AND HOUSING

Population growth is considered significant only if it is unplanned or unanticipated by the City. The No Project/No Build Alternative would not facilitate any population growth as this alternative would not result in the development of new residential land uses or generate new employment opportunities. Similar to the project, this alternative would not result in substantial or unplanned population growth. Additionally, this alternative would not help the City reach its housing development allocation goals per the RHNA required by the State or facilitate the development of affordable homes.

Therefore, impacts of the No Project/No Build Alternative related to population and housing would be *similar* in comparison to impacts associated with the project.

PUBLIC SERVICES AND RECREATION

Under the No Project/No Build Alternative, an increase in demand on existing public services or recreational facilities would not occur as this alternative would not facilitate any population growth. This alternative would not increase demand for fire protection or police protection services, schools, or libraries. This alternative would not result in any development; therefore, payment of required growth mitigation fees from the project would not occur and no new potential sources of tax revenue from development of the site would be generated.

Therefore, impacts of the No Project/No Build Alternative related to public services and recreation would be *decreased* in comparison to impacts associated with the project.

TRANSPORTATION

Under the No Project/No Build Alternative, no new development would be introduced on the project site and no new traffic or changes to the local roadway network would be introduced. Traffic conditions would remain as they are under existing conditions. Because the No Project/No Build Alternative would not result in any significant transportation impacts, impacts related to transportation would be *similar* in comparison to impacts associated with the project.

UTILITIES AND SERVICE SYSTEMS

Under the No Project/No Build Alternative, no new development would be introduced on the project site and there would be no need for the construction of new and expanded utility infrastructure to serve the project, including potable water, wastewater, stormwater, and other utilities, such as natural gas, electricity, telephone, and cable/data service. This alternative would not require infrastructure

improvements beyond the boundary of the project site, as proposed by the project, and therefore impacts associated with construction and installment of utility infrastructure both on- and off-site would not occur. While this alternative would not allow for annexation of the project site into Santa Maria city limits, annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water could be provided at the discretion of the City of Santa Maria. ~~However, this alternative would not allow for annexation of the project site into Santa Maria city limits and therefore the current water supply constraints to the site would remain.~~

Overall, impacts of the No Project/No Build Alternative related to utilities and service systems would be *decreased* in comparison to impacts associated with the project.

5.4.2 Alternative 1: Existing Santa Maria General Plan Land Use Designation

The project site is located within the City's Sphere of Influence (SOI) and therefore has associated planned land use designations as presented in the City's General Plan Land Use Element. Alternative 1 would include annexation of the project site into Santa Maria city limits and would allow the project site to be developed in accordance with the City's existing planned land use designation for the site, which is Commercial and Professional Office. The Commercial and Professional Office designation allows for office development for medical, legal, travel agencies, insurance, and real estate services, as well as complementary commercial uses (Figure 5-1). A complementary zoning designation of commercial office and professional office (CPO) would apply to this alternative. Table 5-2 provides an overview of the buildout scenario for Alternative 1, which would allow for the construction of up to 658,200 square feet of commercial and professional office uses (which includes approximately 39,000 square feet of mini-storage use). This alternative would continue to require the construction of new and expanded utility infrastructure. See Chapter 2, Project Description, for a full description of the utility infrastructure improvements.

Table 5-2. Overview of Alternative 1

Zoning Designations	Acres	Potential Floor Area (square feet)
Commercial and Professional Office (CPO)	27.4	658,200*
Total	**43.75**	658,200

Source: RRM Design Group Alternative Concept Plans (2022)

* Includes approximately 39,000 square feet of mini-storage use.

Figure 5-1. Alternative 1: Existing Santa Maria General Plan Land Use Designation.

5.4.2.1 Relationship to Project Objectives

Table 5-3 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 2, Project Description.

Table 5-3. Attainment of Project Objectives: Alternative 1, Existing Santa Maria General Plan Land Use Designation

Project Objective	Alternative's Consistency with Project Objective
To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to ~~allow for~~ facilitate the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.	Yes. The project site would be annexed into the city of Santa Maria and would therefore be able to access the supplemental water available to the City per their agreement with Golden State Water. However, annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water is provided at the discretion of the City of Santa Maria. ~~access the supplemental water rights available to the City per their agreement with Golden State Water.~~
Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.	No. Without the inclusion of residential land use designations, housing would not be included as part of the development of the project site. Therefore, it would not provide housing to contribute to the housing needs of the region.
Develop this infill property while respecting the surrounding existing neighborhoods. The project will include setback and landscaping buffers.	Yes. The Santa Maria General Plan and associated Municipal Code provide specific setback and landscaping buffer requirements to ensure development would be complementary and compatible with the existing surrounding land uses.
Provide high-density housing to meet the needs of the city and help address the current RHNA. The various types of housing units will be available for rent while others will be for-sale units.	No. Without the inclusion of residential land use designations, housing would not be included as part of the development of the project site. As such, it would not provide any high-density housing to help address the current RHNA.
Provide commercial uses that would serve the daily needs of the new residents and the surrounding community including those traveling on UVP.	No. The commercial office and professional office land use designation allows for office-centric uses and less on commercial uses that would serve the daily needs of nearby residents and roadway travelers.
Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.	Yes. As part of any future development, plans for stormwater retention facilities would be subject to the development standards and design review as required by the City's Municipal Code. In addition, a comprehensive drainage plan would be prepared to demonstrate stormwater runoff is conveyed in a non-erosive manner in accordance with the Regional Water Quality Control Board stormwater requirements and City Public Improvement Standards.
Include architectural and landscaping amenities along UVP and SR 135 to address the visual resources along these travelways.	Yes. The Santa Maria General Plan and associated Municipal Code provide regulations, development standards, and design requirements for zoning districts (e.g., building setbacks, height restrictions, landscape plans, architectural review plans, etc.) to protect visual resources along UVP and SR 135.
Create uses that are consistent with the noise, height, and safety guidelines of the adopted Santa Maria ALUCP.~~1993 ALUP and the Draft 2022 ALUCP.~~	Yes. As part of any future development, an approval application for development permits for new land uses onsite would be required to demonstrate full compliance with the applicable safety standards and compatibility policies of the airport land use plan in effect at the time. Consistency with the airport land use plan would be required to be reviewed and verified by the City Community Development Department prior to building permit issuance.
Assure the orderly development of the City of Santa Maria General Plan planning area by providing the effective and efficient development of public facilities, infrastructure, and services appropriate for the planning area.	Yes. Development of the project site would continue to require the construction of new and expanded utility infrastructure.

Project Objective	Alternative's Consistency with Project Objective
Provide the City with increased sales tax and property tax.	Yes. The development of new buildings for commercial purposes would create an increase in sales and property tax for the City.
Conform to Santa Barbara County Local Agency Formation Commission (SBLAFCO) requirements to allow for approval of the annexation of the site to the city limits.	Yes. Conforming with SBLAFCO requirements to allow for approval of annexation of the site to the city limits could be achieved under this alternative.

5.4.2.2 Comparison of Significant Effects of Alternative to the Project

Under Alternative 1, buildout of the project site would be similar in scale as the project, with development consistent with the Commercial and Professional Office land use designation. This alternative would not include a residential component and no housing would be incorporated. However, development of the project site in this alternative would require grading and ground-disturbing activities on the entire 43.75-acre site. As a result, impacts under this alternative would be generally similar to impacts associated with the project, as most project impacts are construction related. Alternative 1 would partially meet the project objectives.

AESTHETICS

Under Alternative 1, future buildout of the project site would include construction of new commercial and professional office uses to the scale and design allowed by the development standards set for in the City's Municipal Code. The high-density residential uses proposed as part of the project would not be included under this alternative. While Alternative 1 would not include the project's high-density residential component, it would still allow for development at a similar scale (maximum allowable building height of 35 feet, as proposed by the project). Similar to the project, this alternative would result in a notable change in the existing visual character of the site from undeveloped to developed. This alternative would also include removal of all or most of the existing vegetation onsite to accommodate development. Inhabitants of the surrounding residential land uses as well as motorists, cyclists, and pedestrians traveling along public roadways would notice this visual change, as they would with the project. However, like the project, this alternative would not have a substantial effect on a scenic vista or damage scenic resources within a State Scenic Highway, as no such resources have been identified within the vicinity of the project site. Development under this alternative would be required to adhere to the same guidance and requirements set forth in City Municipal Code for design review, landscape standards, and lighting and glare requirements as the project.

Therefore, impacts of the Alternative 1 related to aesthetics would be *similar* in comparison to impacts associated with the project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Implementation of this alternative would still result in an increase in criteria pollutant emissions because construction activities would still occur, and new operational sources would be created. Construction activities would result in a short-term increase in air pollutant emissions generated by construction equipment and vehicle use and ground-disturbing activities. As identified for the project, this alternative would also be required to implement mitigation to reduce construction-related air pollutant emissions. Operational emissions would be lower under this alternative due to the reduction in daily vehicle trips related to residential uses; however, impacts of this alternative would still be similar to the project as the project's operational air quality would not exceed established Santa Barbara County Air Pollution Control District (SBCAPCD) thresholds. This alternative would be similar to the project's potentially significant

impact related to exposing nearby residential development to toxic air contaminants from the use of off-road diesel equipment, since construction activities would still occur within 1,000 feet of nearby sensitive receptors. All other air quality and odor impacts associated with this alternative would be similar to the project.

This alternative would allow for buildout of the project site, requiring the use of equipment and vehicles that would generate short-term GHG emissions. However, given that the scale of this alternative is similar to the project, it would not generate greenhouse gas emissions above established SBCAPCD thresholds. Long-term GHG emissions would be generated by vehicle trips created by the project and operational energy use; however, because this alternative does not include residential uses, there is likely to be a reduction in vehicle-generated GHG emissions. This alternative would likely not exceed the given operational GHG emissions thresholds, resulting in similar impacts as the project. This alternative, similar to the project, has the potential to be inconsistent with goals and objectives of the SBCAG 2040 RTP/SCS related to reducing criteria pollutant emissions and promoting alternative modes of transportation. In addition, the project does not include best management practices (BMPs) that would constitute its "fair share" of what would be required to meet the State's long-term climate goals set forth in CARB California's Draft 2022 Scoping Plan Update. It would be subject to the same mitigation measures set forth for the project to reduce operation GHG emissions, and therefore would be similar to the project.

Therefore, impacts of Alternative 1 related to air quality and greenhouse gas emissions would be *similar* in comparison to impacts associated with the project.

BIOLOGICAL RESOURCES

Alternative 1 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project, requiring the same grading and ground-disturbing activities necessary to prepare the site for development. As such, Alternative 1 would have the same potential as the project to result in direct and indirect impacts related to construction activities to special-status wildlife species identified in Section 4.3, Biological Resources, including the Northern California legless lizard, monarch butterfly, western red bat, and nesting migratory birds and raptors. Similar to the proposed project, this alternative would result in significant and unavoidable impacts to monarch butterfly overwintering habitat. In addition, this alternative would require infrastructure improvements beyond the 43.75-acre project site boundary with the potential to impact special-status wildlife species directly or indirectly and would require the same mitigation as proposed by the project. Like the project, this alternative would also involve the removal of the existing trees located onsite, in whole or in part, resulting in conflicts with local policies and ordinances protecting biological resources, specifically considerations under the City's RME and Municipal Code and would require the same mitigation measure as the project.

Therefore, impacts of Alternative 1 related to biological resources would be *similar* in comparison to impacts associated with the project.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Alternative 1 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project, requiring the same grading and ground-disturbing activities necessary to prepare the site for development. The project site does not contain any historical buildings or structures that would be eligible for listing in the California Register of Historical Resources (CRHR) or local register of historic resources, and while there are no known archaeological resources within the project site, ground-disturbing activities would have the potential to result in direct disturbance to prehistoric archaeological resources and/or unknown tribal cultural resources if present within future disturbance areas. Additionally, due to the extent of proposed ground-disturbing activities, there is potential for inadvertent discovery of previously unidentified cultural resources and human remains. This alternative would be

required to implement mitigation measures identified for the project, which have been included to reduce impacts related to inadvertent discovery of previously unidentified resources, including human remains. Alternative 1 would have the same potential to disturb known and unknown cultural resources sites and would be subject to the implementation of identified mitigation for the project.

Therefore, impacts of Alternative 1 related to cultural and tribal cultural resources would be *similar* in comparison to impacts associated with the project.

ENERGY

Alternative 1 would result in the consumption of energy resources associated with electricity, water use (i.e., water pumping, heating, etc.), and natural gas in a manner consistent with the project. This alternative would be required to implement the same mitigation measures identified for the project to avoid unnecessary, wasteful, or inefficient energy use.

Therefore, impacts of Alternative 1 related to energy would be *similar* in comparison to impacts associated with the project.

GEOLOGY AND SOILS

Alternative 1 would include the development of the project site and allow for the construction of new habitable buildings and structures and would have the same potential for seismic-related hazards, including fault rupture, ground shaking, liquefaction, and landslide and the potential for other ground-failure events as the project. This alternative would be required to implement mitigation and adhere to CBC and other applicable engineering standards to reduce potential impacts related to seismic-related and other ground-failure events. Under Alternative 1, ground disturbance and tree removal for project construction would be generally consistent with the project and would have similar potential to increase erosion and loss of topsoil during construction. This alternative would be required to comply with a State Water Resources Control Board (SWRCB) General Construction Permit related to short- and long-term erosion control at the project site. In addition, this alternative would have the same potential to disturb paleontological resources if present within the proposed area of disturbance and would be required to implement mitigation to reduce potential disturbance to paleontological resources during project construction.

Therefore, impacts of the Alternative 1 related to geology and soils impacts would be *similar* in comparison to impacts associated with the project.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 1 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project. This would require the use of construction-related hazardous materials (e.g., fuels, gasoline, solvents, oils, paints, etc.) and would be required to comply with state and local regulations to reduce associated hazards. This alternative would not include radically different land uses or features that could facilitate the use of hazardous materials that could result in significant upset if released. As with the project, construction of infrastructure improvements on- and off-site (i.e., enlargements of water and sewer main below SR 135 and Orcutt Road) could result in the release of ADL, a hazardous material, into the environment. This alternative would require the same mitigation as the project to reduce the significance of these potential impacts. In addition, development in accordance with this alternative has the potential to create land uses that may be inconsistent with the applicable airport land use policies or create a potential safety hazard for land uses located within ~~Safety Area 2 of the 1993 ALUP or~~ Safety Areas 2 or 4 of the ~~2022 Draft~~ Santa Maria ALUCP. The project's mitigation measure related to this potential impact would also be required under this alternative.

Therefore, impacts of Alternative 1 related to hazards and hazardous materials impacts would be *similar* in comparison to impacts associated with the project.

HYDROLOGY AND WATER QUALITY

The project site does not support any natural drainage or surface water features and it is currently undeveloped, consisting of largely pervious surfaces. Alternative 1 would result in buildout of the site in a manner consistent with the project and is likely to result in the creation of similar acreages of impervious surfaces (i.e., approximately 70% of the site). These increases would have the potential to increase the pollutants and non-stormwater discharges that could adversely impact water quality. This alternative has the same potential as the project for substantial increases in soil erosion and sediment transport that have the potential to affect water quality from runoff as the project, particularly during construction phases that include excavation, grading, and other earthwork. Due to the addition of a similar amount of impervious surfaces as the project, this alternative also has the potential to interfere substantially with groundwater recharge and a loss of basin-wide percolation. As such, this alternative would result in a large amount of soil disturbance, require the use of construction equipment and vehicles during construction, and result in a large amount of new impervious surface area at the project site, which is consistent with the project. Further, this alternative would be subject to the same mitigation measures as the project as well as all applicable state and local water quality protection requirements, which is also consistent with the project.

Therefore, impacts of Alternative 1 related to hydrology and water quality would be *similar* in comparison to impacts associated with the project.

LAND USE AND PLANNING

Alternative 1 would not result in new features that could physically divide an established community, consistent with the project. Unlike the project, this alternative would not include a housing component. While this alternative would be consistent with the City's planned land use for the site, it would not meet many of the policies set forth in the City's Land Use and Housing Elements or those in the 2040 RTP/SCS pertaining to residential housing development needs and would not contribute addressing the current RHNA.

Therefore, impacts of Alternative 1 related to land use and planning would be *increased* in comparison to impacts associated with the project.

NOISE

Alternative 1 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project, resulting in the generation of similar short-term, intermittent increases in ambient noise during the construction phase from initial site improvements, vehicle and equipment movement, and future construction of residential and commercial land uses. Like the project, construction activities in this alternative would have the potential to result in temporary exceedances of the maximum acceptable noise levels for residential land uses set forth in the City's Municipal Code (Table 4.10-8). In addition, this alternative would create similar long-term, permanent increases in ambient noise levels, primarily associated with potential increases in vehicle traffic on nearby roadways as well as onsite activities. Alternative 1 would be required to implement many of the same mitigation measures as the project to reduce construction-related noise and operational impacts related to future traffic noise levels, although the exact locations of sound barriers for the final design plan may need to be modified to address the specific land use distribution of the alternative.

Therefore, impacts of Alternative 1 related to noise would be *similar* in comparison to impacts associated with the project.

POPULATION AND HOUSING

Alternative 1 would allow for the implementation of commercial and professional office land uses and would not include a residential component. While this alternative would not create residential land uses, it would create new employment opportunities with its proposed commercial and professional office uses. Potential for job creation would depend on the exact nature and type of commercial uses developed, but it is likely that this alternative would create a similar, if not increased, number of new jobs as compared to the project. Regardless, this alternative would not result in substantial or unplanned population growth, similar to the project. However, this alternative would not help the City reach its housing development allocation goals per the RHNA or facilitate the development of affordable homes. Alternative 1 would not result in the demolition or removal of existing homes and would not require additional homes to be constructed elsewhere, similar to the project.

Therefore, impacts of Alternative 1 related to population and housing would be *similar* in comparison to impacts associated with the project.

PUBLIC SERVICES AND RECREATION

Alternative 1 includes proposed commercial and professional office land uses and would not include a residential component. Without the residential component, this alternative would not generate the same increase in population and would not result in the same increase in the level of demand on existing public services such as schools, libraries, or recreational facilities. However, future development of the project site would generate new employment opportunities and introduce new structures onsite that would still require fire and police protection services. Similar to the project, any new development on the site would be required to pay growth mitigation fees as set forth in Municipal Code Section 8-15 to offset impacts for the increased demand on public services, such as fire and police protection.

Therefore, impacts of Alternative 1 related to public services and recreation would be *similar* in comparison to impacts associated with the project.

TRANSPORTATION

Alternative 1 would provide for development of the project site with solely commercial and professional office land uses. The project would not introduce mixed-use development and thus would not promote vehicle miles traveled (VMT) reduction to the same degree as the proposed project. As well, the alternative would be expected to generate additional VMT as compared to the project. Without conducting a VMT analysis for this alternative, it is difficult to fully evaluate the effects of this alternative on the transportation system. However, considering the lack of mixed use and the emphasis on professional office uses, it is expected that employees that would travel to the site for employment would create additional VMT as compared to the proposed project. The level of employment-generating use included in this alternative would make it difficult for the alternative to meet VMT thresholds, even though the project site is in an area that has considerable residential uses. While it is reasonable to assume that this alternative could reduce hazardous transportation conditions and emergency access considerations to below a level of significance, this alternative would be expected create inconsistencies with policies promoting mixed use and reducing VMT.

Therefore, impacts of Alternative 1 related to transportation would be *increased* in comparison to impacts associated with the project.

UTILITIES AND SERVICE SYSTEMS

Alternative 1 would result in buildout of the entire 43.75-acre project site in a manner similar to the project, resulting in the need for the construction of new and expanded infrastructure improvements onsite as well as several improvements that would be necessary outside of the boundaries of the project site. This alternative would be required to implement the project's identified mitigation to reduce potential adverse impacts on the environment. While this alternative does not include a housing component, the project site would be entirely developed with commercial and professional office land uses, which would result in an increased demand for water, as well as increase wastewater and solid waste generation rates over existing conditions, similar to the project.

Overall, impacts of Alternative 1 related to utilities and service systems would be *similar* in comparison to impacts associated with the project.

5.4.3 Alternative 2: Tree Preservation and Reduced Housing Density

Alternative 2, Tree Preservation and Reduced Housing Density Alternative, would include annexation of the project site into the Santa Maria city limits. Allowable development under this alternative would include a mix of commercial uses similar to those proposed by the project, combined with lower-density residential land uses (i.e., a reduced number of dwelling units when compared to the project) (Figure 5-2). The land use and zoning designations would be the same as the project, however the housing proposed under this alternative would be closer to, but still higher than, the density and extent of the existing housing located in the neighborhoods surrounding the project site.

Another feature of this alternative would be the preservation and enhancement of several natural features of the site. There are many mature trees and other natural features on the project site that are aesthetically desirable and provide important shade relief and biological resource benefit. In this alternative, many of these mature trees would be retained and development would be planned around them to the extent possible. The eucalyptus grove that is south of UVP would be retained. This particular grove is an important inland overwintering grove of the monarch butterfly and has a high CDFW conservation concern (Area of Conservation Concern HEX ID 50049) (CDFW 2023). Thus, the retention of this particular open space area is of particular benefit of Alternative 4.

In addition, this alternative would redesign park areas proposed by the project in a way that orients them away from busy roads and intersections, while offering internal connections and pathways between land uses. The construction of new and expanded utility infrastructure would continue to be required in this alternative. Table 5-4 provides an overview of the buildout scenario for Alternative 2.

Table 5-4. Overview of Alternative 2

Zoning Designations	Acres	Residential Units	Potential Floor Area (square feet)
General Commercial (C-2)	16.35	N/A	134,096*
High-Density Residential (R-3) Apartments	20.2	246	N/A
High-Density Residential (R-3) Townhomes	7.2	66	N/A
Total	**43.75**	**312**	**134,096**

Source: RRM Design Group Alternative Concept Plans (2022)

* Includes approximately 39,000 square feet of mini-storage use.

Figure 5-2. Alternative 2: Tree Preservation and Reduced Housing Density.

Alternative 2 would allow for 134,096 square feet of commercial uses and accommodate 312 housing units. When compared to the project, this alternative would allow for an additional 9,346 square feet of commercial uses and 183 fewer housing units. This alternative would result in 43.75 acres of ground disturbance, equal to the project.

While this alternative is similar to the proposed project in that it would provide a mixture of residential and commercial uses, it is not known whether the Applicant would be interested in developing this alternative as the financial implications to the Applicant related to the reduction in residential units are not known. As well, it is important to note that this alternative would provide less housing so it would contribute less to the City's RHNA goals when compared to the proposed project.

5.4.3.1 Relationship to Project Objectives

The Tree Preservation and Reduced Housing Density Alternative would achieve all the project objectives. Table 5-5 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 2, Project Description.

Table 5-5. Attainment of Project Objectives: Alternative 2, Tree Preservation and Reduced Housing Density Alternative

Project Objective	Alternative's Consistency with Project Objective
To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to ~~allow for~~ facilitate the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.	Yes. The project site would be annexed into the city of Santa Maria and would therefore be able to access the supplemental water available to the City per their agreement with Golden State Water. However, annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water is provided at the discretion of the City of Santa Maria. ~~access the supplemental water rights available to the City per their agreement with Golden State Water.~~
Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.	Yes. This alternative would provide a mix of housing and commercial development at a lesser extent than the project, but would still contribute to the commercial and housing needs of the region.
Develop this infill property while respecting the surrounding existing neighborhoods. The project would include setback and landscaping buffers.	Yes. The Santa Maria General Plan and associated Municipal Code provide specific setback and landscaping buffer requirements to ensure development would be complementary and compatible with the existing surrounding land uses.
Provide high-density housing to meet the needs of the city and help address the current RHNA. The various types of housing units will be available for rent while others will be for-sale units.	Yes. While housing would be included in this alternative, it would be at a lower density than that of the project. It would provide a lower number of units and likely a single type of unit as opposed to various types of housing units; however, it would still contribute to meeting the needs set forth in the RHNA.
Provide commercial uses that would serve the daily needs of the new residents and the surrounding community, including those traveling on UVP.	Yes. A variety of commercial uses would be allowed under this alternative to serve the daily needs of the new residents and the surrounding community.
Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.	Yes. As part of any future development, plans for stormwater retention facilities would be subject to the development standards and design review as required by the City's Municipal Code. In addition, a comprehensive drainage plan would be prepared to demonstrate stormwater runoff is conveyed in a non-erosive manner in accordance with the Regional Water Quality Control Board stormwater requirements and City Public Improvement Standards.
Include architectural and landscaping amenities along UVP and SR 135 to address the visual resources along these travelways.	Yes. The Santa Maria General Plan and associated Municipal Code provide regulations, development standards, and design requirements for zoning districts (e.g., building setbacks, height

Project Objective	Alternative's Consistency with Project Objective
	restrictions, landscape plans, architectural review plans, etc.) to protect visual resources along UVP and SR 135.
Create uses that are consistent with the noise, height, and safety guidelines of the adopted Santa Maria ALUCP. ~~1993 ALUP and the Draft 2022 ALUCP.~~	Yes. As part of any future development, an approval application for development permits for new land uses onsite would be required to demonstrate full compliance with the applicable safety standards and compatibility policies of the airport land use plan in effect at the time. Consistency with the airport land use plan would be required to be reviewed and verified by the City Community Development Department prior to building permit issuance.
Assure the orderly development of the City of Santa Maria General Plan planning area by providing the effective and efficient development of public facilities, infrastructure, and services appropriate for the planning area.	Yes. Development of the project site would continue to require the construction of new and expanded utility infrastructure.
Provide the City with increased sales tax and property tax.	Yes. The development of new buildings for commercial and residential purposes would create an increase in sales and property tax for the City.
Conform to Santa Barbara County Local Agency Formation Commission (SBLAFCO) requirements to allow for approval of the annexation of the site to the city limits.	Yes. Conforming with SBLAFCO requirements to allow for approval of annexation of the site to the city limits could be achieved under this alternative.

5.4.3.2 Comparison of Significant Effects of Alternative to the Project

Under Alternative 2, buildout of the project site would allow for similar land uses as those proposed by the project, with the major difference being the reduced density of proposed housing and the retainment of the mature trees and other natural features onsite, to the extent possible. This alternative would still require grading and ground-disturbing activities at the project site, although to a lesser extent. It is likely that this alternative would continue to require the construction of new and expanded utility infrastructure, similar to the project. As a result, impacts of this alternative would generally be similar to that of the project with the exception of biological resource impacts. Preservation of the mature trees and other natural features onsite would reduce many of the project impacts related to biological resources while creating better consistency with the City's Resource Management Element.

As a result, impacts under this alternative would be *decreased* when compared to impacts associated with the project. Alternative 2 would meet most of the project objectives.

AESTHETICS

As stated, Alternative 2 includes the same land use designations as the project but would propose a reduction in the number of total dwelling units to be constructed on the project site. Residential land uses would remain situated south of UVP, but this area would be developed to a lesser extent than the project, with fewer residential units, consistent with the neighboring residential development. Like the project, this alternative would not have a substantial effect on a scenic vista or damage scenic resources within a State Scenic Highway as no such resources have been identified within the vicinity of the project site. While the project site would be developed to a lesser extent in this alternative and would include the preservation of the mature trees onsite to the greatest extent possible, it would still result in the development of a currently undeveloped site, causing a notable change in the site's existing visual character. Inhabitants of the surrounding residential land uses as well as motorists, cyclists, and pedestrians traveling along public roadways would notice this visual change, as they would with the project. Development under this alternative would be required to adhere to the same guidance and requirements set forth in City Municipal Code for design review, landscape standards, and lighting and glare requirements as the project.

Therefore, impacts of the Alternative 2 related to aesthetics would be *similar* in comparison to impacts associated with the project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Implementation of Alternative 2 would still result in an increase in criteria pollutant emissions because construction activities would still occur, and new operational sources would be created. Construction activities would result in a short-term increase in air pollutant emissions generated by construction equipment and vehicle use and ground-disturbing activities. As identified for the project, this alternative would also be required to implement mitigation to reduce construction-related air pollutant emissions. Operational emissions would be lower under this alternative due to the reduction in daily vehicle trips related to the reduced housing density; however, impacts of this alternative would still be similar to the project as the project's operational air quality would not exceed established SBCAPCD thresholds. This alternative would be similar to the project's potentially significant impact related to exposing nearby residential development to toxic air contaminants from the use of off-road diesel equipment since construction activities would still occur within 1,000 feet of nearby sensitive receptors. All other air quality and odor impacts associated with this alternative would be similar to the project.

This alternative would allow for buildout of the project site, requiring the use of equipment and vehicles that would generate short-term GHG emissions. However, given that the land uses of this alternative are similar to the project, it would not generate greenhouse gas emissions above established SBCAPCD thresholds. Long-term GHG emissions would be generated by vehicle trips created by the project and operational energy use. This alternative would likely not exceed the given operational GHG emissions thresholds, resulting in similar impacts as the project. This alternative, similar to the project, has the potential to be inconsistent with goals and objectives of the SBCAG 2040 RTP/SCS related to reducing criteria pollutant emissions and promoting alternative modes of transportation. In addition, the project does not include BMPs that would constitute its "fair share" of what would be required to meet the State's long-term climate goals set forth in CARB California's Draft 2022 Scoping Plan Update. It would be subject to the same mitigation measures set forth for the project to reduce operation GHG emissions, and therefore would be similar to the project.

Therefore, impacts of Alternative 2 related to air quality and greenhouse gas emissions would be *similar* in comparison to impacts associated with the project.

BIOLOGICAL RESOURCES

Alternative 2 would result in buildout of the project site to a lesser extent than the project and include the preservation of the mature trees and other natural features present at the project site, to the extent possible. Of particular benefit from a biological perspective is the retention of the eucalyptus grove that is located south of UVP, which provides overwintering habitat for the monarch butterfly. Monarch butterflies are a candidate for listing under the federal Endangered Species Act. The 7.63-acre stand of trees located south of UVP would be preserved under this alternative and would serve as a retained natural feature of the site. Smaller overwintering roosts, like this one, provide important habitat to the species (CDFW 2023). Alternative 2 would avoid removal of the trees in this area, consistent with CDFW's recommendations. Avoidance of this significant and unavoidable impact of the proposed project (or any project alternative on the project site similar in density to the proposed project) is a notable attribute of Alternative 2.

~~While~~ Regarding other biological species, while the site's natural features would become incorporated into the future buildout plan in this alternative, grading and ground-disturbing activities ~~of 43.75 acres~~ would still be necessary to prepare the site for development. In addition, this alternative would continue to require infrastructure improvements on- and off-site to support development of the site. Like the project,

these construction-related activities would have the same potential as the project to result in direct and indirect impacts to special-status wildlife species identified in Section 4.3, Biological Resources, including the Northern California legless lizard, ~~monarch butterfly,~~ western red bat, and nesting migratory birds and raptors. As such, the same mitigation measures proposed by the project would be required in this alternative.

However, due to this alternative's preservation of the site's monarch butterfly overwintering habitat, mature trees and other natural features, project impacts related to conflicts with local policies and ordinances protecting biological resources, specifically considerations under the City's RME and Municipal Code, would be avoided. In addition, substantially fewer trees would have to be replaced under the project's mitigation measure requiring tree replacement, and instead any trees that are removed under this alternative would occur following the guidelines set forth in Chapter 44 of Title 12 of the Municipal Code, and no mitigation would be necessary. This alternative would allow for the mature trees onsite to remain as part of the City's existing urban forest.

Therefore, impacts of Alternative 2 related to biological resources would be *decreased* in comparison to impacts associated with the project. In addition, the significant and unavoidable impact related to the removal of monarch butterfly overwintering habitat that would occur with the proposed project would be avoided.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Alternative 2 would result in buildout of the project site to a lesser extent than the project; however, grading and ground-disturbing activities would still be necessary to prepare the site for development. The project site does not contain any historical buildings or structures that would be eligible for listing in the CRHR or local register of historic resources, and while there are no known cultural archaeological resources within the project site, ground-disturbing activities would have the potential to result in direct disturbance to prehistoric archaeological and/or unknown tribal cultural resources if present within future disturbance areas. Additionally, due to the extent of proposed ground-disturbing activities, there is potential for inadvertent discovery of previously unidentified cultural resources and human remains. This alternative would be required to implement mitigation measures identified for the project, which have been included to reduce impacts related to inadvertent discovery of previously unidentified resources, including human remains. Alternative 2 would have the same potential to disturb known and unknown cultural resources sites and be subject to the implementation of identified mitigation for the project.

Therefore, impacts of Alternative 2 related to cultural and tribal cultural resources would be *similar* in comparison to impacts associated with the project.

ENERGY

Alternative 2 would result in the consumption of energy resources associated with electricity, water use (i.e., water pumping, heating, etc.), and natural gas in a manner consistent with the project since it proposes similar land uses. This alternative would be required to implement the same mitigation measures identified for the project to avoid unnecessary, wasteful, or inefficient energy use.

Therefore, impacts of Alternative 2 related to energy would be *similar* in comparison to impacts associated with the project.

GEOLOGY AND SOILS

Alternative 2 would include the development of the project site and allow for the construction of new habitable buildings and structures would have the same potential for seismic-related hazards, including fault rupture, ground shaking, liquefaction, and landslide and the potential for other ground-failure events

as the project. This alternative would be required to implement mitigation and adhere to CBC and other applicable engineering standards to reduce potential impacts related to seismic-related and other ground-failure events. Under Alternative 2, ground disturbance activities would occur to a lesser extent than the project but would have similar potential to increase erosion and loss of topsoil during construction. This alternative would be required to comply with an SWRCB General Construction Permit related to short- and long-term erosion control at the project site. In addition, this alternative would have the same potential to disturb paleontological resources if present within the proposed area of disturbance and would be required to implement mitigation to reduce potential disturbance to paleontological resources during project construction.

Therefore, impacts of the Alternative 2 related to geology and soils impacts would be *similar* in comparison to impacts associated with the project.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 2 would result in buildout of the project site to a lesser extent than the project; however, it would continue to require the use of construction-related hazardous materials (e.g., fuels, gasoline, solvents, oils, paints, etc.) and would be required to comply with state and local regulations to reduce associated hazards. This alternative would not include radically different land uses or features that could facilitate the use of hazardous materials that could result in significant upset if released. As with the project, construction of infrastructure improvements on- and off-site (i.e., enlargements of water and sewer main below SR 135 and Orcutt Road) could result in the release of ADL, a hazardous material, into the environment. This alternative would require the same mitigation as the project to reduce the significance of these potential impacts. In addition, development in accordance with this alternative has the potential to create land uses that may be inconsistent with the applicable airport land use policies or create a potential safety hazard for land uses located within ~~Safety Area 2 of the 1993 ALUP or~~ Safety Areas 2 or 4 of the Santa Maria ~~2022 Draft~~ ALUCP. The project's mitigation measure related to this potential impact would also be required under this alternative.

Therefore, impacts of Alternative 2 related to hazards and hazardous materials impacts would be *similar* in comparison to impacts associated with the project.

HYDROLOGY AND WATER QUALITY

The project site does not support any natural drainage or surface water features and is currently undeveloped, consisting of largely pervious surfaces. Alternative 2 would result in buildout of the project site to a lesser extent than the project and is likely to reduce the acreage of impervious surfaces when compared to the project due to the reduced housing density and building footprints. Allowable development under this alternative, although reduced in scale when compared to the project, would still require ground-disturbing activities during construction, including excavation, grading, and other earthwork. Like the project, the potential exists for substantial increases in soil erosion and sediment transport that have the potential to affect water quality from runoff. The increase in impervious surfaces on the project site, while less than that proposed by the project, would also result in an increase of people and vehicles on the project site. These increases would have the potential to increase the pollutants and non-stormwater discharges that could adversely impact water quality. Development of the project site in this alternative also has the potential to interfere substantially with groundwater recharge and a loss of basin-wide percolation, like the project, due to the site changing from undeveloped to a developed condition. Even though this alternative would develop the project site to a lesser extent, it would still result in a large amount of soil disturbance, require the use of construction equipment and vehicles during construction, and result in a large amount of new impervious surface areas at the project site (compared to existing conditions), which is consistent with the project. Further, this alternative would be subject to the

same mitigation measures as the project as well as all applicable state and local water quality protection requirements, which is also consistent with the project.

Therefore, impacts of Alternative 2 related to hydrology and water quality would be *similar* in comparison to impacts associated with the project.

LAND USE AND PLANNING

Alternative 2 would not result in new features that could physically divide an established community, consistent with the project. In addition, this alternative would include a reduced density housing component when compared to the project; however, this housing component would contribute to meeting many of the policies of the City's Land Use and Housing Elements and 2040 RTP/SCS.

Therefore, impacts of Alternative 2 related to land use and planning would be *similar* in comparison to impacts associated with the project.

NOISE

Alternative 2 would result in buildout of the project site to a lesser extent than the project; however, like the project, it would result in the generation of similar short-term, intermittent increases in ambient noise during the construction phase from initial site improvements, vehicle and equipment movement, and future construction of residential and commercial land uses. Like the project, construction activities in this alternative would have the potential to result in temporary exceedances of the maximum acceptable noise levels for residential land uses set forth in the City's Municipal Code (Table 4.10-8). In addition, this alternative would create similar long-term, permanent increases in ambient noise levels, primarily associated with potential increases in vehicle traffic on nearby roadways as well as onsite activities. Alternative 2 would be required to implement many of the same mitigation measures as the project to reduce construction-related noise and operational impacts related to future traffic noise levels, although the exact locations of sound barriers for the final design plan may need to be modified to address the specific land use distribution of the alternative.

Therefore, impacts of Alternative 2 related to noise would be *similar* in comparison to impacts associated with the project.

POPULATION AND HOUSING

Alternative 2 would result in buildout of the project site to a lesser extent than the project, providing 312 units of high-density residential uses and creating an estimated increase in population of 1,164 residents (an approximate 37% reduction in housing and population when compared to the project).[1] The retail commercial land uses proposed in this alternative would also create new employment. Potential for job creation would depend on the exact nature and type of commercial uses developed, but it is likely that this alternative would create a similar number of new jobs as compared to the project. Because this alternative would result in less housing density, there would be less of a population increase than the project. However, the project's contribution to population growth was determined to be within planned growth under the SBCAG growth projections, so this alternative would result in similar impacts as the project and would not result in substantial or unplanned population growth. In addition, this alternative would also meet the City's planning goals to provide additional housing and would contribute to housing development allocation goals per the RHNA. Alternative 2 would not result in the demolition or removal

[1] Projected population increase calculated using an estimate growth factor of 3.73 residents per dwelling unit, consistent with the analysis in Section 4.11, Population and Housing.

of existing homes and would not require additional homes to be constructed elsewhere, similar to the project.

Therefore, impacts of Alternative 2 related to population and housing would be *similar* in comparison to impacts associated with the project.

PUBLIC SERVICES AND RECREATION

Alternative 2 would result in buildout of the project site to a lesser extent than the project but would include the same type of land use designations, generating an incremental increase in population and new employment opportunities at the project site. This would result in a similar level of demand on existing public services and recreational facilities as the project. Future development of the project site under this alternative would be subject to pay the growth mitigation fees as set forth in Municipal Code Section 8-15 as well as state-mandated impact mitigation fees for schools, similar to the project. In addition, this alternative would create a similar amount of dedicated park space as the project, although it would be situated differently on the project site. Like the project, inclusion of these park areas within the project site would contribute to the City's current parkland level of service by providing accessible parkland to new residents generated by the project and to other residents within the community. As such, Alternative 2 would result in an increased demand on public services and recreational facilities in a manner that is consistent with the project.

Therefore, impacts of the Alternative 2 related to public services and recreation would be *similar* in comparison to impacts associated with the project.

TRANSPORTATION

Alternative 2 would result in development of the project site but at a lower overall density as compared to the project. Like the project, Alternative 2 would introduce mixed-use development and promote VMT reduction. As well, similar to the project, Alternative 2 could reduce hazardous transportation conditions and emergency access considerations to below a level of significance.

Therefore, impacts of Alternative 2 related to transportation would be *similar* in comparison to impacts associated with the project.

UTILITIES AND SERVICE SYSTEMS

Alternative 2 would result in buildout of the project site to a lesser extent than the project; however, the land uses proposed in this alternative are similar to the project and would continue to result in the need for the construction of new and expanded infrastructure improvements onsite as well as several improvements that would be necessary outside of the boundaries of the project site. The types of land uses proposed by this alternative would likely result in similar, although slightly reduced due to less residential uses, water demand and wastewater generation. This alternative would be required to implement the project's identified mitigation to reduce potential adverse impacts on the environment.

Overall, impacts of Alternative 2 related to utilities and service systems would be *similar* in comparison to impacts associated with the project.

5.4.4 Alternative 3: Mixed Use with Additional Commercial Uses

Alternative 3, Mixed Use with Additional Commercial Uses Alternative, as with all the alternatives and the project, would include annexation of the project site into the Santa Maria city limits. Development under this alternative would be similar to the project in the allowable land use designations; however, the balance and location of proposed uses would be different (i.e., proposed commercial uses would be developed to a greater extent as compared to proposed residential uses—63% commercial land use and 37% residential land use) (Figure 5-3). This alternative design would include more commercial and retail land uses both to the north and south of UVP, as well as along Orcutt Road south of UVP. Commercial and professional office uses would account for approximately one-third of the area south of UVP and the remainder would consist of residential uses situated in the southeastern portion of the project site only. In addition, this alternative would be designed with a focus on walkability between the land uses on the project site with connected pathways and bike trails to increase access for both pedestrians and bicyclists in and around the project site. Table 5-6 provides an overview of the buildout scenario for Alternative 3.

Table 5-6. Overview of Alternative 3

Zoning Designations	Acres	Residential Units	Potential Floor Area (square feet)
General Commercial (C-2)	16.35	N/A	134,096*
Commercial and Professional Office (CPO)	6.40	N/A	70,000
High-Density Residential (R-3) Apartments	12.30	288	N/A
High-Density Residential (R-3) Townhomes	8.70	89	N/A
Total	**43.75**	**377**	**204,096**

Source: RRM Design Group Alternative Concept Plans (2022)

* Includes approximately 39,000 square feet of mini-storage use.

This alternative would allow for 134,096 square feet of commercial uses, 70,000 square feet of commercial and professional office uses, and would accommodate 377 housing units. When compared to the project, this alternative would allow for an additional 9,346 square feet of commercial uses, an additional 70,000 square feet of commercial and professional office uses, and 118 fewer housing units. This alternative would require grading and ground disturbance activities on the entire 43.75-acre project site. The construction of new and expanded utility infrastructure would continue to be required in this alternative.

Figure 5-3. Alternative 3: Mixed Use with Additional Commercial Uses.

5.4.4.1 Relationship to Project Objectives

The Mixed Use with Additional Commercial Uses Alternative would achieve all the project objectives. Table 5-7 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 2, Project Description.

Table 5-7. Attainment of Project Objectives: Alternative 3, Mixed Use with Additional Commercial Uses Alternative

Project Objective	Alternative's Consistency with Project Objective
To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to facilitate ~~allow for~~ the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.	Yes. The project site would be annexed into the city of Santa Maria and would therefore be able to access the supplemental water available to the City per their agreement with Golden State Water. However, annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water is provided at the discretion of the City of Santa Maria. ~~access the supplemental water rights available to the City per their agreement with Golden State Water.~~
Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.	Yes. This alternative would provide a mix of housing and commercial development at a lesser extent than the project, but would still, in part, contribute to the commercial and housing needs of the region.
Develop this infill property while respecting the surrounding existing neighborhoods. The project would include setback and landscaping buffers.	Yes. The Santa Maria General Plan and associated Municipal Code provide specific setback and landscaping buffer requirements to ensure development would be complementary and compatible with the existing surrounding land uses.
Provide high-density housing to meet the needs of the city and help address the current RHNA. The various types of housing units will be available for rent while others will be for-sale units.	Yes. While housing would be included in this alternative, it would be at a lower density than that of the project. It would provide a lower number of units and likely a single type of unit as opposed to various types of housing units, but still contribute to meeting the needs set forth in the RHNA.
Provide commercial uses that would serve the daily needs of the new residents and the surrounding community, including those traveling on UVP.	Yes. An increased variety of commercial uses would be allowed under this alternative to serve the daily needs of the new residents and the surrounding community.
Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.	Yes. As part of any future development, plans for stormwater retention facilities would be subject to the development standards and design review as required by the City's Municipal Code. In addition, a comprehensive drainage plan would be prepared to demonstrate stormwater runoff is conveyed in a non-erosive manner in accordance with the Regional Water Quality Control Board stormwater requirements and City Public Improvement Standards.
Include architectural and landscaping amenities along UVP and SR 135 to address the visual resources along these travelways.	Yes. The Santa Maria General Plan and associated Municipal Code provide regulations, development standards, and design requirements for zoning districts (e.g., building setbacks, height restrictions, landscape plans, architectural review plans, etc.) to protect visual resources along UVP and SR 135.
Create uses that are consistent with the noise, height, and safety guidelines of the adopted Santa Maria ALUCP.~~1993 ALUP and the Draft 2022 ALUCP.~~	Yes. As part of any future development, an approval application for development permits for new land uses onsite would be required to demonstrate full compliance with the applicable safety standards and compatibility policies of the airport land use plan in effect at the time. Consistency with the airport land use plan would be required to be reviewed and verified by the City Community Development Department prior to building permit issuance.
Assure the orderly development of the City of Santa Maria General Plan planning area by providing the effective and efficient development of public facilities, infrastructure, and services appropriate for the planning area.	Yes. Development of the project site would continue to require the construction of new and expanded utility infrastructure.

Project Objective	Alternative's Consistency with Project Objective
Provide the City with increased sales tax and property tax.	Yes. The development of new buildings for commercial and residential purposes would create an increase in sales and property tax for the City.
Conform to Santa Barbara County Local Agency Formation Commission (SBLAFCO) requirements to allow for approval of the annexation of the site to the city limits.	Yes. Conforming with SBLAFCO requirements to allow for approval of annexation of the site to the city limits could be achieved under this alternative.

5.4.4.2 Comparison of Significant Effects of Alternative to the Project

Alternative 3 includes the similar land use designations as the project but would propose a reduction in the number of total dwelling units to be constructed on the project site. Residential land uses would remain situated south of UVP, but this area would be developed to a lesser extent than the project, with fewer residential units, consistent with the neighboring residential development. This alternative would still require grading and ground-disturbing activities to occur across the entire 43.75-acre project site and would also require the construction of new and expanded utility infrastructure, similar to the project. As a result, impacts of this alternative would generally be *similar* to that of the project. Alternative 3 would meet all of the project objectives.

AESTHETICS

Alternative 3 includes the same land use designations as the project but would propose a reduction in the number of total dwelling units to be constructed on the project site. Residential land uses would remain situated south of UVP, but this area would be developed to a lesser extent than the project, with fewer residential units, consistent with the neighboring residential development. Like the project, this alternative would not have a substantial effect on a scenic vista or damage scenic resources within a State Scenic Highway as no such resources have been identified within the vicinity of the project site. While residential land uses would be developed to a lesser extent in this alternative, development of the project site in this alternative would still result in a notable change in the site's existing visual character, from undeveloped to developed. Inhabitants of the surrounding residential land uses as well as motorists, cyclists, and pedestrians traveling along public roadways would notice this visual change, as they would with the project. Development under this alternative would be required to adhere to the same guidance and requirements set forth in City Municipal Code for design review, landscape standards, and lighting and glare requirements as the project.

Therefore, impacts of the Alternative 3 related to aesthetics would be *similar* in comparison to impacts associated with the project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Implementation of Alternative 3 would result in an increase in criteria pollutant emissions because construction activities would still occur, and new operational sources would be created. Construction activities would result in a short-term increase in air pollutant emissions generated by construction equipment and vehicle use and ground-disturbing activities. As identified for the project, this alternative would also be required to implement mitigation to reduce construction-related air pollutant emissions. Operational emissions would be lower under this alternative due to the reduction in daily vehicle trips related to the reduced housing density; however, impacts of this alternative would still be similar to the project as the project's operational air quality would not exceed established SBCAPCD thresholds. This alternative would be similar to the project's potentially significant impact related to exposing nearby residential development to toxic air contaminants from the use of off-road diesel equipment, since

construction activities would still occur within 1,000 feet of nearby sensitive receptors. All other air quality and odor impacts associated with this alternative would be similar to the project.

This alternative would allow for buildout of the project site, requiring the use of equipment and vehicles that would generate short-term GHG emissions. However, given the land uses of this alternative are similar to the project, it would not generate greenhouse gas emissions above established SBCAPCD thresholds. Long-term GHG emissions would be generated by vehicle trips created by the project and operational energy use. This alternative would likely not exceed the given operational GHG emissions thresholds, resulting in similar impacts as the project. This alternative, similar to the project, has the potential to be inconsistent with goals and objectives of the SBCAG 2040 RTP/SCS related to reducing criteria pollutant emissions and promoting alternative modes of transportation. In addition, the project does not include BMPs that would constitute its "fair share" of what would be required to meet the State's long-term climate goals set forth in CARB California's Draft 2022 Scoping Plan Update. It would be subject to the same mitigation measures set forth for the project to reduce operation GHG emissions, and therefore would be similar to the project.

Therefore, impacts of Alternative 3 related to air quality and greenhouse gas emissions would be *similar* in comparison to impacts associated with the project.

BIOLOGICAL RESOURCES

Alternative 3 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project, requiring the same grading and ground-disturbing activities necessary to prepare the site for development. As such, this alternative would have the same potential as the project to result in direct and indirect impacts related to construction activities to special-status wildlife species identified in Section 4.3, Biological Resources, including the Northern California legless lizard, monarch butterfly, western red bat, and nesting migratory birds and raptors. Similar to the proposed project, this alternative would result in significant and unavoidable impacts to monarch butterfly overwintering habitat. In addition, this alternative would require infrastructure improvements beyond the 43.75-acre project site boundary with the potential to impact special-status wildlife species directly or indirectly and require the same mitigation as proposed by the project. Like the project, this alternative would also involve the removal of the existing trees located onsite, in whole or in part, resulting in conflicts with local policies and ordinances protecting biological resources, specifically considerations under the City's RME and Municipal Code and would require the same mitigation measure as the project.

Therefore, impacts of Alternative 3 related to biological resources would be *similar* in comparison to impacts associated with the project.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Alternative 3 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project, requiring the same grading and ground-disturbing activities necessary to prepare the site for development. The project site does not contain any historical buildings or structures that would be eligible for listing in the CRHR or local register of historic resources and while there are no known cultural archaeological resources within the project site, ground-disturbing activities would have the potential to result in direct disturbance to prehistoric archaeological resources and/or unknown tribal cultural resources if present within future disturbance areas. Additionally, due to the extent of proposed ground-disturbing activities, there is potential for inadvertent discovery of previously unidentified cultural resources and human remains. This alternative would be required to implement mitigation measures identified for the project, which have been included to reduce impacts related to inadvertent discovery of previously unidentified resources, including human remains. Alternative 3 would have the same potential

to disturb known and unknown cultural resources sites and be subject to the implementation of identified mitigation for the project.

Therefore, impacts of Alternative 3 related to cultural and tribal cultural resources would be *similar* in comparison to impacts associated with the project.

ENERGY

Alternative 3 would result in the consumption of energy resources associated with electricity, water use (i.e., water pumping, heating, etc.), and natural gas in a manner consistent with the project since it proposes similar land uses. This alternative would be required to implement the same mitigation measures identified for the project to avoid unnecessary, wasteful, or inefficient energy use.

Therefore, impacts of Alternative 3 related to energy would be *similar* in comparison to impacts associated with the project.

GEOLOGY AND SOILS

Alternative 3 would include the development of the project site and allow for the construction of new habitable buildings and structures would have the same potential for seismic-related hazards, including fault rupture, ground shaking, liquefaction, and landslide and the potential for other ground-failure events as the project. This alternative would be required to implement mitigation and adhere to CBC and other applicable engineering standards to reduce potential impacts related to seismic-related and other ground-failure events. Under this alternative, ground disturbance and tree removal for project construction would be generally consistent with the project and would have similar potential to increase erosion and loss of topsoil during construction. This alternative would be required to comply with an SWRCB General Construction Permit related to short- and long-term erosion control at the project site. In addition, this alternative would have the same potential to disturb paleontological resources if present within the proposed area of disturbance and be required to implement mitigation to reduce potential disturbance to paleontological resources during project construction.

Therefore, impacts of the Alternative 3 related to geology and soils impacts would be *similar* in comparison to impacts associated with the project.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 3 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project. This would require the use of construction-related hazardous materials (e.g., fuels, gasoline, solvents, oils, paints, etc.) and be required to comply with state and local regulations to reduce associated hazards. This alternative would not include radically different land uses or features that could facilitate the use of hazardous materials that could result in significant upset if released. As with the project, construction of infrastructure improvements on- and off-site (i.e., enlargements of water and sewer main below SR 135 and Orcutt Road) could result in the release of ADL, a hazardous material, into the environment. This alternative would require the same mitigation as the project to reduce the significance of these potential impacts. In addition, development in accordance with this alternative has the potential to create land uses that may be inconsistent with the applicable airport land use policies or create a potential safety hazard for land uses located within ~~Safety Area 2 of the 1993 ALUP or~~ Safety Areas 2 or 4 of the Santa Maria ~~2022 Draft~~ ALUCP. The project's mitigation measure related to this potential impact would also be required under this alternative.

Therefore, impacts of Alternative 3 related to hazards and hazardous materials impacts would be *similar* in comparison to impacts associated with the project.

HYDROLOGY AND WATER QUALITY

The project site does not support any natural drainage or surface water features and it is currently undeveloped, consisting of largely pervious surfaces. Alternative 3 would result in buildout of the project site but is likely to reduce the acreage of impervious surfaces when compared to the project due to the added dedication of park/open space in the northern portion of the project site. Allowable development under this alternative would continue to require ground-disturbing activities during construction, including excavation, grading, and other earthwork. Like the project, the potential exists for substantial increases in soil erosion and sediment transport that have the potential to affect water quality from runoff. The increase in impervious surfaces on the project site from existing conditions, while less than that proposed by the project, would also result in an increase of people and vehicles on the project site. These increases would have the potential to increase the pollutants and non-stormwater discharges that could adversely impact water quality. Development of the project site in this alternative also has the potential to interfere substantially with groundwater recharge and a loss of basin-wide percolation, like the project, due to the site changing from undeveloped to a developed condition. Even though this alternative would develop the project site to a lesser extent, it would still result in a large amount of soil disturbance, require the use of construction equipment and vehicles during construction, and result in a large amount of new impervious surface areas at the project site (compared to existing conditions), which is consistent with the project. Further, this alternative would be subject to the same mitigation measures as the project as well as all applicable state and local water quality protection requirements, which is also consistent with the project.

Therefore, impacts of Alternative 3 related to hydrology and water quality would be *similar* in comparison to impacts associated with the project.

LAND USE AND PLANNING

Alternative 3 would not result in new features that could physically divide an established community, consistent with the project. This alternative would require the same mitigation as proposed by the project. In addition, this alternative would include a reduced density housing component when compared to the project; however, this housing component would contribute to meeting many of the policies of the City's Land Use and Housing Elements and 2040 RTP/SCS.

Therefore, impacts of Alternative 3 related to land use and planning would be *similar* in comparison to impacts associated with the project.

NOISE

Alternative 3 would result in buildout of the entire 43.75-acre project site in a manner consistent with the project, resulting in the generation of similar short-term, intermittent increases in ambient noise during the construction phase from initial site improvements, vehicle and equipment movement, and future construction of residential and commercial land uses. Like the project, construction activities in this alternative would have the potential to result in temporary exceedances of the maximum acceptable noise levels for residential land uses set forth in the City's Municipal Code (Table 4.10-8). In addition, this alternative would create similar long-term, permanent increases in ambient noise levels, primarily associated with potential increases in vehicle traffic on nearby roadways as well as onsite activities. Alternative 3 would be required to implement many of the same mitigation measures as the project to reduce construction-related noise and operational impacts related to future traffic noise levels, although the exact locations of sound barriers for the final design plan may need to be modified to address the specific land use distribution of the alternative.

Therefore, impacts of Alternative 3 related to noise would be *similar* in comparison to impacts associated with the project.

POPULATION AND HOUSING

Alternative 3 would result in buildout of the project site, providing high-density residential land uses at a lesser density than the project: 377 of high-density residential uses creating an estimated increase of 1,406 residents (an approximate 24% reduction in housing and population when compared to the project).[2] The retail commercial land uses proposed in this alternative would also create new employment. Potential for job creation would depend on the exact nature and type of commercial uses developed, but it is likely that this alternative would create a similar number of new jobs as compared to the project. Because this alternative would result in less housing density, there would be less of a population increase than the project. However, the project's population growth was determined to be within planned growth under the SBCAG growth projections, so this alternative would result in similar impacts as the project and would not result in substantial or unplanned population growth. In addition, this alternative would also meet the City's planning goals to provide additional housing and would contribute to housing development allocation goals per the RHNA. Alternative 3 would not result in the demolition or removal of existing homes and would not require additional homes to be constructed elsewhere, similar to the project.

Therefore, impacts of Alternative 3 related to population and housing would be *similar* in comparison to impacts associated with the project.

PUBLIC SERVICES AND RECREATION

Alternative 3 would result in buildout of the project site with the same type of land use designations as the project, generating an increase in population and new employment opportunities at the project site. This would result in a similar level of demand on existing public services and recreational facilities as the project. Future development of the project site under this alternative would be subject to pay the growth mitigation fees as set forth in Municipal Code Section 8-15 as well as state-mandated impact mitigation fees for schools, similar to the project. In addition, this alternative would dedicate a large portion of the project site north of UVP as park and/or open space. This increase in the amount of dedicated park areas on the project site would further contribute to the City's current parkland level of service by providing accessible parkland to new residents generated by the project and to other residents within the community, as with the project. As such, Alternative 3 would result in an increased demand on public services and recreational facilities in a manner that is consistent with the project.

Therefore, impacts of the Alternative 3 related to public services and recreation would be *similar* in comparison to impacts associated with the project.

TRANSPORTATION

Alternative 3 would result in development of the project site but at a lower overall density as compared to the project. Like the project, Alternative 3 would introduce mixed-use development and promote VMT reduction. The provision of additional commercial and retail land uses would support the residential communities near the project site. In addition, this alternative would be designed with a focus on walkability between the land uses on the project site with connected pathways and bike trails to increase access for both pedestrians and bicyclists in and around the project site. For these reasons, the project would be expected to be consistent with reducing VMT, overall, and would also be expected to be consistent with policies and plans related to mixed use and VMT reduction. As well, similar to the

[2] Projected population increase calculated using an estimate growth factor of 3.73 residents per dwelling unit, consistent with the analysis in Section 4.11, Population and Housing.

project, Alternative 3 could reduce hazardous transportation conditions and emergency access considerations to below a level of significance.

Therefore, impacts of Alternative 3 related to transportation would be *similar* in comparison to impacts associated with the project.

UTILITIES AND SERVICE SYSTEMS

Alternative 3 would result in buildout of the entire 43.75-acre project site in a manner similar to the project, resulting in the need for the construction of new and expanded infrastructure improvements onsite as well as several improvements that would be necessary outside of the boundaries of the project site. This alternative would be required to implement the project's identified mitigation to reduce potential adverse impacts on the environment. The types of land uses proposed by this alternative, although slightly reduced due to less residential uses, would likely result in similar water demand and wastewater generation. This alternative would be required to implement the project's identified mitigation to reduce potential adverse impacts on the environment.

Overall, impacts of Alternative 3 related to utilities and service systems would be *similar* in comparison to impacts associated with the project.

5.4.5 Alternative 4: No Project/No Annexation with Orcutt Community Plan Buildout

In Alternative 4, No Project/No Annexation with Orcutt Community Plan (OCP) Buildout, the project as proposed would not be approved and annexation of the project site into the city of Santa Maria would not occur. Instead, the project site would remain in the jurisdictional boundaries of the County. Under this alternative, allowable development of the project site would be consistent with the land use and zoning as described in the County's OCP (2022). In the OCP, the project site is identified as Key Site 26 with an approved Specific Plan (Richard's Specific Plan [83-SP-1]) having planned land use designations of General Commercial, Office and Professional, and Planned Residential Development 3.3 (allows 3.3 dwelling units per acre) (County of Santa Barbara 2022), which currently applies to the site. The County's associated zoning designation for the site is General Commercial (C-2).[3] The C-2 zone allows for mixed use projects with a Minor Conditional Use Permit if the residential use is secondary to the principal commercial use on the same lot (Santa Barbara County Code, 35.42.200). Alternative 4 is depicted in Figure 5-4, which is the illustration of the anticipated development pattern under the OCP as depicted in the OCP itself.

As provided for in the OCP, the County envisions development of the project site with 141 single-family residential or multifamily units, 60,000 square feet of general commercial, 30,000 square feet of office-professional spaces, and approximately 12 acres of open space and recreational uses (County of Santa Barbara 2022). As proposed in the existing Specific Plan and identified in the OCP, buildout of the project site would situate open space and recreational uses in the northeastern portion of the project site, while clustering residential development in the southeastern portion of the project site. Commercial and Office and Professional uses would be situated north of UVP (outside of the open space and recreation uses), with commercial uses fronting SR 135 and UVP and office and professional uses located within the central core of the project site.

[3] The County's existing zoning designation for the project site is C-2, but the OCP designation is Planned Residential Development.

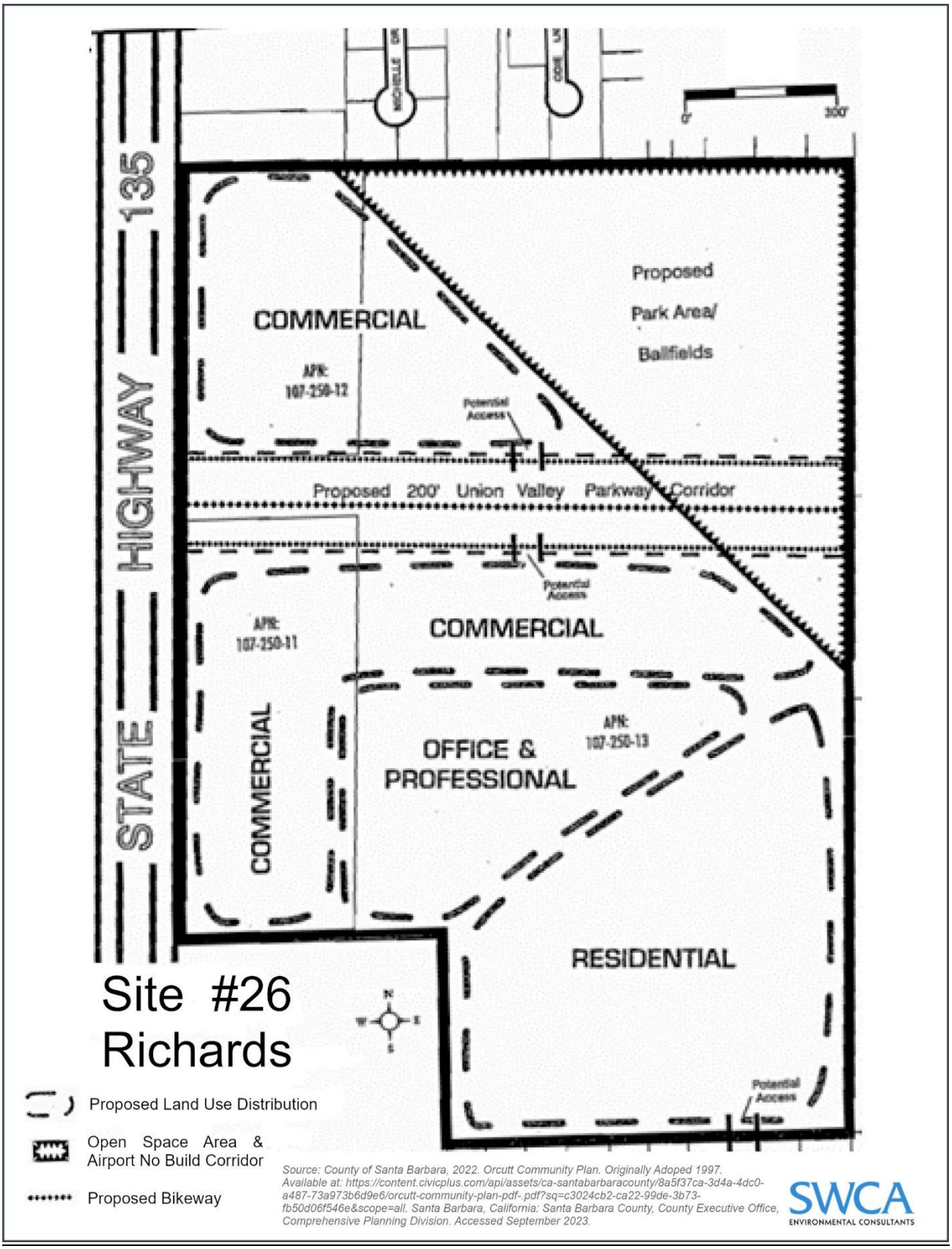

Figure 5-4. Alternative 4: No Project/No Annexation with Orcutt Community Plan Buildout.

Under this alternative, many of the existing mature trees on the project site would be retained and development would be planned around them to the extent possible. However, to accommodate the planned land uses, it is assumed that the eucalyptus grove that provides monarch butterfly overwintering habitat (situated south of UVP) would continue to be proposed for removal under this alternative. The OCP provides for a large amount of the site to be set aside as park area and ballfields in the northeast corner. It is not known how this parkland would be funded at this time; if this area is expected to be set aside by potential developers it is highly unlikely that any development would be proposed without removal of the eucalyptus grove to the south of UVP in order to gain enough density within the project site to be feasible for private developments. For this reason, development of all the property south of UVP is anticipated. Because of this, it is assumed that most of the property would be mass graded, similar to the proposed project, since ballfields and/or other active recreation for the northeastern portion of the site would also require significant grading/leveling of the site.

With these assumptions, this alternative would result in a buildout scenario of 354 fewer residential units, 64,750 fewer square feet of commercial uses, an increase of 30,000 square feet of office-professional, and approximately 12 acres of open space and recreational uses when compared to the project.

5.4.5.1 Relationship to Project Objectives

The No Project/No Annexation with OCP Buildout would achieve most of the project objectives. Two project objectives would not be satisfied. This alternative would not provide high-density housing to meet the needs of the city and help address the City's current RHNA. This alternative would likely provide a single type of unit as opposed to various types of housing units and would not provide high-density housing. Further, this alternative would not provide annexation into the City so it would not address the City's RHNA. However, development of housing units would be positive regardless of the jurisdiction in which those housing units were developed. In addition, because the project site would not be annexed into the city, the development of new land uses would not create an increase in sales and property tax for the City.

Table 5-8 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 2, Project Description.

Table 5-8. Attainment of Project Objectives: Alternative 4, No Project/No Annexation with Orcutt Community Plan Buildout

Project Objective	Alternative's Consistency with Project Objective
To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to facilitate the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.	Undetermined. Annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water is provided at the discretion of the City of Santa Maria. It is undetermined whether supplemental water supply would be provided under this alternative.
Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.	Yes. This alternative could provide a mix of housing and commercial development, although to a lesser extent than the project, but would still, in part, contribute to the commercial and housing needs of the area.
Develop this infill property while respecting the surrounding existing neighborhoods. The project would include setback and landscaping buffers.	Yes. The project would be developed in accordance with the OCP and would be subject to the specific setback and landscaping buffer requirements in the OCP and Santa Barbara County Land Use and Development Code to ensure development would be complementary and compatible with the existing surrounding land uses.
Provide high-density housing to meet the needs of the city and help address the current RHNA. The various types of housing units will be available for rent while others will be for-sale units.	No. This alternative proposes a density of up to 3.3 dwelling units per acre, whereas the project proposes a density of up to 22 dwelling units per acre. While housing would be included in this alternative, it would be at a much lower density when

Project Objective	Alternative's Consistency with Project Objective
	compared to that of the project. This alternative would likely provide a single type of unit as opposed to various types of housing units and would not provide high-density housing. Further, this alternative would not provide annexation into the City so it would not address the City's RHNA. However, development of housing units would be positive regardless of the jurisdiction under which those housing units were developed.
Provide commercial uses that would serve the daily needs of the new residents and the surrounding community, including those traveling on UVP.	Yes. An increased variety of commercial uses would be allowed under this alternative to serve the daily needs of the new residents and the surrounding community.
Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.	Yes. As part of any future development, plans for stormwater retention facilities would be subject to the development standards of the Santa Barbara County Code. In addition, a comprehensive drainage plan would be prepared to demonstrate stormwater runoff is conveyed in a non-erosive manner in accordance with the Regional Water Quality Control Board stormwater requirements.
Include architectural and landscaping amenities along UVP and SR 135 to address the visual resources along these travelways.	Yes. The project would be developed in accordance with the OCP and would be subject to the regulations, development standards, and design requirements for zoning districts (e.g., building setbacks, height restrictions, landscape plans, architectural review plans, etc.) of the Santa Barbara County Land Use and Development Code. These development standards and regulations would ensure the protection of visual resources along UVP and SR 135.
Create uses that are consistent with the noise, height, and safety guidelines of the adopted Santa Maria ALUCP.	Yes. As part of any future development, an approval application for development permits for new land uses onsite would be required to demonstrate full compliance with the applicable safety standards and compatibility policies of the airport land use plan in effect at the time. Consistency with the airport land use plan would be required to be reviewed and verified by the County's Building and Safety Division prior to building permit issuance.
Assure the orderly development of the City of Santa Maria General Plan planning area by providing the effective and efficient development of public facilities, infrastructure, and services appropriate for the planning area.	Yes. Development of the project site would continue to require the construction of new and expanded utility infrastructure.
Provide the City with increased sales tax and property tax.	No. Because the project site would not be annexed into the City, the development of new land uses would not create an increase in sales and property tax for the City.
Conform to Santa Barbara County Local Agency Formation Commission (SBLAFCO) requirements to allow for approval of the annexation of the site to the city limits.	Not Applicable. Because annexation is not included in this alternative, consistency with SBLAFCO annexation and boundary change requirements would not be necessary.

5.4.4.2 Comparison of Significant Effects of Alternative to the Project

Under Alternative 4, buildout of the project site would allow for similar land uses as those proposed by the project, with the major differences being: (1) the substantially reduced density of proposed housing; (2) the addition of office and professional uses; and (3) the dedication of a large portion of the project site to open space and recreation uses in the northeast corner. This alternative would continue to require grading and ground-disturbing activities at the project site. If development were to occur under the OCP, it may be that grading could be reduced when compared to the proposed project because of the lower density of the development. However, because there is a large amount of land that would not result in a financial return for the developer (i.e., the area planned for open space and parkland on the northeast corner of the site), it is highly unlikely that any proposed development of the site under the OCP would not propose mass grading. Some preservation of the mature trees and other natural features onsite under

this alternative are assumed to occur within the open space area situated in the northeastern portion of the site, but it is assumed that this area would be less than 3 acres in size. To accommodate the planned land uses, it is assumed that the eucalyptus grove that provides monarch butterfly overwintering habitat (situated south of UVP) would continue to be proposed for removal under this alternative. Development of all the property south of UVP is assumed, including mass grading. While this alternative would not include annexation of the project site into the City, annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water is provided at the discretion of the City of Santa Maria. It is undetermined whether supplemental water supply would be provided under this alternative.

Alternative 4 would meet most of the project objectives. Two project objectives would not be satisfied. This alternative would not provide high-density housing to meet the needs of the city and help address the City's current RHNA. This alternative would likely provide a single type of unit as opposed to various types of housing units and would not provide high-density housing. Further, this alternative would not provide annexation into the City so it would not address the City's RHNA. However, development of housing units would be positive regardless of the jurisdiction under which those housing units were developed. In addition, because the project site would not be annexed into the City, the development of new land uses would not create an increase in sales and property tax for the City.

AESTHETICS

Alternative 4 includes similar land use designations as the proposed project but would propose a substantial reduction in the number of total dwelling units to be constructed on the project site. Residential land uses would remain situated south of UVP, but this area would be developed to a lesser extent than the project, with fewer residential units, consistent with the neighboring residential development. Like the project, this alternative would not have a substantial effect on a scenic vista or damage scenic resources within a State Scenic Highway as no such resources have been identified within the vicinity of the project site. While the project site would be developed to a lesser extent in this alternative, it would still result in the development of a currently undeveloped site, causing a notable change in the site's existing visual character. Inhabitants of the surrounding residential land uses as well as motorists, cyclists, and pedestrians traveling along public roadways would notice this visual change, as they would with the project.

Therefore, impacts of the Alternative 4 related to aesthetics would be *similar* in comparison to impacts associated with the project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Implementation of Alternative 4 would still result in an increase in criteria pollutant emissions because construction activities would still occur, and new operational sources would be created. Construction activities would result in a short-term increase in air pollutant emissions generated by construction equipment and vehicle use and ground-disturbing activities. As identified for the project, this alternative would also be required to implement mitigation to reduce construction-related air pollutant emissions. Operational emissions would be lower under this alternative due to the reduction in daily vehicle trips related to the reduced housing density; however, impacts of this alternative would still be similar to the project as the project's operational air quality would not exceed established SBCAPCD thresholds. This alternative would be similar to the project's potentially significant impact related to exposing nearby residential development to toxic air contaminants from the use of off-road diesel equipment since construction activities would still occur within 1,000 feet of nearby sensitive receptors. All other air quality and odor impacts associated with this alternative would be similar to the project.

This alternative would allow for buildout of the project site, requiring the use of equipment and vehicles that would generate short-term GHG emissions. However, given that the land uses of this alternative are

similar to the project, it would not generate GHG emissions above established SBCAPCD thresholds. Long-term GHG emissions would be generated by vehicle trips created by the project and operational energy use. This alternative would likely not exceed the given operational GHG emissions thresholds, resulting in similar impacts as the project. This alternative, similar to the project, has the potential to be inconsistent with goals and objectives of the SBCAG 2040 RTP/SCS related to reducing criteria pollutant emissions and promoting alternative modes of transportation. In addition, the project does not include BMPs that would constitute its "fair share" of what would be required to meet the State's long-term climate goals set forth in CARB California's Draft 2022 Scoping Plan Update. It would be subject to the same mitigation measures set forth for the project to reduce operation GHG emissions, and therefore would be similar to the project.

Therefore, impacts of Alternative 4 related to air quality and greenhouse gas emissions would be *similar* in comparison to impacts associated with the project.

BIOLOGICAL RESOURCES

Alternative 4 would result in buildout of the project site with an alternative that is less dense than the proposed project. Also, the northeastern portion of the project site would be set aside for open space and/or parkland, including sports fields. While this type of use in the northeastern portion of the site would not result in the construction of significant structural elements, it would require grading and/or leveling of most of the site. Because the County would likely be interested in preserving some natural features on the site, approximately 3 acres of the site to the north of UVP is assumed to be retained with the existing habitat and/or mature trees. Therefore, this alternative would result in less grading than the proposed project, but only slightly. To accommodate the planned land uses, it is assumed that the eucalyptus grove that provides monarch butterfly overwintering habitat (situated south of UVP) would continue to be removed under this alternative.

Because only 3 acres of property is assumed to not be mass graded, the differences in impact between this alternative and the proposed project are slight. This alternative would have the same potential as the project to result in construction-related direct and indirect impacts to special-status wildlife species identified in Section 4.3, Biological Resources, including the northern California legless lizard, monarch butterfly, western red bat, and nesting migratory birds and raptors. Similar to the proposed project, this alternative would result in significant and unavoidable impacts to monarch butterfly overwintering habitat. Like the project, this alternative would also involve the removal of the existing trees located onsite, in whole or in part, resulting in conflicts with local policies and ordinances protecting biological resources.

Therefore, impacts of Alternative 4 related to biological resources would be *similar* in comparison to impacts associated with the project.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Alternative 4 would result in buildout of the project site to a lesser extent than the proposed project; however, grading and ground-disturbing activities would still be necessary to prepare the site for development. The project site does not contain any historical buildings or structures that would be eligible for listing in the CRHR or local register of historic resources, and while there are no known cultural or archaeological resources within the project site, ground-disturbing activities would have the potential to result in direct disturbance to prehistoric archaeological and/or undocumented tribal cultural resources if present within future disturbance areas. Additionally, due to the extent of proposed ground-disturbing activities, there is potential for inadvertent discovery of previously unidentified cultural resources and human remains. This alternative would be required to implement mitigation measures identified for the project, which have been included to reduce impacts related to inadvertent discovery of previously

unidentified resources, including human remains. Alternative 4 would have the same potential to disturb known and unknown cultural resources sites and be subject to the implementation of identified mitigation for the project.

Therefore, impacts of Alternative 4 related to cultural and tribal cultural resources would be *similar* in comparison to impacts associated with the project.

ENERGY

Alternative 4 would result in the consumption of energy resources associated with electricity, water use (i.e., water pumping, heating, etc.), and natural gas in a manner consistent with the proposed project since it proposes similar land uses. This alternative would be required to implement the same mitigation measures identified for the project to avoid unnecessary, wasteful, or inefficient energy use.

Therefore, impacts of Alternative 4 related to energy would be *similar* in comparison to impacts associated with the project.

GEOLOGY AND SOILS

Alternative 4 would include the development of the project site and allow for the construction of new habitable buildings and structures would have the same potential for seismic-related hazards, including fault rupture, ground shaking, liquefaction, and landslide, and the potential for other ground-failure events, as the proposed project. This alternative would be required to implement mitigation and adhere to CBC and other applicable engineering standards to reduce potential impacts related to seismic-related and other ground-failure events. Under Alternative 4, ground-disturbing activities would occur to a lesser extent than the project but would have similar potential to increase erosion and loss of topsoil during construction. This alternative would be required to comply with an SWRCB General Construction Permit related to short- and long-term erosion control at the project site. In addition, this alternative would have the same potential to disturb paleontological resources if present within the proposed area of disturbance and would be required to implement mitigation to reduce potential disturbance to paleontological resources during project construction.

Therefore, impacts of the Alternative 4 related to geology and soils impacts would be *similar* in comparison to impacts associated with the project.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 4 would result in buildout of the project site to a lesser extent than the project; however, it would continue to require the use of construction-related hazardous materials (e.g., fuels, gasoline, solvents, oils, paints, etc.) and would be required to comply with state and local regulations to reduce associated hazards. This alternative would not include radically different land uses or features that could facilitate the use of hazardous materials that could result in significant upset if released. As with the project, construction of infrastructure improvements on- and off-site (i.e., enlargements of water and sewer main below SR 135 and Orcutt Road) could result in the release of ADL, a hazardous material, into the environment. This alternative would require the same mitigation as the project to reduce the significance of these potential impacts. In addition, development in accordance with this alternative has the potential to create land uses that may be inconsistent with the applicable airport land use policies or create a potential safety hazard for land uses located within Safety Areas 2 or 4 of the Santa Maria ALUCP. While it appears that development could avoid the safety zones under this alternative, final plans of this alternative would continue to need to be reviewed for consistency prior to development permit approval. The project's mitigation measure related to this potential impact would continue to be required under this alternative.

Therefore, impacts of Alternative 4 related to hazards and hazardous materials impacts would be *similar* in comparison to impacts associated with the project.

HYDROLOGY AND WATER QUALITY

The project site does not support any natural drainage or surface water features and is currently undeveloped, consisting of largely pervious surfaces. Alternative 4 would result in buildout of the project site to a lesser extent than the project and is likely to reduce the acreage of impervious surfaces when compared to the project due to the reduced housing density and building footprints as well as an increase in open space and recreational uses. Allowable development under this alternative, although reduced in scale when compared to the project, would still require ground-disturbing activities during construction, including excavation, grading, and other earthwork. Like the project, the potential exists for substantial increases in soil erosion and sediment transport that have the potential to affect water quality from runoff. The increase in impervious surfaces on the project site, while less than that proposed by the project, would also result in an increase of people and vehicles on the project site. These increases would have the potential to increase the pollutants and non-stormwater discharges that could adversely impact water quality. Development of the project site in this alternative also has the potential to interfere substantially with groundwater recharge and a loss of basin-wide percolation, like the project, due to the site changing from undeveloped to a developed condition. Even though this alternative would develop the project site to a lesser extent, it would still result in a large amount of soil disturbance, require the use of construction equipment and vehicles during construction, and result in a large amount of new impervious surface areas at the project site (compared to existing conditions), which is consistent with the project. Further, this alternative would be subject to the same mitigation measures as the project as well as all applicable state and local water quality protection requirements.

Therefore, impacts of Alternative 4 related to hydrology and water quality would be *similar* in comparison to impacts associated with the project.

LAND USE AND PLANNING

Alternative 4 would not result in new features that could physically divide an established community, consistent with the proposed project. This alternative would include a reduced-density housing component when compared to the project; however, the alternative's proposed mix of land uses would contribute to meeting many of the policies of the County's OCP and 2040 RTP/SCS. However, while the reduced housing density proposed in this alternative does not necessarily conflict with the policies of the applicable land use plans, it would not maximize the potential housing density for the project site.

Environmental land use and planning impacts of Alternative 4 related to land use and planning would be *similar* in comparison to impacts associated with the project.

NOISE

Alternative 4 would result in buildout of the project site to a lesser extent than the proposed project; however, like the project, it would result in the generation of similar short-term, intermittent increases in ambient noise during the construction phase from initial site improvements, vehicle and equipment movement, and future construction of residential and commercial land uses. Like the project, construction activities in this alternative would have the potential to result in temporary exceedances of the maximum acceptable noise levels for residential land uses set forth in the Noise Element of the County's Comprehensive Plan. In addition, this alternative would create similar long-term, permanent increases in ambient noise levels, primarily associated with potential increases in vehicle traffic on nearby roadways as well as onsite activities. Alternative 4 would be required to implement many of the same mitigation measures as the project to reduce construction-related noise and operational impacts related to future

traffic noise levels, although the exact locations of sound barriers for the final design plan may need to be modified to address the specific land use distribution of the alternative.

Therefore, impacts of Alternative 4 related to noise would be *similar* in comparison to impacts associated with the project.

POPULATION AND HOUSING

Alternative 4 would result in buildout of the project site to a substantially lesser extent than the proposed project, providing 144 units of low-density residential uses and creating an estimated increase in population of 537 residents (an approximate 71% reduction in housing and population when compared to the project).[4] The retail commercial and office and profession land uses proposed in this alternative would also create new employment. Potential for job creation would depend on the exact nature and type of commercial and office professional uses developed, but it is likely that this alternative would create a similar number of new jobs as compared to the project. Because this alternative would result in lower housing density, there would be less of a population increase than the project. However, the project's contribution to population growth was determined to be within planned growth under the SBCAG growth projections, and this alternative would result in a 71% reduction in population growth when compared to the project. Thus, the project would not result in substantial or unplanned population growth.

Therefore, impacts of Alternative 4 related to population and housing would be *similar* in comparison to impacts associated with the project.

PUBLIC SERVICES AND RECREATION

Alternative 4 would include similar types of land uses as the proposed project but would include office and professional uses and provide approximately 12 acres of the project site for open space and recreational uses. Buildout under this alternative would generate an incremental increase in population and new employment opportunities at the project site, but at a lesser extent than that of the project. Regardless, buildout of the project site in any capacity would increase demand for existing public services and recreational facilities.

Alternative 4 would provide an increase in open space and recreational uses over the project. This would increase the County's parkland totals and help to increase the County's current level of service for parkland. While this alternative would increase the area dedicated to open space and recreational uses when compared to the project, the project itself would also provide adequate areas dedicated to these uses to maintain the current parkland level of service. As such, this alternative would result in similar impacts as the project related to parkland. Given the amount of area dedicated to open space and recreational uses as well as the access to nearby park and recreational facilities, future population growth associated with this alternative project would not result in the substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities. Because the proposed project would not create an environmental impact related to the provision of parks and recreation services, the impact would thus be similar.

Therefore, impacts of the Alternative 4 related to public services and recreation would be *similar* in comparison to impacts associated with the project.

[4] Projected population increase calculated using an estimate growth factor of 3.73 residents per dwelling unit, consistent with the analysis in Section 4.11, Population and Housing.

TRANSPORTATION

Alternative 4 would result in development of the project site but at a substantially lower overall density as compared to the proposed project. Given this alternative would result in a reduced overall density, it is likely that this alternative would generate a reduction in VMT. However, given that potential VMT-related impacts for each component of the project were determined to be below established screening criteria or thresholds, this alternative also falls below and would not generate VMT in a manner that would exceed state or local thresholds, similar to the project. Alternative 4 would not include the construction of new incompatible land uses that could introduce new hazards along existing roadways. This alternative would be required to comply with County and Caltrans requirements and other applicable engineering standards for driveways and access roads to ensure adequate emergency access and public ingress and egress at the project site.

Therefore, impacts of Alternative 4 related to transportation would be *similar* in comparison to impacts associated with the project.

UTILITIES AND SERVICE SYSTEMS

Alternative 4 would result in buildout of the project site to a lesser extent than the proposed project; however, the broad types of land uses (e.g., residential and commercial) proposed in this alternative are similar to the proposed project. The overall needs for utilities and service systems to serve the site would be similar to the proposed project. While the reduced housing density would likely reduce water demand and wastewater generation for residential uses, the remainder of the site would be built out with uses that would still create water demand and wastewater generation. While this alternative would not allow for annexation of the project site into Santa Maria city limits, annexation is not a prerequisite to allowing for the use of supplemental water supplies; supplemental water could be provided at the discretion of the City of Santa Maria. It is undetermined whether supplemental water supply would be provided under this alternative.

Therefore, impacts of Alternative 4 related to utilities and service systems would be *similar* in comparison to impacts associated with the project.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines require an analysis of alternatives to identify an Environmentally Superior Alternative among the alternatives evaluated in the EIR. The Environmentally Superior Alternative is the alternative that would minimize adverse impacts to the environment. Based on the evaluation of alternatives above, the No Project/No Build Alternative would be the Environmentally Superior Alternative because it would minimize the project's adverse impacts to the environment. However, State CEQA Guidelines Section 15126.6(e)(2) states that if the no project alternative is also the Environmentally Superior Alternative, the EIR should then identify an Environmentally Superior Alternative among the other alternatives.

As summarized in Table 5-9 ~~Table 5-8~~, all four ~~three~~ project alternatives would have very similar impacts in most of the environmental issues areas as the project, with two exceptions. Alternative 1 (Existing Santa Maria General Plan Land Use Designation) would result in increased environmental impacts related to land use and planning as it does not include a housing component and would not contribute to addressing the current RHNA. Alternative 2 (Tree Preservation and Reduced Housing Density) would result in decreased impacts related to biological resources due to the alternative's focus on tree preservation; because Alternative 2 could preserve the eucalyptus grove that is located to the south of UVP, it would avoid this significant impact of the proposed project. None of the other alternatives, with the exception of the No Project/No Build Alternative, would avoid this significant impact of the proposed project. Alternative 3 (Mixed Use with Additional Commercial Uses) would have similar impacts when compared to the project in all resource issue areas.

Alternatives 1 and 4 only partially meet the project objectives, whereas Alternatives 2 and 3 meet the basic project objectives. However, Alternative 2 would be considered the Environmentally Superior Alternative because it would reduce the project's significant impacts, avoid the impact to the monarch butterfly overwintering habitat (which cannot be mitigated to a less-than-significant level under the other three development alternatives), and also successfully meet the basic project objectives.

~~Alternative 1 only partially meets the project objectives, while Alternatives 2 and 3 meet the basic project objectives. However, Alternative 2 would be considered the Environmentally Superior Alternative because it would reduce the project's significant impacts, while successfully meeting the basic project objectives.~~

Alternative 2 would result in residential and commercial development, preservation of many of the mature trees on the project site, retention of the monarch butterfly overwintering habitat, and would redesign park areas proposed by the project in a way that orients them away from busy roads and intersections, while offering internal connections and pathways between land uses. The tree preservation component of this alternative would reduce the impacts related to biological resources when compared to the other built-project alternatives, as well as the project. All other impacts would be similar to that of the proposed project. Overall, Alternative 2 would reduce the project's significant environmental impacts and/or would result in similar impacts to other issue areas.

Table 5-9. Comparison of Impacts Among Alternatives

Issue Area	No Project/ No Build Alternative	Alternative 1: Existing Santa Maria General Plan Land Use Designation	Alternative 2: Tree Preservation and Reduced Housing Density	Alternative 3: Mixed Use with Additional Commercial Uses	Alternative 4: No Project/No Annexation with Orcutt Community Plan Buildout
Aesthetics	Decreased	Similar	Similar	Similar	Similar
Air Quality and Greenhouse Gas Emissions	Decreased	Similar	Similar	Similar	Similar
Biological Resources	Decreased; would avoid the project's significant and unavoidable impact	Similar; impacts would continue to be significant and unavoidable*	Decreased; would avoid the project's significant and unavoidable impact	Similar; impacts would continue to be significant and unavoidable*	Similar; impacts would continue to be significant and unavoidable*
Cultural Resources and Tribal Cultural Resources	Decreased	Similar	Similar	Similar	Similar
Energy	Decreased	Similar	Similar	Similar	Similar
Geology and Soils	Decreased	Similar	Similar	Similar	Similar
Hazards and Hazardous Materials	Decreased	Similar	Similar	Similar	Similar
Hydrology and Water Quality	Decreased	Similar	Similar	Similar	Similar
Land Use and Planning	Increased	Increased	Similar	Similar	Similar
Noise and Vibration	Decreased	Similar	Similar	Similar	Similar
Population and Housing	Decreased	Similar	Similar	Similar	Similar
Public Services and Recreation	Decreased	Similar	Similar	Similar	Similar
Transportation and Traffic	Similar	Increased	Similar	Similar	Similar
Utilities and Service Systems	Decreased	Similar	Similar	Similar	Similar
Meets Project Objectives?	No	Partially	Yes	Yes	Partially

* Any development of the Richards Ranch site of a density similar to the project, regardless of land use type, would require removal of the eucalyptus grove that provides overwintering habitat to the monarch butterfly. For this reason, only alternatives that do not develop the site or develop the site at a lower density would avoid this significant biological resource impact. Alternative 4 would not avoid the significant impact associated with the monarch habitat because full development of the site south of UVP would be anticipated under this alternative.

Table 5-8. Comparison of Impacts Among Alternatives

Issue Area	No Project/ No Build Alternative	Alternative 1: Existing Santa Maria General Plan Land Use Designation	Alternative 2: Tree Preservation and Reduced Housing Density	Alternative 3: Mixed Use with Additional Commercial Uses
Aesthetics	Decreased	Similar	Similar	Similar
Air Quality and Greenhouse Gas Emissions	Decreased	Similar	Similar	Similar
Biological Resources	Decreased	Similar	Decreased	Similar
Cultural Resources and Tribal Cultural Resources	Decreased	Similar	Similar	Similar
Energy	Decreased	Similar	Similar	Similar
Geology and Soils	Decreased	Similar	Similar	Similar
Hazards and Hazardous Materials	Decreased	Similar	Similar	Similar
Hydrology and Water Quality	Decreased	Similar	Similar	Similar
Land Use and Planning	Increased	Increased	Similar	Similar
Noise and Vibration	Decreased	Similar	Similar	Similar
Population and Housing	Decreased	Similar	Similar	Similar
Public Services and Recreation	Decreased	Similar	Similar	Similar
Transportation and Traffic	Similar	Increased	Similar	Similar
Utilities and Service Systems	Decreased	Similar	Similar	Similar
Meets Project Objectives?	No	Partially	Yes	Yes

While Alternative 2 is similar to the proposed project in that it would provide a mixture of residential and commercial uses, it is not known whether the Applicant would be interested in developing this alternative as the financial implications to the Applicant related to the reduction in residential units are not known. As well, it is important to note that this alternative would provide less housing so it would contribute less to the City's RHNA goals when compared to the proposed project.

Although Alternative 2 is identified in this EIR as the Environmentally Superior Alternative, the City has the discretion to approve (or disapprove) whatever alternative or combination of alternatives it deems most appropriate, provided that the environmental impacts of the project can be mitigated or finds that there are overriding considerations (social, economic, legal, technical, or other beneficial aspects of the proposed project) that outweigh the unavoidable adverse environmental impacts of the project and/or alternatives. A detailed summary of impacts and associated mitigation measures identified for the project are provided in the Summary, Table S-2, Summary of Impacts and Mitigation Measures.

CHAPTER 3. REFERENCES

The following references support this Partially Recirculated Draft EIR (PRDEIR) in addition to the references included within the original Draft EIR. Through this PRDEIR, these references are added to the record.

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