City of Buellton

Meritage Senior Living Project

Final

Subsequent Environmental Impact Report

Volume I: Report

June 2013

rincon

Environmental Scientists Planners Engineers

Meritage Senior Living Project

Final
Subsequent Environmental Impact Report

Volume I: Report

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Final
Meritage Senior Living Project SEIR

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EXECUTIVE SUMMARY

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

PROJECT SYNOPSIS

Lead Agency

City of Buellton
Planning Department
107 W. Highway 246
Buellton, California 93427

Current Property Owner

Norman Williams
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855 10th Street, Suite 10
Santa Monica, California 90403

Project Applicant Representative

Mark Edwards
~~Parton & Edwards Construction, Inc.~~
922 Laguna Street
Santa Barbara, California 93101

Project Description

The proposed project involves a Tentative Tract Map and Conditional Use Permit entitlements to subdivide the two existing parcels that constitute the 18.2-acre project site into six parcels for the development of a new senior care facility. The property is identified as Assessor's Parcel Numbers (APN) 099-400-064 and 099-400-065. A portion of the project is located offsite on APN 099-400-069, outside the Buellton City limit.

ALTERNATIVES

This SEIR addresses four alternatives to the currently-proposed Meritage Senior Living project, summarized in Section 7.1.1 below. The alternatives are:

1. New No Project/No Development Alternative
2. AHOZ Development Alternative
3. Typical Commercial Project Alternative
4. Reconfigured Project Alternative

The New No Project/No Development Alternative (Alternative 1) would be environmentally superior overall, since no new development would occur on the project site. This would reduce

all identified project impacts, including impacts related to light and glare, agricultural operations, previously undiscovered cultural resources, settlement/slope stability, operational GHG emissions, and short-term noise impacts during construction to a less than significant level.

Among the remaining alternatives, the AHOZ Development Alternative (Alternative 2) and the Typical Commercial Project Alternative (Alternative 3) would result in increased impacts, as compared to the proposed project, and would therefore be environmentally inferior to the proposed project. Specifically, the increased number of habitable units that would be developed under Alternative 2 would result in added vehicle trips, which would contribute to potentially significant impacts related to operational criteria pollutant emissions, local intersection levels of service, and cumulative traffic levels. In addition, the increased number of habitable units would also result in new long-term residents in Buellton, which would contribute to the City's existing need for new recreational facilities. All of the impacts identified under Alternative 2 would be potentially significant but mitigable (Class II). Similarly, the commercial retail development under Alternative 3 would result in a substantial increase in new vehicle trips, which would contribute to potentially significant impacts related to operational criteria pollutant emissions, Clean Air Plan consistency, cumulative air quality, off-site roadway noise levels, cumulative roadway noise levels, local intersection levels of service, and cumulative traffic levels. Impacts to operational criteria pollutant emissions, Clean Air Plan consistency, cumulative air quality, off-site roadway noise, and cumulative roadway noise levels under Alternative 3 would be significant and unavoidable (Class I). However, because Alternative 3 would involve commercial retail development, this alternative would eliminate potential conflicts between adjacent agricultural land uses and sensitive receptors.

The Reconfigured Project Alternative (Alternative 4) would not reduce or increase any of the project impacts identified in this SEIR, but it would allow the proposed retention basin to be relocated within the City limit. Because Alternative 4 would result in similar impacts to the proposed project, it would therefore be considered environmentally superior among the remaining alternatives. As discussed in this SEIR, the proposed project would not result in any significant and unavoidable (Class I) impacts; therefore this alternative would not eliminate or any significant and unavoidable impacts. Furthermore, Alternative 4 does not present any new significant impacts that were determined to be less than significant for the proposed project. For these reasons, the Reconfigured Project Alternative (Alternative 4) is identified as the Environmentally Superior Alternative among the remaining alternatives.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

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

Class I – Significant and Unavoidable Impacts

- *None identified*

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

- *Light and Glare*
- *Agricultural Operations*
- *Unknown Cultural Resources*
- *Settlement/Slope Stability*
- *Operational Greenhouse Gas Emissions*
- *Construction Impacts to Noise Levels*

Class III – Less than Significant Impacts

- *Public Views*
- *Visual Character*
- *Cumulative Impacts to Visual Character and Light and Glare*
- *Grazing and Farming Land*
- *Cumulative Impacts to Agricultural Resources*
- *Construction Emissions*
- *Operational Emissions*
- *Hazardous Air Pollutants*
- *Clean Air Plan Consistency*
- *Cumulative Impacts to Air Quality*
- *Known Cultural Resources*
- *Cumulative Impacts to Cultural Resources*
- *Ground Shaking*
- *Cumulative Impacts due to Geologic Hazards*
- *Cumulative Greenhouse Gas Emissions*
- *Construction Impacts to Hydrology and Water Quality*
- *Drainage and Runoff*
- *Cumulative Impacts to Hydrology and Water Quality*
- *Land Use Compatibility.*
- *General Plan and Zoning Ordinance Consistency.*
- *Cumulative Impacts to Land Use*
- *Roadway Noise Exposure*
- *Off-Site Roadway Noise*
- *Cumulative Impacts to Noise*
- *Construction Trips*
- *Operational Levels of Service*
- *Traffic Hazards*
- *Cumulative Impacts to Operational Levels of Service*
- *Cumulative Impacts to Transit Facilities*
- *Fire Protection Services and Facilities*
- *Police Protection Services and Facilities*
- *Recreational Facilities*
- *Library Services*

- *Water Use*
- *Wastewater Generation*
- *Solid Waste Generation*
- *Cumulative Impacts to Fire Protection Services*
- *Cumulative Impacts to Police Protection Services*
- *Cumulative Impacts to Parks and Recreation*
- *Cumulative Impacts to Community Libraries*
- *Cumulative Impacts to Water*
- *Cumulative Impacts to Wastewater Generation*
- *Cumulative Impacts to Solid Waste Generation*

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

Impact	Mitigation Measures	Significance After Mitigation
CLASS II PROJECT-SPECIFIC IMPACTS (Less than Significant with Mitigation)		
4.1 Aesthetics/Visual Resources		
Impact AES-2. Development of the Meritage Senior Living Project would introduce new sources of light and glare to the project site and adjacent land uses. Potential impacts to existing development due to glare would be Class II, *significant but mitigable*.	**AES-2 Exterior Building Materials.** New structures shall utilize non-reflective exterior materials to prevent glare, as feasible.	With implementation of Mitigation Measure AES-2, in addition to implementation of the City's Community Design Guidelines and General Plan policies, impacts would be reduced to a less than significant level.
4.2 Agricultural Resources		
Impact AG-2. The proposed project would place new senior center facilities, including assisted and independent living units, in the vicinity of existing agricultural operations, which may result in conflicts between agriculture and urban uses. However, with existing City polices and the enforcement of a 200-foot agricultural buffer consistent with mitigation measures established by the 2005 LUE and CE Update EIR, impacts would be Class II, *significant but mitigable*.	**AG-2(a) Agricultural Buffer.** A 200-foot buffer between the senior center facilities and active agricultural uses on adjacent parcels shall be incorporated into the project site plans of the proposed project. **AG-2(b) Agricultural Buffer Monitoring.** As a component of monitoring AG-2(a), the project applicant shall provide photo documentation to City planning staff on an annual basis documenting adherence to the 200-foot buffer between the senior center facilities and active agricultural uses on the adjacent property.	Adherence to and monitoring of the 200-foot buffer between the senior center facilities and adjacent agricultural uses would reduce conflicts between urban and agricultural uses. The buffer would maintain a safe distance to prevent residents of the senior care facilities from being affected by adverse agricultural uses including herbicide and pesticide spraying, objectionable odors, and dust. It would also serve to minimize impacts to the agricultural activities by increasing its distance from urban uses. These mitigation measures, in combination with existing City Zoning Ordinance policies and Community Design Guidelines, would reduce impacts related to agricultural land use conflicts to a less than significant level.

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

Impact	Mitigation Measures	Significance After Mitigation
4.4 Cultural and Historical Resources		
Impact CR-2. Previously unidentified, subsurface cultural resources may be unearthed during project construction activities. Impacts to unknown cultural resources would be Class II, *significant but mitigable*.	**CR-2 Halt Work Order for Archaeological Resources.** If archaeological resources are exposed during construction of the proposed project, pursuant to the Land Use or Circulation Elements, all earth disturbing work within 100 feet of the find must be temporarily suspended until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A representative should monitor any mitigation excavation associated with Native American materials.	Implementation of the Mitigation Measures CR-1 would reduce impacts associated with the potential to unearth unknown cultural resources during construction activities to a less than significant level.
4.5 Geology/Soils		
Impact G-2. The project would result in potentially unstable soil conditions from expansive, compressible/collapsible, and/or erosive soils and slope instability. However, with the implementation existing General Plan policies and the measures recommended in the Preliminary Geotechnical Investigation, impacts would be Class II, *significant but mitigable*.	**G-2 Reduction of Soil Stability Hazards.** Grading and construction of the proposed project shall incorporate all of the recommendations included in the Preliminary Geotechnical Investigation prepared by Pacific Material Laboratory, dated June 6, 2012 (refer to Appendix D). These recommendations are summarized below and include, but are not limited to, the following requirements designed to minimize impacts related to soil stability hazards. a) Grading o Soils found to be expansive will be excavated and wasted in landscape portions of the project. o The footings of the proposed structures shall be supported completely by a uniform thickness of non-expansive soil. The structure shall not be supported over a cut/fill transition unless the foundation is engineered to account for the transition. o Beneath the proposed structures and for a minimum distance of 5 feet beyond the exterior perimeters, the loose topsoil and compressible surface soils shall be removed and observed by a representative of Pacific Materials Laboratory. o Positive surface drainage shall direct water away from all slopes and away from the foundation system of the proposed structure.	Through adherence to the recommendations in the Preliminary Geotechnical Investigation in accordance with Mitigation Measure G-2, the potential effects of expansive soils, settlement of compressible/collapsible and erosive soils, and slope instability, would be reduced to a less than significant level.

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

Impact	Mitigation Measures	Significance After Mitigation
	b) Foundations o All continuous exterior footing for one-story portions of the structure which rest upon compacted fill soil shall extend a minimum of 18 inches and all continuous interior one-story footing shall extend a minimum distance of 12 inches below compacted ground surface. o Footings below two-story portions of the structure shall extend 18 inched below compacted ground surface. o Footings below three-story portions of the structure shall extend 24 inches below compacted ground surface. o All footings shall contain a minimum of two No. 4 horizontal rebar placed one in the base and one in the stem of the footing. c) Resistance to Lateral Loads o An allowable friction coefficient of 0.35 shall be used. o The passive pressures of 350 pcf of footing shall be used. o A triangular distribution shall be used. o The frictional resistance and the passive pressure may be combined without reduction. o The resistance may be increased by one-third for wind or seismic loading. d) Retaining Walls o The cantilevered retaining walls (site walls and garden walls) shall be designed assuming an active soil pressure equivalent to a fluid (E.F.P.) whose weight is 35 pcf for level backfill conditions and 52 pcf for backfill slopes, which are constructed at an angle of up to 27 degrees. o Restrained and partially restrained retaining walls or cantilevered retaining walls which form a portion of the foundation system of the structure shall be designed assuming an at-rest soil pressure equivalent to a fluid	

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

Impact	Mitigation Measures	Significance After Mitigation
	(E.F.P.) whose weight is 60 pcf for level backfill conditions and 73 pcf for backfill slopes, which are constructed at an angle of up to 27 degrees. e) Pavement o Beneath the proposed parking areas, the top loose surface soils shall be removed, moistened or dried to at or near the optimum moisture content and compacted. o R-values shall be performed once the subgrade elevations have been established. The parking lot shall be designed based on an estimated R-value of 35. o Maintenance to reduce the potential for deterioration of paved areas shall include surface treatment approximately six months to one year after construction and approximately three years or less from the first treatment. f) Adjacent Loads o The effect of adjacent loads shall be calculated using the published Formulas for Stresses in Semi-infinite Elastic Foundations or the Boussinesq figures and equations. g) Settlement o The project shall achieve angular distortions of approximately 1/480. The required provisions from the Preliminary Geotechnical Investigation shall be reflected on grading and foundation plans and reviewed by the City Engineer to verify compliance as required.	

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

Impact	Mitigation Measures	Significance After Mitigation
4.6 Greenhouse Gas Emissions		
Impact GHG-1 The project would generate short-term as well as long-term GHG emissions. The proposed project would exceed the 1,100 MT CO2E/year threshold, and would incrementally contribute to climate change. Impacts would be Class II, *significant but mitigable*.	**G-1 GHG Reduction Measures.** The project shall reduce operational greenhouse gas emissions through implementation of one or more of the following measures: A. Prior to permit issuance, the applicant shall develop a GHG Reduction Plan that would reduce annual greenhouse gas emissions from the project by a minimum of 355 MT CO2E per year over the operational life of the project. The plan will be implemented on site by the project applicant and may include, but is not be limited to, the following components: 1. Alternative fuel vehicles 2. Energy conservation policies 3. Energy efficient equipment, appliances, heating and cooling 4. Energy efficient lighting 5. Green building and roofs 6. Water conservation and recycling 7. Renewable energy production 8. Off-site vehicle trip reduction 9. Carbon sequestration; or B. If greenhouse gas emissions cannot be reduced through compliance with a project GHG Reduction Plan, the project applicant shall purchase carbon offsets to reduce GHG emissions below threshold levels. Purchased carbon offsets shall be approved by City staff prior to permit approval.	Implementation of Mitigation GHG-1 would reduce GHG emission impacts to a less than significant level (Class II). Implementation of Mitigation Measures OCP EIR AQ-3 and AQ-11, would further reduce GHG emissions impacts.

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

Impact	Mitigation Measures	Significance After Mitigation
4.9 Noise		
Impact N-1. Project construction could intermittently generate high noise levels on and adjacent to the project site. Project construction would take place adjacent to existing residences, thereby temporarily exposing sensitive receptors to noise levels exceeding City thresholds. Impacts would be Class II, *significant but mitigable*.	**N-1(a) Notification of Temporary Construction Noise.** The applicant shall provide all residential property owners within 2,800 feet of proposed construction on the project site with a construction activity schedule and construction routes at least one week in advance of construction activities. Any alterations or additions shall require one week advanced notification. **N-1(b) Construction Noise Attenuation Techniques.** Stationary construction equipment shall be shielded to the satisfaction of the Buellton Planning Department. For all construction activity on the project site, noise attenuation techniques shall be employed as needed to ensure that noise at nearby sensitive receptors remains within levels allowed by City noise standards. At a minimum, such techniques shall include: • All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers. • Whenever feasible, electrical power shall be used to run air compressors and similar power tools. • Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters if within 300 feet of any sensitive receptor.	The project would be required to comply with City Municipal Code Section 12.04.410, which restricts construction activity during the hours of 7:00 p.m. to 7:00 a.m. weekdays, and during Saturdays or Sundays. With compliance with City construction requirements, and implementation of the required mitigation measures, short-term construction noise impacts would be reduced to a less than significant level.
CLASS III PROJECT-SPECIFIC IMPACTS (Less than Significant)		
4.1 Aesthetics/Visual Resources		
Impact AES-1. Implementation of the Meritage Senior Living Project would introduce new development that would alter existing public views. Potential impacts to such views are considered Class III, *less than significant*.	With implementation of existing City policies including the Community Design Guidelines and General Plan policies outlined in Section 4.4.1(c) above, impacts would be less than significant. No mitigation is necessary.	Impacts would be less than significant without mitigation.
Impact AES-3. Development of the Meritage Senior Living Project would alter the visual character of the project site. However, existing City regulations would minimize aesthetic impacts. Impacts would be Class III, *less than significant*.	With implementation of existing City policies including the Community Design Guidelines and General Plan policies outlined in Section 4.4.1(c) above, impacts would be less than significant. No mitigation is necessary.	Impacts would be less than significant without additional mitigation.

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

Impact	Mitigation Measures	Significance After Mitigation
4.2 Agricultural Resources		
Impact AG-1. The proposed project would convert portions of the site from grazing and farming land to non-agricultural use. Based on the Land Evaluation and Site Assessment model, conversion of the project site is not considered significant, and the site is zoned for commercial uses with an AHOZ designation under the City's General Plan; therefore, conversion of the site would be a Class III, *less than significant*, impact.	No mitigation is required.	Impacts to agricultural conversion would be less than significant without mitigation.
4.3 Air Quality		
Impact AQ-1. Project construction would generate temporary increases in localized air pollutant emissions. Such emissions may result in temporary adverse impacts to local air quality. With implementation of standard dust and emissions control measures required by the SBCAPCD, impacts would be Class III, *less than significant*.	Implementation of standard dust and emissions control measures required by the SBCAPCD would ensure that construction-related air quality impacts are less than significant.	Impacts would be less than significant without mitigation, as standard dust and emissions control measures would be effective in controlling emissions to a less than significant level.
Impact AQ-2. The project would result in an increase in operational air pollutant emissions from the development of 247 new senior care residential units and the associated energy use needs and increased vehicular traffic. However, the increase in emissions would not exceed thresholds established by SBCAPCD and impacts would be Class III, *less than significant*.	No mitigation measures would be required.	Impacts would be less than significant without mitigation.

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

Impact	Mitigation Measures	Significance After Mitigation
Impact AQ-3. Sensitive receptors on the proposed project site would be exposed to hazardous air pollutants from heavy vehicle traffic on U.S. Highway 101. However, the proposed senior care residential units closest to U.S. Highway 101 would not be exposed to air pollutants that exceed applicable health risk significance thresholds and impacts would be Class III, *less than significant*.	As the proposed senior care residential units closest to U.S. Highway 101 would not be exposed to air pollutants that exceed significance thresholds, impact would be less than significant, and no mitigation measures would be required.	Impacts would be less than significant without mitigation.
Impact AQ-4. The proposed project would be consistent with the SBCAPCD's 2010 Clean Air Plan and adopted regional, State, and federal air quality plans. This impact would be Class III, *less than significant*.	As the proposed project would be consistent with the 2010 CAP, impact would be less than significant, and no mitigation measures would be required.	Impacts would be less than significant without mitigation.
4.4 Cultural and Historical Resources		
Impact CR-1. Construction of the proposed project would not adversely affect known archaeological, historical, and paleontological resources. Impacts would be Class III, *less than significant*.	No mitigation measures are required.	Impacts would be less than significant without mitigation.
4.5 Geology/Soils		
Impact G-1. The project site is located in an area of high earthquake risk and is subject to moderate ground shaking, which has the potential to cause fill material to settle, destabilize slopes, and cause physical damage to structures, property, utilities, road access, and humans. Compliance with the Uniform Building Code (UBC), General Plan policies and California Building Code would result in a Class III, *less than significant*, impact.	No mitigation is required.	Compliance with existing City policies of the Buellton General Plan in conjunction with applicable standards of the UBC and CBC would ensure that hazards from moderate ground shaking would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
4.7 Hydrology and Water Quality		
Impact HWQ-1 Point and non-point sources of contamination associated with construction of the proposed project would disturb more than one acre of land, and could degrade water quality through increased rates of erosion and sedimentation. This would be a Class III, *less than significant*, impact.	No mitigation is required.	With adherence to existing NPDES regulatory measures, construction-related impacts to water quality would be less than significant.
Impact HWQ-2 Development of the proposed project would result in the addition of urban contaminant sources and impermeable surfaces to the site. The proposed retention basin would ensure that post-development discharge would not exceed existing conditions. Therefore, the proposed project would not substantially alter existing drainage patterns, increase storm water runoff, result in increased flooding, result in a substantial decrease in percolation to groundwater basins, or exceed existing drainage infrastructure capacity. This would be a Class III, *less than significant*, impact.	No mitigation is required.	With the implementation of the proposed off-site retention basin and compliance with City SWMP BMPs, impacts associated with storm water runoff, such as increased rates of runoff and a reduction in groundwater percolation, would be less than significant.
4.8 Land Use/Policy Consistency		
Impact LU-1 The proposed project would result in a change in the scale of development on the site. This would present potential land use incompatibility issues with surrounding land uses. This is a Class III, *less than significant*, impact.	With implementation of existing City policies including the Municipal Code requirements, Community Design Guidelines, and General Plan policies, impacts would be less than significant. Mitigation measures identified in Sections 4.1, Aesthetics/Visual Resources, and 4.8, Noise, would further minimize potential land use incompatibility impacts. No additional mitigation is required.	Impacts would be less than significant without mitigation.

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

Impact	Mitigation Measures	Significance After Mitigation
Impact LU-2 The proposed project would be consistent with the applicable policies and development standards in the City's General Plan and Zoning Ordinance. Impacts related to consistency with the General Plan and Zoning Ordinance would be Class III, *less than significant*.	No mitigation measures are required.	Impacts would be less than significant without mitigation.
4.9 Noise		
Impact N-2. Development of a senior care facility adjacent to Jonata Park Road and near U.S. Highway 101 would not expose the proposed project to noise levels exceeding City standards. Impacts would be Class III, *less than significant*.	No mitigation measures are required.	Impacts would be less than significant without mitigation.
Impact N-3. Traffic generated by the project is anticipated to result in noise level increases along roadways in the project vicinity. Traffic-related increases in noise would not exceed the City standards along three studied roadway segments and impacts would be Class III, *less than significant*.	No mitigation measures are required.	Impacts would be less than significant without mitigation.
4.10 Public Services and Utilities		
Impact PSU-1. New senior care facility residents would contribute to the need for additional fire protection services and/or new or expanded facilities. However, the project site would be within the Santa Barbara County Fire Department's response time goal, the proposed project would be required to pay development impact fees based on new building size, and to achieve compliance with SBCFD's established standards for the issuance of Fire Protection Certificates.	None required.	With the payment of the required development impact fees and adherence to SBCFD's established standards for the issuance of Fire Protection Certificates, the potential environmental impacts to fire protection would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
With the payment of development impact fees and adherence to SBCFD's established standards, impacts would be Class III, *less than significant*.		
Impact PSU-2. The proposed project would generate senior care facility residents in the City of Buellton. This increase in population would contribute to the need for additional police protection services and/or new or expanded facilities. However, based on the nature and location of the project site, the proposed project would not result in an exceedance of the response time goal. Therefore, impacts would be Class III, *less than significant*.	None required.	Impacts would be less than significant.
Impact PSU-3 New senior care facility residents would not be anticipated to result in increased use of recreational facilities, or otherwise contribute to the physical deterioration of these facilities. This is a Class III, *less than significant*, impact.	No mitigation is required.	Impacts would be Class III, less than significant.
Impact PSU-4 The proposed project would generate senior care facility residents in the City of Buellton. The additional senior residents that would result from development of the proposed project would increase existing demand for library services. With payment of required fees to offset such impacts, the proposed project would result in Class III, *less than significant*, impacts related to demand for libraries.	No mitigation is required.	Impacts would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
Impact PSU-5 The proposed project would demand an estimated 63.93 acre-feet per year (AFY) of water. The total available water supply to the City is currently 1,200 AFY, which is sufficient to deliver water to the projected buildout population of the City with the proposed project. Therefore the impact of this increase in water use would be Class III, *less than significant*.	No mitigation is required.	Impacts to water supply would be less than significant.
Impact PSU-6 The proposed project would generate an estimated 61,707 gallons of wastewater per day. The Buellton Wastewater Treatment Plant has the capacity to accommodate an additional 170,000 gallons per day. Therefore, adequate capacity would be available to serve the proposed project and this impact would be Class III, *less than significant*.	Impacts to wastewater infrastructure would be less than significant. No mitigation is required.	Project impacts to the wastewater infrastructure would be less than significant without mitigation.
Impact PSU-7 The proposed project would generate an estimated 1.1 tons of solid waste per day, which would not exceed the surplus capacity of 510 tons per day at the Tajiguas Sanitary Landfill. Therefore, impacts related to solid waste would be Class III, *less than significant*.	No mitigation is required.	Impacts to solid waste services would be less than significant.
4.11 Transportation and Circulation		
Impact T-1. Project construction and equipment staging would temporarily increase truck traffic in the project area, which could affect operations at project area intersections, disrupt the normal use of adjacent streets, and affect parking availability. Impacts would be Class III, *less than significant*.	Impacts are less than significant without mitigation. No mitigation is required.	Impacts would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
Impact T-2. Operation of the project would result in the addition of 725 average daily trips (46 A.M. and 75 P.M. peak hour trips) to the study area roadways and intersections. The addition of project traffic would not degrade the levels of service at the study area intersections or roadway segments under A.M. or P.M. peak hour conditions. Impacts would be Class III, *less than significant*.	Impacts are less than significant without mitigation. No mitigation is required.	Impacts would be less than significant.
Impact T-3. Operation of the project would result in the inclusion of four access connections to Jonata Park Road. The project would provide adequate emergency access, and operation of the proposed project would not result in design hazards at any of the proposed access connections. Impacts would be Class III, *less than significant*.	No mitigation measures would be required.	Impacts would be less than significant without mitigation.
CLASS III CUMULATIVE IMPACTS (Less than Significant)		
4.1 Aesthetics/Visual Resources		
Cumulative Impacts to Aesthetics (Light and Glare)	No mitigation measures would be required.	Cumulative development would largely occur in areas currently intended for residential and commercial development and would be subject to City regulations pertaining to aesthetics and light and glare, which are intended to minimize visual impacts and ensure consistency throughout the City. As such, impacts related to visual character and light and glare would not be cumulatively considerable.
Cumulative Impacts to Aesthetics (Visual Character)	No mitigation measures would be required.	The majority of development would be located on infill sites throughout the City, as well as tracts of undeveloped land along the City's urban perimeters.

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

Impact	Mitigation Measures	Significance After Mitigation
4.2 Agricultural Resources		
Cumulative Impacts to Agricultural Resources	No mitigation measures would be required.	The entirety of currently proposed development is located within the City's Planning Area on land designated for urban uses. Currently, there is no land zoned for agriculture in the City. Future residential development could occur adjacent to agriculturally designated lands and result in potential land use conflicts. Potential impacts of cumulative developments within the Buellton area would be addressed on a case-by-case basis, and would be required to comply with pertinent General Plan policies, as well as future mitigation measures identified through subsequent environmental review. Therefore, the proposed project would not result in cumulatively considerable impacts on agricultural resources.
4.3 Air Quality		
Cumulative Impacts to Air Quality	No mitigation measures would be required.	Per Santa Barbara County Air Pollution Control District thresholds, a project would have a significant cumulative impact if a project's air pollutant emissions of either of the ozone precursors (NO_X or ROG) exceed the long-term thresholds and if emissions have not been taken into account in the most recent CAP growth projections. As discussed in Impact AQ-2, the proposed project would not result in an exceedance of long-term thresholds for either of the ozone precursors (NO_X or ROG). Moreover, as discussed in Impact AQ-4, the proposed project is consistent with the 2010 CAP. In summary, cumulative air quality impacts of the proposed project would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
4.4 Cultural and Historic Resources		
Cumulative Impacts to Cultural and Historic Resources	No mitigation measures would be required.	Potential impacts to cultural resources are addressed on a case-by-case basis through site-specific investigations and, if necessary, surveys, assessment, and documentation or other appropriate mitigation. As such, cumulative development in the project area would be reviewed on a case-by-case basis. In the event that significant resources are discovered, impacts to such resources would be mitigated in accordance with the type of find. Project-specific mitigation would ensure that the project's contribution to cumulative impacts would be less than significant. No additional mitigation measures would be required, and cumulative impacts would be less than significant.
4.5 Geology/Soils		
Cumulative Impacts to Geology/Soils	No mitigation measures would be required.	With implementation of mitigation measures and compliance with existing policies and regulations, the proposed project, in conjunction with other cumulative projects proposed in Buellton, would not expose additional people and property to seismic and geologic hazards that exist in the region. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Any specific geologic hazards associated with each individual site would be limited to that site without affecting other areas. In addition, City regulations and policies (including compliance with the General Plan Safety Element, the Uniform Building Code, and the California Building Code requirements) would be expected to reduce seismic and geologic hazards to acceptable levels. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Cumulative geologic hazard impacts would be less than significant.
4.6 Greenhouse Gas Emissions		
Cumulative Impacts from Greenhouse Gas Emissions	No mitigation measures would be required.	Greenhouse gases and climate change are, by definition, cumulative impacts. Refer to Impact GHG-1 for discussion of climate change and GHG emissions.

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

Impact	Mitigation Measures	Significance After Mitigation
4.7 Hydrology and Water Quality		
Cumulative Impacts to Hydrology and Water Quality	Through the implementation of the BMPs contained in the City's Stormwater Management Plan, potential cumulative impacts would be reduced. No mitigation measures would be required.	Substantial portions of land have the potential to be developed with impermeable surfaces, which would alter drainage patterns, increase peak flows and risk of flooding, reduce groundwater recharge, and degrade water quality. Through the implementation of the BMPs contained in the City's Stormwater Management Plan, potential cumulative impacts would be reduced. Furthermore, the 2005 LUE and CE Update EIR determined that impacts associated with hydrology and water quality, resulting from development facilitated by the 2005 LUE and CE Update EIR, would be less than significant with the incorporation of mitigation. Therefore, cumulative impacts to hydrology and water quality would be less than significant.
4.8 Land Use/Policy Consistency		
Cumulative Impacts to Land Use/Policy Consistency	Future development project in the City would generally be expected to be consistent with the applicable General Plan and Municipal Code requirements. No mitigation measures would be required.	Cumulative development in Buellton would gradually transform the community to a more urban character and result in additional loss of open space areas. Such development would also generate short-term construction air and noise emissions, and long-term land use compatibility effects related to quality of life issues, noise nuisances, aesthetic incompatibility, and agriculture/urban conflicts. Future development project in the City would generally be expected to be consistent with the applicable General Plan and Municipal Code requirements. Potential land use conflicts would be addressed on a case-by-case basis. Cumulative land use impacts would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
4.9 Noise		
Cumulative Impacts to Noise	No mitigation measures would be required.	Cumulative noise impacts would include those related to traffic-generated increases in roadway noise. Traffic-generated increases in roadway noise were evaluated on a cumulative basis, as the project-level noise exposure impact discussions (Impact N-3) analyzed cumulative traffic levels. Table 4.9-4 shows estimates of cumulative + project traffic noise increases of no more than 0.3 dBA on all studied project area roadways. Therefore, the project is not anticipated to result in cumulative noise impacts. Cumulative noise impacts would be less than significant but mitigable.
4.10 Public Services and Utilities		
Cumulative Impacts to Public Services and Utilities (Fire Protection)	No mitigation measures would be required.	As discussed above in Impact PSU-1, the project site is located within the Fire Department's five minute response time goal, and impacts would be Class III, less than significant. Of the City's 2005 LUE and CE Update EIR, buildout in accordance with the Land Use Element and Circulation Element is not anticipated to cause response times to exceed the City's response time goal of five minutes. Buildout in accordance with the Land Use Element and Circulation Element would result in a population increase of about 4,508 new residents to a total population of 8,968 people, which would reduce the existing ratio to 1.3 firefighters to 971 residents (or 1.34 firefighters per 1,000 residents). Development impact fees would be collected by the City to fund required service improvements. Therefore, with the payment of the required development impact fees, cumulative impacts to fire protection services would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
Cumulative Impacts to Public Services and Utilities (Police Protection)	No mitigation measures would be required.	As discussed above in Impact PSU-2, the project site is located within the Police Department's response time goal and impacts would be Class III, less than significant. As development continues to occur in the City, it could create the need for new or expanded facilities in the future, the construction of which could result in environmental impacts. However, the location, size and type of such facilities are speculative at this point in time, and would be subject to environmental review. According to the LUE and CE Update EIR, an additional two deputies would be needed to accommodate buildout of the City. Furthermore, it is anticipated that as the City grows, emergency services would be monitored and augmented to provide the standard of emergency care as needed. Development impact fees would be collected by the City to fund service improvements, as needed. Cumulative impacts are therefore less than significant.
Cumulative Impacts to Public Services and Utilities (Parks and Recreation)	No mitigation measures would be required.	As discussed above in Impact PSU-3, the additional senior residents would not be anticipated to utilize off-site parks and impacts would be Class III, less than significant. Future development throughout the City could result in the need for new or expanded parks or recreational facilities, the construction of which could result in environmental impacts. However, the location, size and type of such facilities are speculative at this point in time, and would be subject to environmental review prior to development. In addition, until such facilities are constructed, impacts would continue to be mitigated on a case-by-case basis in accordance with the Quimby Act, either through the payment of park in-lieu fees or the dedication of parkland as part of future projects. Cumulative impacts are therefore adverse but less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
Cumulative Impacts to Public Services and Utilities (Community Libraries)	No mitigation measures would be required.	As discussed above in Impact PSU-4, the additional senior residents generated by the proposed project would increase the demand for library services, but the payment of required library fees would ensure that impacts remain Class III, less than significant. The proposed project would incrementally increase the demand for library services. As discussed in Section 4.9, Public Services and Infrastructure, of the City's 2005 LUE and CE Update EIR, the Land Use Element Update would generate up to 8,938 new City residents that would increase demand for City library facilities. A portion of the development impact fees required for each new project would be applied to the City's general fund. In turn, a portion of the City's general fund would be used to finance improvements to City library facilities and services. With the payment of required City development impact fees, cumulative development in the City of Buellton would result in less than significant impacts on library facilities and services.
Cumulative Impacts to Public Services and Utilities (Water)	No mitigation measures would be required.	As discussed above in Impact PSU-5, the proposed project's water demand of 63.93 AFY is within the capacity of the City's existing water supplies and impacts would be Class III, less than significant. This development would increase the overall demand for water in the City. As discussed above in Impact PSU-5, the 2005 LUE and CE Update EIR concluded that the City of Buellton water supplies would be sufficient to accommodate buildout of the City, up to the year 2025. Furthermore, the LUE and CE Update EIR (2005) determined that water demand from all potentially developable land uses in the City under Land Use Element Update buildout conditions, would be 587 AFY, while currently available water supplies are 1,200 AFY. Therefore, cumulative impacts to water supply and groundwater resources would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
Cumulative Impacts to Public Services and Utilities (Wastewater)	No mitigation measures would be required.	As discussed above in Impact PSU-6, the proposed project's wastewater generation of 61,770 GPD is within the surplus capacity of the City's Wastewater Treatment Plant and impacts would be Class III, less than significant. The Buellton Wastewater Treatment Plant has a capacity of 0.65 mgd. As discussed in Section 4.9, Public Services and Infrastructure, of the City's 2005 LUE and CE Update EIR, the total wastewater flow at buildout of the City under the existing Land Use Element would be about 0.87 mgd. This would exceed the current treatment capacity of the City's wastewater treatment plant. However, construction of new wastewater facilities would be subject to additional environmental review in which potential environmental impacts would be addressed accordingly. Future development would be required to pay impact fees to fund improvements and offset impacts on the treatment plant. With payment of these fees, cumulative impacts would be less than significant.
Cumulative Impacts to Public Services and Utilities (Solid Waste)	No mitigation measures would be required.	As discussed above in Impact PSU-7, the proposed project's solid waste generation of 1.1 tons per day is within the surplus capacity of the Tajiguas Sanitary Landfill and impacts would be Class III, less than significant. The proposed project would incrementally contribute to the cumulative impact to landfill capacity. As discussed in Section 4.9, Public Services and Infrastructure, of the City's 2005 LUE and CE Update EIR, buildout of the Land Use Element Update would produce a total of 23,516 pounds per day (4,292 tons per year), or approximately 11.8 tons per day, of solid waste. As discussed above in Impact PSU-7, the Tajiguas Sanitary Landfill has a surplus capacity of 510 tons per day. Therefore, cumulative impacts to solid waste generation at local landfills would be less than significant.

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

Impact	Mitigation Measures	Significance After Mitigation
4.11 Transportation and Circulation		
Cumulative Impacts to Traffic **Impact T-4.** Under cumulative plus project conditions, project development would not degrade the levels of service at any study area intersections under A.M. or P.M. peak hour conditions. Impacts would be Class III, *less than significant*.	Impacts would be less than significant without mitigation. No mitigation is required.	Impacts would be less than significant.
Cumulative Impacts to Traffic **Impact T-5.** Under cumulative plus project conditions, project development would generate additional residential inhabitants that may require the use of transit facilities. The generation of additional transit riders would not significantly impact existing transit facilities. Impacts would be Class III, *less than significant*.	Impacts would be less than significant without mitigation. No mitigation is required.	Impacts would be less than significant.

1.0 INTRODUCTION

This document is a Subsequent Environmental Impact Report (SEIR) that examines the potential effects of subdividing the proposed 18.2-acre project site into six parcels for the development of a new senior care facility in the City of Buellton. The proposed project is described in detail in Section 2.0, *Project Description*. This section describes: (1) the general background of the project; (2) the purpose of and legal authority for the EIR; (3) the scope and content of the EIR; (4) lead, responsible and trustee agencies; and (5) the environmental review process required under the California Environmental Quality Act (CEQA).

1.1 PROJECT BACKGROUND

Summary of Proposed Project

The proposed project involves a Tentative Tract Map and Conditional Use Permit entitlements to subdivide the two existing parcels that constitute the 18.2-acre project site into six parcels for the development of a new senior care facility. The property is identified as Assessor's Parcel Numbers (APN) 099-400-064 and 099-400-065. The project site is located within the City of Buellton.

History of Environmental Review for the Project Site

City of Buellton General Plan Land Use Element and Circulation Element Update EIR

In September 2005 the City Council approved the City of Buellton General Plan Land Use Element and Circulation Element Update Program and associated Environmental Impact Report (EIR), which updated the Land Use and Circulation Elements of the General Plan to address development of the vacant and under-developed lands within the City limit through the buildout year of 2025, including the currently proposed project site [identified therein as Affordable Housing Overlay Zone (AHOZ) Program Key Site II]. The project site is included in the City's Affordable Housing Overlay Zone (AHOZ) Program, which is a permissive overlay zoning designation, which allows high density residential development as an alternative to the base zoning of AHOZ-designated sites.

The General Plan Land Use Element and Circulation Element Update EIR identified and programmatically evaluated site-specific impacts that could occur should the site be developed. Section 6.0, *Alternatives*, of the LUE and CE Update EIR evaluated four potential alternatives to the LUE & CE Update, including no future development (Alternative 1), existing General Plan land use development of the project site (No project; Alternative 2), as well as two configurations of the AHOZ development on the identified Key Sites (Alternative 3 and Alternative 4. The alternatives from the LUE & CE Update EIR are summarized in Appendix K. The proposed project site, identified as Key Site II therein, was not identified as an AHOZ site in Alternative 3 or Alternative 4. The LUE and CE Update EIR also discussed both general and site specific mitigation measures for each environmental impact identified. A summary of project-site impacts and applicable mitigation from the General Plan Land Use Element and Circulation Element Update EIR is included under the heading of *Previous Environmental Review* in the discussion of each environmental issue area in Section 4.0, *Environmental Impact Analysis*.

City of Buellton General Plan Update Phase 2 SEIR

In March 2007 the City Council approved the City of Buellton General Plan Update Phase 2 Program and associated Supplemental EIR, which updated the Conservation and Open Space, Economic Development, Noise, Parks and Recreation, Public Facilities and Services, and Safety Elements of the General Plan, and amended the General Plan Land Use Element to re-designate and re-zone 12 parcels along Central Avenue from General Commercial (CR) to Multi-Family Residential (RM-16).

The Phase 2 update to the Conservation and Open Space, Economic Development, Noise, Parks and Recreation, Public Facilities and Services, and Safety Elements were specifically intended to mitigate the environmental effects associated with future growth in the City, as planned in the General Plan Land Use Element and Circulation Element Update Program. As discussed in the General Plan Update Phase 2 Supplemental EIR, policy guidance provided by the Conservation and Open Space, Economic Development, Noise, Public Facilities and Services, and Safety Elements would not result in physical impacts. No impacts or mitigation were identified in the General Plan Update Phase 2 Supplemental EIR that would apply to development on the project site.

This Subsequent EIR will tier from the City of Buellton Land Use Element and Circulation Element Update Program EIR, which is available for review on the City's website, www.cityofbuellton.com, and at the Buellton Planning Department office, located at 331-B Park Street, Buellton, California.

1.2 PURPOSE and LEGAL AUTHORITY

The project applicant requests Tentative Tract Map and Conditional Use Permit entitlements to subdivide the two existing parcels that constitute the 18.2-acre project site into six parcels for the development of a new senior care facility.

The proposed Tentative Tract Map and Conditional Use Permit entitlements are discretionary actions requiring approval of the City Council. Therefore, the proposed project is subject to the requirements of CEQA. In accordance with Section 15121 of the *State CEQA Guidelines*, the purpose of this EIR is to serve as an informational document that:

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

As discussed above, this document is a Subsequent EIR to the City of Buellton General Plan Land Use Element and Circulation Element Update EIR. Development of the project site was analyzed programmatically in the LUE and CE EIR; however, the proposed project requires project-level analysis, tiering from the programmatic review conducted in the LUE and CE EIR, pursuant to Section 15152 of the *State CEQA Guidelines*.

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

1.3 SCOPE and CONTENT

In accordance with the *State CEQA Guidelines*, a Notice of Preparation (NOP) for this EIR was distributed for review by affected agencies and the public on April 30, 2012. The NOP and responses to the NOP are presented in Appendix A of this report.

This SEIR addresses the issues determined to be potentially significant in the Final EIR that was certified in 2005, Supplemental EIR certified in 2007, responses to the NOP, and scoping discussions among the public, consulting staff, and the City. A brief explanation of issues determined to be less than significant is included in Section 5.0, *Effects Found Not To Be Significant*. The issues addressed in detail in this SEIR include:

- *Aesthetics/Visual Resources*
- *Agricultural Resources*
- *Air Quality*
- *Cultural Resources*
- *Geology and Soils*
- *Greenhouse Gas Emissions*
- *Hydrology and Water Quality*
- *Land Use and Policy Consistency*
- *Noise*
- *Public Services and Utilities*
- *Transportation/Traffic*

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

In preparing the SEIR, use was made of pertinent City policies and guidelines, existing EIRs and background documents prepared by the City, and documents that guide land use in the neighboring County of Santa Barbara. A full reference list is contained in Section 8.0 of this SEIR.

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

> *An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in*

light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure. (Section 15151).

1.4 LEAD, RESPONSIBLE and TRUSTEE AGENCIES

The *State CEQA Guidelines* define "lead," "responsible" and "trustee" agencies. The City of Buellton is the lead agency for the project because it has the principal responsibility for approving the proposed project. Discretionary approval of the project (acquisition of the project site) is vested with the Buellton City Council.

A "responsible agency" refers to public agencies other than the "lead agency" that have discretionary approval over the project. The Regional Water Quality Control Board (RWQCB) will be a responsible agency for review of National Pollutant Discharge Elimination System (NPDES) permit requests. The County of Santa Barbara will be responsible for permitting related to the proposed off-site retention basin, which is located outside of the Buellton City limit.

A "trustee agency" refers to a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. CEQA Guidelines Section 15386 designates four agencies as Trustee Agencies: the California Department of Fish and Game with regard to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission, with regard to state-owned "sovereign" lands, such as the beds of navigable waters and state school lands; the California Department of Parks and Recreation, with regard to units of the State Parks system; and the University of California, with regard to sites within the Natural Land and Water Reserves System.

1.5 ENVIRONMENTAL REVIEW PROCESS

The environmental impact review process, as required under CEQA, is outlined below. The steps are presented in sequential order.

1. **Notice of Preparation (NOP).** Immediately after deciding that an EIR is required, the lead agency must file a NOP soliciting input on the EIR scope to "responsible," "trustee," and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing (*State CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP was posted on April 30, 2012. The NOP and responses received regarding the NOP are contained in Appendix A.
2. **Draft Environmental Impact Report.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) significant impacts (direct, indirect, cumulative, growth-inducing

and unavoidable impacts); f) alternatives; g) mitigation measures; and h) irreversible changes.

3. **Public Notice and Review.** A lead agency must prepare a Notice of Availability of an EIR. The Notice must be placed in the County Clerk's office for 30 days (Public Resources Code Section 21092). The lead agency must send a copy of its Notice to anyone requesting it (*State CEQA Guidelines* Section 15087). Additionally, public notice of DEIR availability must be given through at least one of the following procedures: (a) publication in a newspaper of general circulation; (b) posting on and off of the project site; or (c) direct mailing to owners and occupants of contiguous properties. The lead agency must consult with and request comments on the Draft EIR from responsible and trustee agencies, and adjacent cities and counties (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a DEIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless a shorter period is approved by the Clearinghouse (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include: (a) the DEIR; (b) copies of comments received during public review; (c) a list of persons and entities commenting; and (d) responses to comments.
5. **Final EIR Certification.** Prior to approving a project, the lead agency must certify that: (a) the Final EIR has been completed in compliance with CEQA; (b) the Final EIR was presented to the decision-making body of the lead agency and that the lead agency considered the information in the Final EIR; and c) the Final EIR reflects the lead agency's independent judgment and analysis (*State CEQA Guidelines* Section 15090).
6. **Lead Agency Decision.** A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*State CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible *(State CEQA Guidelines* Section 15091). If an agency approves a project with unavoidably significant environmental effects, it must prepare a written Statement of Overriding Considerations that set forth the specific social, economic or other reasons supporting the agency's decision.

8. **Mitigation Monitoring/Reporting Program.** When a lead agency makes findings on significant effects identified in a Final EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination.** The lead agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared (*State CEQA Guidelines* Section 15094). A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice starts a 30-day statute of limitations on CEQA challenges (Public Resources Code Section 21167[c]).

2.0 PROJECT DESCRIPTION

Summary. The proposed project involves a Tentative Tract Map and Conditional Use Permit entitlements to subdivide the two existing parcels that constitute the 18.2-acre project site into six parcels for the development of a new senior care facility. The property is identified as Assessor's Parcel Numbers (APN) 099-400-064 and 099-400-065. A portion of the project is located offsite on APN 099-400-069, outside the Buellton City limit.

2.1 CURRENT PROPERTY OWNER

Norman Williams
Buellton Oaks L.P.
855 10th Street, Suite 10
Santa Monica, California 90403

2.2 PROJECT APPLICANT REPRESENTATIVE

Mark Edwards
~~Parton & Edwards Construction, Inc.~~
922 Laguna Street
Santa Barbara, California 93101

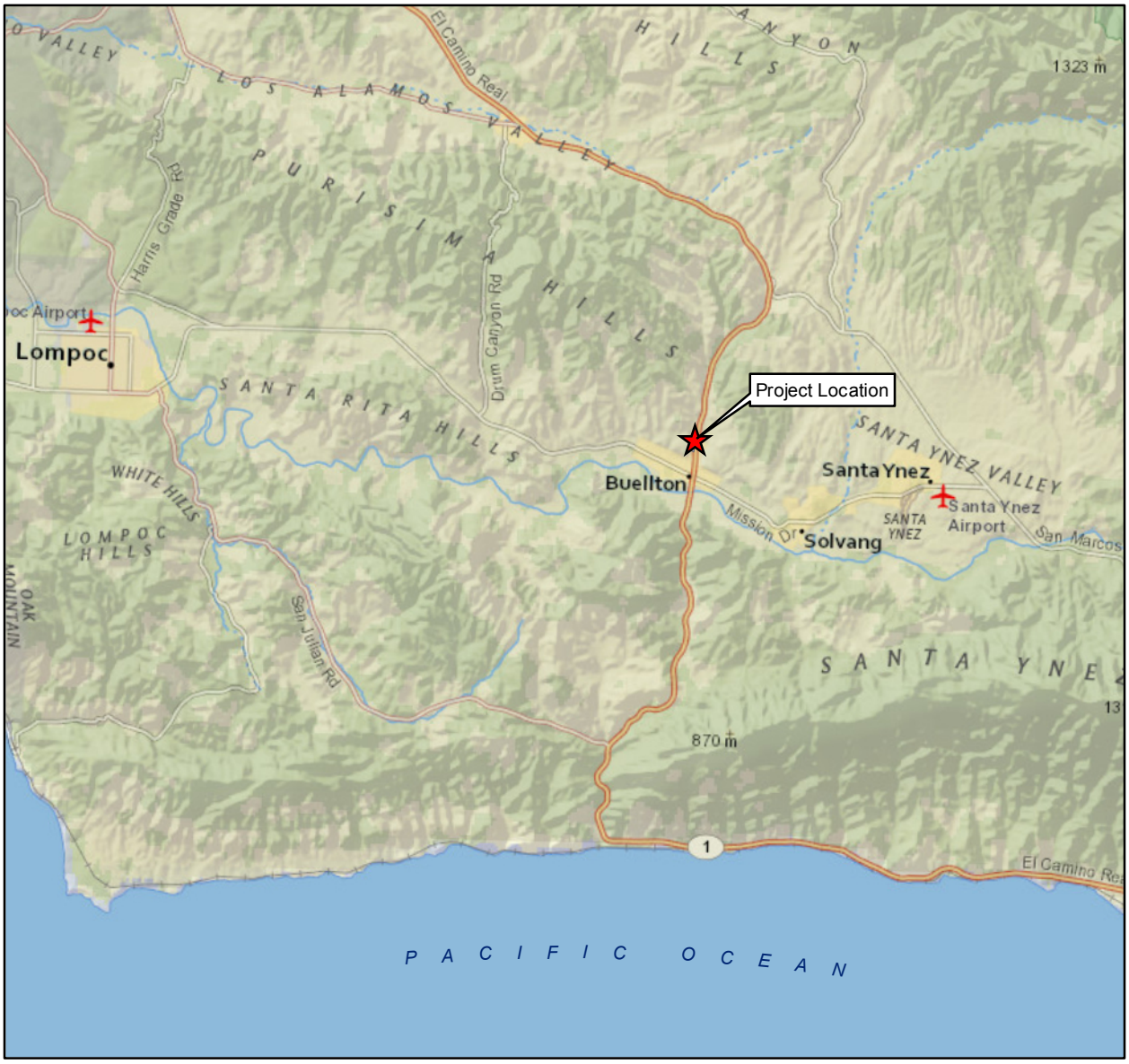
2.3 PROJECT LOCATION

The 18.2-acre project site is located on Jonata Park Road, on the west side of U.S. Highway 101, approximately ½ mile north of State Route (S.R.) 246, at the north end of the incorporated limit of the City of Buellton. The site is bounded by Jonata Park Road on the east, a Caltrans facility on the south, and agricultural land and open space on the north and west. Figure 2-1 shows the regional location of the project site, while Figure 2-2 shows the site within its local context.

2.4 EXISTING SITE CHARACTERISTICS

The project site is approximately 18.2 acres. Portions of the site are currently used for grazing and farming. A residence and some outbuildings are currently located on the site, and would be removed as part of the proposed project. The site is characterized by natural grasses, and slopes gradually downward from the western hillside toward the edge of the property at Jonata Park Road. The natural drainage area is from the top of the hillside down to Jonata Road, where water is diverted under the road near a culvert at the southern edge of the property. On-site slopes are generally less than 9%, and do not exceed 15%. Habitat on the project site consists of scattered oaks, coastal scrub, and non-native annual grassland.

The project site is designated General Commercial under the Buellton General Plan, with corresponding zoning of General Commercial (CR) under the City's Municipal Code. The project site is included in the City's Affordable Housing Overlay Zone (AHOZ) Program, which is a permissive overlay zoning designation, which allows high density residential development as an alternative to the base zoning of AHOZ-designated sites. The AHOZ Program is the City's



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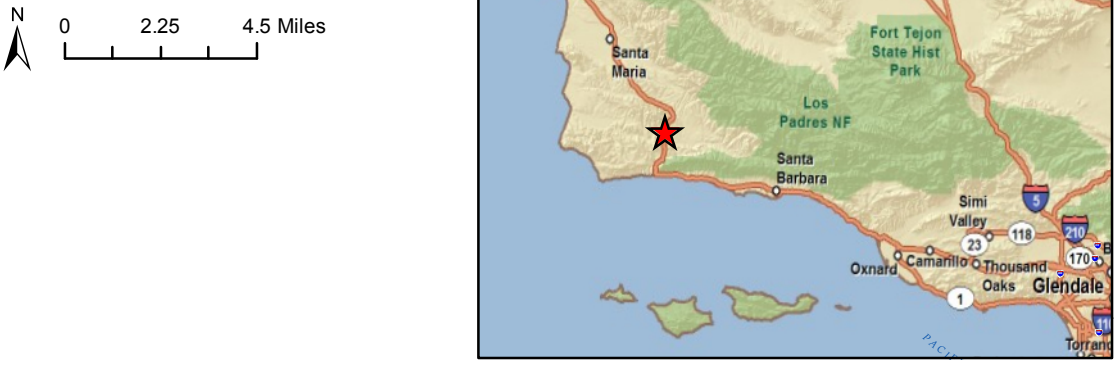


Regional Location

Figure 2-1

Imagery provided by National Geographic Society, ESRI and its licensors © 2012.

Project Boundary

N 0 200 400 Feet

Project Site Location

Figure 2-2

Imagery provided by National Geographic Society, ESRI and its licensors © 2012.

Project Boundary

Proposed Off-Site Retention Basin

N

0 200 400 Feet

Project Site Location

Figure 2-2

principal means for accommodating the City's Regional Housing Needs Assessment (RHNA) housing production goals. The portion of the proposed project that would be used for the proposed off-site retention basin, located within the County of Santa Barbara, is zoned Agriculture under the Santa Barbara County zoning ordinance. Table 2-1 summarizes the existing land use and regulatory characteristics of the site.

Table 2-1 Existing Property Information

Site Characteristic	Description
APN	099-400-064, 099-400-065, 099-400-069 (offsite portion)
Land Use Designation	General Commercial
Zoning (project)	General Commercial (CR), Affordable Housing Overlay Zone (AHOZ)
County Zoning (retention basin)	Agriculture
Size	18.2 acres
Existing Land Use	Agriculture
Surrounding Land Use	***North:*** Agriculture/Open Space ***South:*** Caltrans facility (Public, Quasi Public) ***East:*** Jonata Park Road ***West:*** Agriculture/Open Space

The Buellton Planning Commission has determined the proposed project meets the definition of a "Medical Services-Hospitals and Extended Care" use, and therefore would be permissible in the General Commercial (CR) zone. **As described in Section 19.12.020 of the Buellton Municipal Code, this land use is defined as follows:**

> ***Medical services—hospitals and extended care (land use)" means hospitals and similar establishments primarily engaged in providing diagnostic services, extensive medical treatment including surgical and other hospital services; such establishments have an organized medical staff, inpatient beds, and equipment and facilities to provide complete health care. May include accessory retail pharmacies, and emergency heliports. Also includes residential establishments providing nursing and health related care as a principal use with in-patient beds, such as: skilled nursing facilities (facilities allowing care for physically or mentally disabled persons, where care is less than that provided by an acute care facility); extended care facilities; convalescent and rest homes; board and care homes. Long-term personal care facilities that do not emphasize medical treatment are classified in "residential care.***

Previous Environmental Review. In September 2005 the City Council approved the City of Buellton General Plan Land Use Element and Circulation Element Update Program and associated Environmental Impact Report (EIR), which updated the Land Use and Circulation Elements of the General Plan to address development of the vacant and under-developed lands within the City limit through the buildout year of 2025, including the current proposed project site (identified therein as AHOZ Program Key Site II).

In March 2007 the City Council approved the City of Buellton General Plan Update Phase 2 Program and associated Supplemental EIR, which updated the Conservation and Open Space,

Economic Development, Noise, Parks and Recreation, Public Facilities and Services, and Safety Elements of the General Plan, and amended the General Plan Land Use Element to re-designate and re-zone 12 parcels along Central Avenue from General Commercial (CR) to Multi-Family Residential (RM-16).

This Subsequent EIR will tier from the City of Buellton Land Use Element and Circulation Element Update Program EIR, which is available for review on the City's website, www.cityofbuellton.com, and at the Buellton Planning Department office, located at 331-B Park Street.

2.5 PROJECT CHARACTERISTICS

The proposed project is a request by Parton & Edwards Construction, as agent for the owner, Norman Williams, for approval of a Tentative Tract Map (TTM), and a Conditional Use Permit for the 18.2-acre project site. The two existing parcels would be split into six parcels. The southernmost two parcels would remain vacant and are approximately 2.8 acres each. The northernmost four parcels are planned as a new senior care facility, and total approximately 12.6 acres. It is anticipated that each of the parcels would obtain additional, separate governmental permits, at their own rate of development. A residence and outbuildings would be demolished to make way for the planned developments. Table 2-2 shows the characteristics and proposed future uses for the six parcels.

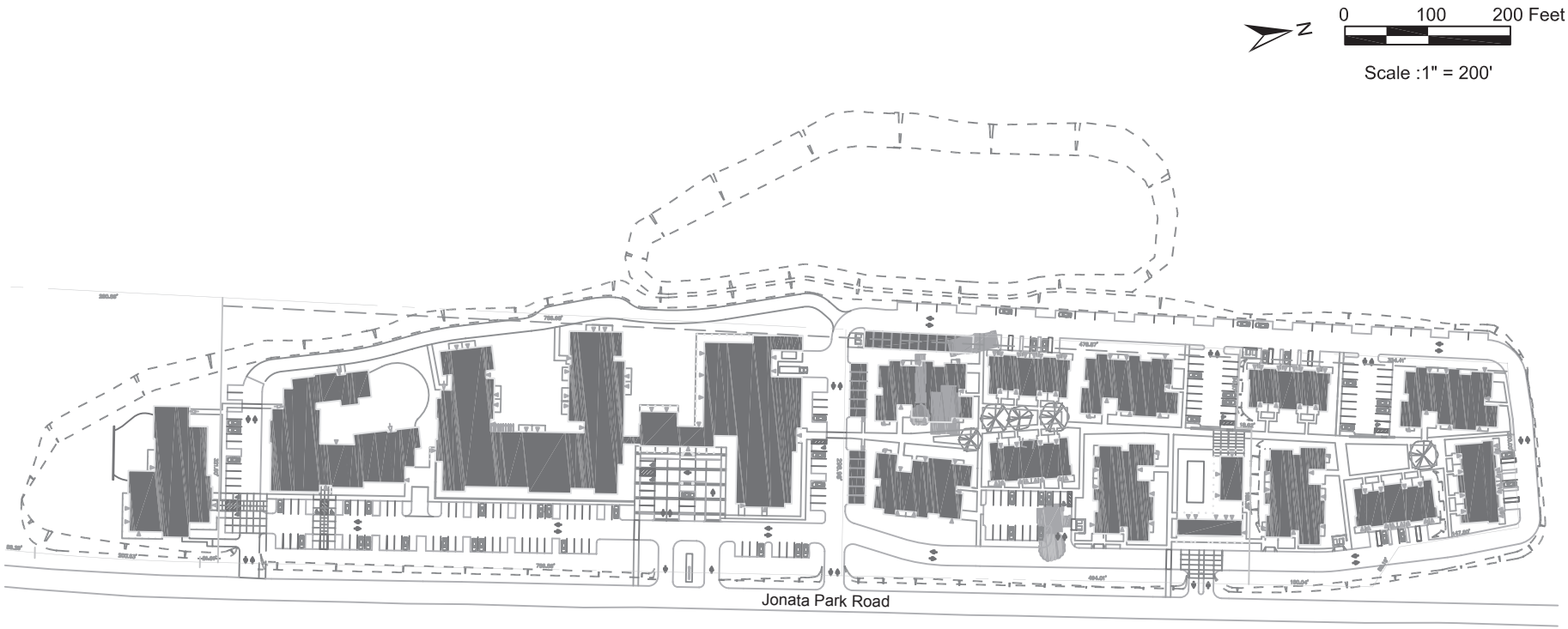
Table 2-2 Proposed Parcels and Land Uses

Parcel Reference Number	Approximate Size	Proposed Future Use
Parcel 1	2.8 acres	Vacant
Parcel 2	2.8 acres	Vacant
Parcel 3	2.1 acres	Skilled Nursing Facility
Parcel 4	5.4 acres	Memory Building, Assisted Living/Independent Living, Main Entry, Dining Kitchen
Parcel 5	3.3 acres	Independent Living, Community Center – Phase I
Parcel 6	1.9 acres	Independent Living – Phase II

Notes: Parcels are numbered from southernmost (Parcel 1) to northernmost (Parcel 6).Refer to Figure 2-3, Proposed Site Plan.

As shown in Table 2-2, the project proposes to develop a facility designed to provide multiple levels of senior board and care ranging from independent and assisted living to special needs and extended care. Figure 2-3 illustrates the proposed site plan. The proposed facilities include a dining hall and commercial kitchen, a pool and health center, social programming, health education, cultural programs, and concierge services. Seniors would be housed in one- or two-story independent units, or two- and three-story independent and assisted facilities. A 40-unit memory care building is also proposed as part of the facility. A 24-bed skilled nursing facility, near the main campus, is planned for special needs of the clients.

The skilled nursing facility would have 24 private rooms and an enclosed garden. The memory care building would have 40 private studios and an enclosed garden. The assisted living building would have 91 one- and two-bedroom assisted living units, which would include 56 independent living units. The assisted living building would also include a dining hall, a



Base drawing source: BAR Architects, 2012.

Proposed Site Plan

Figure 2-3

commercial kitchen, a community center, a swimming pool, and two outdoor courtyards. The independent living units would include a total of 92 one- and two-bedroom units, located in 4-plex and 12-plex buildings. Garages and carports would be provided for the parking spaces for the independent living units. The independent living facilities would include a kitchen, exercise room, multi-purpose room, and restrooms. In total, the project would result in 247 habitable units. The proposed buildings would be agrarian in architectural style. Table 2-3 describes each of the project components in greater detail.

The facility would be staffed 24 hours per day, seven days per week. Staff would include positions in the areas of administration, care-giving, skilled nursing, memory care, food service, housekeeping, activities, marketing, and maintenance. The project would be expected to operate with a staff of approximately 56 employees.

Table 2-3 Proposed Building Area, Unit Count, and Parking Summary

Proposed Future Use	Building Area	Building Height	Total Units	Total Parking Stalls
Skilled Nursing Building	1st Floor 11,870 gsf 2nd Floor 10,705 gsf	33 feet	24 private rooms	24 (Guests, Staff, and Handicap)
Memory Building	1st Floor 16,560 gsf 2nd Floor 15,800 gsf	35 feet	40 private studios	20 (Guests, Staff, and Handicap)
Assisted Living Building	1st Floor 51,730 gsf 2nd Floor 36,926 gsf 3rd Floor 29,640 gsf	35 feet	91 1- and 2-bedroom units	70 (Residents, Guests, Staff, and Handicap)
Independent Living: 4-Plex Cottages	21,860 gsf	20 feet	20 2-bedroom units	28 (Residents, Guests, and Staff)
Independent Living: 12-Plex Apartments	1st Floor 43,460 gsf 2nd Floor 41,484 gsf	33 feet	72 1- and 2-bedroom units	100 (Residents, Guests, Staff, and Handicap)
Community Building	3,130 gsf	23 feet	-	-
Enclosed Garages	5,500 gsf	-	-	-
Total	**288,665 gsf**	**-**	**247 units**	**242 parking stalls**

The proposed project would require approval of a Conditional Use Permit (CUP) for the proposed senior living facility. The Buellton Planning Commission has determined the proposed project meets the definition of a "Medical Services-Hospitals and Extended Care" use, and therefore would be permissible in the General Commercial (CR) zone.

Roadway Access. Interior access to the site would be provided by four access points along Jonata Park Road. Interior vehicular travel, as well as fire and emergency access, would be provided by a loop roadway system around the senior care parcels. The portion of this roadway along the west property line of parcels four, five, and six would be located on land in the County of Santa Barbara via a dedicated use easement. Parallel guest parking would also be located on this roadway. A total of 242 parking spaces would be provided. This includes 24 for the skilled nursing building, 20 spaces for the memory building, 70 spaces for the assisted living building, and 128 spaces for the independent living units.

Landscaping, Pedestrian Pathways, and Lighting. The campus would be landscaped with a variety of trees, shrubs, and ground covers. The proposed Conditional Use Permit also includes

walking paths throughout the site and along Jonata Park Road. Lighting would be located along walkways, at building entries, in parking areas, and as perimeter security.

Drainage and Grading. Storm water from the proposed development would be collected and directed to storm drains located in the project roadways and Jonata Park Road. Off-site drainage would be collected in a retention basin located to the west of the site. The proposed retention basin would fall outside of the Buellton City limit, and would be under the jurisdiction of Santa Barbara County. The retention basin would be designed to be consistent with Santa Barbara County Flood Control and Water Conservation District's Standard Conditions of Project Plan Approval and would be subject to permitting from the County of Santa Barbara.

The senior center facilities would be developed on the level portion of each parcel. Grading for compaction, drainage, and minor slope modifications would be determined based on the choice of phase development and in an effort to balance cut and fills on-site.

Adjacent Agricultural Buffer. The project applicant and site owner is also the owner of the adjacent parcel of the land to the west and north, which is under the jurisdiction of Santa Barbara County, and is currently used for grazing and agriculture. As part of the proposed project, the applicant would provide an agricultural buffer of no less than 200 feet between the senior center facilities and active agricultural operations on the adjacent parcel.

Public Services and Utilities. Water supply, wastewater treatment, and stormwater drainage would be provided directly by the City of Buellton. Other public services in the City are on a contract basis with other jurisdictions, such as the City of Buellton's Police Department, which is a sub-department of the Santa Barbara County Sheriff's Department, and fire protection services, which are contracted from the Santa Barbara County Fire Department. Garbage collection and disposal, including recyclable materials collection services, for the City is provided by Marborg Industries of Santa Barbara. Unrecyclable solid waste from the City is ultimately disposed of at Tajiguas Sanitary Landfill, located near the City of Goleta.

Pacific Gas and Electric would provide the electric service, and Southern California Gas would provide gas service to the site. Verizon would provide phone service, and Comcast Cable would serve the site.

2.6 PROJECT OBJECTIVES

The applicant's primary objectives of the Meritage Senior Living project are to:

- *Provide a new senior care facility that is functionally compatible with adjacent uses.*
- *Protect and enhance the quality of life of Buellton residents through the creation and maintenance of an affordable, attractive, and well-served senior care community.*
- *Create an economically viable, quality project that is consistent with the existing zoning and land use designation for the site, and designed in harmony with the existing urban form.*
- *Provide for walkability and access to services and facilities by locating project residents near Avenue of Flags and downtown businesses.*
- *Provide new employment and career opportunities to Buellton's resident workforce.*

2.7 REQUIRED APPROVALS

Implementation of the proposed project would require the following discretionary approvals from the City of Buellton:

- *Tentative Tract Map (TTM) to subdivide the property into 6 parcels; and*
- *Approval of a Conditional Use Permit for the proposed senior living facility.*

In addition, the Regional Water Quality Control Board (RWQCB) will be a responsible agency for review of National Pollutant Discharge Elimination System (NPDES) permit requests, and the County of Santa Barbara will be responsible for permitting related to the proposed off-site retention basin, which is located outside of the Buellton City limit.

3.0 ENVIRONMENTAL SETTING

3.1 REGIONAL SETTING

The project site is located within the Santa Ynez Valley in southern Santa Barbara County. The Santa Ynez Valley is a coastal valley bound by the Santa Ynez and San Rafael mountains to the south and north, the Purisima and Solomon Hills to the northwest, and the Santa Rita Hills to the West. Numerous streams, creeks, and their tributaries drain the Valley area and eventually feed into the Santa Ynez River, which flows east to west adjacent to the southern boundary of the City.

Santa Barbara County has a Mediterranean climate characterized by warm, dry summers and temperate, semi-moist winters. Daytime summer temperatures in the County average from the high 70s to mid 90s, with generally higher temperatures in inland areas and lower temperatures along the coast. Nighttime low temperatures during the summer are typically in the high 50s to low 60s. Winter daytime high temperatures tend to be in the 60s, while winter low temperatures are typically in the 30s. The Santa Ynez Valley tends to have larger day-night temperature variations and tends to be drier and warmer than the coastal areas of Santa Barbara County. Foggy conditions are relatively common in the mornings, particularly during the summer months, with fog typically burning off by mid- to late-morning. The western Santa Ynez Valley is slightly cooler than the eastern portion of the Valley, as the influence of morning fog is greater in western portions.

Annual rainfall typically ranges from about 13 to 18 inches, with nearly all precipitation occurring between October and April. Over the past ten years, the Santa Ynez Valley received an average rainfall of 20.39 inches per year.

3.2 SITE SPECIFIC SETTING

The 18.2-acre project site is located on Jonata Park Road, on the west side of Highway 101, approximately ½ mile north of State Route (S.R.) 246, at the north end of the Buellton City Limits. The site is bordered by Jonata Park Road on the east, a Caltrans facility on the south, and agricultural land and open space on the north and west. The land immediately to the north and west is under the jurisdiction of Santa Barbara County.

The project site is designated General Commercial under the Buellton General Plan. Portions of the site are currently used for grazing and farming. The project site is included in the City's Affordable Housing Overlay Zone (AHOZ) Program, which is a permissive overlay zoning designation, which allows high density residential development as an alternative to the base zoning of AHOZ-designated sites. A small residence and outbuildings are currently located on the site, and would be removed as part of the proposed project. The site is characterized by scattered oaks, coastal scrub, and non-native annual grassland, and slopes gradually downward from the western hillside toward the edge of the property at Jonata Park Road. The natural drainage area is from the top of the hillside down to Jonata Park Road, where water is diverted under the road near a culvert at the southern edge of the property. On-site slopes are generally less than 9%, and do not exceed 15%.

3.3 CUMULATIVE DEVELOPMENT

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

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

The impact sections of this SEIR discuss the potential cumulative environmental impacts resulting from the proposed project in association with other planned, pending, and reasonably foreseeable projects in the vicinity of the project site. The cumulative impacts discussion considers cumulative development in the City of Buellton, which is expected to include 297 residential units that are currently pending, approved, or under construction, in addition to 441 hotel units and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.). Table 3-1 lists the projects included in the cumulative impact analyses.

Table 3-1 City of Buellton Cumulative Projects List

Project Name/Application Date	Project Type	Units/S.F.	Location	Status
Peterson Development Plans 02/21/12	Industrial	7,000 sf and 3,500 sf outdoor entertainment area	Southwest side of industrial way 71, 73, and 75 Industrial Way	**Pending** PC approved the PDP and FDP on 07/05/12; outdoor entertainment area has been completed
Crossroads Center at the Village Specific Plan Site 10/19/11	Commercial	48,830 sf	Vacant property at the northeast corner of Highway 246 and McMurray Road APN 137-090-045 Miller Bros., contact John Franklin, 805-907-5124	**Pending** PC Conceptually Reviewed this Proposal on 11/15/12
Farm Supply Company 06/17/11	Commercial	4,900 sf	North of the intersection of Thomas Road and McMurray Road 700 McMurray Road Jim Brabeck, 805-543-3751	**Complete** ZA Approved the FDP on 10/11/11 Zoning Clearance Approved on 11/15/11
MetroPCS Cellular Antennas 05/31/11	Commercial	220 sf	South of the intersection of Damassa Road and McMurray Road 555 McMurray Road Tricia Knight, 805-448-4221	**Complete** PC Approved the CUP on 09/01/11 Zoning Clearance Approved on 12/01/11
Joint Replacement Hospital 12/28/09	Commercial	30,000 sf	East of the intersection of Damassa Road and McMurray Road APN 137-170-067 Tom Davidson, 805-588-7777	**Pending**

Table 3-1 City of Buellton Cumulative Projects List

Project Name/Application Date	Project Type	Units/S.F.	Location	Status
Verizon Tentative Parcel Map 04/30/09	Industrial	No Development Proposed	West side of Industrial Way 123 Industrial Way APN 099-690-019 Marilyn Warren, 818-734-7801	**Approved** PC Approved the TPM on 11/19/09 Inactive - pending expiration on 11/19/14
The Village Master Tentative Tract Map 04/24/08	Mixed Use: Residential/Commercial	No additional development proposed. Same development as proposed in the Village Specific Plan.	Vacant property at the northeast corner of Highway 246 and McMurray Road APN 137-090-045 Miller Bros., contact Phil Culler, 805-523-1377	**Approved** CC Approved the TTM on 10/09/08 Expires on 10/08/14
Polo Village 09/10/07	Residential	53 multi-family units (Including 11 affordable units)	Vacant property on the east side of McMurray Road APN 137-090-067 Joel Baker, 805-688-8562	**Approved** Zoning Administrator approved the FDP on 04/23/08 Inactive - pending expiration on 04/23/13
Santa Ynez Valley Inn and Racquet Club 05/14/07	Commercial Recreation with a Condo Hotel Component	19,296 sf clubhouse, 8 tennis courts, 2 pools, and 120 Residential/Guest Lodging Units	Vacant property east of Industrial Way and south of River Grove Mobile Home Park APN 099-690-048 Karl Pope, 805-207-8502	**Approved** CC approved the FDP, TPM and GPA on 02/14/08 and a ZOA on 02/28/08 Inactive – pending expiration on 02/14/13
Village Specific Plan (formerly Known as Oak Springs Village) 4/06/07 [1]	Mixed Use: Residential/Commercial	244 residential units/45,000-55,000 sf of Commercial space/100,000-200,000 sf hotel/1.8 acres of parks	Vacant property at the northeast corner of Highway 246 and McMurray Road APN 137-090-045 Miller Bros., contact Phil Culler, 805-523-1377	**Approved** CC approved the amended Specific Plan on 09/27/07

Table 3-1 City of Buellton Cumulative Projects List

Project Name/Application Date	Project Type	Units/S.F.	Location	Status
Bach Hotel 1/16/01	Commercial	66,667 sf 4 story hotel with 90 standard guest rooms, 6 suites, 1000 sf of restaurant space, and 1,200 sf of meeting facilities and other complimentary uses	412 and 450 Avenue of Flags On Avenue of Flags, north of Anderson's Pea Soup 412 and 450 Avenue of Flags APN's 137-180-001 and 137-180-023 Kui Li, 805-688-4181	**Approved** FDP Approved by Zoning Administrator on 12/29/03 LLA Approved by PC on 01/04/07 Building permits issued for selected aspects of project

1: With the exception of the Crossroads Center at the Village Specific Plan Site, discussed above, permitted Development within the Village Specific Plan is excluded from the total cumulative development, as specific development within the Specific Plan area is not yet permitted.
Source: City of Buellton, June, 2012

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4.0 ENVIRONMENTAL IMPACT ANALYSIS

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

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

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

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

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

Please refer to the Executive Summary of this SEIR, which summarizes all impacts and mitigation measures that apply to the proposed project.

4.1 AESTHETICS/VISUAL RESOURCES

4.1.1 Setting

a. Regional Setting. The City of Buellton is located in northern Santa Barbara County, approximately 47 miles north of the City of Santa Barbara and approximately 40 miles south of the City of Santa Maria via U.S. Highway 101. The total area of incorporated Buellton is approximately 1.6 square miles. Buellton is bordered by the Santa Ynez River to the south and is located in the rich agricultural Santa Ynez Valley. Areas surrounding the City remain as rural residential, ranches, and production agriculture. To the east the agricultural lands and ranches give way to urban development in the City of Solvang. Similarly, to the west, agricultural lands and ranches give way to urban development in the City of Lompoc.

The visual character of the Buellton area is a combination of a natural and built environment. The rural County areas adjacent to the City are primarily intact visually as natural or agricultural countryside. The three major components of the Buellton visual setting are the topography, the vegetation, and the character of its built environment.

The topography within the Planning Area ranges from nearly flat with hillsides to the north and to the south across the Santa Ynez River. The elevation of the Santa Ynez River bed drops at a gentle gradient. Topography immediately north of the riverbed is characterized by a gently sloping alluvial terrace rising to the gently rolling hillsides that comprise the area north of the City limit. Most of the City north of the Santa Ynez River has an average elevation of approximately 350 feet above sea level. In the areas to the north and northeast of the City, hills rise to an elevation of 800 feet. The parallel ridgelines to the north and south provide a scenic backdrop to the community, while the surrounding fields establish a pastoral character. The Santa Ynez River provides a natural visual boundary to the City in the south. The River, as well as Thumbelina and Zaca Creeks, include visually important riparian habitat along their channels.

The urban character of the City is less well defined. The commercial buildings include a mix of Victorian, Spanish, contemporary commercial, western storefront, as well as half-timber style architecture. Main residential areas within the City include: Sycamore Ranch, Oak Creek, La Pita Hillside, Twin Oaks, Calor-La Lata, Central Avenue, and Juliette Walk neighborhoods west of Avenue of Flags and north of Highway 246; Meadow Ridge, Ranch Club, River Grove, Valley Station, and Rancho de Maria neighborhoods to the west of Avenue of Flags and south of Highway 246; and the Thumbelina and Ballard Canyon neighborhoods to the east of Freear Drive and north of Highway 246. These neighborhoods include single story and two-story single-family residences on relatively uniform-sized lots as well as condominiums on smaller lots. Rectilinear streets and a traditional development pattern provide the framework for these established residential communities. Industrial districts are located in the northeast area of the City along McMurray Road and in the southern area of the City along Industrial Way. Industrial buildings are typically large metal buildings, but there is no particular unifying architectural style. Development within the City generally exhibits a small town character.

U.S. Highway 101 and State Route (S.R.) 246 are the primary regional highways serving the area and are important gateways to the City. Avenue of Flags is the major north-south arterial

roadway located west of and parallel to U.S. Highway 101. U.S. Highway 101 and SR 246 are not locally-designated or State-designated scenic highways or routes; however U.S. Highway 101 is "eligible for designation" along its entire length through the City of Buellton and within Santa Barbara County.

b. Project Site Visual Character. The 18.2-acre project site is located on Jonata Park Road, on the west side of U.S. Highway 101, approximately ½ mile north of SR 246, at the north end of the Buellton City limit. The project site includes parcels 099-400-064 and 099-400-065 and is bordered by Jonata Park Road on the east, a Caltrans facility on the south, and agricultural land and open space on the north and west.

Portions of the site are currently used for grazing and farming. A small residence and outbuildings are currently located on the site, and would be removed as part of the proposed project. The site slopes gradually downward from the western hillside toward the edge of the property at Jonata Park Road. On-site slopes are generally less than 9%, and do not exceed 15%. Habitat on the project site consists of scattered oaks, coastal scrub, and non-native annual grassland.

The project site is designated General Commercial under the Buellton General Plan, with corresponding zoning of General Commercial (CR) under the City's Municipal Code. The project site is included in the City's Affordable Housing Overlay Zone (AHOZ) Program, which is a permissive overlay zoning designation, which allows high density residential development as an alternative to the base zoning of AHOZ-designated sites. Surrounding land uses are primary comprised of agricultural land and open space to the north and west, with industrial uses across U.S. Highway 101 to the east. Commercial, public facilities, and residential uses are also present within the vicinity of the project site.

Views through the site consist primarily of open grazing land and include views of the small residence and outbuildings along the property line of parcels 099-400-064 and 099-400-065. The project site is located west of U.S. Highway 101 which is the major public viewing corridor traversing the City in a north/south direction. Through the City, U.S. Highway 101 has foreground views of predominantly commercial and residential development and background views of hillsides, including the Santa Ynez Mountains, and agriculture to the north and south. Views from U.S. Highway 101 towards the site similarly consist of open grazing land and existing structures in the foreground with views of the hillsides of the Santa Ynez Mountains in the background (refer to Figure 4.1-1).

Sources of light and glare on the project site are primarily attributed to the existing single family residence and outbuildings. The remainder of the site does not contain street lighting, lighted nighttime activity, or structures that would produce glare. Some residual lighting on site may be attributed to vehicles along Jonata Park Road and U.S. Highway 101. Additional sources of light and glare near the project site include street and building lighting associated with public facilities to the south and industrial uses across U.S. Highway 101 to the east.

Photo 1 - Existing on-site structures, viewed from U.S. Highway 101

Photo 2 - Southern portion of the project site, viewed from U.S. Highway 101

Views of the Project Site
from U.S. Highway 101

Figure 4.1-1

c. Regulatory Setting. The City of Buellton regulates the design of the built environment through its Community Design Guidelines (adopted November 2005), which describe elements encouraged to be incorporated into new developments and redevelopment community-wide within the City of Buellton. The Design Guidelines focus on single-family residential, multi-family residential, commercial and commercial mixed-use, and industrial land uses. The Design Guidelines are intended to aid property owners, designers, and decision-makers by providing a clear statement of the City's expectations for new development. The Design Guidelines reflect the architectural influences of the surrounding farms and ranches of the Santa Ynez Valley, and to a lesser extent, the California Missions. Applicable Community Design Guidelines related to commercial and mixed-use development include:

- *The natural contours of the land should be respected when developing on sloped properties. Terraced parking lots, stepped building pads, and larger setbacks should be used to preserve the general shape of natural landforms and to minimize grade differentials with adjacent streets and adjoining properties.*
- *Proposed development should be designed to preserve existing stands of trees wherever possible.*
- *Development should incorporate existing natural features into the overall site design including rock outcroppings, major landforms, ridgelines, significant trees and vegetation, streams, and drainage areas.*
- *Projects adjacent to Highways101 and 246 should be designed with landscaping and architectural detailing that are attractive and inviting when viewed from the Highway.*
- *High standards for the physical appearance of buildings and sites as seen from the Highways should be emphasized.*
- *The area with the most public visibility should have an emphasis on materials and landscaping and should establish a quality architectural presence.*
- *Entry drive orientation and accent landscaping should be used to enhance/identify the entry sequence.*
    - *The entry drive should be oriented towards the main entrance of the building,*
    - *A minimum 7' wide landscaped center median should be provided at the entry drive where feasible.*
    - *Landscaped areas should flank the entry drive.*
    - *Signs, paving, and plants should be incorporated into a well-designed entry to visually link the site entry to the buildings.*
- *Walls, fences, or hedges should be incorporated into the design of parking lots adjacent to public streets to screen vehicles from public view and to reduce headlight glare.*
- *Landscape materials must be appropriate to the local climate and soil conditions and should be drought tolerant.*
- *Projects along Highways 246 and 101 should provide trees and a landscaped setback between the right-of-way and adjacent development.*
- *Soften blank walls through the use of doors and windows, varying colors and materials, awnings and canopies, display cases, trellises, vines, murals, wall undulation, and architectural details.*
- *Emphasize vertical or horizontal planes of the building via the use of accent trim or window arrangement.*
- *The following is a list of encouraged design elements:*
    - *Significant wall articulation,*
    - *A variety of surface textures,*
    - *Roof overhangs and arcades,*
    - *Large windows at street level for display areas,*

- *Regular window rhythm,*
- *Significant landscaping,*
- *Screened parking areas, and*
- *A comprehensive sign program that complements the character of the building.*

Additional policy guidance regarding visual resources is provided in the Buellton General Plan (December 2008). The Land Use Element and Conservation Element include policies to protect and enhance visual resources. In addition, the Zoning Ordinance implements the General Plan by establishing setback, parking and sign standards, building height limits, hillside development restrictions, and building densities. Applicable General Plan goals, policies and programs include the following:

LU Goal 1	*To provide effective standards for the location, amount, rate, type and quality of new development so that the local economy remains healthy, attractive residential neighborhoods can expand, the character of the City is preserved, surrounding agriculture is enhanced and maintained, and the natural environment is protected.*
Policy L-9	*The entrances to Buellton from the east and west on Highway 246, and from the north and south on the US 101 freeway and Avenue of Flags should be considered important features. New public and private development in these locations should include elements such as signage, landscaping and appropriate architectural detailing that announces that one has arrived in Buellton. Such elements should also be designed to reduce the speed of vehicles entering the City for the safety of pedestrians and bicyclists using and crossing arterial roads. Entrance monuments, as described in the Avenue of Flags/Highway 246 Urban Design Plan shall also be encouraged.*
Policy L-12	*All exterior lighting in new development shall be located and designed so as to avoid creating substantial off-site glare, light spillover onto adjacent properties, or upward into the sky. The style, location and height of the lighting fixtures shall be submitted with building plans and shall be subject to approval.*
C/OS Goal 10	*Preserve and protect important views and scenic resources within the City.*
Policy C/OS-14	*Encourage new development to protect visual amenities, including hillsides, by implementing the standards in the Community Design Guidelines.*
Program C/OS-14	*Require new public or private development to protect scenic resources by:* *a. Prohibiting structures that silhouette along ridgelines or hilltops from a public viewpoint;* *b. Utilizing natural landforms and vegetation for screening structures, access roads, building foundations, and cut and fill slopes;*

c. *Requiring landscaping which provides a landscape transition between developed areas and adjacent open space or undeveloped areas; and is compatible with the scenic resource being protected;*

d. *Incorporating sound Natural Resource Conservation Service practices and minimizing land alterations. Land alterations should be minimized by: keeping cuts and fills to a minimum; limiting grading to the smallest practical area of land; limiting land exposure to the shortest practical amount of time; replanting graded areas to insure establishment of plant cover before the next rainy season; and creating grading contours that blend with the natural contours on site or look like contours that would naturally occur;*

e. *Designing roads, parking, and utilities to minimize visual impacts. Proposed utilities, as well as existing utilities located on any portion of a development site shall be placed underground, unless determined unreasonable or impractical by the Planning Director. Roadways and parking should fit the natural terrain; and*

f. *Designing projects to fit the site's scale and character. Structures should be designed and located so: roof lines and vertical architectural features blend with and do not detract from the natural background or ridge outline; residential density and massing is decreased with increased elevation where it would mar the scenic quality of the scenic resource; they fit the natural terrain, and they utilize building materials, colors, and textures that blend with the natural landscape and avoid the creation of high-contrast situations.*

g. *Complying with and implementing the City's Urban Design Plan and Community Design Guidelines, as applicable.*

4.1.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The Meritage Senior Living project site corresponds with Key Site II as identified in the LUE and CE Update EIR. Impacts related to visual and aesthetic resources were analyzed in Section 4.1, *Aesthetics and Community Design*, of the LUE and CE Update EIR. The LUE and CE Update EIR concluded that impacts to view corridors (AES-1) were less than significant. Impacts to nighttime lighting and glare (AES-2) were identified as potentially significant. The LUE and CE Update EIR identified General Plan and Community Design policies which are designed to minimize glare and uplighting, as well as to require lighting to be shielded to confine light to the subject site. Mitigation Measure AES-2(a) regulated the use of non-reflective exterior building materials and was required to reduce potential impacts due to glare to a less than significant level. Impacts regarding alteration of the existing visual character of the site (AES-3) were determined to be significant and unavoidable. The LUE and CE Update EIR

concluded that development on the project site would alter the rural and topographic character of the site as well as the rural character of Jonata Park Road. Further, it stated that while existing City policies would help maintain the existing character of the community, alteration of the fundamental character of large rural areas cannot be avoided by urban site development.

Since the Meritage Senior Living Project is generally consistent with the Community Design Guidelines and General Plan regarding development policies (with the exception of a request to place 12 single-story garages and carports within the 10-foot rear setback zone) as originally analyzed in the LUE and CE Update EIR, no additional analysis of these issues is necessary. The impacts mentioned above are discussed in greater detail in Section 4.1.3 (b), below.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds. The assessment of aesthetic impacts involves qualitative analysis that is inherently subjective in nature. Different individuals react to viewsheds and aesthetic conditions differently. This evaluation measures the existing visual resources against the proposed development, analyzing the nature of the anticipated change and its compatibility with the visual character of the area. The Community Design Guidelines and General Plan were reviewed for policies relating to visual resources and design policy.

Pursuant to the CEQA Guidelines, potentially significant impacts would occur if development of the project site would:

- *Substantially degrade the existing visual character or quality of the site and its surroundings;*
- *Have a substantial adverse effect on a scenic vista;*
- *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; and/or*
- *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.*

U.S. 101 and SR 246 provide the primary through-travel corridors in the Buellton area. Segments of U.S. 101 have been designated as "Scenic Highways." U.S. Highway 101 is also "eligible for designation" along its entire length in Santa Barbara County. However, neither of these highways are designated scenic highways in the project region. Therefore, no impacts related to scenic resources within a state scenic highway would occur as a result of the proposed project. For a discussion of impacts determined to result in no impact as a result of the proposed project, refer to Section 5.0, *Effects Found Not To Be Significant*.

b. Project Impacts and Mitigation Measures.

Impact AES-1 Implementation of the Meritage Senior Living Project would introduce new development that would alter existing public views. Potential impacts to such views are considered Class III, *less than significant.*

The primary public viewpoints from which the project site is visible are Jonata Park Road and U.S. Highway 101. Project implementation would result in short-term visual changes to existing views from these public viewpoints during project construction, as well as a long-term modification of these existing views. Short-term, visual impacts to the roadways' visual corridors would include:

- Blockage of views by construction equipment and staging areas
- Disruption of views by temporary signage
- Exposure of slopes and removal of vegetation

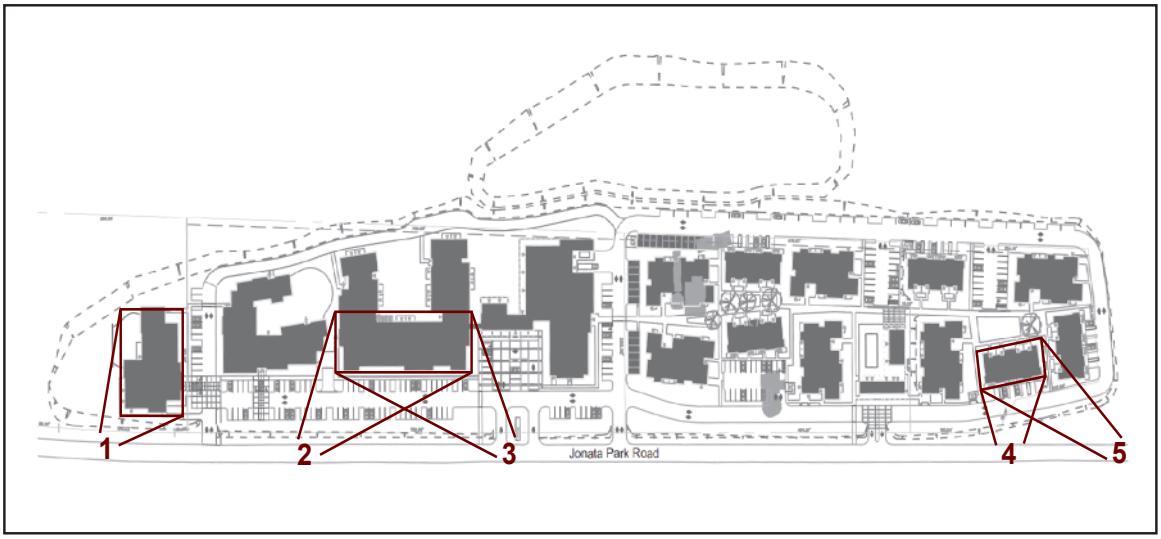
These construction impacts are expected to be minimal and temporary, and would be less than significant.

The proposed project would also result in long-term visual changes to the project site, including new buildings, signage, parking, and accessory facilities. The project site is directly adjacent to Jonata Park Road and U.S. Highway 101 and is visible from both roadways. The proposed project would result in 28% building footprint lot coverage, including two-story and three-story buildings. Views of the project site from Jonata Park Road with story poles that indicate the size and scale of the proposed structures on the project site are included in Figure 4.1-2(a) through Figure 4.1-2(c).

City policies, including the Community Design Guidelines and General Plan policies (outlined in Section 4.4.1[c], above) provide direction regarding architecture, building bulk, compatibility with surrounding development, and landscaping. The Meritage Senior Living Project is consistent with these guidelines. The proposed buildings are designed with an agrarian architectural style to blend in and complement the surrounding area. Building heights would not exceed the 35-foot maximum above average grade. This height is consistent with zoning standards for the project site and surrounding parcels. Additionally, buildings with three-story elements would be scaled down by one and two-story buildings at the edges of the site. Proposed structures would partially, but not completely obstruct existing views of the hillsides to the west of the project site from Jonata Park Road and U.S. Highway 101.

The project site would also be landscaped with a variety of trees, shrubs and ground covers to further reduce aesthetic impacts to views from Jonata Park Road, U.S. Highway 101 and surrounding areas. Project site plans include the planting of screening trees in the Caltrans right of way between U.S. Highway 101 and Jonata Park Road as well as the placement of a landscaped walking path along the eastern border of the site. These types of landscaping techniques are recommended in the Community Design Guidelines, consistent with Policy C/OS-14 of the General Plan. Project site landscaping is designed to screen vehicles from public view as well as enhance the visual character of the project. Implementation of the Community Design Guidelines and applicable General Plan policies would reduce adverse impacts on foreground views. This impact would be less than significant.

Mitigation Measures. With implementation of existing City policies including the Community Design Guidelines and General Plan policies outlined in Section 4.4.1(c) above, impacts would be less than significant. No mitigation is necessary.



Map Key - Numbers depicted on map correspond to photo number, location, and direction.

Photo 1 - Skilled Nursing Building, Viewed from Southeast

Views of the Project Site
from Jonata Park Road

Figure 4.1-2a

Photo 2 - Assisted Living Building East Wing, Viewed from Southeast

Photo 3 - Assisted Living Building East Wing, Viewed from Northeast

Views of the Project Site
from Jonata Park Road

Figure 4.1-2b

Photo 4 - 12-Plex C2, Viewed from East

Photo 5 - 12-Plex C2, Viewed from Northeast

Views of the Project Site
from Jonata Park Road

Figure 4.1-2c

Significance After Mitigation. Impacts would be less than significant without additional mitigation.

Impact AES-2 **Development of the Meritage Senior Living Project would introduce new sources of light and glare to the project site and adjacent land uses. Potential impacts to existing development due to glare would be Class II, *significant but mitigable.***

As discussed in Section 4.2.1(c), the project site contains existing sources of light attributed to the single-family residence and outbuilding on site. Additional sources of light and glare in the vicinity are attributed to vehicle lights from Jonata Park Road and U.S. Highway 101. Development of the Meritage Senior Living Project would increase the ambient nighttime lighting on the project site. Increased light would be generated by streetlights, parking lot lights, and signage on buildings. The Land Use Element of the General Plan (December 2008) includes Policy L-12, which requires new lighting to be designed to minimize glare and up lighting. The Community Design Guidelines also require lighting to be shielded to confine light to the subject site. Additionally, all exterior lighting will be shielded and in accordance with the City's Night Lighting Standards. Compliance with these policies would minimize impacts related to new sources of lighting on the project site to a less than significant level.

Despite these regulations, increased glare could adversely affect occupants of new buildings on-site as well as adjacent properties. Furthermore, proposed building plans include metal roofing materials which could potentially increase glare to vehicles along Jonata Park Road and U.S. Highway 101. Potential impacts regarding increased glare on the project site and within the vicinity would be potentially significant.

Mitigation Measures. With implementation of existing City policies including the Community Design Guidelines and General Plan policies outlined in Section 4.4.1(c) above, impacts to lighting would be less than significant. However, in addition to the implementation of applicable City polices described above, the following mitigation would be required to reduce potential impacts due to glare to a less than significant level.

AES-2 **Exterior Building Materials.** New structures shall utilize non-reflective exterior materials to prevent glare, as feasible.

Significance After Mitigation. With implementation of Mitigation Measure AES-2, in addition to implementation of the City's Community Design Guidelines and General Plan policies, impacts would be reduced to a less than significant level.

Impact AES-3 **Development of the Meritage Senior Living Project would alter the visual character of the project site. However, existing City regulations would minimize aesthetic impacts. Impacts would be Class III, *less than significant.***

The project site is located on the edge of the Buellton City limit on the west side of U.S. Highway 101, and is accessed by Jonata Park Road. The site is currently developed with a single

family residence and outbuildings. The remainder of the site is vacant open space and in agriculture production. The project site is generally flat along Jonata Park Road, but slopes upward into the hills on the west side of the site.

The project site is adjacent to the Buellton City limit on the northern and western boundary of the site. Beyond the City limit, the site is adjacent to agricultural and open space land, which is within the County of Santa Barbara. The site is bordered to the south by a Caltrans facility and to the east by Jonata Park Road. U.S. Highway 101 is immediately across Jonata Park Road, east of the project site. The LUE and CE Update EIR identified impacts regarding alteration of the existing visual character of the site that would result from implementation of the AHOZ designation (and associated increase in allowable development density) on the subject sites to be significant and unavoidable. The proposed project is consistent with the City's plan for the area, as depicted in the existing City land use designation and zoning regulations. Proposed structures on the project site would generally be two stories in height, with the exception of the proposed Assisted Living Facility, which would be three stories, and would be located in the center of the project site, as viewed from U.S. Highway 101. These building heights are consistent with development to the south of the project site, which is composed of a mix of two-story and one-story structures. Building heights of proposed project structures would taper off to single-story development to the north, where the project would abut existing agricultural land. Therefore, implementation of the project would provide visual continuity of the built environment.

Additionally, existing policies of the General Plan and Community Design Guidelines would further reduce impacts to the visual character of the project site. Refer to impact discussion AES-1 for details regarding the project's compliance with these policies.

Mitigation Measures. With implementation of existing City policies including the Community Design Guidelines and General Plan policies outlined in Section 4.4.1(c) above, impacts would be less than significant. No mitigation is necessary.

Significance After Mitigation. Impacts would be less than significant without additional mitigation.

c. Cumulative Impacts. Cumulative development in the City of Buellton would gradually alter the visual makeup of the area to a more built environment. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. None of the additional pending projects are located directly along U.S. Highway 101. The majority of development would be located on infill sites throughout the City, as well as tracts of undeveloped land along the City's urban perimeters.

Collectively, the Meritage Senior Living Project and cumulative development throughout Buellton would incrementally change the character of the City. However, the change in aesthetic character to commercial use would be consistent with the City's General Plan land use designations. In addition, cumulative development would largely occur in areas currently intended for residential and commercial development and would be subject to City regulations

pertaining to aesthetics and light and glare, which are intended to minimize visual impacts and ensure consistency throughout the City. As such, impacts related to visual character and light and glare would not be cumulatively considerable.

4.2 AGRICULTURAL RESOURCES

4.2.1 Setting

a. Regional Setting. California is the leading state in agricultural production in the United States, and Santa Barbara County consistently ranks within the top 20 counties in the state in overall agricultural productivity. Santa Barbara County's gross agricultural production in 2011 totaled $1,194,379,056 on an estimated 709,617 acres. The top ten revenue crops that were produced in the County in 2011 included strawberries, broccoli, wine grapes, head lettuce, avocados, cauliflower, celery, cattle, lily cut flowers, and gerbera cut flowers.

As a result of urbanization and increased development and populations, the County of Santa Barbara has seen a decline in agricultural land uses over the years. Table 4.2-1 illustrates the changes in agricultural land uses and the gain of non-agricultural land uses in Santa Barbara County between 2008 and 2010. During this time period, approximately 61 acres were lost from "important farmland," and 344 acres were lost from grazing land throughout the County.

Table 4.2-1 Santa Barbara County Agricultural Conversion 2008-2010

Land Use Category	Total Acreage Inventoried		2008-2010 Net Acreage Change
	2008	2010	
Prime Farmland	67,169	66,568	-601
Farmland of Statewide Importance	12,299	12,475	176
Unique Farmland	34,777	35,606	829
Farmland of Local Importance	11,108	10,643	-465
Important Farmland Subtotal	**125,353**	**125,292**	**-61**
Grazing Land	581,986	581,642	-344
Agricultural Land Subtotal	**707,339**	**706,934**	**-405**
Urban and Built-up Land	62,332	62,762	430
Other Land	265,466	265,443	-23
Water Area	4,191	4,191	0
Total Area Inventoried	**1,039,328**	**1,039,330**	**2**

Buellton is surrounded by agricultural parcels ranging in size from 10 to 200 acres. Agriculture outside the City includes grazing and pasture land to the north, west, and east, and crop production to the south adjacent to the Santa Ynez River. Within the City, there is no land currently zoned for agriculture. It should be noted, however, that approximately 15 acres adjacent to the northernmost edge of the City and approximately 10 acres adjacent to the southern edge of the City, near Highway 101, are currently used for pasture and rotational crops, respectively.

b. Project Site Setting.

Agricultural Uses. The subject property is identified as Assessor's Parcel Numbers (APN) 099-400-064 and 099-400-065. A review of historical aerial photographs revealed that parcels 099-400-064 and 099-400-065 both appear to have been historically used for agricultural

purposes. The parcels are located on the boundary of the incorporated limit of the City of Buellton. A small residence and some outbuildings are currently located on the site, and would be removed as part of the proposed project. The site is identified as grazing land under the California Department of Conservation's Farmland Mapping and Monitoring Program (refer to Figure 4.2-1) (FMMP, 2010), and portions of the site are currently used for grazing and farming. Property to the north and west of the site is zoned for agriculture by Santa Barbara County (Santa Barbara Planning and Development, 2011), and are designated Prime Farmland and Unique Farmland by the FMMP. ~~These areas are also designated as Williamson Act Prime Agricultural Land Non-Renewal properties.~~ As discussed in Section 2.0, *Project Description*, the project applicant and site owner is also the owner of the adjacent parcel of the land to the west and north, which is under the jurisdiction of Santa Barbara County. As part of the proposed project, the applicant would provide an agricultural buffer of no less than 200 feet between the senior center facilities and active agricultural operations on the adjacent parcel. The project site is not subject to a Williamson Act agricultural preserve contract ~~(refer to Figure 4.2-2)~~. There are no wells or drainages located on the project site.

Soils. The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) has surveyed and mapped soils complexes in Buellton (City of Buellton General Plan, Figure C/OS-2). The NRCS has developed a system for classifying soils in accordance with their capability to support certain types of agriculture operations. The system uses a scale from I to VIII, with Class I having the most desirable characteristics, and Class VIII having the least desirable characteristics. Soils Classes I and II are considered prime agricultural land.

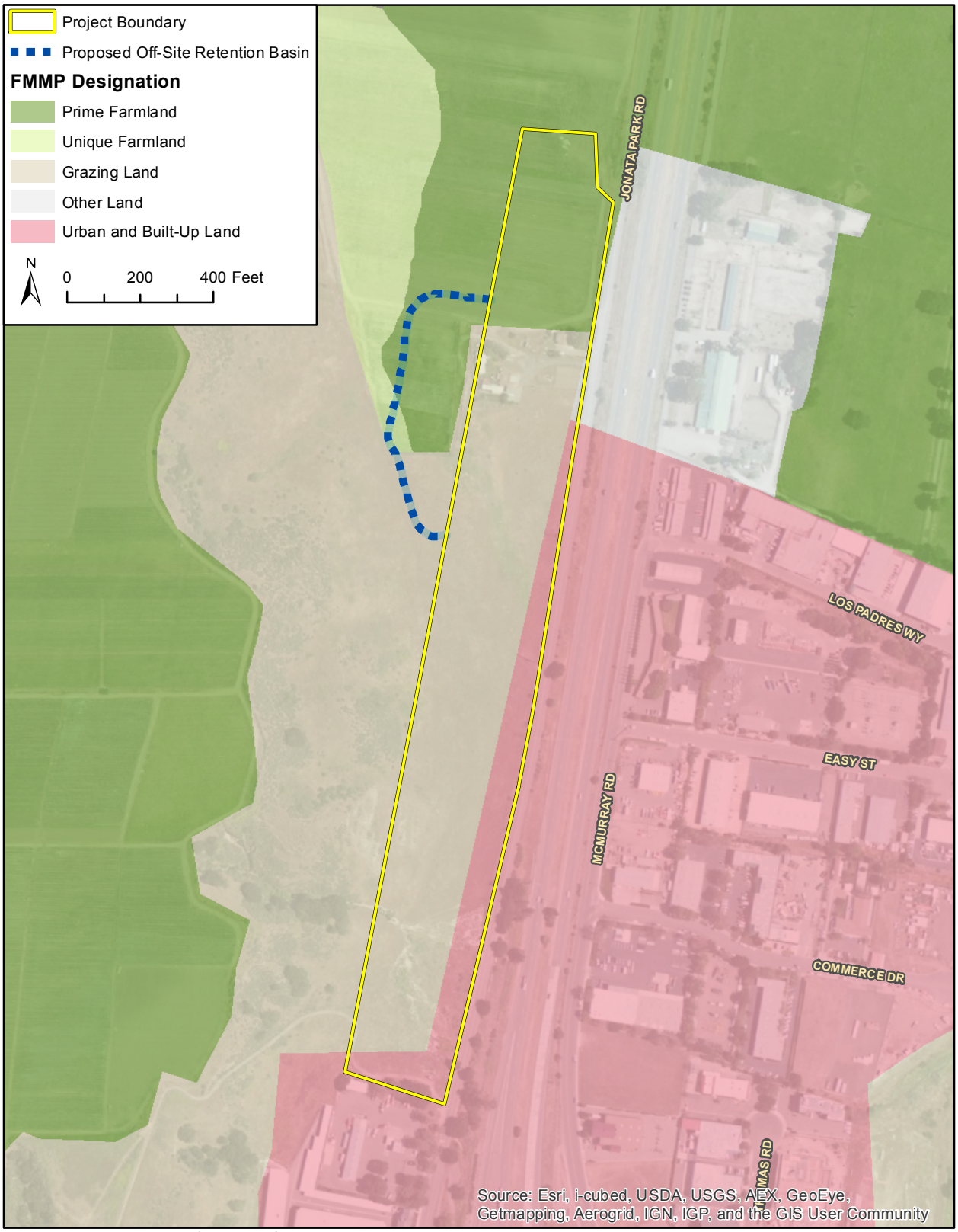
A total of three soil types occur on the project site (refer to Figure 4.5-1, Section 4.5, *Geology and Soils*). Of these soils, one (Ballard gravely fine loam, 2 to 9 percent slopes) is Class II, and is therefore considered prime agricultural land. The remaining two soil types are Class IV and VII.

The suitability of soils for agricultural use depends on many factors, including fertility, slope, texture, drainage, depth, and salt content. A variety of classification systems have been devised to categorize soil capabilities. The two systems that have been most widely used are the United States Department of Agriculture Capability Classification System and the Storie Index. The former system classifies soils based on their ability to support agriculture. The latter assesses the productivity of a soil from the degree of soil profile development, texture of the surface layer, slope; and manageable features, including drainage, micro-relief, fertility, acidity, erosion, and salt content. A score ranging from 0 to 100 is determined for each factor, and the scores are then averaged to derive an index rating. Table 4.2-2 shows the soils characteristics, Capability Class and Storie Index for soils within the project site. Table 4.2-3 shows the acreages of the project site relative to Capability Class and the Storie Index, as well as defines each Capability Class.

Table 4.2-2 Soil Characteristics and Capability Class for Soils within the Project Site

Soil Name	Acres	Capability Class	Storie Index
BbC, Ballard gravelly fine sandy loam, 2 to 9 percent slopes	11.8	2	31
BbD, Ballard gravelly fine sandy loam, 9 to 15 percent slopes	4.7	3	29
TdF, Terrace escarpments, loamy	1.7	6	N/A

Source: U.S. Department of Agriculture Soil Survey Northern Web Soil Survey, 2009. http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx



Imagery provided by National Geographic Society, ESRI and its licensors © 2012. Additional data © Department of Conservation, Farmland Mapping and Monitoring Program, 1984-2010.

Farmland Mapping and Monitoring Program Map

Figure 4.2-1

Table 4.2-3 Storie Index Grades for Soils within the Project Site

Capability Class	Soil Grade Description	Soil Types Within Each Grade	Total Acreage
1	Few limitations that restrict their use for crops.	None	0
2	Suitable for most crops, but have minor limitations that narrow the choice of crops and have a few special management needs.	BbC, Ballard gravelly fine sandy loam, 2 to 9 percent slopes	11.8
3	Suited to a few crops or to special crops and requires special management.	BbD, Ballard gravelly fine sandy loam, 9 to 15 percent slopes	4.7
4	If used for crops, are severely limited and require special management.	None	0
5	Not suited for cultivated crops, but can be used for pasture and range.	None	0
6	Soil and land types generally not suited to farming.	TdF, Terrace escarpments, loamy	1.7
Not Rated	-	None	0

Source: U.S. Department of Agriculture Soil Survey Northern Web Soil Survey, 2009. http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

c. Regulatory Setting. The project site is located in Santa Barbara County within the incorporated City of Buellton. As such, the project is subject to city policies including the Buellton General Plan. The City of Buellton General Plan Land Use Element and Conservation Element include goals and policies designed to preserve agricultural land, specifically aimed at establishing a "greenbelt" and supporting the Santa Barbara County's Right to Farm Ordinance. Applicable General Plan goals and polices are listed below:

LU Goal-1 — *To provide effective standards for the location, amount, rate, type and quality of new development so that the local economy remains healthy, attractive residential neighborhoods can expand, the character of the City is preserved, surrounding agriculture is enhanced and maintained, and the natural environment is protected.*

C/OS Goal-6(c) — *Provide a "greenbelt" or open spaces around the City's perimeter to: (c) protect important agricultural areas from urban uses and maintain agriculture as an economically viable activity.*

Policy C/OS-4 — *Encourage Santa Barbara County to:*

a. Maintain agriculturally productive lands for agricultural uses, and require urban uses to locate within the City;

b. Maintain agricultural land use designations on agricultural lands, and agricultural lands in the County's agricultural preserve program; and

c. Locate new highways and other similar linear projects away from agricultural land as feasible, or along the border of agricultural lands rather than dividing viable agricultural land.

Policy C/OS-5 — *Encourage Santa Barbara County to require public and private development to:*

a. Locate urban uses within the City;

	b. Maintain large parcel agricultural zoning and prohibit the subdivision of agricultural lands to smaller lots unless such development: (1) is part of a cluster project, (2) the project will not conflict with adjacent agricultural operations; (3) will not substantially hamper or discourage long-term agricultural operations either onsite or on adjacent agricultural lands; and (4) will not substantially impact adjacent agricultural production, individually or cumulatively; and
	c. Incorporate design, construction, and maintenance techniques that protect agriculture and minimize conflicts with adjacent uses.
Policy C/OS-7	*Support the County's right-to-farm ordinance and other efforts to reduce potential impacts caused by urban development located contiguous to county agricultural lands. These additional measures may include establishing a buffer on land to be developed between new urban development and surrounding agricultural lands.*

As discussed in Policy C/OS-7 of the General Plan, listed above, the City of Buellton supports the County of Santa Barbara Right to Farm Ordinance (Chapter 3, Article V, Section 3-23). The purpose of the ordinance is to protect agricultural land uses on land designated on the Comprehensive Plan/Coastal Plan, on Land Use Maps as A-I or A-II, or on land zoned exclusively for agricultural use from conflicts with nonagricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation. Objectives of the Right to Farm Ordinance include:

- *Promote the general health, safety, and welfare of the county;*
- *Preserve and protect for exclusive agricultural use those lands zoned for agricultural use;*
- *Support and encourage continued agricultural operations in the county; and*
- *Forewarn prospective purchasers or residents of property adjacent to or near agricultural operations of the inherent potential problems associated with such purchase or residence including, but not limited to, the sounds, odors, dust, and chemicals that may accompany agricultural operations.*

The Santa Barbara County Agricultural Commissioner's Office provides recommendations for setbacks (buffers) between development and agricultural property based on the types of pesticides used on agricultural properties. The Agricultural Commissioner's Office has the authority to impose spray buffers and other restrictions to pest management practices due to development or other potential hazards near agricultural operations, although this authority only extends to the agricultural parcels. The appropriateness of agricultural buffer distances is determined on a project-by-project basis, based on relevant site and project criteria, practical knowledge of agricultural practices, technical literature, and contact with other professionals.

4.2.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The Meritage Senior Living project site corresponds with Key Site II as identified in the LUE and CE Update EIR. Impacts related to agricultural resources were analyzed in Section 4.7, *Land Use, Agriculture, and Housing*, of the LUE and CE Update EIR. The LUE and CE Update EIR

concluded that impacts involving land use conflicts with adjacent agricultural uses (LU-1) were potentially significant. The LUE and CE Update EIR included mitigation measures, which require the City of Buellton to work with the Santa Barbara Agricultural Commissioner to implement a Notice of Intent to apply agricultural chemicals (LU-1a), and a minimum 200-foot buffer between proposed structures and active agricultural uses (LU-1b). In the LUE and CE Update EIR, these measures, combined with existing City Zoning Ordinance policies and Community Design Guidelines, were determined to fully mitigate or lessen the extent of the impacts regarding potential incompatibility; therefore, this impact was considered Class II, significant but mitigable.

The LUE and CE Update EIR also identified impacts related to the conversion of areas containing prime agricultural soil to non-agricultural uses (LU-3). The LUE and CE Update EIR concluded that since the site was not farmed at that time and was designated for commercial uses with an AHOZ designation, this impact was considered Class III, less than significant.

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds. The EIR quantitatively evaluated impacts to agricultural resources using the Land Evaluation and Site Assessment Model (LESA). Results of the model are summarized in the analysis below. Refer to Appendix B for full results of the model. The LESA model was developed to provide lead agencies with a methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095). The LESA model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The project score becomes the basis for making a determination of a project's potential significance.

Pursuant to the CEQA Guidelines, potentially significant impacts would occur if development of the project site would:

- *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland),as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;*
- *Conflict with existing zoning for agricultural use, or a Williamson Act contract;*
- *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));*
- *Result in the loss of forest land or conversion of forest land to non-forest use;*
- *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.*

There is no forest land or timberland on or within the area surrounding the project site. The site is zoned for urban use and will not result in the conversion or loss of forest land. Therefore, no

impacts related to forest land or timberland would occur as a result of the proposed project. For a discussion of impacts determined to result in no impact as a result of the proposed project, refer to Section 5.0, *Effects Found Not To Be Significant*.

b. Project Impacts and Mitigation Measures.

Impact AG-1 The proposed project would convert portions of the site from grazing and farming land to non-agricultural use. Based on the Land Evaluation and Site Assessment model, conversion of the project site is not considered significant, and the site is zoned for commercial uses with an AHOZ designation under the City's General Plan; therefore, conversion of the site would be a Class III, *less than significant*, impact.

Portions of the project site are currently used for grazing and farming and are identified as grazing land under the FMMP (Figure 4.2-1). Additionally, one of the soils on the project site (Ballard gravely fine loam, 2 to 9 percent slopes) is identified as a Class II, prime agricultural soil (refer to Figure 4.5-1, Section 4.5, *Geology and Soils*).

The Land Evaluation and Site Assessment (LESA) model was utilized to quantify potential impacts to these agricultural resources within the vicinity of the project site**, including the portion of the adjacent parcel proposed for an off-site retention basin**. The LESA model provides a quantitative metric for determining the significance of potential agricultural lands conversion impacts based on a score of 0 to 100. According to the LESA model, the Land Evaluation of the project site scored a total of ~~24.85~~ **24.55**, while the Site Assessment portion scored a total of ~~16.75~~ **15.25**, for a total combined score of ~~41.60~~ **39.80** (Table 4.2-4). The worksheets used for the LESA analysis can be found in Appendix B of this EIR.

Table 4.2-4 Summary of LESA Model Score Sheet

Factor Name	Factor Rating (0-100 Points)	X	Factor Weighting (Total = 1.0)	=	Weighted Factor Rating
Land Evaluation					
1. Land Capability Classification	~~71.81~~ **70.98**	X	0.25	=	~~17.95~~ **17.75**
2. Storie Index Rating	~~27.59~~ **27.21**	X	0.25	=	~~6.90~~ **6.80**
Site Assessment					
1. Project Size	~~10~~ **0**	X	0.15	=	~~1.50~~ **0.00**
2. Water Resource Availability	65	X	0.15	=	9.75
3. Surrounding Agricultural Lands	30	X	0.15	=	4.50
4. Protected Resource Lands	20	X	0.05	=	1.00
				Total:	***~~41.60~~ 39.80***

A project that scores ~~between 40 to 59~~ **less than 40** points is **not** considered significant ~~only if both the Land Evaluation and Site Assessment scores are each greater than 20. As shown in Table 4.2-4, the Site Assessment score is less than 20~~.

Additionally, with the adoption of the 1993 Buellton General Plan (since updated in 2007), all of the land within the City was designated for urban uses. Currently, there is no land zoned for

agriculture in the City. The project site is zoned for commercial uses, with an AHOZ designation. It should also be noted that the project site is not subject to a Williamson Act contract. Impacts would be less than significant.

Mitigation Measures. No mitigation is required.

Significance after Mitigation. Impacts to agricultural conversion would be less than significant without mitigation.

Impact AG-2 The proposed project would place new senior center facilities, including assisted and independent living units, in the vicinity of existing agricultural operations, which may result in conflicts between agriculture and urban uses. However, with existing City polices and the enforcement of a 200-foot agricultural buffer consistent with mitigation measures established by the 2005 LUE and CE Update EIR, impacts would be Class II, *significant but mitigable*.

Development of the senior center facilities on the project site could result in potential incompatibilities with adjacent agricultural activities. The project site is located on the edge of the City and abuts land zoned for agriculture use under County jurisdiction. Property to the north and west is zoned Agriculture and is designated Prime Farmland and Unique Farmland.

Residents living adjacent to agricultural lands often cite odor nuisance impacts, noise from farm equipment, vehicle conflicts, dust, and pesticide spraying as land use conflicts. Conflicts between farm vehicles and high-speed automobiles used by residents on adjacent roadways can lead to accidents. Pesticide spraying can result in health hazards, while odor and noise are nuisances that can affect the enjoyment of private dwellings. Increased dust from soils and farm equipment can be both a nuisance and a health hazard.

The placement of senior center facilities and associated living units adjacent to farmland can also have several negative impacts on farm operations. Soil compaction from trespassers or equestrians can also damage crop potential. Decreased air quality from adjacent urban development can also result in impacts to adjacent farmland.

The City of Buellton supports the Santa Barbara County Right-to-Farm Ordinance (Chapter 3, Article V, Section 3-23), the purpose of which is to protect agricultural lands from conflicts with nonagricultural land uses that may result in financial hardships to agricultural operations or the termination of their operation. The County's Right-to-Farm Ordinance states that no agricultural activity, operation, or facility shall be deemed or become a "nuisance" due to any changed condition in the locality, after the agricultural use has been in operation for at least three years. The County's Right-to-Farm Ordinance would protect on-going agricultural operation from such lawsuits.

Additionally, as discussed in Section 2.0, *Project Description*, as part of the proposed project, the applicant (also the owner of the adjacent parcels to the north and west) would provide an agricultural buffer of no less than 200 feet between the senior center facilities and active agricultural operations on the adjacent parcel. This is consistent with the 2005 LUE and CE

Update EIR requiring implementation of Mitigation Measures LU-1a and LU-1b to minimize impacts related to land use conflicts between residential and agricultural uses. These measures require the City of Buellton to work with the Santa Barbara Agricultural Commissioner to implement a Notice of Intent to apply agricultural chemicals (LU-1a), and a minimum 200-foot buffer between proposed structures and active agricultural uses (LU-1b).

Mitigation Measures. The following mitigation measures were identified to ensure the application and maintenance of the 200-foot agricultural buffer by the project applicant as included as a component of the proposed project. These measures are designed to further minimize conflicts between the senior center facilities and agricultural uses on adjacent County land to the north and west of the project site.

AG-2(a) **Agricultural Buffer.** A 200-foot buffer between the senior center facilities and active agricultural uses on adjacent parcels shall be incorporated into the project site plans of the proposed project. **The agricultural buffer shall be required, by condition of approval, to be incorporated into the applicable off-site agricultural parcel by easement.**

AG-2(b) **Agricultural Buffer Monitoring.** As a component of monitoring AG-2(a), the project applicant shall provide photo documentation to City planning staff on an annual basis documenting adherence to the 200-foot buffer between the senior center facilities and active agricultural uses on the adjacent property.

Significance after Mitigation. Adherence to and monitoring of the 200-foot buffer between the senior center facilities and adjacent agricultural uses would reduce conflicts between urban and agricultural uses. The buffer would maintain a safe distance to prevent residents of the senior care facilities from being affected by adverse agricultural uses including herbicide and pesticide spraying, objectionable odors, and dust. It would also serve to minimize impacts to the agricultural activities by increasing its distance from urban uses. These mitigation measures, in combination with existing City Zoning Ordinance policies and Community Design Guidelines, would reduce impacts related to agricultural land use conflicts to a less than significant level.

c. Cumulative Impacts. Cumulative development in the City of Buellton would gradually alter the area's semi-rural character. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. The entirety of currently proposed development is located within the City's Planning Area on land designated for urban uses. Currently, there is no land zoned for agriculture in the City. Additionally, analysis using the LESA model resulted in a combined project score of 40.61, with a Site Assessment Score of less than 20. According to LESA model thresholds, these results indicate that impacts to agricultural resources within the vicinity of the project site would be less than significant.

Future residential development could occur adjacent to agriculturally designated lands and result in potential land use conflicts. Potential impacts of cumulative developments within the

Buellton area would be addressed on a case-by-case basis, and would be required to comply with pertinent General Plan policies, as well as future mitigation measures identified through subsequent environmental review. Therefore, the proposed project would not result in cumulatively considerable impacts on agricultural resources.

4.3 AIR QUALITY

4.3.1 Setting

The project area is within the South Central Coast Air Basin (SCCAB), which includes all of San Luis Obispo, Santa Barbara, and Ventura counties. The 2010 Clean Air Plan (CAP) (adopted January 20, 2011) for Santa Barbara County describes the air quality setting for the County in detail, including the local climate and meteorology, current and projected air quality, and the regulatory framework for the management of air quality. The 2010 CAP is available for review at the Santa Barbara County Air Pollution Control District (SBCAPCD) web site, www.sbcapcd.org. The air quality setting for the region is summarized below.

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

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

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

b. Air Pollutants of Primary Concern. The State and Federal Clean Air Acts mandate the control and reduction of certain air pollutants. Under these Acts, the U.S. Environmental Protection Agency and the California Air Resources Board (CARB) have established ambient air quality standards for certain "criteria" pollutants. Ambient air pollutant concentrations are affected by the rates and distributions of corresponding air pollutant emissions, as well as by the climactic and topographic influences discussed above. The primary determinant of concentrations of non-reactive pollutants (such as CO and PM_{10}) is proximity to major sources.

Ambient CO levels usually closely follow the spatial and temporal distributions of vehicular traffic. A discussion of these primary criteria pollutants follows:

Federal and state standards have been established for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead, and fine particulates (PM_{10} and $PM_{2.5}$). Table 4.3-1 summarizes the current federal and state standards for each of these pollutants. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except lead and the eight-hour average for CO.

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

Pollutant	Averaging Time	Federal Primary Standards	California Standard
Ozone	1-Hour	---	0.09 ppm
	8-Hour	0.075 ppm	0.070 ppm
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	188 µg/m^3	0.18 ppm
Sulfur Dioxide	Annual	---	---
	24-Hour	---	0.04 ppm
	1-Hour	0.075 ppm	0.25 ppm
PM_{10}	Annual	---	20 µg/m^3
	24-Hour	150 µg/m^3	50 µg/m^3
$PM_{2.5}$	Annual	15 µg/m^3	12 µg/m^3
	24-Hour	35 µg/m^3	---
Lead	30-Day Average	---	1.5 µg/m^3
	Calendar Quarter	1.5 µg/m^3	---
	3-Month Average	0.15 µg/m^3	---

ppm = parts per million
µg/m^3 = micrograms per cubic meter
Source: CARB, February, 2012

The SBCAPCD monitors criteria pollutant levels to assure that air quality standards are met, and if they are not met, develops strategies to meet the standards. A network of 18 monitoring stations measures air pollutant levels throughout the County. Some pollutants, such as ozone, are measured continuously. Other pollutants are sampled periodically. Particulate matter, for example, is measured over 24 hours every six days. The stations fall into two main categories: (1) state and local air monitoring stations (SLAMS) and (2) Prevention of Significant Deterioration (PSD) stations. The six SLAMS, four of which are operated by the SBCAPCD and two of which are operated by the CARB, measure urban and regional air quality. The 12 PSD stations are used to determine the impacts of specific operations, such as large oil and gas facilities.

The SCCAB monitoring station located nearest to the project site and in the same valley is the Santa Ynez-Airport Road monitoring station located approximately 7 miles east of the project site. However, particulate matter data and carbon monoxide data is not available from the Santa Ynez – Airport Road monitoring station; therefore, data for these pollutants has been taken from the Lompoc – SH Street monitoring station, located approximately 15 miles west of the project site. Table 4.3-2 indicates the number of days each of the standards has been exceeded at these stations in each of the last three years.

Table 4.3-2 Ambient Air Quality at the Santa Ynez and Lompoc Monitoring Stations

Pollutant	2009	2010	2011
Ozone (ppm), Worst Hour [a]	0.066	0.081	0.081
Number of days of State exceedances (>0.09 ppm)	0	1	1
Ozone (ppm), 8-hr average [a]	0.080	0.089	0.090
Number of days of State exceedances (>0.07 ppm)	0	0	0
Number of days of Federal exceedances (>0.08 ppm)	0	0	0
Carbon Monoxide (ppm), Highest 8-Hour Average [b]	0.71	0.50	0.83
Number of days of above State or Federal standard (>9.0 ppm)	0	0	0
Particulate Matter <10 microns, $\mu g/m^3$, Worst 24 Hours [b]	62.6	55.1	71.1
Number of days above State standard (>50 $\mu g/m^3$)	1	3	2
Number of days above Federal standard (>150 $\mu g/m^3$)	0	0	0
Particulate Matter <2.5 microns, $\mu g/m^3$, Worst 24 Hours [b]	19.6	19.1	18.8
Number of days above Federal standard (>65 $\mu g/m^3$)	*	*	*

a = Data collected for the Santa Ynez – Airport Road monitoring station
b = Data collected for the Lompoc – SH Street monitoring station
** There was insufficient (or no) data available to determine the value.*
Source: CARB Top Four Summary available at http://www.arb.ca.gov/adam/topfour/topfour1.php

As indicated in the above table, the one-hour ozone concentration exceeded the State standard once in 2010 and once in 2011. The PM_{10} concentration exceeded State standards once in 2009 and once in 2009, three times in 2010, and twice in 2011. No exceedances of either the State or federal standards for the eight-hour ozone concentration have occurred at the Santa Ynez – Airport Road monitoring station since 2009. Similarly, no exceedances of either the state or federal carbon monoxide standard have occurred at the Lompoc – SH Street monitoring station since 2009. There was insufficient data to determine the number of exceedances of the federal $PM_{2.5}$ concentration between 2009 and 2011.

~~The SCCAB~~ **Santa Barbara County** is designated in attainment for the State one-hour ozone standard, and the federal PM_{10} standard. ~~The SCCAB~~ **Santa Barbara County** is designated unclassifiable/attainment for the federal eight hour ozone standard. ~~The SCCAB~~ **Santa Barbara County** is designated nonattainment for the state eight-hour ozone standard and the state standards for PM_{10}. The major sources for large particulate matter are quarries, grading, demolition, agricultural tilling, road dust, and vehicle exhaust. PM_{10} levels in the area are primarily due to agricultural operations, grading and motor vehicle emissions. Ozone is a secondary pollutant that is not produced directly by a source, but rather it is formed by a reaction between NO_X and reactive organic gases (ROG) in the presence of sunlight. Reductions in ozone concentrations are dependent on reducing the amount of these precursors. ~~The SCCAB~~ **Santa Barbara County** is in unclassified/attainment for the federal $PM_{2.5}$ standard and unclassified for the state $PM_{2.5}$ standard (based on monitored data from 2007 to 2009). No other state or federal standard, including standards for carbon monoxide or nitrogen dioxide, were exceeded during the years 2009 to 2011.

c. Regulatory Setting. The federal and State governments have been empowered by the federal and state Clean Air Acts to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (EPA) is the federal agency designated to administer air

quality regulation, while CARB is the state equivalent in California. Local control in air quality management is provided by the CARB through county-level or regional (multi-county) air pollution control districts (APCDs). The CARB establishes air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The CARB has established 15 air basins statewide. The SBCAPCD regulates air quality in the portion of the SCCAB that is in Santa Barbara County, and is responsible for attainment planning related to criteria air pollutants, and for district rule development and enforcement.

The 2010 Santa Barbara County CAP addresses state and federal Clean Air Act mandates, including all federal planning requirements for "maintenance" areas. The 2010 CAP examines the emission reductions achieved from existing and proposed regulations with respect to every feasible measure and identifies measures for further study. It also examines the change in emissions related to changes in population, industrial activity, vehicle use, and provides updated emission inventories to the year 2030.

d. Sensitive Receptors. Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. The majority of sensitive receptor locations are therefore schools and hospitals. As the proposed project would involve the development of a senior care facility on a vacant site, the on-site senior care residents would be sensitive receptors. Jonata Middle School is located approximately ½ mile southwest of the project site.

4.3.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The project site corresponds with Key Site II, as identified in the LUE and CE Update EIR. The LUE and CE Update EIR examined the air quality setting of the City and the potential impacts resulting from development facilitated by the LUE and CE Update EIR. The LUE and CE Update EIR concluded that impacts related to CAP consistency (Impact AQ-1) were significant and unavoidable while impacts related to air pollutant emissions (Impact AQ-2) and construction air quality impacts (Impact AQ-3) were significant but mitigable.

Mitigation Measures related to the project site included: Santa Barbara County Congestion Management Plan policies; implementation of the Buellton Bikeway Master Plan; expansion of the existing transit system; access to retail, commercial, recreational, and educational facilities via transit and pedestrian and bicycle routes; park-and-ride facilities; Transportation Demand Management (TDM) measures; energy conservation measures; land-use planning techniques to encourage alternative transportation; Santa Barbara County CAP Transportation Control Measures; Santa Barbara County Air Quality Management Plan pollution control measures; an incentive-based emissions reduction program; the application of best available control technology for construction equipment (CBACT) (AQ-3[b]); SBCAPCD standard ozone precursor controls (AQ-3[c]); and dust control measures (AQ-3[a]). These mitigation measures

would mitigate Impact AQ-2 and AQ-3 to a less than significant level (Class III). However, impact AQ-1 would remain significant and unavoidable (Class I).

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds. Pursuant to the State CEQA Guidelines, air quality impacts related to the proposed project would be significant if the project would:

- *Conflict with or obstruct implementation of the applicable air quality plan;*
- *Violate any air quality standard or contribute substantially to an existing or projected air quality violation;*
- *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative guidelines for ozone precursors);*
- *Expose sensitive receptors to substantial pollutant concentrations; and/or*
- *Create objectionable odors affecting a substantial number of people.*

The proposed project involves the development of a senior care facility. The operation of the proposed project would not involve any activities that would generate substantially objectionable odors. Therefore, odor related impacts are less than significant and are discussed in Section 5.0, *Effects Found Not To Be Significant*.

The analysis of air quality impacts follows the guidance provided in the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents* (December 2011). The California Emissions Estimator Model (CalEEMod) was utilized in estimating regional air pollutant emissions associated with project construction and operation. Where project-specific information was unavailable, default assumptions provided in the CalEEMod software for Santa Barbara County were used to calculate operational emissions associated with the project. The estimate of vehicle trips associated with the proposed project is from the Traffic and Circulation Study prepared by Associated Transportation Engineers (Appendix G; also refer to Section 4.11, *Transportation and Circulation*).

Operational Pollutant Emissions. As described in the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents* (December 2011), a project will have a significant air quality effect on the environment if operation of the project will:

- *Emit (from all sources, both stationary and mobile) more than 240 lbs/day for ROG and NO_X or more than 80 lbs/day for PM_{10};*
- *Emit more than 25 pounds per day of NO_X or ROG from motor vehicle trips only;*
- *Cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);*
- *Exceed the APCD health risk public notification thresholds adopted by the APCD Board; or*
- *Be inconsistent with the adopted federal and state air quality plans for Santa Barbara County.*

There is no daily operational threshold for CO as it is an attainment pollutant. Due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts

associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, CO "Hotspot" analyses are no longer required.

Construction Pollutant Emissions. The SBCAPCD does not have quantitative thresholds of significance for construction emissions since they are considered to be short-term and temporary. However, according to the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (December 2011), construction-related NO_X, ROG, PM_{10}, and $PM_{2.5}$ emissions from diesel and gasoline powered equipment, paving and other activities, should be quantified. SBCAPCD uses 25 tons per year for ROG or NO_X as a guideline for determining the significance of construction impacts. In addition, standard dust control measures must be implemented for any discretionary project involving earth-moving activities, regardless of size or duration. According to the SBCAPCD, proper implementation of these required measures is considered to reduce fugitive dust emissions to a level that is less than significant (SBCAPCD, December 2011). Therefore, all construction activity would be required to incorporate the SBCAPCD requirements pertaining to minimizing construction-related emissions and demolition of existing structures.

2010 Clean Air Plan Consistency. Consistency with land use and population forecasts in local and regional plans, including the Clean Air Plan, is required under CEQA for all projects. By definition, consistency with the CAP for the projects subject to these guidelines means that direct and indirect emissions associated with the project are accounted for in the CAP's emissions growth assumptions and the project is consistent with policies adopted in the CAP. The CAP relies primarily on the land use and population projections provided by the Santa Barbara County Association of Governments (SBCAG) and ARB on-road emissions forecast as a basis for vehicle emission forecasting. The 2010 Clean Air Plan utilized SBCAG's Regional Growth Forecast 2005-2040, adopted August 2007, to project population growth and associated air pollutant emissions for all of the Santa Barbara County incorporated and unincorporated areas. Commercial or industrial projects are determined to be consistent with the CAP if they are consistent with APCD rules and regulations.

b. Project Impacts and Mitigation Measures.

Impact AQ-1 Project construction would generate temporary increases in localized air pollutant emissions. Such emissions may result in temporary adverse impacts to local air quality. With implementation of standard dust and emissions control measures required by the SBCAPCD, impacts would be Class III, *less than significant*.

Temporary air quality impacts generally occur during project construction. Ozone precursors NO_X and ROG, as well as CO, would be emitted by the operation of construction equipment, while fugitive dust (PM_{10}) would be emitted by activities that disturb the soil, such as grading and excavation, road construction and building construction. Construction emissions were analyzed using the CalEEMod 2011 emissions model. Table 4.3-3 shows estimates of maximum daily construction emissions associated with the proposed development.

Table 4.3-3 Construction Emissions Associated with the Proposed Project

Land Use	Maximum Emissions (tons/year)			
	ROG	NO_X	CO	PM_{10}
247 senior care residential units & parking (242 spaces)	6.05	6.70	6.49	0.92

Source: CalEEMod v.2011.1, annual emissions reports. Modeling results contained in Appendix C.

SBCAPCD uses 25 tons per year for ROG or NO_X as a guideline for determining the significance of construction impacts. The annual emissions of all criteria pollutants would be below the 25-ton-per-year threshold under SBCAPCD Rule 202.F.3; therefore, no offsets would be required for annual construction emissions. For full modeling results refer to Appendix C.

As the City of Buellton is located in Santa Barbara County and the Santa Barbara County portion of the SCCAB is a nonattainment area for the state PM_{10} standard, construction emissions and dust control measures are required for all projects involving earthmoving activities regardless of size or duration.

In accordance with standard practices, such construction emissions control measures would be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. According to the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (December 2011), implementation of required dust control measures results in fugitive dust emissions that are less than significant. The specific measures that would be applied in accordance with standard requirements include the following:

- *During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.*
- *Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.*
- *If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.*
- *Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.*
- *After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.*
- *The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.*

- *Prior to land use clearance, the applicant shall include, as a note on a separate informational sheet to be recorded with map, these dust control requirements. All requirements shall be shown on grading and building plans.*
- *All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.*
- *Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.*
- *All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.*
- *Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.*
- *Diesel powered equipment should be replaced by electric equipment whenever feasible.*
- *If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.*
- *Catalytic converters shall be installed on gasoline-powered equipment, if feasible.*
- *All construction equipment shall be maintained in tune per the manufacturer's specifications.*
- *The engine size of construction equipment shall be the minimum practical size.*
- *The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.*
- *Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.*

The SBCAPCD also requires that prior to occupancy of new buildings, Authority to Construct permits are required for diesel engines rated at 50 brake-horsepower (bhp) and greater (e.g., fire pumps and emergency standby generators) and boilers/large water heaters whose combined heat input rating exceeds 2.0 million British Thermal Units (BTUs) per hour.

Project construction emissions would not exceed the 25-ton-per-year threshold under SBCAPCD Rule 202.F.3, and the proposed project would incorporate required construction emissions and dust control measures. These requirements would ensure that construction-related air quality impacts would be less than significant.

Mitigation Measures. Implementation of standard dust and emissions control measures required by the SBCAPCD would ensure that construction-related air quality impacts are less than significant.

Significance After Mitigation. Impacts would be less than significant without mitigation, as standard dust and emissions control measures would be effective in controlling emissions to a less than significant level (Class III).

Impact AQ-2 The project would result in an increase in operational air pollutant emissions from the development of 247 new senior care residential units and the associated energy use needs and increased vehicular traffic. However, the increase in emissions would not exceed thresholds established by SBCAPCD and impacts would be Class III, *less than significant*.

Long-term regional emissions are contributed by on-site (stationary) sources and mobile sources. Stationary emissions result from use of natural gas, aerosols, lawn maintenance equipment and other modern conveniences expected in residential use. Mobile emissions are based on the estimated amount of project-generated vehicle trips.

Table 4.3-4 summarizes operational emissions resulting from the proposed project.

Table 4.3-4 Unmitigated Operational Emissions for the Proposed Project

Source	Maximum Emissions (lbs/day)		
	ROG	NO_X	PM_{10}
Area Source	12.02	0.25	0.11
Energy	0.08	0.68	0.05
Mobile	4.39	8.21	6.89
Total	**16.49**	**9.14**	**7.05**
Threshold (area + energy +mobile)	***~~55~~ 240***	***~~55~~ 240***	*80*
Threshold Exceeded?	**No**	**No**	**No**
Threshold (mobile only)	*25*	*25*	*n/a*
Threshold Exceeded?	**No**	**No**	**n/a**

Source: CalEEMod v.2011.1, modeling results contained in Appendix C.
**indicates exceedance of a threshold*

As shown in Table 4.3-4, the project would generate an estimated 16.49 pounds of ROG, 9.14 pounds of NO_X, and 7.05 pounds of PM_{10} per day. No SBCAPCD thresholds would be exceeded; therefore, impacts would be less than significant.

Mitigation Measures. No mitigation measures would be required.

Significance After Mitigation. Impacts would be less than significant without mitigation (Class III).

Impact AQ-3 Sensitive receptors on the proposed project site would be exposed to hazardous air pollutants from heavy vehicle traffic on U.S. Highway 101. However, the proposed senior care residential units closest to U.S. Highway 101 would not be exposed to air pollutants that exceed applicable health risk significance thresholds and impacts would be Class III, *less than significant*.

Rincon Consultants prepared a Health Risk Assessment (HRA) technical memorandum for the Meritage Senior Living Project in November 2012. The HRA was based on the project site plans

that had been prepared at that time. A copy of this memorandum is included in Appendix H in this SEIR.

Diesel particular matter is classified as the primary airborne carcinogen in the State. CARB, in the *Air Quality and Land Use Handbook: A Community Health Perspective* (June 2005) recommends avoiding siting new sensitive land uses, such as residences, schools, daycare centers, playgrounds, or medical facilities, within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. Additional non-cancer health risk attributable to proximity to freeways was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop-off in particulate pollution levels at 500 feet (ARB, 2005). The HRA notes that the CARB recommendations from the *Air Quality and Land Use Handbook* are strictly advisory and are not intended to be used as a significance threshold for the purposes of CEQA; however the thresholds of significance used in the HRA for carcinogenic and non-carcinogenic toxic air contaminants are recommended by SBCAPCD in *Scope and Content of Air Quality Sections in Environmental Documents* (June 2008).

The project site is located on Jonata Park Road, approximately 125 feet west of the centerline of the southbound lane of U.S. Highway 101. The entire project site is located within 500 feet of the freeway alignment. Wind and other local climatic factors also affect the project area. Winds in the project region are variable, but are predominantly from the west or northwest, which when westerly, would have a mitigating effect on hazardous pollutant levels at the project site. During the fall and winter these winds are replaced by periods of Santa Ana wind conditions, which generally blow from the northeast, and would carry emissions from U.S. Highway 101 toward the project site. Emission levels affecting the site would also be influenced by intervening topography, which is variable along the site, but provides some buffering capacity.

The HRA examined carcinogenic risk associated with diesel particulates and other carcinogens (benzene, 1.3 butadiene, acetaldehyde, and formaldehyde), the chronic health risks associated with these toxic air contaminants along with that of acrolein, and the acute health risks associated with facility workers. The HRA determined that proposed sensitive receptors (independent living units, assisted living facilities, and nursing facilities) on the portion of the project site nearest to the freeway would be exposed to a 30-year excess cancer risk of about 5 in one million, which does not exceed the Santa Barbara County Air Pollution Control District (SBCAPCD) recommended health risk criteria for excess cancer of 10 in one million. This impact is based on a 30-year residency, because the senior living facility residents would be limited to older adults, and it is not anticipated that seniors would reside in the facility for the more conservative 70-year residency averaging time. In addition, the HRA determined that health effects for the 30-year facility worker and average (50-percentile) residency of 9 years for an adult would also be less than 10 per million. Because the carcinogenic health risk for 30-year residency is lower than 10 in one million for proposed sensitive receptors on the portion of the project site nearest to the freeway, the HRA concluded that the potential effect of exposure to freeway air pollutants for these habitable units is less than significant under CEQA.

The HRA also evaluated possible non-cancer, chronic health risks for on-site sensitive receptors, as well as acute health risk effects for facility workers, and determined that both chronic and acute health risks would be lower than SBCAPCD health risk criteria, and would therefore be less than significant.

Mitigation Measures. As the proposed senior care residential units closest to U.S. Highway 101 would not be exposed to air pollutants that exceed significance thresholds, impact would be less than significant, and no mitigation measures would be required.

Significance After Mitigation. Impacts would be less than significant without mitigation (Class III).

Impact AQ-4 The proposed project would be consistent with the SBCAPCD's 2010 Clean Air Plan and adopted regional, State, and federal air quality plans. This impact would be Class III, *less than significant*.

Commercial or industrial projects are judged consistent with the 2010 CAP if they are consistent with SBCAPCD rules and regulations. In general, the air quality policies in the 2010 CAP encourage mixed-use development and alternative transportation modes.

Project operations would produce criteria pollutants in the form of combustive and fugitive dust (PM_{10}) emissions. The 2010 CAP proposes emission reduction measures that are designed to bring the County into attainment of the state ozone standards and maintain attainment status for all criteria pollutants. SBCAPCD adopts 2010 CAP control measures into District rules and regulations, which are then used to regulate sources of air pollution in the county. Compliance with District rules related to on-site air pollutant emissions is regulated through compliance with SBCAPCD permit requirements; however, the proposed project would not involve stationary sources of emissions that would require SBCAPCD permits. As discussed in Impact AQ-2, and shown in Table 4.3-4, the project would not result in criteria pollutant emissions that would exceed SBCAPCD emission thresholds. Therefore, emissions from the project would not conflict with or obstruct implementation of the 2010 CAP.

In addition, the proposed project would result in new long-term residents associated with the extended care facilities at the proposed senior center. While the project is not a residential use, SBCAPCD requires that population increases accommodated by population-generating land uses be consistent with the annual incremental population projections contained in the 2010 CAP, in order to be determined consistent with the CAP. Vehicle use and emissions are directly related to population, as additional residents would result in more vehicular use. Populations that remain within CAP and SBCAG forecasts are accounted for with regards to SBCAPCD emissions inventories. When population growth exceeds these forecasts, emission inventories could be surpassed, affecting attainment status.

The 2010 CAP is based on growth projections contained in the 2007 SBCAG Regional Growth Forecast, which utilized a number of assumptions regarding land development patterns to obtain future forecasts, and contains population forecasts for the City of Buellton (SBCAG Regional Growth Forecast, August 2007). These population projections are shown in Table 4.3-5.

Table 4.3-5 SBCAG Population Projections for the City of Buellton

Year	Population	5-Year Increase
2015	5,228	400*
2020	5,628	400
2025	6,028	400
2030	6,428	400
2035	6,828	400
2040	7,228	400

**Increase calculated from City of Buellton population estimate for 2010 (a 2010 population of 4,828) from the California Department of Finance 2010 Census, March 8, 2011.*
Source: SBCAG Regional Growth Forecast (2007).

Based on the assumption that 64 of the 247 units would be single occupancy units and 183 of those 247 units would house a maximum of two senior occupants, the proposed project would be expected to generate approximately 430 residents. The total number of residents generated by the proposed project would not exceed the population increase of 2,000 forecasted under the CAP between 2015 and 2040. An increase of 430 residents would comprise approximately 22% of the projected growth in the City of Buellton, which would be within growth forecast assumptions used in the 2010 CAP. Therefore, the project would not conflict with or obstruct implementation of the 2010 CAP. Impacts would be less than significant (Class III).

Mitigation Measures. As the proposed project would be consistent with the 2010 CAP, impact would be less than significant, and no mitigation measures would be required.

Significance After Mitigation. Impacts would be less than significant without mitigation (Class III).

c. Cumulative Impacts. Cumulative development in Buellton would contribute to the cumulative degradation of regional air quality. As shown in Table 3-1 in Section 3.0, Environmental Setting, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. Per Santa Barbara County Air Pollution Control District thresholds, a project would have a significant cumulative impact if a project's air pollutant emissions of either of the ozone precursors (NO_X or ROG) exceed the long-term thresholds and if emissions have not been taken into account in the most recent CAP growth projections. As discussed in Impact AQ-2, the proposed project would not result in an exceedance of long-term thresholds for either of the ozone precursors (NO_X or ROG). Moreover, as discussed in Impact AQ-4, the proposed project is consistent with the 2010 CAP. In summary, cumulative air quality impacts of the proposed project would be less than significant (Class III).

4.4 CULTURAL and HISTORIC RESOURCES

4.4.1 Setting

a. Regional Setting. A summary of the ethnography, prehistory, and history of the general project region is provided below.

Ethnography. Santa Barbara County lies in the ethnographic territory of the Chumash, one of the most populous and socially complex native groups in California. The Chumash homeland encompasses the coastal and inland areas from present-day San Luis Obispo, 250 miles south to Malibu Canyon and includes the Santa Barbara Channel Islands (Grant, 1978). The Chumash spoke at least six related languages, each corresponding to a regionally based group. The Ynezeño Chumash occupied the Santa Ynez River watershed from the mouth of Zaca Creek eastward (Glassow, 1979). Numerous ethnographic villages have been identified within Ynezeño territory, although very few have actually been linked to archaeological sites (Glassow, 1979; King, 1975). Ethnographic village sites near the Project area include *Elijman* (CA-SBA-485) and *Teqepsh* (CA-SBA-477).

Prehistory. The broad patterns of regional prehistory are well known, having been developed by numerous researchers over many decades (Arnold, 1992; Erlandson, 1991, 1994; Glassow, 1996; King, 1990; Lebow and Moratto, 2005; Rogers, 1929; Spanne, 1975). In general, Early Holocene (pre-8500 B.P.) people of the greater Santa Barbara Channel region lived in small groups with relatively egalitarian social organization, had simple technology, and subsisted on a variety of plant foods, shellfish, and a limited array of vertebrate species (Erlandson, 1994).

The Middle Period (circa 3000–950 B.P.) is marked by a significant increase in the number and size of archaeological sites. Glassow (1996) argues that the increase in archaeological sites dating to this period is due to significant changes in the subsistence economy, which eventually led to changes in the distribution of settlements on the landscape. Technological innovations also occurred during the Middle Period, including the development of the *tomol*, or plank canoe, and most of the sophisticated fishing technology, such as the single-piece fishhook and the harpoon, used until historic times (King, 1990). The bow and arrow also was introduced during this period (Glenn, 1990, 1991). People began to rely increasingly on marine resources, particularly fish, for food; however, use of terrestrial mammals also remained high. The increase in population during the Middle Period resulted in a more intensive occupation in the interior valleys, including Santa Ynez (Macko, 1983).

The Middle to Late Period transition (circa A.D. 1150–1300), called the Transitional Period by Arnold (1992), is believed by most local archaeologists to have been the time of emergent political complexity, development of social ranking, and the rapid development of craft specialization in the Santa Barbara Channel region.

During the Late Period (circa A.D. 1150 to missionization), population densities reached peak levels (Glassow, 1990, 1996). Higher numbers of *Olivella* shell beads reflect increased exchange between the Channel Islands, the Santa Barbara mainland, and northern Chumash territory. Increased subsistence diversity is apparent, and the range and diversity of site types increased

as a greater variety of habitats and resources were used (Glassow, 1990; Lebow and Harro, 1998; Woodman et al., 1991). Prehistoric cultures were probably quite similar to the Chumash encountered by the Spanish when they first arrived in the region. Maritime adaptations were increasingly the focus of subsistence, craft specialization was important on the islands, and regional economic, political, and religious organization integrated a broad area of southern California.

History. The arrival of European settlers in the area brought the complex culture of the Chumash to the brink of extinction in the late eighteenth century. The establishment of the Spanish Presidio, or military fort, in Santa Barbara and the establishment of five Franciscan missions in Chumash territory produced significant disruptions in social, economic, and political organization. The introduction of domestic plants and animals as well as European wild grasses caused irreversible changes to the local environment. Native Californians had limited resistance to European diseases, which caused considerable population reduction among the Chumash. Although people of Chumash ancestry still live in the region today, and many strive to retain parts of their culture, the complex social system of the Chumash ended during the Mission Period.

The Santa Ynez Valley is home to the nineteenth mission established in Alta California, which was founded on September 17, 1804 by Father Estevan Tapis. In 1810, Mexico declared its independence from Spain; after 10 years the separation was achieved. Mexico continued the Spanish policy of colonizing California and passed the Secularization Act in 1883. This enforced the change from mission to parish church for the Franciscans, and although the mission lands were meant to be divided among the native people, the governor was given the power to grant large areas of former mission lands to private citizens. As a result, former mission lands were divided into large tracts, or ranchos, ceded to private citizens through grants from the Mexican government. Many of these land grant recipients were Americans who settled in California and became Mexican citizens. In addition to the conflicts between the Californios and the Mexican government, the presence of disgruntled American interlopers led to a series of uprisings culminating in the Bear Flag Revolt of June 1846. However, Mexican control of California had effectively ended the year before when the Californios expelled Mexican governor Manuel Micheltorena. In the same year California essentially became part of the United States (Starr, 2005).

With the signing of the Treaty of Guadalupe Hidalgo on February 2, 1848, the United States formally assumed control of California, and two years later, on September 9, 1850, California became the thirty-first state in the Union. Between those two years came a large influx of Americans seeking their fortunes, triggered by James Marshall's 1848 discovery of gold at Sutter's Mill. While most of the gold seekers flooded to northern California, the population of southern California remained relatively low throughout the 1860s and 1870s. The region was considered a remote and relatively lawless place, and cattle ranching continued as the principal economic activity; the historic ranchos remained relatively unchanged during this time. However, a period of drought and expensive land title defense cases in U.S. courts resulted in the sale of many of the ranches to Euro-Americans.

The extension of transportation systems into the region was a precursor to more intensive settlement. The town of Buellton, which was established in 1918 with the construction of the

Santa Ynez River Bridge, began as a post office on Buell Ranch in 1883 (Cragg and the Buellton Historical Society, 2006; Rife, 1977). When the State Route system was developed in 1916, an alternative route was created for travel through the Santa Ynez Valley. This led to the construction of the Santa Ynez Bridge at Buellton in 1918. Starting in 1921, the California State Highway Department began paving the highway between San Francisco and Los Angeles (*Oxnard Daily Courier,* 1922). The Buellton area experienced significant growth after the paving of the highway. Business continued to develop on the main streets of the community and Buellton became an incorporated city in 1992 (Cragg and the Buellton Historical Society, 2006).

b. Project Site Setting. The project area is characterized by rolling hillsides, increasing in elevation toward the Purisma Hills to the north and the Santa Ynez Mountains to the south. The project site is located along Jonata Park Road in the northern portion of the City, west of U.S. Route 101. The project site comprises approximately 18 acres, and is currently used for grazing and farming. The majority of the project site is relatively flat, with moderate to steep slopes along the site's western border. Elevations on site range from approximately 415 feet to 475 feet with slopes ranging from 2-15%. A small residence and outbuildings are located on the project site and would be demolished as part of the proposed project.

c. Regulatory Setting. Cultural resources are defined as buildings, sites, structures, or objects which may have historical, architectural, archaeological, cultural, and/or scientific importance. Numerous laws, regulations, and statutes govern archaeological and historic resources deemed to have scientific, historic, or cultural value. The pertinent regulatory framework, as it applies to the proposed project, is summarized below.

The project requires approval from the City of Buellton, which is held accountable by the California Environmental Quality Act (CEQA) to identify the significant environmental impacts of the project. CEQA mandates that government bodies consider the impact of their actions on the environment, including historically significant cultural and paleontological resources.

The City of Buellton Land Use and Circulation Element provides the following policy regarding historic buildings:

Policy L-10	*The City should encourage the protection of historically or architecturally significant buildings from substantial changes in outward appearance in a way that diminishes the historical character.*

The City of Buellton Conservation and Open Space Element contains the following goal and policy regarding archaeological, cultural, and historical resources:

C/OS Goal 12	*Preserve and identify cultural, archaeological, and historic resources that define the historic significance of the City of Buellton and the Santa Ynez Valley.*
Policy C/OS-18	*Encourage the preservation of cultural resources consistent with state and federal requirements by ensuring development does not adversely affect such resources or by mitigating adverse effects in accordance with state and federal regulations.*

In addition, the Conservation and Open Space Element includes the following programs pertaining to archaeological, cultural, and historical resources:

Program C/OS 19	*If development of a site uncovers cultural resources, the guidance of Section 15064.5 of the State CEQA Guidelines (Sections 15000 et seq. of the California Code of Regulations) shall be followed for identification, documentation, and preservation of the resource.*
Program C/OS 21	*Document and record data or information relevant to prehistoric and historic cultural resources which may be impacted by proposed development. Require the preparation of archaeological studies, historical resources studies, and/or preliminary evaluation reports by qualified professionals for new developments on sites that could potentially contain an important cultural resource.*

4.4.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The Meritage Senior Living project site corresponds with Key Site II, as identified in the LUE and CE Update EIR. The LUE and CE Update EIR concluded that no known historic or archaeological resources have been identified in the Buellton area. However, the EIR concluded that additional impacts could occur to undiscovered archaeological sites as a result of grading, other construction related activities, or future development. Therefore, Mitigation Measure CR-1, which required work cessation and additional assessment and mitigation should resources be encountered during construction activities, was applied to future development within Buellton. The EIR determined that existing General Plan policies would reduce impacts to unrecognized historic resources to a less than significant level. General Plan policies require new development to comply with Section 15064.5 of the CEQA guidelines if development uncovers cultural resources, as well as document and record information relevant to cultural resources impacted by the development.

4.4.3 Impact Analysis

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

Section 15064.5(a)(3) of the CEQA Guidelines, as amended (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3), states that a resource shall be considered to be "historically significant" or a "historical resource" if it meets the criteria for listing on the California Register of Historical Resources (CRHR) (California Public Resources Code [PRC] Section 5024.1; CCR Title 14, Section 4852). Resources included in a local register of historical resources (pursuant to PRC Section 5020.1[k]), or identified as significant in a historical

resources survey (meeting the criteria in PRC Section 5024.1[g]), also are considered "historical resources" for the purposes of CEQA. Historical resources may include, but are not limited to:

> "*Any object, building, structure, site, area, place, record or manuscript which a lead agency determines to be historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.*" [PRC Section 5020.1(j)]

Specifically, a resource is considered to be "historically significant" if the resource meets the criteria for listing on the CRHR (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

> *(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*
>
> *(B) Is associated with the lives of persons important in our past;*
>
> *(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
>
> *(D) Has yielded, or may be likely to yield, information important in prehistory or history.*
>
> *(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*

Pursuant to *Appendix G* of the CEQA Guidelines, potentially significant impacts would occur if development of the project site would:

- *Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5.*
- *Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.*
- *Directly or indirectly destroy a unique paleontological resource site or unique geologic feature.*
- *Disturb any human remains, including those interred outside of formal cemeteries.*

b. Project Impacts and Mitigation Measures.

Impact CR-1 Construction of the proposed project would not adversely affect known archaeological, historical, and paleontological resources. Impacts would be Class III, *less than significant*.

A Cultural Resources Inventory for the proposed project was prepared by Applied Earthworks, Inc. (July 2012). The study included a records search to identify prior investigations and previously recorded cultural resources within the project area; Native American communication; a pedestrian archaeological and architectural survey of Assessor's Parcel Numbers 099-400-064 and 099-400-065; and a CRHR significance evaluation of the residence and barn that were identified during the surveys.

No archaeological resources were identified within the project site during the Cultural Resources Inventory. The records search did not identify any known cultural or architectural resources; no archaeological resources were observed on-site; and the Native American Heritage Commission (NAHC) indicated that no sacred lands or other Native American cultural resources were identified within the project area. In addition, the residence and barn were found to be not eligible for inclusion on the CRHR and, as such, are not considered to be historical resources. Therefore, demolition of the buildings on the project site would not affect any historical resources.

The LUE and CE Update EIR states that prehistoric artifacts have never been identified in the Buellton area, based on available records. In addition, Rincon staff, Julie Broughton, Senior Paleontologist, reviewed the geological formation on the project site. The geological formation consists of Quaternary alluvium, which has a low potential for paleontological resources. If any paleontological resources were found, they would have been transported from another location and would have no scientific significance. Therefore, construction of the proposed project would not affect paleontological resources.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact CR-2 Previously unidentified, subsurface cultural resources may be unearthed during project construction activities. Impacts to unknown cultural resources would be Class II, *significant but mitigable*.

As discussed above in Impact CR-1, the project site does not contain known cultural or archaeological resource remains. By its nature, an archaeological reconnaissance can only confidently assess the potential for encountering surface cultural resource remains. Therefore, areas of deeper excavation could potentially encounter archaeological or paleontological resources. Because the possibility exists for encountering subsurface archaeological resources remains during construction activities, impacts to unknown cultural resources would be potentially significant.

In addition, consistent with State law, if human remains are encountered during excavation within the project area, all work must halt, and the County Coroner must be notified (Section 7050.5-California Health and Safety Code). If the coroner determines that the remains are of Native American origin, it is necessary to comply with state and federal laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a

recommendation to the landowner or the person responsible for the excavation work for means of treating, with appropriate dignity, the human remains and any associated grave goods, as provided in PRC Section 5097.98.

Mitigation Measure. The following mitigation measure would be required:

CR-2 **Halt Work Order for Archaeological Resources.** If archaeological resources are exposed during construction of the proposed project, pursuant to the Land Use or Circulation Elements, all earth disturbing work within 100 feet of the find must be temporarily suspended until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A representative should monitor any mitigation excavation associated with Native American materials.

Significance After Mitigation. Implementation of the Mitigation Measures CR-1 would reduce impacts associated with the potential to unearth unknown cultural resources during construction activities to a less than significant level.

c. Cumulative Impacts. Potential impacts to cultural resources are addressed on a case-by-case basis through site-specific investigations and, if necessary, surveys, assessment, and documentation or other appropriate mitigation. As such, cumulative development in the project area would be reviewed on a case-by-case basis. In the event that significant resources are discovered, impacts to such resources would be mitigated in accordance with the type of find. Project-specific mitigation as discussed above would ensure that the project's contribution to cumulative impacts would be less than significant. Mitigation applied for each specific development project in the area would reduce cumulative impacts to cultural resources to a less than significant level. No additional mitigation measures would be required, and cumulative impacts would be less than significant.

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4.5 GEOLOGY/SOILS

4.5.1 Setting

a. Geological Setting. A summary of the geology and soils in the general project area is discussed below. Figure 4.5-1 shows the soils on the project site. Additional geotechnical and soil information can be found in the Soil and Foundation Study (December 1994) and in the update to the study (Preliminary Geotechnical Investigation, June 2012), both prepared by Pacific Materials Laboratory. These documents are located in Appendix D.

Topography/Soils. The project site is located in a relatively low lying area to the north of the Santa Ynez River. Terrain in the vicinity consists of rolling hillsidses increasing in elevation toward the Purisma Hills to the north and the Santa Ynez Mountains to the south. The majority of the project site is relatively flat, with moderate to steep slopes along the site's western border. Elevations on site range from approximately 415 feet to 475 feet with slopes ranging from 2-15%.

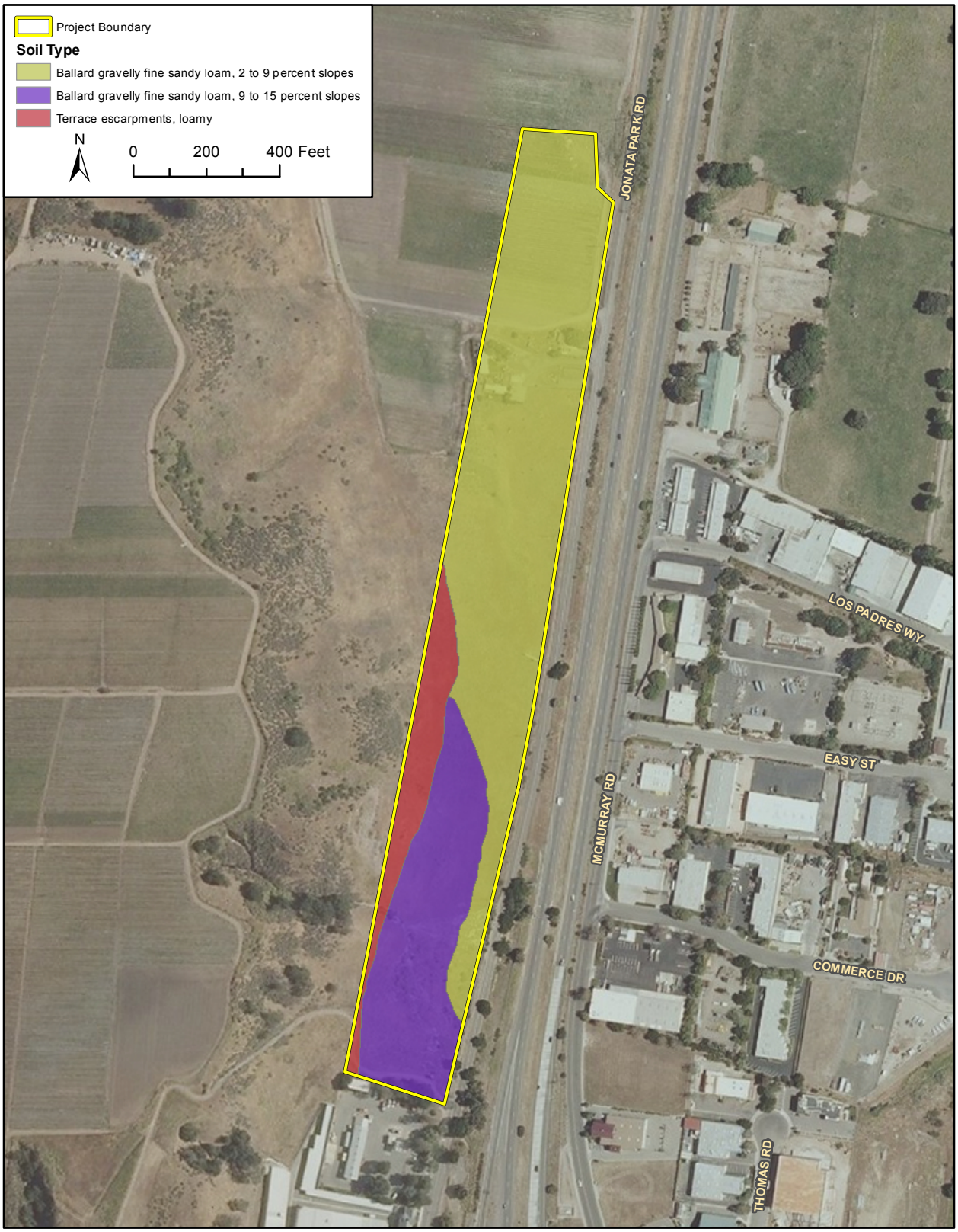
The soil profile on the project site generally consists of clayey sand and clayey silt and sand. The entire soil profile also contains interbedded gravel layers (Soil and Foundation Study, 1994). The project site is comprised primarily of Ballard gravelly fine sandy loam 2-9% slopes (BbC). The remainder of the site is comprised of Ballard gravelly fine sandy loam 9-15% slopes (BbD) and Terrace escarpments, loamy (TdF). Soil characteristics for the site soils related to permeability, shrink-swell potential, rate of surface runoff, and erosion hazard are listed below in Table 4.5-1.

Table 4.5-1 Soil Characteristics within the Project Site

Name	Permeability	Shrink-Swell Potential	Rate of Surface Runoff	Erosion Hazard
Ballard gravely fine sandy loam, 2 to 9 percent slopes (BbC)	Moderate	Low	Slow to Medium	Slight to Moderate
Ballard gravely fine sandy loam, 9 to 15 percent slopes (BbD)	Moderate	Low	Medium	Moderate
Terrace escarpments, loamy (TdF)	No data	No data	Rapid	Moderate to High

Source: Natural Resource Conservation Service, Soil Survey of Northern Santa Barbara Area, July 1972.
Note: Development projects located on soils with hazards indicated in bold may require special study.

Seismic and Other Soil Hazards. Similar to much of California, the project site is located within a seismically active region. Regional faults are depicted in Figure S-3 of the Buellton General Plan. Two potentially active faults that could cause groundshaking in the vicinity of the site are the San Andreas, located about 50 miles to the northwest, and the Santa Ynez Fault, located about six miles to the south. The San Andreas is capable of generating a very large earthquake which would cause some ground shaking in Buellton. The likelihood of an earthquake on the Santa Ynez Fault is low by comparison. The Santa Ynez Fault is active, but its history is relatively unknown. Some estimates place the likelihood of a major earthquake on this fault at once in several hundred years to perhaps a thousand years (General Plan, 2008) . The California Building Code identifies the project area as being in Seismic Zone 4, which is characterized as having the highest earthquake risk.



Imagery provided by National Geographic Society, ESRI and its licensors © 2012. Additional data provided by the Natural Resource Conservation Service, 2012.

Soils Map

Figure 4.5-1

Fault Rupture. Seismically-induced ground rupture occurs as the result of differential movement across a fault. An earthquake occurs when seismic stress builds to the point where rocks rupture. As the rocks rupture, one side of a fault block moves relative to the other side. The resulting shock wave is the earthquake. If the rupture plane reaches the ground surface, ground rupture occurs.

According to the California Department of Conservation Special Studies Zones Map (Zaca Creek Quadrangle) the nearest Alquist-Priolo Earthquake Fault Zone is located approximately five miles northeast of the project site (Department of Conservation, 1986). Therefore, there would be no potential for fault rupture on the project site.

Groundshaking. Groundshaking is the primary seismic concern for Buellton. Portions of Buellton, especially those areas within or immediately adjacent to the Santa Ynez River floodplains, are located on alluvial deposits, which can increase the potential for groundshaking damage. As earthquake waves pass from more dense rock to less dense alluvial material, they tend to reduce velocity, but increase in amplitude. Ground motion lasts longer on loose, water-saturated materials than on solid rock. As a result, structures located on these types of materials may suffer greater damage. The soil properties of a site can be a greater hazard for structures than close proximity to the fault or the earthquake's epicenter.

As shown in the Seismic Shaking Hazard Maps of California (California Geologic Survey, 2002), the area near the site has a 10% probability of experiencing 0.3-0.4 g peak horizontal ground acceleration within the next 50 years. The California Geological Survey interactive probabilistic hazard map and table (California Department of Conservation, 1999) indicate the ground acceleration for the site coordinates are 0.37 g for firm rock, 0.38 g for soft rock, and 0.42 g for alluvium. Earth materials on the project site are primarily comprised of alluvium, therefore the appropriate acceleration would be modeled by the alluvium conditions. The site may experience moderate levels of ground shaking.

The largest upper level earthquake in Buellton would be an approximate 7.8 magnitude earthquake on the San Andreas Fault. Such an event could produce peak horizontal ground acceleration on the order of 0.16g. Peak horizontal ground acceleration is expressed on a scale of 0-1 and is the maximum acceleration experienced by ground particles during the course of the earthquake motion. A peak ground acceleration of 0.10g may be a threshold of damage to older (pre-1965) dwellings or dwellings not made to resist earthquakes. Some post-1985 dwellings, built to California earthquake standards, have experienced severe shaking (0.60 g) with only chimney damage and damage to contents (USGS, 2007). Due to the relative location of the Los Alamos-Baseline (approximately eight kilometers northeast), Santa Ynez (approximately ten kilometers south), and North Channel Slope (approximately 24 kilometers east) faults, higher upper level earthquake accelerations may be expected from these faults. Although higher accelerations may be experienced on the site from these faults, compared to events on the San Andreas Fault, the recurrence interval for such events is much longer than for an event on the active San Andreas Fault Zone.

The nearest fault, the Los Alamos-Baseline, is located approximately five miles northeast of the City limit and is designated as an Alquist-Priolo Earthquake Fault Zone. The fault is rated with a slip-rate P, indicating that the fault is poorly constrained (USGS, 2007). The Santa Ynez Fault, is

located approximately six miles south of the City limit. The west segment of this fault has left lateral strike-slip motion. This fault is considered active but its earthquake history is relatively unknown, although displacement along the Santa Ynez Fault occurred in Holocene time (within the last 11,000 years). Offset relationships along the South Branch of the Santa Ynez Fault suggest the recurrence of movements adequate to generate a major earthquake (Richter magnitude +/-7) is once in several hundred to a thousand years. Therefore, while ground shaking would probably be severe during a major earthquake on this fault, the likelihood of occurrence is low in comparison to potential major earthquakes along the San Andreas Fault, which is considered likely within the next 30 years.

In addition to structural damage caused by groundshaking, there are other ground effects caused by such shaking. These ground failure effects include liquefaction, subsidence, lurch cracking, and lateral spreading. The potential for these hazards to occur in Buellton is discussed below. No areas of high risk due to secondary seismic/geologic hazards have been identified within the City.

Liquefaction. Liquefaction is a temporary, but substantial, loss of shear strength in granular solids, such as sand, silt, and gravel, usually occurring during or after a major earthquake. Liquefaction in soils and sediments can occur during earthquake events, when material is temporarily transformed from a solid to a liquid (gelatinous) by increases in pressure. Earthquake-induced liquefaction most often occurs in low-lying areas with soils composed of unconsolidated, saturated, clay-free sands and silts, but can also occur in dry, granular soils or saturated soils with some clay content. Liquefaction also occurs in areas overlain by unconsolidated fill, particularly artificial fill. Liquefaction during a major earthquake could occur in Buellton. Liquefaction occurs during an earthquake when groundwater migrates upward into sandy soils, which then become liquefied and lose their cohesiveness and their ability to support structures. The potential for liquefaction is highest in areas with sandy, alluvial soil and shallow groundwater, such as areas of the City nearest the Santa Ynez River and Zaca Creek. The terrace deposits on which the major portion of the City is located can be considered as having a low to moderate liquefaction potential in the presence of shallow groundwater (less than 30 feet). Consolidated rock areas of the City are characterized by low to non-existent liquefaction potential. Liquefaction hazards can be avoided with proper foundation engineering based on an analysis of the soils on a given building site.

The site soils were tested as part of the 1994 Soil and Foundation Survey and updated Preliminary Geotechnical Investigation (June 2012) completed by Pacific Material Laboratory. The report stated that no groundwater was observed in borings to a depth of approximately 25 feet. According to these reports, the potential for liquefaction was considered to be very low.

Subsidence. Subsidence involves deep-seated settlement due to the withdrawal of fluid (oil, natural gas, or water). It occurs irregularly and is largely a function of the underlying soils. Depending on the event, the amount of compaction can vary from a few inches to several feet. In Buellton, the potential for subsidence is greatest in areas underlain by alluvium or other soft water-saturated soils; however, no substantial subsidence problems have been identified in the City. The Preliminary Geotechnical Investigation indicated that the top 36 inches of soil on the project site are estimated to be compressible and sensitive to collapse when subjected to increased moisture content (Pacific Materials Laboratory, 2012).

Lurch Cracking and Lateral Spreading. Lurch cracking refers to fractures, cracks and fissures produced by groundshaking, and may occur far from an earthquake's epicenter. Lateral spreading is the horizontal movement of soil toward an open face of a stream bank or the side of a levee. Steep-sided artificial fill embankments are most susceptible to damage. The potential for these hazards is greatest on steep-sided alluvial soils where the groundwater table is high. In the City, this would include areas adjacent to the Santa Ynez River. The project site is not located adjacent to the Santa Ynez River and would have low potential for lurch cracking and lateral spreading.

Expansive Soils. Soils with relatively high clay content are expansive due to the capacity of clay minerals to take in water and swell (expand) to greater volumes. The site soils were tested as part of the Soil and Foundation Study (December 1994) and the Preliminary Geotechnical Investigation (June 2012) completed by Pacific Material Laboratory. The results of the 1994 site soil testing indicated that site soils were generally found to be clayey sand and clayey silt and sand, however the amount of expansive soils was comparatively small. The update to this report (Preliminary Geotechnical Investigation, June 2012) indicated that most of the supporting soils were found to be soils having very low potential for expansion. Additionally, the NRCS designated on-site soils as low shrink-swell potential (see Table 4.5-1 above).

Erosive Soils. Soil erosion is the removal of soil by water and wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. Soils in Buellton are classified as having slight to high susceptibility to erosion (Natural Resource Conservation Service, Soil Survey of Northern Santa Barbara Area, California, July 1972). In the low-lying areas surrounding the Santa Ynez River, erodibility is attributed to river scouring and potential flooding. In the steeper upland areas of the City, soils are subject to erosion from wind, rain, grazing, and human disturbance or soil and vegetation. The effects of erosion range from nuisance problems, such as increased siltation in storm drains, to extreme cases where watercourses are downcut and gullies develop that can eventually undermine adjacent structures or vegetation. Soils with high shrink-swell potential, rapid runoff rates, and high erosion hazard are generally located in the hills to the northeast of Buellton while those with rapid permeability are located in lower lying areas in the center of Buellton and associated with drainage features near the eastern edge of the City (refer to Figure C/OS-2 [Soils Map] in the Conservation and Open Space Element).

The project site is located at the toe slope of a hill. The USDA NRCS Web Soil Survey program indicates that on-site soils (specifically BbC and BbD) are characterized by slight to moderate erosion hazard. Specifically, the soils are rated five on a scale of one to eight, with eight being the lowest wind erosion hazard. Site soils are also rated with a 0.15 K-factor on a scale from 0.02-0.69, with 0.02 having the lowest erosion hazard. TdF soils did not have ratings in these categories but were characterized by moderate to high erosion hazards by the Soil Survey of Northern Santa Barbara Area (NRCS, 1972). Field observations conducted as part of the Soil and Foundation Study indicated deep erosion channels forming at the toe of an existing cut slope. The report also noted easily erodible slopes on the western edge of the site due to the concentration of natural drainage.

Slope Stability/Landslides. Geologic, topographic, and climatic factors generally determine the occurrence of landslides. Landslides can be traced to the nature of the parent rock and the

natural processes affecting it. Landslides can occur in formations with the following structural characteristics: brecciated rock (sedimentary rocks that are made up of largely angular fragments) in fault zones; weak bedding or bed joints and cleavage plains; massive beds overlying weak materials and alterations; and permeable beds, such as sandstones.

With the exception of the banks of the Santa Ynez River, slopes in the City are geologically stable and are not subject to major landslides (General Plan, 2008). Strength parameters of the clayey silt and sand on-site soils were tested as part of the Soil and Foundation Study. Results of these tests indicate cohesion of 500 pounds per square foot and an internal angle of friction of 37 degrees for the short term stability, and cohesion of 300 pounds per square foot and internal angle of friction of 27 degrees for the long term stability. The Soil and Foundation Study also cites results from a geology report conducted by Rick Hoffman and Associates stating that significant landslides or other forms of preexisting slope failures were not encountered on the project site; however, potential for slope instability exists in the form of surface erosion and soil creep. The geology report by Rick Hoffman and Associates deemed this potential to be low provided the implementation of proper grading and draining control.

4.5.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The Meritage Senior Living project site corresponds with Key Site II as identified in the LUE and CE Update EIR. The LUE and CE Update EIR concluded that all impacts related to geologic hazards were Class III, less than significant. Impacts related to ground shaking (G-1), slope stability hazard (G-3), and expansive/erosive soils (G-4) were deemed less than significant due to required compliance with existing General policies and the Uniform Building Code. Impacts related to liquefaction (G-2) were deemed less than significant since the project site is not located within the 100- or 500- year flood zone of the Santa Ynez River bed or Zaca Creek bed. The LUE and CE Update EIR also required mitigation in the form of a Grading and Erosion Control Plan (G-4a) to further reduce impacts from soil related hazards.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds. Assessment of impacts is based on review of site information and conditions and County information regarding geologic issues. In accordance with the State CEQA Guidelines, a project would result in a significant impact if it would:

- *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides;*
- *Result in substantial soil erosion or the loss of topsoil;*
- *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;*
- *Be located on expansive soil, creating substantial risks to life or property; or*

- *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.*

The proposed project does not involve the use of septic tanks and would not result in impacts related to soil incapability related to wastewater disposal systems. For a discussion of impacts determined to result in no impact as a result of the proposed project, refer to Section 5.0, *Effects Found Not To Be Significant.*

b. Project Impacts and Mitigation Measures.

Impact G-1 **The project site is located in an area of high earthquake risk and is subject to moderate ground shaking, which has the potential to cause fill material to settle, destabilize slopes, and cause physical damage to structures, property, utilities, road access, and humans. Compliance with the Uniform Building Code (UBC), General Plan policies and California Building Code would result in a Class III, *less than significant*, impact.**

The City of Buellton contains no Alquist-Priolo fault rupture zones, and no hazards related to fault rupture. No active faults have been mapped across the site; however the site is located in Seismic Zone 4, characterized as having the highest potential earthquake risk in the State of California. According to the Safety Element of the 2025 Buellton General Plan, there are two major potentially active faults that could cause groundshaking in the vicinity of the site: the San Andreas, located about 50 miles to the northwest, and the Santa Ynez Fault, located about six miles to the south. The Los Alamos-Baseline (approximately eight kilometers northeast), Santa Ynez (approximately ten kilometers south), and North Channel Slope (approximately 24 kilometers east) faults are also located within the vicinity of the project site and may contribute to groundshaking in the event of an earthquake. The largest upper level earthquake in Buellton would be an approximate 7.8 magnitude earthquake on the San Andreas Fault. Such an event could produce peak horizontal ground acceleration on the order of 0.16g. The Santa Ynez Fault is active, but its history is relatively unknown. Some estimates place the likelihood of a major earthquake on this fault at once in several hundred to a thousand years. The 2005 LUE and CE Update EIR indicated that the area surrounding the project site would be subject to moderate ground shaking from these faults.

Besides the direct physical damage to structures caused by the ground shaking, marginally stable landslides, slopes, and inadequately compacted fill material could move and cause additional damage. Gas, water, and electrical lines can be ruptured during the ground shaking, or broken during the movement of material activated by the seismic event, which can jeopardize public safety after an earthquake. Liquefaction in soils and sediments can also occur during earthquake events, when material is temporarily transformed from a solid to a liquid (gelatinous) by increases in pressure. However, the potential for liquefaction on the project site is considered very low (Pacific Material Laboratory, 1994 and 2012). Despite the conditions described above, implementation of the Buellton General Plan, Uniform Building Code (UBC) and the California Building Code (CBC) seismic design standards during grading and building pad construction would reduce the potential hazards from ground shaking to structures and occupants on the project site. Safety Element Policy HZ-4, of the Buellton General Plan requires

compliance with the UBC, which is the primary tool used by the City to ensure that construction meets seismic safety standards. The UBC and CBC are intended to promote public safety and provide standardized requirements for safe design and construction under normal geologic circumstances. Since the project site isn't subject to high risk from fault rupture or ground shaking, conformance with the UBC and CBC would reduce impacts to a less than significant level.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Compliance with existing City policies of the Buellton General Plan in conjunction with applicable standards of the UBC and CBC would ensure that hazards from moderate ground shaking would be less than significant.

Impact G-2 The project would result in potentially unstable soil conditions from expansive, compressible/collapsible, and/or erosive soils and slope instability. However, with the implementation existing General Plan policies and the measures recommended in the Preliminary Geotechnical Investigation, impacts would be Class II, *significant but mitigable*.

Expansive Soils. The results of the 1994 site soil testing indicated that site soils were generally found to be clayey sand and clayey silt and sand; however the amount of expansive soils was comparatively small (Pacific Materials Laboratory, 1994). The update to this report (Preliminary Geotechnical Investigation, June 2012) indicated that most of the supporting soils were found to be soils having very low potential for expansion. Additionally, the NRCS designated on-site soils as low shrink-swell potential (USDA, 1972).

Compressible/Collapsible Soils. The Preliminary Geotechnical Investigation indicated that the top 36 inches of soil are estimated to be compressible and sensitive to collapse when subjected to increased moisture content (Pacific Materials Laboratory, 2012). Additionally, soils identified on site (BbC, BbD, and TdF) are sensitive to ground water and surface infiltration that can cause settlement of soils (USDA, 1972). Therefore, project construction on compressible/collapsible soils would be a potentially significant impact.

Erosive Soils/ Slope Instability. The USDA NRCS Web Soil Survey program indicates that on-site soils (specifically ballard gravely fine loam 2-9% slopes and ballard gravely fine loam 9-15% slopes) are characterized by slight to moderate erosion hazard. Terrace escarpments, loamy soils are also present on-site and were characterized by moderate to high erosion hazards by the Soil Survey of Northern Santa Barbara Area (NRCS, 1972). Field observation recorded as part of the Soil and Foundation Study (Pacific Materials Laboratory, 1994) indicated deep erosion channels forming at the toe of an existing cut slope. The report also noted easily erodible slopes on the western edge of the site due to the concentration of natural drainage. The Soil and Foundation Study cited results from a geology report conducted by Rick Hoffman and Associates stating that significant landslides or other forms of preexisting slope failures were not encountered on the project site, however, the potential for slope instability exists in the form of surface erosion and soil creep. The geology report by Rick Hoffman and Associates deemed this potential to be low provided the implementation of proper grading and draining control. The City's grading ordinance (Municipal Code Chapter 17.01) contains standards and specifications for excavation

and fill which are intended to regulate the design, construction, and materials used during heavy grading minimizing erosion and slope stability hazards; however, erosive soils and slope instability would still present a potentially significant impact.

Mitigation Measures. The following actions were recommended by Pacific Materials Laboratory based on results identified in their Preliminary Geotechnical Investigation (June 2012). The following mitigation measure is required to minimize impacts to potentially unstable soil conditions to a less than significant level.

G-2 **Reduction of Soil Stability Hazards.** Grading and construction of the proposed project shall incorporate all of the recommendations included in the Preliminary Geotechnical Investigation prepared by Pacific Material Laboratory, dated June 6, 2012 (refer to Appendix D). These recommendations are summarized below and include, but are not limited to, the following requirements designed to minimize impacts related to soil stability hazards.

a) ***Grading***

- *Soils found to be expansive will be excavated and wasted in landscape portions of the project.*
- *The footings of the proposed structures shall be supported completely by a uniform thickness of non-expansive soil. The structure shall not be supported over a cut/fill transition unless the foundation is engineered to account for the transition.*
- *Beneath the proposed structures and for a minimum distance of 5 feet beyond the exterior perimeters, the loose topsoil and compressible surface soils shall be removed and observed by a representative of Pacific Materials Laboratory.*
- *Positive surface drainage shall direct water away from all slopes and away from the foundation system of the proposed structure.*

b) ***Foundations***

- *All continuous exterior footing for one-story portions of the structure which rest upon compacted fill soil shall extend a minimum of 18 inches and all continuous interior one-story footing shall extend a minimum distance of 12 inches below compacted ground surface.*
- *Footings below two-story portions of the structure shall extend 18 inched below compacted ground surface.*
- *Footings below three-story portions of the structure shall extend 24 inches below compacted ground surface.*
- *All footings shall contain a minimum of two No. 4 horizontal rebar placed one in the base and one in the stem of the footing.*

c) ***Resistance to Lateral Loads***

- *An allowable friction coefficient of 0.35 shall be used.*
- *The passive pressures of 350 pcf of footing shall be used.*
- *A triangular distribution shall be used.*

- *The frictional resistance and the passive pressure may be combined without reduction.*
- *The resistance may be increased by one-third for wind or seismic loading.*

d) ***Retaining Walls***

- *The cantilevered retaining walls (site walls and garden walls) shall be designed assuming an active soil pressure equivalent to a fluid (E.F.P.) whose weight is 35 pcf for level backfill conditions and 52 pcf for backfill slopes, which are constructed at an angle of up to 27 degrees.*
- *Restrained and partially restrained retaining walls or cantilevered retaining walls which form a portion of the foundation system of the structure shall be designed assuming an at-rest soil pressure equivalent to a fluid (E.F.P.) whose weight is 60 pcf for level backfill conditions and 73 pcf for backfill slopes, which are constructed at an angle of up to 27 degrees.*

e) ***Pavement***

- *Beneath the proposed parking areas, the top loose surface soils shall be removed, moistened or dried to at or near the optimum moisture content and compacted.*
- *R-values shall be performed once the subgrade elevations have been established. The parking lot shall be designed based on an estimated R-value of 35.*
- *Maintenance to reduce the potential for deterioration of paved areas shall include surface treatment approximately six months to one year after construction and approximately three years or less from the first treatment.*

f) ***Adjacent Loads***

- *The effect of adjacent loads shall be calculated using the published Formulas for Stresses in Semi-infinite Elastic Foundations or the Boussinesq figures and equations.*

g) ***Settlement***

- *The project shall achieve angular distortions of approximately 1/480.*

The required provisions from the Preliminary Geotechnical Investigation shall be reflected on grading and foundation plans and reviewed by the City Engineer to verify compliance as required.

Significance After Mitigation. Through adherence to the recommendations in the Preliminary Geotechnical Investigation in accordance with Mitigation Measure G-2, the potential effects of expansive soils, settlement of compressible/collapsible and erosive soils, and slope instability, would be reduced to a less than significant level.

c. Cumulative Impacts. With implementation of mitigation measures and compliance with existing policies and regulations, the proposed project, in conjunction with other cumulative projects proposed in Buellton, would not expose additional people and property to seismic and geologic hazards that exist in the region. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the

specific hazards associated with individual sites. Any specific geologic hazards associated with each individual site would be limited to that site without affecting other areas. In addition, City regulations and policies (including compliance with the General Plan Safety Element, the Uniform Building Code, and the California Building Code requirements) would be expected to reduce seismic and geologic hazards to acceptable levels. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Cumulative geologic hazard impacts would be less than significant.

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4.6 GREENHOUSE GAS EMISSIONS

4.6.1 Setting

a. Climate Change and Greenhouse Gases. Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC, 2007), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (90% or greater chance) that the global average net effect of human activities since 1750 has been one of warming. The prevailing scientific opinion on climate change is that most of the observed increase in global average temperatures, since the mid-20th century, is likely due to the observed increase in anthropogenic GHG concentrations (IPCC, 2007).

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6) (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane (CH_4) has a GWP of 21, meaning its global warming effect is 21 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 1997).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHG, Earth's surface would be about 34° C cooler (CalEPA, 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations. The following discusses the primary GHGs of concern.

Carbon Dioxide. The global carbon cycle is made up of large carbon flows and reservoirs. Billions of tons of carbon in the form of CO_2 are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, carbon fluxes among these various reservoirs are roughly balanced (United States Environmental Protection Agency [USEPA], April 2011). CO_2 was the first GHG demonstrated to be increasing in atmospheric concentration, with the first conclusive measurements being made in the last half of the 20th Century. Concentrations of CO_2 in the atmosphere have risen approximately 40% since the industrial revolution. The global atmospheric concentration of CO_2 has increased from a pre-industrial value of about 280 parts per million (ppm) to 391 ppm in 2011 (IPCC, 2007; Oceanic and Atmospheric Association [NOAA], 2010). The average annual CO_2 concentration growth rate was larger during the last 10 years (1995–2005 average: 1.9 ppm per year) than it has been since the beginning of continuous direct atmospheric measurements (1960–2005 average: 1.4 ppm per year), although there is year-to-year variability in growth rates (NOAA, 2010). Currently, CO_2 represents an estimated 82.7% of total GHG emissions (Department of Energy [DOE] Energy Information Administration [EIA], December 2008). The largest source of CO_2, and of overall GHG emissions, is fossil fuel combustion.

Methane. Methane (CH_4) is an effective absorber of radiation, though its atmospheric concentration is less than that of CO_2 and its lifetime in the atmosphere is limited to 10 to 12 years. It has a global warming potential (GWP) approximately 21 times that of CO_2. Over the last 250 years, the concentration of CH_4 in the atmosphere has increased by 148% (IPCC, 2007), although emissions have declined from 1990 levels. Anthropogenic sources of CH_4 include enteric fermentation associated with domestic livestock, landfills, natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, stationary and mobile combustion, and certain industrial processes (USEPA, April 2011).

Nitrous Oxide. Concentrations of nitrous oxide (N_2O) began to rise at the beginning of the industrial revolution and continue to increase at a relatively uniform growth rate (NOAA, 2010). N_2O is produced by microbial processes in soil and water, including those reactions that occur in fertilizers that contain nitrogen, fossil fuel combustion, and other chemical processes. Use of these fertilizers has increased over the last century. Agricultural soil management and mobile source fossil fuel combustion are the major sources of N_2O emissions. The GWP of nitrous oxide is approximately 310 times that of CO_2.

Fluorinated Gases (HFCS, PFCS and SF_6). Fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfurhexafluoride (SF_6), are powerful GHGs that are emitted from a variety of industrial processes. Fluorinated gases are used as substitutes for ozone-depleting substances such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and halons, which have been regulated since the mid-1980s because of their ozone-destroying potential and are phased out under the Montreal Protocol (1987) and Clean Air Act Amendments of 1990.

Electrical transmission and distribution systems account for most SF_6 emissions, while PFC emissions result from semiconductor manufacturing and as a by-product of primary aluminum production. Fluorinated gases are typically emitted in smaller quantities than CO_2, CH_4, and N_2O, but these compounds have much higher GWPs. SF_6 is the most potent GHG the IPCC has evaluated.

Greenhouse Gas Inventory. Worldwide anthropogenic emissions of GHG were approximately 40,000 million metric tons (MMT) CO_2E in 2004, including ongoing emissions from industrial and agricultural sources, but excluding emissions from land use changes (i.e., deforestation, biomass decay) (IPCC, 2007). CO_2 emissions from fossil fuel use accounts for 56.6% of the total emissions of 49,000 million metric tons CO_2E (includes land use changes) and all CO_2 emissions are 76.7% of the total. Methane emissions account for 14.3% of GHG and N_2O emissions account for 7.9% (IPCC, 2007).

Total U.S. GHG emissions were 6,633.2 million metric tons CO_2E in 2009 (USEPA, April 2011). While total U.S. emissions have increased by 7.3% from 1990 to 2009, emissions decreased from 2008 to 2009 by 427.9 million metric tons CO_2E, or 6.1% (DOE EIA, Table 12.1, August 2010). This decrease was primarily due to (1) a decrease in economic output resulting in a decrease in energy consumption across all sectors; and (2) a decrease in the carbon intensity of fuels used to generate electricity due to fuel switching as the price of coal increased, and the price of natural gas decreased substantially. Since 1990, U.S. emissions have increased at an average annual rate of 0.4%. The transportation and industrial end-use sectors accounted for 33% and 26%, respectively, of CO_2 emissions from fossil fuel combustion in 2009. Meanwhile, the residential and commercial end-use sectors accounted for 22% and 19%, respectively, of CO_2 emissions from fossil fuel combustion in 2009 (USEPA, 2011).

Based upon the California Air Resources Board (ARB) *California Greenhouse Gas Inventory for 2000-2008* (ARB, 2011), California produced 478 MMT CO_2E in 2008. The major source of GHG in California is transportation, contributing 36% of the state's total GHG emissions. Electricity generation is the second largest source, contributing 24% of the state's GHG emissions (ARB, June 2010). California emissions are due in part to its large size and large population compared to other states. Another factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. ARB has projected statewide unregulated GHG emissions for the year 2020, which represent the emissions that would be expected to occur in the absence of any GHG reduction actions, will be 596 MMT CO_2E (ARB, 2007).

Effects of Climate Change. Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Scientists have projected that the average global surface temperature could rise by1.0-4.5°F (0.6-2.5°C) in the next 50 years, and the increase may be as high as 2.2-10°F (1.4-5.8°C) in the next century. In addition to these projections, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic (IPCC, 2007).

According to the CalEPA's 2010 Climate Action Team Biennial Report, potential impacts of climate change in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CalEPA, April 2010). Below is a summary of some of the potential effects that could be experienced in California as a result of climate change.

Sea Level Rise. According to *The Impacts of Sea-Level Rise on the California Coast*, prepared by the California Climate Change Center (CCCC) (May 2009), climate change has the potential to induce substantial sea level rise in the coming century. The rising sea level increases the likelihood and risk of flooding. The study identifies a sea level rise on the California coast over the past century of approximately eight inches. Based on the results of various global climate change models, sea level rise is expected to continue. The California Climate Adaptation Strategy (December 2009) estimates a sea level rise of up to 55 inches by the end of this century.

Air Quality. Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (CEC March, 2009).

Water Supply. Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future water supplies in California. However, the average early spring snowpack in the Sierra Nevada decreased by about 10 percent during the last century, a loss of 1.5 million acre-feet of snowpack storage. During the same period, sea level rose eight inches along California's coast. California's temperature has risen 1°F, mostly at night and during the winter, with higher elevations experiencing the highest increase. Many Southern California cities have experienced their lowest recorded annual precipitation twice within the past decade. In a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources [DWR], 2008; CCCC, May 2009).

This uncertainty complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The Sierra snowpack provides the majority of California's water supply by accumulating snow during our wet winters and releasing it slowly when we need it during our dry springs and summers. Based upon historical data and modeling DWR projects that the Sierra snowpack will experience a 25 to 40 percent reduction from its historic average by 2050. Climate change is also anticipated to bring warmer storms that result in less snowfall at lower elevations, reducing the total snowpack (DWR, 2008).

Hydrology. As discussed above, climate change could potentially affect: the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise may be a product of climate change through two main processes: expansion of sea water as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply due to salt water intrusion. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture. California has a $30 billion agricultural industry that produces half of the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater air pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (CCCC, 2006).

Ecosystems and Wildlife. Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the average global surface temperature could rise by 1.0-4.5°F (0.6-2.5°C) in the next 50 years, and 2.2-10°F (1.4-5.8°C) in the next century, with substantial regional variation. Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan, 2004; Parmesan, C. and H. Galbraith, 2004).

While the above-mentioned potential impacts identify the possible effects of climate change at a global and potentially statewide level, in general scientific modeling tools are currently unable to predict what impacts would occur locally with a similar degree of accuracy. In general, regional and local predictions are made based on downscaling statewide models (CEC, March 2009).

b. Regulatory Setting. The following regulations address both climate change and GHG emissions.

International and Federal Regulations. The United States is, and has been, a participant in the United Nations Framework Convention on Climate Change (UNFCCC) since it was produced by the United Nations in 1992. The objective of the treaty is "stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system." This is generally understood to be achieved by stabilizing global greenhouse gas concentrations between 350 and 400 ppm, in order to limit the global average temperature increases between 2 and 2.4°C above pre-industrial levels (IPCC 2007). The UNFCC itself does not set limits on greenhouse gas emissions

for individual countries or enforcement mechanisms. Instead, the treaty provides for updates, called "protocols," that would identify mandatory emissions limits.

Five years later, the UNFCC brought nations together again to draft the *Kyoto Protocol* (1997). The Protocol established commitments for industrialized nations to reduce their collective emissions of six greenhouse gases (carbon dioxide, methane, nitrous oxide, sulfur hexafluoride, hydrofluorocarbons, and perfluorocarbons) to 5.2% below 1990 levels by 2012. The United States is a signatory of the Protocol, but Congress has not ratified it and the United States has not bound itself to the Protocol's commitments (UNFCCC, 2007).

The United States is currently using a voluntary and incentive-based approach toward emissions reductions in lieu of the Kyoto Protocol's mandatory framework. The Climate Change Technology Program (CCTP) is a multi-agency research and development coordination effort (led by the Secretaries of Energy and Commerce) that is charged with carrying out the President's National Climate Change Technology Initiative (USEPA, December 2007).

However, the voluntary approach to address climate change and greenhouse gas emissions may be changing. The United States Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) held that the United States Environmental Protection Agency (EPA) has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act.

California Regulations. Assembly Bill (AB) 1493 (2002), referred to as "Pavley," requires ARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, EPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year. Pavley I took effect for model years starting in 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" will cover 2017 to 2025. Fleet average emission standards would reach 22 per cent reduction by 2012 and 30 per cent by 2016.

In 2005, Governor Schwarzenegger issued Executive Order S-3-05, establishing statewide GHG emissions reduction targets. Executive Order (EO) S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80% of 1990 levels (CalEPA, 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006," signed into law in 2006. AB 32 codifies the Statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15%

reduction below 2005 emission levels; the same requirement as under S-3-05), and requires ARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires ARB to adopt regulations to require reporting and verification of statewide GHG emissions.

After completing a comprehensive review and update process, the ARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2E. The Scoping Plan was approved by ARB on December 11, 2008, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. The Scoping Plan includes a range of GHG reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms.

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020.

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Senate Bill (SB) 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing ARB to develop regional greenhouse gas emission reduction targets to be achieved from vehicles for 2020 and 2035. SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, ARB adopted final regional targets for reducing greenhouse gas emissions from 2005 levels by 2020 and 2035.

ARB Resolution 07-54 establishes 25,000 metric tons of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold represents just over 0.005% of California's total inventory of GHG emissions for 2004.

In April 2011, Governor Brown signed SB 2X requiring California to generate 33% of its electricity from renewable energy by 2020.

For more information on the Senate and Assembly bills, Executive Orders, and reports discussed above, and to view reports and research referenced above, please refer to the following websites: www.climatechange.ca.gov and http://www.arb.ca.gov/cc/cc.htm.

Local Regulations and CEQA Requirements. Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines

provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant. To date, the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), the San Joaquin Air Pollution Control District (SJVAPCD), and the San Luis Obispo Air Pollution Control District (SLOAPCD) have adopted quantitative significance thresholds for GHGs. Districts/jurisdictions with an interim approach include ~~the Santa Barbara County Air Pollution Control District (SBCAPCD),~~ SCAQMD, Santa Monica, **Santa Barbara County,** and San Diego County. The City of Buellton is located in the County of Santa Barbara, which has developed an interim approach to the establishment of GHG significance thresholds **(refer to Interim GHG Emissions – Evidentiary Support and Interim Procedures for Evaluating Greenhouse Gas Emissions, Appendix C)**. The County's interim approach is described below in Section 4.6.3 (a).

4.6.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The project site corresponds with Key Site II, as identified in the LUE and CE Update EIR. However, the LUE and CE Update EIR did not evaluate the potential impacts related to greenhouse gas emissions resulting from development facilitated by the LUE and CE Update EIR, including the project site (formerly Key Site II), because evaluation of GHG emissions was not a CEQA requirement at the time of preparation of the LUE and CE Update EIR.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds. Pursuant to the requirements of SB 97, the Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions in March 2010. These guidelines are used in evaluating the cumulative significance of GHG emissions from the proposed project. According to the adopted CEQA Guidelines, impacts related to GHG emissions from the proposed project would be significant if the project would:

- *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or*
- *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is

cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

For future projects, the significance of GHG emissions may be evaluated based on whether projects are consistent with an adopted Climate Action Plan (or other GHG reduction plan). As neither the City nor the SBCAPCD has developed or adopted permanent GHG significance thresholds, this analysis is based on the County of Santa Barbara's interim approach to evaluating GHG emissions. The County's methodology to address climate change in CEQA documents is evolving. The County is currently working to develop an inventory of GHG emissions and a Climate Action Strategy and Climate Action Plan based on this data.

Until County-specific data becomes available and significance thresholds applicable to GHG emissions are developed and formally adopted, the County will follow an interim approach to evaluating GHG emissions. This interim approach looks to criteria adopted by the BAAQMD, summarized in Table 4.6-1, for guidance on determining the significance of GHG emissions.

Table 4.6-1 County of Santa Barbara GHG Significance Determination Guidelines

GHG Emission Source Category	Operational Emissions
Non-stationary Sources	1,100 MT of CO_2E/year OR 4.6 MT CO_2E/SP/year (residents + employees)
Stationary Sources	10,000 MT/year
Plans	6.6 MT CO_2E/SP/year (residents + employees)

Notes: SP = Service Population.
Project emissions can be expressed on a per-capita basis as Metric tons of CO_2E/Service Population/year, which represents the project's total estimated annual GHG emissions divided by the estimated total number of new residents and employees that would result from development of a project.
Neither BAAQMD nor Santa Barbara County includes any standards for construction-related emissions.

The County's per-service population guideline is intended to avoid penalizing large projects that incorporate GHG-reduction measures such that they may have high total annual GHG emissions, but would be relatively efficient, as compared to projects of similar scale. However, this guideline is most appropriately used for conventional residential or commercial projects which would generate a long-term service population (defined as the sum of new residents and new employees that would result from a project). The proposed project is an extended-care medical facility, which would result in additional employees and extended-care patients, but would not result in a conventionally-defined service population, as defined above. Therefore, the proposed project would have a potentially significant contribution to GHG emissions if it would result in greater than 1,100 metric tons of CO_2E/year (MT CO_2E/year).

Study Methodology. Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO_2, CH_4, and N_2O because these make up 98.9% of all GHG emissions by volume (IPCC, 2007) and are the GHG emissions that the project would emit in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF_6, were also considered for the analysis. However, because the project does not involve industrial development, the quantity of fluorinated gases would not be significant since fluorinated gases are primarily associated with industrial processes. Emissions of all GHGs are converted into their equivalent weight in CO_2 (CO_2E). Minimal amounts of other main GHGs

(such as chlorofluorocarbons [CFCs]) would be emitted, and these other GHG emissions would not substantially add to the calculated CO_2E amounts. Calculations are based on the methodologies discussed in the California Air Pollution Control Officers Association (CAPCOA) *CEQA and Climate Change* white paper (January 2008) and included the use of the California Climate Action Registry (CCAR) General Reporting Protocol (January 2009).

On-Site Operational Emissions. Operational emissions from energy use (electricity and natural gas use) for the project site were estimated using the California Emissions Estimator Model (CalEEMod) computer program (see Appendix C for calculations.). The default values on which the CalEEMod computer program are based include the California Energy Commission (CEC) sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies. CalEEMod provides operational emissions estimates for CO_2, N_2O and CH_4. This methodology is considered reasonable and reliable for use, as it has been subjected to peer review by numerous public and private stakeholders, and in particular by the CEC. It is also recommended by CAPCOA (January 2008).

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating were calculated in CalEEMod and utilize standard emission rates from CARB, USEPA, and district supplied emission factor values (CalEEMod User Guide, 2011).

Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CalEEMod User Guide, 2011). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle).

Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California.

Direct Emissions from Mobile Combustion. Emissions of CO_2 and CH_4 from transportation sources for the proposed project were quantified using the CalEEMod computer model. Because the CalEEMod computer program does not calculate N_2O emissions from mobile sources, N_2O emissions were quantified using the California Climate Action Registry General Reporting Protocol (January 2009) direct emissions factors for mobile combustion (see Appendix C for calculations). The estimate of total daily trips associated with the proposed project was based on the standard Institute of Transportation Engineers (ITE) vehicle trip rates for a Continuing Care Retirement Community land use type, but was modified (from 2.81 to 2.94) to be consistent with the total number of average daily trips generated in the Transportation and Circulation Study prepared for the proposed project (refer to Section 4.11, *Transportation and Circulation*). This modified trip rate was calculated and extrapolated to derive total annual mileage in CalEEMod. Emission rates for N_2O emissions were based on the vehicle mix output generated by CalEEMod and the emission factors found in the California Climate Action Registry General Reporting Protocol.

Construction Emissions. Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches (as discussed

below in *GHG Cumulative Significance*) adequately address impacts from temporary construction activity. As stated in the *CEQA and Climate Change* white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA, 2008). Nevertheless, air districts such as the SCAQMD (2011) have recommended amortizing construction-related emissions over a 30-year period in conjunction with the proposed project's operational emissions.

Construction of the proposed project would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Emissions associated with the construction period were estimated using the CalEEMod computer program, based on the projected maximum amount of equipment that would be used onsite at one time. Complete results from CalEEMod and assumptions can be viewed in Appendix C.

b. Project Impacts and Mitigation Measures.

Impact GHG-1 The project would generate short-term as well as long-term GHG emissions. The proposed project would exceed the 1,100 MT CO_2E/year threshold, and would incrementally contribute to climate change. Impacts would be Class II, *significant but mitigable.*

As stated above, GHG emissions for the project were calculated using the SCAQMD's CalEEMod emissions modeling software based on the proposed development. The following summarizes the project's overall GHG emissions (refer to Appendix C for full CalEEMod software output).

Construction Emissions. For the purpose of this analysis, construction activity is conservatively assumed to occur over a period of approximately 18.5 months. As shown in Table 4.6-2, construction activity for the proposed project would generate an estimated 1,216 metric tons of CO_2E. The first year of construction would result in the highest amount of GHG emissions because site preparation and grading would occur during this time. Following the SCAQMD's recommended methodology to amortize emissions over a 30-year period (the assumed life of the project), construction of the proposed project would generate an estimated 41 metric tons of CO_2E per year.

Table 4.6-2 Estimated Construction Emissions of Greenhouse Gases

Year	Annual Emissions (Carbon Dioxide Equivalent (CO_2E)
2013	875.31 metric tons
2014	340.84 metric tons
Total	**1,216.15 metric tons**
Amortized over 30 years	**40.54 metric tons per year**

See Appendix C for CalEEMod Results.

On-Site Operational Emissions. This category includes emissions from consumption of electricity and natural gas as part of building operation and heating/cooling. Operation of the proposed project would consume an estimated 887,854 kilowatt-hours [kWh]/year of electricity (refer to Appendix C). The generation of electricity used at the site occurs at off-site power plants, much of which is generated by the combustion of fossil fuels that yield substantial amounts of CO_2, and to a smaller extent N_2O and CH_4.

Table 4.6-3 depicts the total operational emissions of GHGs associated with the proposed project (excluding mobile source emissions), estimated at 556 metric tons per year of CO_2E.

Table 4.6-3 Annual On-Site Operational Emissions of Greenhouse Gases

Emission Source	Annual Emissions	
	Emissions	CO_2E
Area	3.10 metric tons	555.8 metric tons
Energy	404.40 metric tons	
Waste	102.53 metric tons	
Water	45.77 metric tons	
Total On-Site Operational Emissions		**556 metric tons**

Sources: CalEEMod version 2011.1
See Appendix C for calculations. Includes energy from electrical usage, water usage, wastewater conveyance, solid waste generation, and area source emissions from natural gas and heating.

Emissions from Mobile Combustion. Mobile source GHG emissions were estimated using the total annual vehicle miles traveled estimate generated by the CalEEMod 2011 model (v. 2011.1). The CalEEMod 2011 model estimated that the proposed development would generate approximately 2,003,626 annual VMT. As noted above, CalEEMod does not calculate N_2O emissions related to mobile sources. As such, N_2O emissions were calculated based on the project's VMT using calculation methods provided by the California Climate Action Registry General Reporting Protocol (January 2009). Table 4.6-4 depicts the estimated mobile emissions of GHGs based on this VMT.

Table 4.6-4 Annual Mobile Emissions of Greenhouse Gases

Emission Source	Annual Emissions	
	Emissions	CO_2E
Carbon Dioxide (CO_2)	813 metric tons	858 metric tons
Methane (CH_4)	0.05 metric tons	
Nitrous Oxide (N_2O)[1]	44 metric tons	
Total Mobile Emissions		**858 metric tons**

Sources: CalEEMod 2011 (version 2011.1).
[1] See Appendix C for calculations according to California Climate Action Registry General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1,January 2009, page 30-35.

Combined Stationary and Mobile Source Emissions. Table 4.6-5 combines the construction, operational and mobile GHG emissions associated with the proposed development. As shown therein, project emissions would total approximately 1,455 metric tons per year CO_2E. This represents less than 0.001% of California's total 2008 emissions of 474 MMT. These emission projections indicate that the majority of the project GHG emissions are associated with vehicular travel (approximately 59%). It should be noted that mobile emissions are in part a redirection of existing travel to other locations, and so may already be a part of the total California GHG emissions.

Table 4.6-5 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions
Construction	41 metric tons CO_2E
Operational	556 metric tons CO_2E
Mobile	858 metric tons CO_2E
Project Total MT CO_2E/year	**1,455 MT CO_2E/year**

Sources: CalEEMod 2011 (v.2011.1).
See Appendix C for calculations and for GHG emission factor assumptions.

As indicated in Table 4.6-5, CO_2E emissions associated with the proposed project would exceed the 1,100 metric tons CO_2E/year threshold of significance for non-stationary sources and result in a potentially significant impact.

Mitigation Measures. The following mitigation measure would be required to reduce impacts related to GHG emissions.

GHG-1 **GHG Reduction Measures.** The project shall reduce operational greenhouse gas emissions through implementation of one or more of the following measures:

A. Prior to permit issuance, the applicant shall develop a GHG Reduction Plan that would reduce annual greenhouse gas emissions from the project by a minimum of 355 MT CO_2E per year over the operational life of the project. The plan will be implemented on site by the project applicant and may include, but is not be limited to, the following components:

1. Alternative fuel vehicles
2. Energy conservation policies
3. Energy efficient equipment, appliances, heating and cooling
4. Energy efficient lighting
5. Green building and roofs
6. Water conservation and recycling
7. Renewable energy production
8. Off-site vehicle trip reduction
9. Carbon sequestration;

Or

B. If greenhouse gas emissions cannot be reduced through compliance with a project GHG Reduction Plan, the project applicant shall purchase carbon offsets to reduce GHG emissions below threshold levels. Purchased carbon offsets shall be approved by City staff prior to permit approval.

Depending on the specific mix of elements pursued, expected reduction of GHG emissions under Mitigation Measure GHG-1 would be as shown in Table 4.6-6 for each component.

Table 4.6-6 Potential Project GHG Reduction Plan Measures and Greenhouse Gas Reduction

Annual CO_2e Reduction (metric tons/year)	Per Square Foot ~~(288,655 sf)~~	Per Acre ~~(12.6)~~
Energy Efficient Lighting		
Efficient Lighting Retrofit	0.001	
Water Conservation		
Irrigation Control		0.27
Low-maintenance Landscaping		0.60
Green Roofs	0.001	
Total Emissions Reduction per ~~Unit~~ Square Foot/Acre[1]	**0.002**	**0.87**
Total Potential Emissions Reduction[2]	**~~487.8~~ 577.3**	**~~11.0~~ 0.4**

*1. **288,655 square feet, 0.5 acres (estimated total acreage of landscaped area on the project site).***
***3.** Emissions reduction for the 247 proposed habitable units, determined by multiplying total emissions reduction per ~~habitable unit~~ **square foot/acre** by the total number of proposed ~~habitable units~~ **square feet/acres** ~~(247)~~.*
Source: Climate and Air Pollution Planning Assistant (CAPPA), Local Governments for Sustainability USA (ICLEI).

As the table above indicates, depending on the specific mix of GHG reduction components selected by the project, sufficient GHG emissions reductions are available to mitigate significant impacts of the project and reduce net GHG emissions to a level that is less than significant. As noted above, the proposed project is expected to exceed the significance criterion by 355 MT CO_2E/year. To reduce project emissions to a less than significant level, the applicant must select GHG reductions that equal or exceed reductions of 355 MT CO_2E/year. The table above indicates that there are a total of approximately ~~499~~ **578** MT CO_2E/year "reduction credits" available if all GHG reductions are incorporated into the project. Because the total available reductions are greater than the amount by which the project GHG emissions would exceed the significance criteria (355 MT CO_2E/year), reducing project GHG emissions below the level of significance is possible. As a result, GHG emissions from the project can be fully mitigated and the residual impact is *less than significant with mitigation (Class II).*

Significance After Mitigation. Implementation of Mitigation GHG-1 would reduce GHG emission impacts to a less than significant level (Class II).

c. Cumulative Impacts. Greenhouse gases and climate change are, by definition, cumulative impacts. Refer to Impact GHG-1 for discussion of climate change and GHG emissions.

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4.7 HYDROLOGY and WATER QUALITY

4.7.1 Setting

a. Regional Setting. The City of Buellton is located in Santa Barbara County. Santa Barbara County occupies more than 2,700 square miles, most of which is sparsely populated and mountainous. The County is situated among a series of transverse mountain ranges, the only ranges within the continental United States to trend in an east-westerly direction. Most of the County's developed areas are located along the coastal plain and in the inter-mountain valleys. Santa Barbara County's climate is typically warm and dry in summer and cool and wet in winter, close to that of a Mediterranean-type climate. Most of the County's rivers, creeks, and streams remain dry during the summer months. Zaca Creek, Thumbelina Creek and an unnamed creek all flow through Buellton to the Santa Ynez River, which borders the City to the south. Nojoqui Creek flows north and joins the Santa Ynez River south of the City limit (City of Buellton, December 2008).

The Santa Ynez River watershed, located in central Santa Barbara County, California, is about 900 square miles in area. The Santa Ynez River flows west about 90 miles from its headwaters at 4,000 feet in the San Rafael Mountains to the Pacific Ocean. Bradbury Dam and Cachuma Reservoir, located 48.7 river miles from the ocean, divide the watershed nearly in half. Immediately upstream from Cachuma Reservoir, the river passes through a narrow trough between the mountains. Below Cachuma Reservoir, the river flows over broad alluvial floodplains. West of Buellton, it flows through a narrow meandering stretch to the Lompoc Narrows and emerges onto the broad, flat Lompoc Plain (City of Buellton, December 2008).

Federal Emergency Management Act (FEMA) maps of the Buellton area indicate there is the potential for flooding along the Santa Ynez River, Zaca Creek, and Thumbelina Creek. Only portions of the Santa Ynez River floodway have been mapped by FEMA for Buellton's downtown area. Much of the downtown area south of Highway 246 is designated as a floodway fringe.

No natural lakes of any substantial size are located within the Buellton Planning Area. However, Lake Cachuma is located about seven miles upstream of Buellton on the Santa Ynez River. It is the main source of water for much of southern Santa Barbara County, including the City of Santa Barbara, Goleta, Carpenteria, Montecito, Summerland, and the Santa Ynez River Water Conservation District. The Bureau of Reclamation releases water from Lake Cachuma to maintain adequate supplies for uses downstream, including irrigated agriculture, municipal uses by the City of Solvang, Buellton area homes and farms, and riparian vegetation (City of Buellton, December 2008).

The topography within the City and vicinity ranges from nearly flat with hillsides to the north and to the south across the Santa Ynez River. The elevation of the Santa Ynez River bed drops at a gentle gradient. Topography immediately north of the riverbed is characterized by a gently sloping alluvial terrace rising to the gently rolling hillsides that comprise the area north of the City limit. Most of the City north of the Santa Ynez River has an average elevation of approximately 350 feet above sea level. In the hills to the north and northeast of the City, hills rise to an elevation of 800 feet.

b. Project Site Setting. The project site is characterized by slopes gradually downward from the western hillside toward the edge of the property at Jonata Park Road. The natural drainage area is from the top of the hillside down to Jonata Park Road, where water is diverted under the road near a culvert at the southern edge of the property. On-site slopes are generally less than 9%, and do not exceed 15%. A Preliminary Drainage Report (Appendix C) prepared by Engineering Development Associates on March 15, 2012, has been reviewed and incorporated into the analysis. According to the Preliminary Drainage Report, the project site is mainly comprised of gravelly fine sandy loam soils.

c. Groundwater. Groundwater used by the City draws from the Santa Ynez River Alluvial Basin and Buellton Uplands Basin. The Buellton Uplands Groundwater Basin encompasses about 29 square miles located about 18 miles east of the Pacific Ocean and directly north of the Santa Ynez River. The Santa Ynez River Riparian Basin sediments overlie portions of the Buellton Uplands in the south-east part of the basin. Due to the hydrologic gradient (generally north to south), it is likely that the Buellton Uplands Basin discharges into the Santa Ynez River Riparian Basin. The Santa Barbara County Water Agency (SBCWA) has estimated average annual rainfall in the basin to be about 17 inches per year (Santa Barbara County Groundwater Report, May 2012). The Buellton Uplands Groundwater Basin is in state of surplus, as natural recharge exceeds the rate of pumping by 800 acre-feet per year.

The Santa Ynez River Alluvial Basin consists of the unconsolidated sand and gravel alluvial deposits of the Santa Ynez River. This basin is not subject to overdraft (i.e. a progressive long-term drop in water levels) because the average annual flow to the Santa Ynez River (the main recharge source) is greater than the volume of the basin. Water is extracted from this basin for municipal and agricultural uses by many entities both private and public (City of Buellton General Plan, December 2008). Storage within the upper 50 feet of the basin is approximately 90,000 acre-feet (Santa Barbara County Groundwater Report, May 2012).

d. Hydrology and Water Quality Background. The primary sources of pollution in surface and groundwater resources include storm water runoff from paved areas, which can contain hydrocarbons, sediments, pesticides, herbicides, toxic metals, and coliform bacteria. Seepage from sewage treatment lagoons can further contribute to degraded water quality in the form of elevated nitrate levels. Improperly placed septic tank leach fields can cause similar types of contamination. Illegal waste dumping can introduce contaminants such as gasoline, pesticides, herbicides and other harmful chemicals. Septic tanks are also a source of pollution to some wells in both alluvial and granitic rocks. Septic tanks discharging into alluvium have a high potential to pollute wells producing from the same deposit because of high permeability and low gradient. In the winter, the rains raise the water table in these areas, which can exacerbate possible contamination.

Current water quality data for the Buellton Uplands Groundwater basin is limited. However, data from the late 1950s and early 1960s indicate total dissolved solids (TDS) concentrations between 300 and 700 milligrams per liter (mg/L) for several wells within the basin (City of Buellton, December 2008). The quality of the water from the Santa Ynez Valley River Basin is good, but the basin has high concentrations of manganese and iron, which cause discoloration and an objectionable taste. The City uses the riparian basin as an additional water source, but

the water is treated before it is delivered to residences and businesses. The water delivered by the City meets all applicable standards for quality for domestic water supplies.

The following is a summary of information provided by Santa Barbara County Public Works Water Resource Division and is intended to provide sufficient background material to allow consideration of the potential hydrology and water quality impacts of the anticipated development.

*Storm Water Runoff***.** Storm water runoff from lands modified by human activities can harm surface water resources and, in turn, cause or contribute to an exceedance of water quality standards by changing natural hydrologic patterns, accelerating stream flows, destroying aquatic habitat, and elevating pollutant concentrations. Such runoff may contain or mobilize high levels of contaminants, such as sediment, suspended solids, nutrients (phosphorous and nitrogen), heavy metals and other toxic pollutants, pathogens, oxygen-demanding substances, and floatables. After a storm event, water runoff carries these pollutants into nearby streams, rivers, lakes, estuaries, wetlands, and oceans. The highest concentrations of these contaminants often are contained in ''first flush'' discharges, which occur during the first major storm after an extended dry period. Individually and combined, these pollutants impair water quality, threatening designated beneficial uses and causing habitat alteration or destruction.

Urbanization alters the natural infiltration capability of the land and generates a host of pollutants that are associated with the activities of dense populations, thereby increasing storm water runoff volumes and pollutant loading in storm water discharged to receiving water bodies. Urban development increases the amount of impervious surface in a watershed as farmland, forests, and other natural vegetation with natural infiltration characteristics are converted into buildings with rooftops, driveways, sidewalks, roads, and parking lots with virtually no ability to absorb storm water. Storm water runoff washes over these impervious areas, picking up pollutants along the way while gaining speed and volume because of their inability to disperse and filter into the ground. What results are storm water flows that are higher in volume, pollutants, and temperature than the flows from more pervious areas, which have more natural vegetation and soil to filter the runoff. Studies reveal that the level of imperviousness in an area strongly correlates with decreased quality of the nearby receiving waters.

*Construction Site Runoff***.** Polluted storm water runoff from construction sites often flows to storm drains and ultimately is discharged into local rivers and streams. Pollutants that are commonly discharged from construction sites include: sediment, solid and sanitary wastes, nitrogen (fertilizer), phosphorus (fertilizer), pesticides, concrete truck wash out, construction chemicals, and construction debris. Sediment is usually the main pollutant of concern. Sediment runoff rates from construction sites are typically 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forest lands.

Post Construction Runoff. There are generally two forms of substantial impacts of post-construction runoff. The first is caused by an increase in the type and quantity of pollutants in storm water runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g., nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried

to receiving waters, such as lakes, ponds, and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans. The second kind of post construction runoff impact occurs by increasing the quantity of water delivered to the water body during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from surfaces such as asphalt and concrete and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include stream bank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

e. Regulatory Setting. Development in the City is subject to various local, state, and federal regulations and permits regarding the use of water resources. The Santa Barbara County Flood Control District, California Department of Water Resources, and Central Coast Regional Water Quality Control Board are the primary agencies responsible for the protection of watersheds, floodplains, and water quality. The Santa Barbara County Department of Health is the primary agency responsible for establishing design standards and permitting septic tanks and wells. The federal government administers the National Pollutant Discharge Elimination System (NPDES) permit program, which regulates discharges into surface waters. Section 404 of the Clean Water Act prohibits the discharge of dredged or fill materials into Waters of the United States or adjacent wetlands without a permit from the U.S. Army Corps of Engineers.

The Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act or CWA) requires that discharges do not substantially degrade the physical, chemical or biological integrity of the Nation's waters. Storm water regulations have increasingly emphasized the control of water pollution from non-point sources, which include construction sites. Specifically Section 402 established the NPDES Regulations for wastewater and other pollutant discharges.

Congress amended the CWA in 1987 to require the implementation of a two-phased program to address storm water discharges. NPDES Phase I, promulgated by the U.S. Environmental Protection Agency (EPA) in November 1990, requires NPDES permits for storm water discharges from municipal separate storm sewer systems (MS4s) serving populations of 100,000 or greater, construction sites disturbing greater than 5 acres of land, and ten categories of industrial activities.

Despite the comprehensiveness of the NPDES Phase I program, the EPA recognized that smaller construction projects (disturbing less than 5 acres) and small municipal separate storm sewers (MS4s[1]) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve storm water quality, the EPA promulgated the NPDES Phase II program (*Federal Register* Vol. 64, No. 235, December 8, 1999). The Phase II regulations became effective on February 7, 2000, and require NPDES permits for storm water discharges from regulated small MS4s and for construction sites disturbing more than 1 acre of land. All construction activities disturbing one or more acres are subject to NPDES Phase II permit regulations, which require the use of Best Management Practices (BMPs) to prevent the discharge of sediment-laden water off-site, using the "best available technology economically achievable." The site specific plan to implement BMPs is called a Storm Water Pollution

[1] *Those generally serving less than 100,000 people and located in an urbanized area as defined by the Bureau of the Census.*

Prevention Plan (SWPPP). The SWPPP identifies the likely sources of sediment and pollution, describes measures to minimize sediment and pollution into local surface water drainages.

The State Water Resources Control Board (SWRCB) is a state regulatory agency whose purpose is to protect the quality of surface and ground water within the region for beneficial uses. In order to address specific issues of the various groundwater basins in the State, the SWRCB is divided into nine Regional Water Quality Control Boards (RWQCBs), one for each of the major groundwater basins/surface water flow systems in the State. The northern portion of Santa Barbara County falls within the jurisdiction of the Central Coast RWQCB. The RWQCB establishes requirements prescribing the quality of point-sources of discharge and establishes water quality objectives through the Water Quality Control Plan for the local basin (Basin Plan). Water quality objectives are established based on the designated beneficial uses for a particular surface water or groundwater basin.

Flood Insurance Rate Maps issued by the Federal Emergency Management Administration (FEMA) divide flood areas into three zones: Zone A for areas of 100-year flood, base flood elevations not determined; Zone B for areas of 500-year flood; and Zone C for areas of minimal flooding. The National Flood Insurance Program 100-year floodplain is considered to be the base flood condition. This is defined as a flood event of a magnitude that would be equaled or exceeded an average of once during a 100-year period. Floodways are defined as stream channels plus adjacent floodplains that must be kept free of encroachment as much as possible so that 100-year floods can be carried without substantial increases (no more than one foot) in flood elevations. Development in these floodplain areas are subject to the standard conditions of approval of the Santa Barbara County Flood Control and Water Conservation District and the requirements and development standards set forth in the County Flood Plain Management Ordinance (Chapter 15-A of the County Code) and the Development Along Water Courses Ordinance (Chapter 15-B of the County Code).

The City of Buellton has developed a Storm Water Management Program (SWMP) prepared in response to State Water Resources Control Board Water Quality Draft Order for NPDES Phase II. The goal of the SWMP is to protect the health of the recreational areas and the natural environment, meet Clean Water Act mandates through compliance with Phase II NPDES Permit requirements and applicable regulations, and encourage public involvement and awareness. Additionally, the City's Grading Ordinance (Ordinance 95-04 and Section 18.10.120 of the City's Municipal Code) requires a grading permit and requires that new subdivisions be designed so that all proposed grading incorporates appropriate erosion and sedimentation control measures.

4.7.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The project site corresponds with Key Site II, as identified in the LUE and CE Update EIR. The LUE and CE Update EIR evaluated the hydrological and water quality setting of the project region and the potential impacts resulting from development facilitated by the LUE and CE Update EIR, in Section 4.6, *Hydrology and Water Quality*. The LUE and CE Update EIR concluded that impacts related to development within a floodplain (Impact HWQ-1) would be less than

significant, assuming compliance with the proposed policies in the Safety Element (Policies HZ-1, HZ-2, and HZ-3) and standard requirements for development within the floodplain. The LUE and CE Update EIR determined that there would be no impacts related to flooding and dam inundation at the project site (Key Site II), as the project site is not located within an established floodplain or dam inundation zone.

The LUE and CE Update EIR determined that development facilitated by the LUE and CE Update EIR would result in potentially significant impacts associated with an overall increase in the amount of impervious surfaces, resulting in an increase in watershed runoff rates and a decrease in groundwater percolation within the City (Impact HWQ-3). The LUE and CE Update EIR determined that policies contained in the previous General Plan (Policy S-10 of the Public Facilities and Services Element) would lessen impacts associated with increased runoff by requiring an engineered drainage plan for development greater than five acres in size. The LUE and CE Update EIR required implementation of mitigation measures HWQ-3(a) and HWQ-3(b), which require that a site specific drainage study and plan be prepared for all development on sites greater than once acre in size, and that future development projects be encouraged to develop plans/practices that would minimize runoff rates such as the use of pervious paving material. The LUE and CE Update EIR determined that implementation of the existing General Plan policy and the aforementioned mitigation measures would reduce impacts associated with groundwater recharge and surface water runoff quantity to a less than significant level.

The LUE and CE Update EIR also identified water quality impacts to the Santa Ynez River, tributary creeks, and groundwater in the Buellton Uplands Groundwater Basin as a potentially significant impact requiring mitigation (Impact HWQ-4). The LUE and CE Update EIR identified General Plan Policy S-10 and Mitigation Measure HWQ-2(a), which requires the delivery of written disclosure statements to all prospective occupants, making them aware of the fact that an area is located within a dam failure inundation hazard area (refer to Figure 4.6-2 of the 2005 LUE and CE Update EIR), as methods that would lessen water quality and hydrology impacts. The LUE and CE Update EIR also identified General Plan Policies HZ-1 and HZ-2 as methods that would preserve the impervious surfaces adjacent to waterways allowing for filtration of surface waters before contaminants reach the water flow. Additionally, the LUE and CE Update EIR recommended implementation of Mitigation Measures HWQ-4(a) and HWQ-4(b), which require installation of a Best Management Practices (BMP) device to intercept water flowing off of proposed parking lots and roadway surfaces for urban infill projects as well as recommending approaches to treating surface runoff, and proper cleaning and maintenance of storm water BMP devices. The LUE and CE Update EIR determined that water quality impacts related to polluted runoff would be less than significant, given implementation of State regulations, the aforementioned General Plan policies and the aforementioned mitigation measures.

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds. According to Appendix G of the CEQA guidelines, a project would have significant impacts if it would:

- *Violate any water quality standards or waste discharge requirements;*

- *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;*
- *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;*
- *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
- *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;*
- *Otherwise substantially degrade water quality;*
- *Place housing within a 100-year flood hazard areas structures which would impede or redirect flood flows;*
- *Place within a 100-year flood hazard area structures which would impede or redirect flood flows;*
- *Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam;*
- *Be subject to inundation by seiche, tsunami, or mudflow.*

Potential impacts to water supply and groundwater depletion are discussed in Section 4.10, *Public Services and Utilities*. Impacts related to the placement of housing or other structures within a 100-year flood hazard area, failure of levee or dam, or inundation by a seiche, tsunami, or mudflow have been determined not to be significant. These checklist items are addressed in Section 5.0, *Effects Found Not To Be Significant.*

b. Project Impacts and Mitigation Measures.

Impact HWQ-1 **Point and non-point sources of contamination associated with construction of the proposed project would disturb more than one acre of land, and could degrade water quality through increased rates of erosion and sedimentation. This would be a Class III, *less than significant*, impact.**

Grading activities and vegetation removal during construction could result in short-term water quality impacts associated with increased erosion and the potential transport of pollutants into drainage swales and local waterways. If construction grading on the project site occurs during the rainy season or in the event of heavy storms, soils from the site could be entrained, eroded, and transported to the drainages within and adjacent to the site. As discussed in Section 4.7.1 (d), polluted storm water runoff from construction sites often flows to storm drains and ultimately is discharged into local rivers and streams. Sediment is usually the main pollutant of concern. Uncontrolled discharges of sediment would result in a potentially significant impact to water quality.

All construction activities disturbing one or more acres are subject to the General Permit Storm Water Discharge Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ), which require preparation of a Storm Water Pollution Prevention Program

(SWPPP) to control the discharge of pollutants, including sediment, into local surface water drainages. The SWPPP is designed to minimize water quality degradation through storm water monitoring, establish BMPs, implement erosion control measures, and implement spill prevention and containment measures.

In addition to NPDES permit requirements, as discussed above in Section 4.7.1(e), construction activities would also be subject to the City's Grading Ordinance (Section 18.10.120 of the City's Municipal Code). The Grading Ordinance generally requires that new subdivisions be designed so that all proposed grading incorporates appropriate erosion and sedimentation control measures for all new grading, excavations, fills, cuts, borrow pits, stockpiling, compaction of fill, and to all alterations, changes, additions or repairs to existing excavations, fills, borrow pits, borrow areas. The senior center facilities would be developed on the level portion of each parcel. Grading for compaction, drainage, and minor slope modifications would be determined based on development phasing and effort to balance cut and fills on-site. The proposed project would be required to comply with NPDES permit requirements, as well as the requirements set forth in the City's Grading Ordinance. Therefore, water quality impacts related to erosion and sedimentation would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. With adherence to existing NPDES regulatory measures, construction-related impacts to water quality would be less than significant (Class III).

Impact HWQ-2 **Development of the proposed project would result in the addition of urban contaminant sources and impermeable surfaces to the site. The proposed retention basin would ensure that post-development discharge would not exceed existing conditions. Therefore, the proposed project would not substantially alter existing drainage patterns, increase storm water runoff, result in increased flooding, result in a substantial decrease in percolation to groundwater basins, or exceed existing drainage infrastructure capacity. This would be a Class III, less than *significant*, impact.**

The site is currently undeveloped, but has historically been used for grazing and farming activities. The natural drainage area is from the top of the hillside down to Jonata Park Road, where water is diverted under the road near a culvert at the southern edge of the property. On-site slopes are generally less than 9%, and do not exceed 15%. Proposed structures and paved surfaces would redirect drainage flow during storm events. Surface water flows would travel faster as they run along impermeable surfaces and channelized drainages, which could result in increased peak discharge flows, soil erosion, and risk of flooding. In addition, as storm water runoff increases in flow speed, scouring velocity at discharge points could lead to increased soil erosion and sedimentation, degrading water quality. Increased runoff from impermeable surfaces lessens the amount that is infiltrated, changing the conditions of shallow groundwater recharge. Oils, chemicals, and other contaminants from vehicles, pesticides, fertilizers, pet waste, dust contaminants, and other urban runoff could accumulate on impermeable surfaces such as roadways and rooftops. Whenever surface runoff occurs due to non-storm flows, and

storm events, this accumulation could be discharged into downstream drainages, further diminishing water quality to groundwater and off-site water bodies.

The project proposes an off-site retention basin to control runoff rates. Storm water from the residential development would be collected and directed to storm drains located in the proposed project roadways and Jonata Park Road. Off-site drainage would be collected in a retention basin located to the west of the site. The proposed retention basin would fall outside of the Buellton City limit and would be under the jurisdiction of Santa Barbara County. The retention basin would be required to be designed to be consistent with Santa Barbara County Flood Control and Water Conservation District's Standard Conditions of Project Plan Approval.

Santa Barbara County Flood Control District (SBCFCD) limits post-development discharge loads to 0.07 cubic feet per second (cfs) per acre for 25-year storm events.[2] This rate approximates discharge loads from a natural, undeveloped site in this project vicinity, and therefore approximates pre-development runoff rates. The preliminary drainage study analyzed post-development storm water and detention routing in accordance with SBCFCD methodology, and concluded that the storm water retention basin proposed as part of the project would attenuate the 2, 5, 10, 25, and 100-year storms and discharge at or below existing drainage conditions, thereby adequately mitigating post-development runoff to criteria set forth by the SBCFCD (refer to Appendix C for the complete preliminary drainage study). Because storm water would be captured and then slowly released to mimic existing drainage conditions, the retention basin would reduce impacts related to increased peak flows, including soil erosion, pollutant runoff, reduced groundwater percolation, and flooding.

In addition to the proposed retention basin, in accordance with the City of Buellton SWMP, structural and non-structural BMPs must be consistent with General Permit, Water Board, and City requirements. The use of practical structural design measures, consistent with the aforementioned requirements, is a means of controlling post-construction runoff. Therefore, as a condition of approval, the project would be required to incorporate BMP structural design measures, which may include (but would not be limited to):

- *Wet ponds, dry basins, grassy and bio-swales, and filter strips throughout the project site;*
- *Infiltration basins/trenches, dry wells;*
- *Use of porous pavement to percolate runoff through the soil to groundwater;*
- *Roof leader flows directed to planter boxes and other vegetated areas, and/or vegetated swales and buffers; and*
- *Soil amendments to increase infiltration rates.*

In addition, the California Building Code requires that landscaped areas adjacent to structures receiving roof drainage would be graded so that drainage is away from structures.

Compliance with City SWMP BMPs, in addition to the proposed retention basin, would reduce impacts related to new impervious surfaces, soil erosion, and storm water contaminants. Potential impacts related to the addition of impermeable surfaces on the project site and storm water runoff would therefore be less than significant.

[2] *The 25-year storm event has a 4% probability of occurring within a given year.*

Mitigation Measures. No mitigation is required.

Significance After Mitigation. With the implementation of the proposed off-site retention basin and compliance with City SWMP BMPs, impacts associated with storm water runoff, such as increased rates of runoff and a reduction in groundwater percolation, would be less than significant.

c. Cumulative Impacts. The proposed project and development throughout the City of Buellton would contribute to cumulative hydrological and water quality impacts. Substantial portions of land have the potential to be developed with impermeable surfaces, which would alter drainage patterns, increase peak flows and risk of flooding, reduce groundwater recharge, and degrade water quality. Through the implementation of the BMPs contained in the City's Stormwater Management Plan, and the mitigation measures identified in this SEIR, potential cumulative impacts would be reduced. Furthermore, the 2005 LUE and CE Update EIR determined that impacts associated with hydrology and water quality, resulting from development facilitated by the 2005 LUE and CE Update EIR, would be less than significant with the incorporation of mitigation. Therefore, cumulative impacts to hydrology and water quality would be less than significant (Class III).

4.8 LAND USE/POLICY CONSISTENCY

4.8.1 Setting

a. Regional Land Use. The City of Buellton is located in the County of Santa Barbara, which occupies approximately 2,774 square miles of both urban and rural land uses. Lands within the existing Buellton City limit are currently substantially built out; few vacant parcels remain in the City. Approximately 62% of the City lands are designated low density residential and general commercial. The remaining portion of lands within the City consist of medium density residential, multi-family residential, neighborhood commercial, service commercial, industrial, public/quasi-public, and open space/parks and recreation .

b. Project Site Setting. Portions of the project site are currently used for grazing and farming. A residence and outbuildings are currently located on the site. The project site is designated General Commercial under the Buellton General Plan, with corresponding zoning of General Commercial (CR) under the City's Municipal Code. The project site is included in the City's Affordable Housing Overlay Zone (AHOZ) Program, which is a permissive overlay zoning designation, which allows high density residential development as an alternative to the base zoning of AHOZ-designated sites. Jonata Park Road abuts the western boundary of the project site. Lands north and west of the project site are outside of the City limit, under the jurisdiction of the County of Santa Barbara, and are designated agriculture/open space under the Santa Barbara County General Plan. Land south of the project site is designated public/quasi-public, and contains a Caltrans facility. Somewhat more distant land uses include industrial development east of Highway 101.

c. Regulatory Setting. The City of Buellton regulates the design of the built environment through its General Plan and the City's Zoning Ordinance (Title 19 of the City's Municipal Code). The General Plan is a long-range plan that serves as a guide for the physical development of the City of Buellton. The General Plan is comprised of several elements, including the Land Use Element, Circulation Element, Conservation and Open Space Element, Economic Development Element, Housing Element, Noise Element, Parks and Recreation Element, Public Facilities and Services Element, and Safety Element. The General Plan includes goals and policies that provide a general framework for City-wide development. New development must be consistent with the goals and policies outlined in the City's General Plan. The Land Use Element sets forth the policies for the types and location of land uses throughout the City. In September 2005 the City Council approved the City of Buellton General Plan Land Use Element and Circulation Element Update Program and associated Environmental Impact Report (EIR), which updated the Land Use and Circulation Elements of the General Plan to address development of the vacant and under-developed lands within the City limit through the buildout year of 2025, including the current proposed project site (identified therein as AHOZ Program Key Site II).

The Zoning Ordinance implements the Land Use Element and its policies by establishing specific City regulations and standards for the development of parcels of land. The zoning designation for a site must be consistent with the General Plan in relationship to land use category. The Buellton Planning Commission has determined the proposed project meets the

definition of a "Medical Services-Hospitals and Extended Care" use, and therefore would be permissible in the General Commercial (CR) zone.

4.8.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The project site corresponds with Key Site II as identified in the LUE and CE Update EIR. The LUE and CE Update EIR examined the land use, agriculture, and housing setting of the City and the potential impacts resulting from development facilitated by the LUE and CE Update.

The LUE and CE Update EIR determined that impacts related to land use compatibility (Impact LU-1) would be Class II, significant but mitigable. The LUE and CE Update EIR identified existing requirement in the City's Zoning Ordinance (density, setback, lot coverage, height, and parking requirements, as well as design standards within the City's Community Design Guidelines, and mitigation measures identified in other sections of the LUE and CE Update EIR, as methods that would minimize potential land use incompatibility impacts. Furthermore, the LUE and CE Update EIR required mitigation in the form of implementation of a notice of intent to apply herbicides and pesticides (LU-1[a]) and the implementation of a 200-foot agricultural buffer (LU-1[b]) as measures that would reduce land use compatibility impacts to a less than significant level.

Impacts related to the displacement of residents and housing (Impact LU-2) were determined to be Class I, significant and unavoidable due to the infeasibility of mitigation measures. Nevertheless, the LUE and CE Update EIR concluded that Program 15 (relocation assistance) of the City's existing Housing Element, as well as mitigation measures related to displacement dispensation (LU-2[a]) and displacement from circulation improvements (LU-2[b]) would reduce displacement related impacts to the extent feasible. The LUE and CE Update EIR concluded that impacts related to farmland conversion (Impact LU-3) would be less than significant due to the fact that none of the sites evaluated in the LUE and CE Update EIR were actively farmed, and that future farming on those sites would be constrained by several factors, such as the lack of viable agricultural land. The LUE and CE Update EIR concluded that development facilitated by the LUE and CE Update EIR would be consistent with General Plan Elements as well as regional plans (Impact LU-4) and would; therefore, result in less than significant impacts.

4.8.3 Impact Analysis

a. Methodology and Significance Thresholds. In accordance with Appendix G of the CEQA Guidelines, a project would result in a significant impact if it would:

- *Physically divide an established community;*
- *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or*

- *Conflict with any applicable habitat conservation plan or natural community conservation plan.*

These thresholds are augmented by those contained in Section 4.1, *Aesthetics/ Visual Resources,* Section 4.3, *Air Quality*, Section 4.9, *Noise*, and Section 4.11, *Transportation and Circulation*, which are issues that relate directly to land use compatibility. As discussed in Section 5.0, *Effects Found Not To Be Significant*, the project would not physically divide an established community, since it would involve new development on the urban edge of the City. In addition, the project would not conflict with a habitat conservation plan or natural community conservation plan, since no such plans have been developed within the City of Buellton. Therefore, this analysis focuses on impacts related to land use incompatibility and the proposed project's consistency with adopted policies and regulations contained in the City's General Plan Land Use Element and the City's Zoning Ordinance (Title 19 of the City's Municipal Code).

b. Project Impacts.

Impact LU-1 The proposed project would result in a change in the scale of development on the site. This would present potential land use incompatibility issues with surrounding land uses. This is a Class III, *less than significant*, impact.

Potential environmental impacts of land use compatibility encompass a range of issue areas. Project features and impacts that can create incompatibilities include aesthetic incompatibility resulting from major differences in scale between the project and surrounding uses or introduction of new sources of light and glare, as well as long-term effects such as operational noise, and localized air quality impacts.

The project is within the Buellton City limit, and is designated and zoned for commercial development under the City's General Plan and Municipal Code. The project site is adjacent to U.S. Highway 101 to the east, and adjacent to existing urban development to the south. As discussed in Section 4.1, *Aesthetics/Visual Resources*, the project would alter views along Highway 101. Proposed structures on the project site would generally be two stories in height, with the exception of the proposed Assisted Living Facility, which would be three stories, and would be located in the center of the project site, as viewed from U.S. Highway 101. These building heights are consistent with development to the south of the project site, which is composed of a mix of two-story and one-story structures. Building heights of proposed project structures would taper off to single-story development to the north, where the project would abut existing agricultural land.

The City's Zoning Ordinance establishes density, setback, lot coverage, height, and parking requirements for allowed uses within each zoning district. In addition, the City's Community Design Guidelines describe elements encouraged to be incorporated into new developments and redevelopment community-wide within the City of Buellton. The Community Design Guidelines reflect the architectural influences of the surrounding farms and ranches of the Santa Ynez Valley, and to a lesser extent, the California Missions, and apply to all new commercial and multi-family development within the City. Implementation of existing City policies, including policies contained in the Community Design Guidelines and General Plan would ensure that the proposed project would be compatible with the scale and use characteristics of

surrounding development. Therefore, the proposed project would not be incompatible with scale or use characteristics of the project area.

In addition, the project would introduce new sources of light and glare that could adversely affect surrounding development. Implementation of existing City policies, including policies contained in the Community Design Guidelines and General Plan would ensure that lighting impacts would be less than significant. Mitigation Measure AES-2, which requires new structures to utilize non-reflective exterior materials, is required to ensure that impacts related to glare would be reduced to a less than significant level.

As previously mentioned, the project site is located directly adjacent to agriculturally-zoned land within the County of Santa Barbara. However, the project's compliance with the proposed 200-foot agricultural buffer (consistent with mitigation measures established by the 2005 LUE and CE Update EIR), as well as existing City policies, would ensure that impacts would be less than significant (refer to Section 4.2, *Agricultural Resources*).

As discussed in Section 4.3, *Air Quality*, operation of the proposed project would not generate air pollutant emissions exceeding SBCAPCD operational significance thresholds. Although local air quality may be degraded by the proposed project, the change would not reach levels where the proposed land use could be considered to be in conflict with surrounding uses. Construction activities would generate temporary emissions of ozone precursors and dust. These pollutants may adversely affect adjacent sensitive receptors on a short-term basis. However, emissions from construction would not exceed thresholds of significance, the proposed project would incorporate SBCAPCD required dust control measures, and these construction emissions would be temporary, and thus not considered a long-term land use compatibility issue.

As is discussed in Section 4.9, *Noise*, operation of the proposed project would not result in noise levels that would exceed City thresholds at any nearby sensitive receptor. Although local noise levels may be increased by the project-generated vehicle traffic, the increase would not reach levels where the proposed land use could be considered to be in conflict with surrounding uses. Construction activities would generate noise, which may adversely affect adjacent sensitive receptors on a short-term basis. However, noise from construction would not exceed City standards with required construction noise attenuation techniques (Mitigation Measures N-1[a] and N-1[b]), and these construction noise levels would be temporary, and thus not considered a long-term land use compatibility issue.

Mitigation Measures. With implementation of existing City policies including the Municipal Code requirements, Community Design Guidelines, and General Plan policies, impacts would be less than significant. Mitigation measures identified in Sections 4.1, *Aesthetics/Visual Resources,* and 4.8, *Noise,* would further minimize potential land use incompatibility impacts. No additional mitigation is required.

Significance After Mitigation. Impacts would be less than significant without mitigation (Class III).

Impact LU-2 **The proposed project would be consistent with the applicable policies and development standards in the City's General Plan and Zoning Ordinance. Impacts related to consistency with the General Plan and Zoning Ordinance would be Class III,** ***less than significant.***

The project site is designated General Commercial (GC) under the General Plan, with corresponding zoning of General Commercial (CR) under the City's Municipal Code. The project site is included in the City's Affordable Housing Overlay Zone (AHOZ) Program, which is a permissive overlay zoning designation, which allows high density residential development as an alternative to the base zoning of AHOZ-designated sites. According to the General Plan, the GC land use category is characterized by lands intended to accommodate the widest range of commercial, retail, wholesale and office uses, as well as similar compatible uses. This designation also allows for the development of mixed use at a maximum density of ten dwellings per gross acre, as determined by the variable limit.

As described in Section 19.02.200 of the Zoning Ordinance, the purpose of the CR district is to provide areas to serve community retail business and commercial needs including stores, shops, and offices on individual lots and in shopping centers, supplying commodities or performing services for the residents of the entire community. The CR zoning district is consistent with the general commercial designation of the City's General Plan. The proposed project would require approval of a Conditional Use Permit (CUP) for the proposed senior living facility.

Extended care facilities are a permitted use in the CR district with CUP approval pursuant to Chapter 19.02.210 of the Zoning Ordinance. The project would be subject to all of the requirements described in Chapter 19.02 of the Zoning Ordinance, as well as the requirements of the City's Community Design Guidelines, including restrictions that apply to parking, landscaping, setback size, and maximum building height.

Table 4.8-1 shows the proposed project's consistency with the objectives and policies of the General Plan that are most applicable to the proposed project. Consistent with the scope and purpose of this EIR, this discussion primarily focuses on those General Plan goals and policies that relate to avoiding or mitigating environmental impacts, and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment. The ultimate determination of whether the proposed project is consistent with the General Plan and Zoning Ordinance lies with the decision-making body (e.g. the City of Buellton).

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Land Use Element	
Goal 2. To manage the growth of the City so that adequate facilities and services can be provided in pace with development.	**Consistent.** Potential impacts to public facilities and services are analyzed in detail in Section 4.10, *Public Services and Utilities*, and are determined to be significant but mitigable (Class II) or less than significant (Class III).

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Goal 5. Focus growth inward to accommodate population increases and housing needs. Compact contiguous development within existing City boundaries is preferred over annexation and sprawling development.	**Consistent**. The proposed site is located within the incorporated limit of the City of Buellton.
Policy L-1. The Buellton Urban Growth Boundary, sphere of influence, planning area, and land use designations are shown on Figure LU-1 and LU-3. The land use designations and policies of this General Plan apply to the sphere of influence. Public improvements and significant new private development proposed in the planning area shall be reviewed by the City.	**Consistent**. The proposed project would be consistent with the General Plan designation for the project site. The project is subject to City review.
Policy L-3. Encourage locally serving businesses such as grocery stores, pharmacies, hardware stores, banks, day care, dry cleaning, and post offices, as well as schools, parks and social centers to locate within easy walking distance (generally ½ mile) of residences. Similarly, new residential neighborhoods should remain within easy walking and bicycling distance from the City center.	**Consistent.** As stated in Section 2.0, *Project Description*, the proposed project is located within walking distance to the Avenue of Flags and downtown businesses.
Policy L-4. New development shall be restricted from areas where natural conditions are likely to pose a substantial threat to public safety or produce excessive maintenance costs.	**Consistent.** Potential impacts to public safety, resulting from new development in areas where natural conditions could pose a substantial threat, are analyzed in detail in Section 4.1, *Geology Soils,* and are determined to be significant but mitigable (Class II) or less than significant (Class III).
Policy L-5. New development shall not be allowed unless adequate public services are available to serve such new development.	**Consistent.** As discussed in Section 4.10, *Public Services and Utilities,* adequate public services are available to serve the proposed project.
Policy L-6. New development shall pay its fair share of providing additional public services needed to accommodate such development. The City shall prepare a fiscal impact assessment model to evaluate the fiscal impacts of new development. The model will assess the net fiscal benefit or cost of new development by comparing projected tax benefits to City service costs. All future development projects, with the exception of affordable housing and projects that require only a zoning clearance, shall be required to prepare a fiscal impact report using this model. All projects for which the fiscal impact assessment model identifies a net negative fiscal impact shall be heard by the City Council.	**Consistent.** Potential impacts to public services are analyzed in detail in Section 4.10, *Public Services and Utilities*, and were determined to be less than significant (Class III).

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Policy L-9. The entrances to Buellton from the east and west on Highway 246, and from the north and south on the US 101 freeway and Avenue of Flags should be considered important features. New public and private development in these locations should include elements such as signage, landscaping and appropriate architectural detailing that announces that one has arrived in Buellton. Such elements should also be designed to reduce the speed of vehicles entering the City for the safety of pedestrians and bicyclists using and crossing arterial roads. Entrance monuments, as described in the Avenue of Flags/Highway 246 Urban Design Plan shall also be encouraged.	**Consistent.** As discussed in Section 4.1, *Aesthetics*, the proposed project would be designed in accordance with the City's Community Design Guidelines. The project site would be landscaped with a variety of trees, shrubs and ground covers. Project site plans include the planting of screening trees in the Caltrans right of way between Highway 101 and Jonata Park Road as well as the placement of a landscaped walking path along the eastern border of the site. These types of landscaping techniques are recommended in the Community Design Guidelines. Project site landscaping is designed to screen vehicles from public view as well as enhance the visual character of the project.
Policy L-11. New development shall incorporate a balanced circulation network that provides safe, multi-route access for vehicles, bicycles and pedestrians to neighborhood centers, greenbelts, other parts of the neighborhood and adjacent circulation routes.	**Consistent.** As discussed in Section 2.0, *Project Description*, the plans for the proposed project include pathways within the project site as well as along Jonata Park Road. Therefore, the proposed project is consistent with this policy.
Policy L-12. All exterior lighting in new development shall be located and designed so as to avoid creating substantial off-site glare, light spillover onto adjacent properties, or upward into the sky. The style, location and height of the lighting fixtures shall be submitted with building plans and shall be subject to approval by the City prior to issuance of building or grading permits, as appropriate.	**Consistent.** As discussed in Section 4.1, *Aesthetics*, the proposed project would introduce new sources of light that could spill over onto adjacent properties and affect nighttime views, resulting in an adverse visual impact. However, the use of non-reflective building materials, as well as consistency with the City's Community Design Guidelines and Night Lighting Standard would result in a less than significant impact. Therefore, the proposed project is consistent with this policy.
Policy L-13. Master plans for sewer, water, roads, drainage and other public improvements shall be required for new development that includes at least 100 housing units or 200,000 square feet of commercial or industrial development, unless otherwise specified by the City Public Works Director. The scope of these master plans shall be further defined in the General Plan Public Facilities and Services Element.	**Consistent.** The project would be subject to this City requirement, and all required master plans would be subject to review and approval by Public Works. As discussed in Section 4.10, *Public Services and Utilities*, the project would not result in significant impacts related to water supply, sewer, road, or drainage infrastructure capacity.

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Circulation Element	
Goal 2. To encourage the use of alternate forms of transportation other than the automobile.	**Consistent.** As stated in Section 2.0, *Project Description*, the residences within the proposed project will be located within walking distance of the Avenue of Flags and downtown businesses. In addition, the project includes pathways within the project site as well as along Jonata Park Road. Furthermore, the project site would be served by the Santa Ynez Valley Transit (SYVT), which links the cities of Buellton, Los Olivos, Santa Ynez and Solvang. SYVT offers Dial-A-Ride service to seniors (aged 60 or older), which mirrors the service area and hours of a fixed-route service (City of Solvang, August 6, 2012). Therefore, the proposed project is consistent with this goal.
Policy C-2. Facilities that promote the use of alternate modes of transportation, including bicycle lanes and connections, pedestrian and hiking trails, park-and ride lots and facilities for public transit shall be incorporated where feasible into new development, and shall be encouraged in existing development.	**Consistent.** As discussed in Section 2.0, *Project Description*, the plans for the proposed project include pathways within the project site as well as along Jonata Park Road.
Policy C-3. The City will continue to support the policies and programs of the Santa Barbara County Congestion Management Plan.	**Consistent**. The proposed project would be generally consistent with the goals contained in Table 1.1, *Congestion Management Program Goals*, of the Santa Barbara County Congestion Management Plan. Refer to Section 4.11, *Transportation and Circulation.*
Policy C-5. Level of Service "C" or better traffic conditions shall generally be maintained on all streets and intersections, lower levels of service may be accepted during peak times or as a temporary condition, if improvements to address the problem are programmed to be developed.	**Consistent.** As discussed in Section 4.11, *Transportation and Circulation*, Level of Service "C" or better would be maintained on all streets and intersections that would be affected by project generated traffic.
Policy C-8. The City should manage the street network so that the standards presented in Policy 10 (Roadway Standards) are not exceeded. The City will require new development to mitigate the traffic impacts it causes, or the City will limit development along streets where congestion levels are unacceptable.	**Consistent**. Potential impacts to the City's street network are analyzed in detail in Section 4.11, *Transportation and Circulation*, and were determined to be less than significant (Class III).

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Policy C-16. The City shall require the provision of adequate off-street parking in conjunction with all new development. Parking shall be located convenient to new development and shall be easily accessible from the street. The City may reduce required off-street parking for projects that employ transit demand management strategies that reduce vehicle trips to the site, where there is on-street angular parking along the Avenue of Flags, and for mixed use shared parking. The adequacy and appropriateness of parking requirements in the Zoning Ordinance shall be periodically evaluated and adjusted, if necessary.	**Consistent.** As stated in Section 2.0, *Project Description,* the proposed project includes a total of 242 parking spaces, including 24 spaces near the skilled nursing building, 20 spaces near the memory building, 70 spaces near the assisted living building, and 128 spaces near the independent living units. A total of 242 parking spaces would be provided. Section 19.04.142 of the City Municipal Code states that extended care medical facilities shall provide 1 parking stall per 3 beds and 1 parking stall per 3 employees, or a total of 163 stalls for the proposed project (430 beds / 3 = 144 stalls plus approximately 56 employees / 3 = 19 stalls). Therefore, the proposed project is consistent with this policy.
Policy C-20. In the process of considering development proposals the City shall use the full amount of discretion authorized in the municipal code and CEQA for setting conditions of approval to require new development to provide bicycle storage and parking facilities on-site as well as reserve an offer of dedication of right-of-way necessary for bikeway improvements.	**Consistent**. The project would be required to provide bicycle storage and parking facilities on-site, consistent with the requirements of the City's Municipal Code at the time of project approval.
Policy 24. New development should provide sidewalks and pedestrian paths consistent with applicable State, federal and local plans, programs and standards.	**Consistent.** As stated in Section 2.0, *Project Description*, the plans for the proposed project include pathways within the project site as well as along Jonata Park Road. Theses sidewalks and pedestrian paths would be installed according to the applicable state, federal, and local plans, programs, and standards.
Conservation and Open Space Element	
Goal 1. Protect the town's natural, cultural, visual, and historical resources.	**Consistent**. Potential impacts to cultural and historic resources are analyzed in detail in Section 4.4, *Cultural and Historic Resources*. Potential impacts to visual resources are analyzed in detail in Section 4.1, *Aesthetics*. The project would not result in impacts on biological resources.
Goal 3. Improve and maintain water quality of the region.	**Potentially Consistent.** Potential impacts to water quality are analyzed in detail in Section 4.7, *Hydrology and Water Quality,* and were determined to be less than significant (Class III).
Goal 5. Manage urban development to protect open space areas that provide for public health and safety.	**Consistent.** The project site is within the City's Affordable Housing Overlay Zone and has been identified as a possible site for future development. The project site has not been identified as an area of open space that provides for public health or safety.

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Goal 8. Protect resources (such as creeks, sensitive habitat, and agriculture), and be sensitive to the factors which allow these resources to remain viable.	**Potentially Consistent.** Potential impacts to these resources are analyzed in detail in the following EIR sections: Section 4.2, *Agriculture Resources*, Section 4.4, *Cultural and Historical Resources*, Section 4.7, *Hydrology and Water Quality*, and Section 5.0, *Effects Not Found To Be Significant,* and are determined to be significant but mitigable (Class II) or less than significant (Class III).
Goal 9. Preserve and protect important oak trees within the City.	**Consistent.** As stated in Section 5.0, *Effects Not Found To Be Significant*, there are no important oak trees on the proposed project site. Therefore, the proposed project is consistent with this goal.
Goal 10. Preserve and protect important views and scenic resources within the City.	**Potentially Consistent.** As discussed in Section 4.1, *Aesthetics*, permanent buildings added to the site would be designed with an agrarian architectural style to blend with the current aesthetics of the project area and building heights would not exceed the 35-foot maximum. The project site would be landscaped with a variety of trees, shrubs and ground covers to further reduce aesthetic impacts to views from Highway 101 and surrounding areas.
Goal 11. Improve and maintain healthful air quality in Buellton and the Santa Ynez Valley.	**Potentially Consistent.** Potential impacts to air quality are analyzed in detail in Section 4.3, *Air Quality*, and are determined to be less than significant (Class III).
Goal 12. Preserve and identify cultural, archaeological, and historic resources that define the historic significance of the City of Buellton and the Santa Ynez Valley.	**Consistent.** Potential impacts to cultural resources are analyzed in detail in Section 4.4, *Cultural and Historic Resources,* and are determined to be significant but mitigable (Class II) or less than significant (Class III).
Goal 13. Conserve non-renewable resources and widely used renewable sources of energy.	**Potentially Consistent.** The proposed project would be required to comply with the standards of Title 24 that are in effect at the time of development. Compliance with the standards of Title 24 would conserve non-renewable resources to the extent feasible.
Policy C/OS-1. Encourage efficient water use by existing and future development.	**Potentially Consistent.** Compliance with Title 24 standards would encourage efficient water use to the extent feasible. The project's less than significant impacts related to water usage are analyzed in detail in Section 4.10, *Public Services and Utilities*.
Policy C/OS-2. Encourage implementation of Best Management Practices to eliminate/minimize the impacts of urban run-off and improve water quality.	**Consistent.** Impacts related to urban runoff and water quality are analyzed in detail in Section 4.7, *Hydrology and Water Quality,* and were determined to be less than significant (Class III).
Policy C/OS-3. Encourage the preservation of open space within the City.	**Consistent.** The project site has not been identified as an area of open space, nor would it result in the conversion of land designated as open space to an alternate use.

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Policy C/OS-9. Encourage new development to incorporate oak woodlands, native grasslands, wetlands, and riparian habitats into project design.	**Consistent.** The project site does not include substantial native habitats. As discussed in Section 2.0, *Project Description*, the proposed project would be landscaped with a variety of trees, shrubs, and ground cover.
Policy C/OS-10. Require new development to provide sufficient open space.	**Potentially Consistent.** As discussed in Section 2.0, *Project Description*, the project includes walking paths and outdoor activity areas throughout the site. 5.6 acres of the 18.2 acre project site would remain vacant under the proposed project.
Policy C/OS-13. Development should be designed to avoid native trees with a trunk diameter at breast height of 8 inches or more. A native tree is defined as a perennial woody plant, such as an oak or sycamore, that is a historical element of a natural California habitat. When considering the approval of activities that result in the removal of mature trees, the following factors shall be considered: a. The size, age, health and species of tree(s) to be removed. b. Whether or not the removal of the tree(s) is necessary for the reasonable development and use of the site. c. Whether the tree(s) to be removed is (are) a native or introduced species.	**Consistent.** The proposed project does not propose to remove native trees protected by this policy.
Policy C/OS-14. Encourage new development to protect visual amenities, including hillsides, by implementing the standards in the Community Design Guidelines.	**Consistent.** As discussed in Section 4.1, *Aesthetics*, the proposed project would implement the standards outlined in the Community Design Guidelines.
Policy C/OS-16. Encourage the improvement of air quality in Buellton and in the region by implementing the measures described in the Santa Barbara County Air Quality Management Plan. Such measures include, but are not limited to, new or expanded sidewalks, bicycle and pedestrian paths, safe street and parking lot crossings, planting of shade trees, theft proof and well lit bicycle storage facilities, and placement of parking lots and building entrances to favor pedestrians rather than cars.	**Consistent.** As discussed in Section 4.2, *Air Quality*, the proposed project would be required to incorporate standard construction dust control measures.
Policy C/OS-18. Encourage the preservation of cultural resources consistent with state and federal requirements by ensuring development does not adversely affect such resources or by mitigating adverse effects in accordance with state and federal regulations.	**Consistent.** Potential impacts to cultural resources are analyzed in detail in Section 4.4, *Cultural and Historic Resources,* and are determined to be significant but mitigable (Class II) or less than significant (Class III).

Table 4.8-1
General Plan Policy Consistency

General Plan Goal or Policy	Consistency Discussion
Policy C/OS-19. Encourage the conservation of energy resources in new and existing development through the use of "green construction and building practices", as described in the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) rating system.	**Consistent.** The proposed project would be required to comply with the standards of Title 24 that are in effect at the time of development. Compliance with the standards of Title 24 would conserve energy resources to the extent feasible. As discussed in Section 4.6, *Greenhouse Gas Emissions*, the project applicant would be required to develop a GHG Reduction Plan, or reduce GHG emissions through the purchase of carbon offsets, as approved by City staff prior to permit approval.
Economic Development Element	
Goal 1. Maintain and support a healthy and diverse local economy that meets the present and future employment, shopping, recreational, public safety and services needs of Buellton residents.	**Potentially Consistent**. As discussed in Section 2.0, *Project Description*, the proposed project would provide multiple levels of senior board and care and would offer skilled employment opportunities to the residents of Buellton.
Policy E-3. Encourage economic development activities which provide the opportunity for employment of local residents and/or increased municipal revenues.	**Potentially Consistent.** The proposed project would offer skilled employment opportunities to the residents of Buellton.
Policy E-4. Encourage and actively attract institutional and office uses, and business functions (e.g., health care facilities and related businesses) that engage the local pool of high skilled and semi-skilled labor and/or that offer higher paying wage scales.	**Consistent.** As stated in Section 2.0, *Project Description*, the proposed project would involve the development of a senior care facility, which includes a 24-bed skilled nursing facility, and would require doctors, nurses, and other high skilled and semi-skilled labor. Therefore, the proposed project is consistent with this policy.

As shown in Table 4.8-1, the proposed project would be generally consistent with the goals and policies of the City's General Plan, including but not limited to goals and policies related to economic development, conservation of resources and open space, air quality, the transportation and circulation system, and land use. The proposed project would therefore be consistent with the General Plan and Zoning Ordinance.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. The proposed project is an allowed use under the Buellton General Plan and Municipal Code. As shown in Table 4.8-1, the project would be consistent with adopted policies with incorporation of mitigation measures included in this SEIR. Therefore, impacts would be less than significant without additional mitigation.

c. Cumulative Impacts. Cumulative development in Buellton would gradually transform the community to a more urban character and result in additional loss of open space areas. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. Such development would also generate short-term construction air and noise

emissions, and long-term land use compatibility effects related to quality of life issues, noise nuisances, aesthetic incompatibility, and agriculture/urban conflicts. Future development project in the City would generally be expected to be consistent with the applicable General Plan and Municipal Code requirements. Potential land use conflicts would be addressed on a case-by-case basis. Cumulative land use impacts would be less than significant (Class III).

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4.9 NOISE

4.9.1 Setting

The City of Buellton General Plan (2008) provides basic information regarding the physical characteristics of noise and the existing noise environment in the general vicinity of the project site. The following is a summary of the information contained in the Noise Element and is intended to provide sufficient background material to allow consideration of the potential noise impacts of the proposed development.

a. Overview of Sound Measurement. Noise is generally defined as unwanted sound. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, Leq is summed over a one-hour period.

Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while those along arterial streets are in the 50 to 60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than that can interrupt conversations.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. The Community Noise Equivalent Level (CNEL) is a measure of the cumulative noise exposure in a community, and consists of a weighted average of the hourly Leqs over a 24-hour period. The weighting includes a 5 dB penalty added to evening (7 p.m. to 10 p.m.) and a 10 dB addition to nocturnal (10 p.m. to 7 a.m.) noise levels to account for the greater disturbance associated with noise during these periods. The Day-Night Average Sound Level, LDN, is essentially the same as CNEL, with the exception that all occurrences during the 3-hour evening time period are grouped into the day-time period with no dB penalty.

b. Project Site Setting. U.S. Highway 101 is parallel to the eastern boundary of the site, approximately 100 feet east of the project site boundary. Heavy trucks, medium trucks, automobiles, and motorcycles are clearly audible along the eastern portion of the site. The posted traffic speed along U.S. Highway 101 is 65 miles per hour (mph). Jonata Park Road is adjacent to the eastern project site boundary, in between the project site boundary and U.S. Highway 101; however, U.S. Highway 101 carries substantially more traffic than Jonata Park Road, such that the highway is the primary transportation noise source on the project site.

In addition, existing industrial and commercial uses are located approximately 300 feet east of the project site, across U.S. Highway 101. However, the transportation noise from U.S. Highway 101 remains the primary noise source on the project site.

There is an existing residence and outbuildings located in the middle of the project site; however, these structures would be demolished prior to project construction.

According to the City of Buellton General Plan, noise levels on the project site were above 70 dB within the eastern portion of the project site, and above 65 dB within the entirety of the project site due to roadway noise from U.S. Highway 101 as of 2005 (refer to Figure 4.9-1). According to the General Plan, a greater portion of the eastern side of the project site would be exposed to 70 dB noise levels from U.S. Highway 101 by 2025 (refer to Figure 4.9-2). According to Caltrans traffic data, the AADT (Annual Average Daily Traffic, available from the Caltrans Traffic Data Branch) for the segment of U.S. Highway 101 north of SR 246 was 20,000 vehicles in 2005 and 20,500 vehicles in 2011. Based on the similar volume of vehicle traffic along this segment between 2005 and 2011, the 2005 noise contours shown in Figure 4.9-1 are expected to be similar to existing noise contours associated with U.S. Highway 101.

c. Sensitive Receptors. Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and parks are most sensitive to noise intrusion and therefore have more stringent noise exposure targets than manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance. Land uses that are considered sensitive to noise impacts are referred to as "sensitive receptors." The nearest existing sensitive receptors to the project site include single-family residences located approximately 1,450 feet north of the proposed on-site development. In addition, there are existing residential units located approximately 1,550 feet south of the proposed on-site development. The proposed senior living center within the project site would be a sensitive receptor.

d. Regulatory Setting. The City of Buellton has adopted noise policies in its 2025 General Plan Noise Element (2008). These policies establish both interior and exterior noise limits for noise compatibility. The document specifies an exterior noise standard of 60 dBA Ldn and an interior standard of 45 dBA Ldn for residential uses (both single-family and multi-family) and an exterior standard of 65 dBA Ldn for hospital and nursing home, church, school, and library uses. The City's noise standards also address differences in noise perception due to small and large changes to ambient noise conditions. Accordingly, and as shown in Table 4.9-1, smaller changes in ambient noise levels from roadways result in normally unacceptable conditions at higher existing noise levels.

Table 4.9-1 Standards for Changes in Operational Roadway Noise Exposure

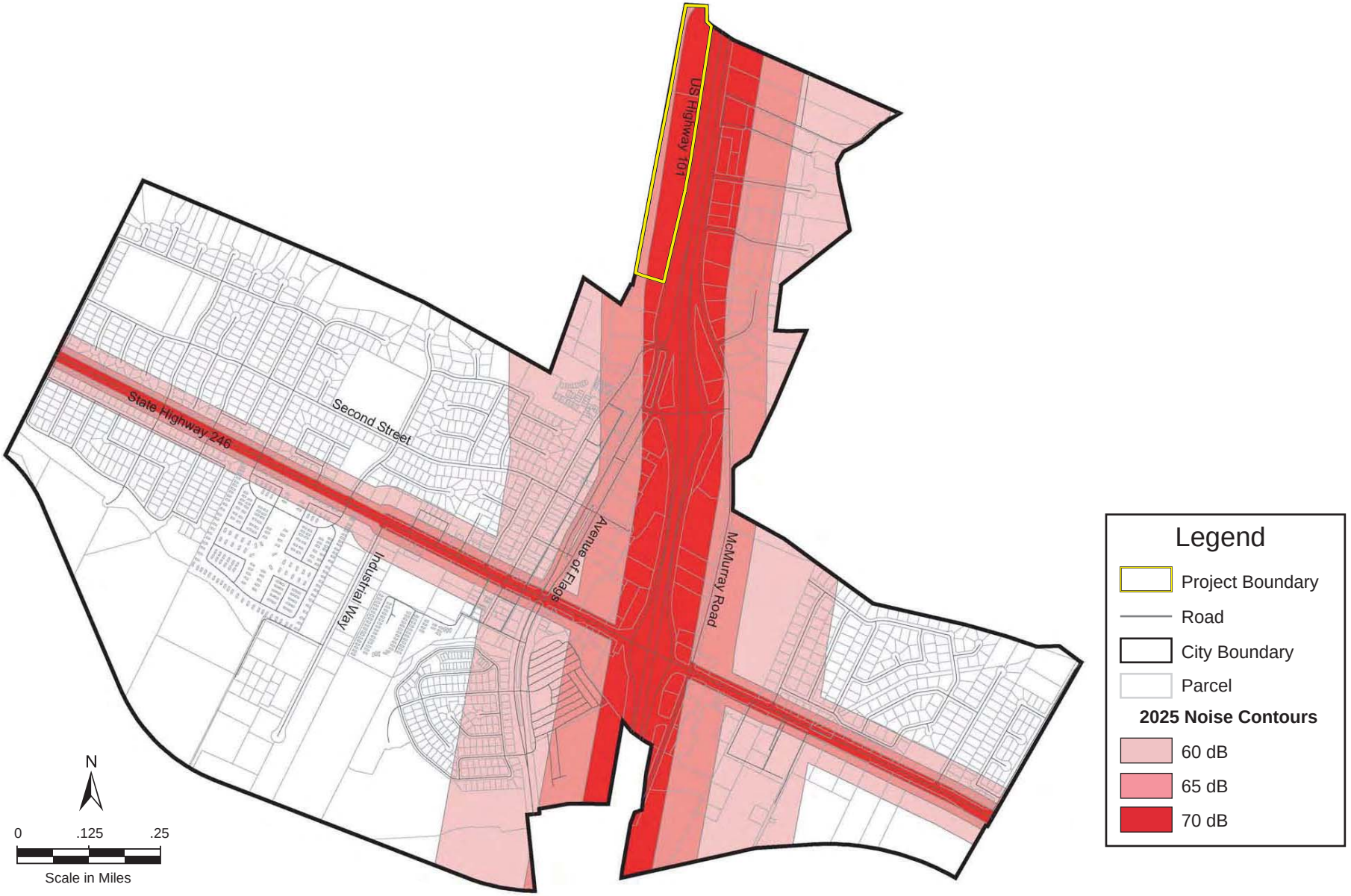
Existing Ambient Noise Level Without Development Project (Ldn)	Normally Unacceptable Change With Development Project (Ldn)
< 60 dB	Noise Levels Exceed Standards and Noise Increases by 5.0 dB or more
60 – 65 dB	Noise Levels Exceed Standards and Noise Increases by 3.0 dB or more
> 65 dB	Noise Levels Exceed Standards and Noise Increases by 1.5 dB or more

Source: 2025 Buellton General Plan Noise Element (2008)

2005 Noise Contours

Source: Buellton General Plan 2025 Noise Element.

Figure 4.9-1



2025 Noise Contours

Source: Buellton General Plan 2025 Noise Element.

Figure 4.9-2

Table 4.9-2 shows the City's standards for long-term increases in operational roadway noise levels caused either by a development project alone or in combination with cumulative development.

Table 4.9-2 Standards for Changes in Long-Term Noise Exposure at Noise Sensitive Land Uses

Long term projected annual average noise levels, including General Plan Buildout	Development Project Standards	Overall Cumulative Standards	Standards for Project Contributions to Cumulative Normally Unacceptable Conditions
Less than 60 dBA Ldn	Not significant for any change in noise level	Not significant for any change in noise level	Not significant for any change in noise level
60 to 65 dBA Ldn	Noise Levels Exceed Standards and Increase by 3.0 dBA or More	Noise Levels Exceed Standards and Increase by 3.0 dBA or More	Noise Levels Exceed Standards and Increase by 1.0 dBA or More
65 to 70 dBA Ldn	Noise Levels Exceed Standards and Increase by 1.5 dBA or More	Noise Levels Exceed Standards and Increase by 1.5 dBA or More	Noise Levels Exceed Standards and Increase by 0.5 dBA or More
Greater than 70 dBA Ldn	Noise Levels Exceed Standards and Increase by 1.0 dBA or More	Noise Levels Exceed Standards and Increase by 1.0 dBA or More	Noise Levels Exceed Standards and Increase by 0.5 dBA or More

Source: 2025 Buellton General Plan Noise Element (2008)

To minimize construction impacts, the Buellton Municipal Code Section 12.04.410 requires that during the hours of 7:00 p.m. to 7:00 a.m. weekdays, and during Saturdays or Sundays, tools, appliances or equipment producing noise of sufficient volume to disturb the sleep or repose of occupants of the neighboring property shall not be used, except with the express written permission of the Planning Director, or in case of an emergency.

In addition, the Buellton Municipal Code Section 19.02.220(E)(3) requires that for commercial and industrial operations, the volume of sound measured outside during calm air conditions, generated by any use on the property shall not exceed 75 dB at or beyond any point along the property boundary upon which such use is located. However, in no case is the volume of sound permitted to exceed 65 dB at the location of any nearby noise sensitive uses.

4.9.2 Previous Environmental Review

The City of Buellton General Plan Land Use Element and Circulation Element Update Program and associated Environmental Impact Report (EIR) updated the Land Use and Circulation Elements of the General Plan to address buildout of the vacant and under-developed lands within the City limit through the buildout year of 2025, including the current proposed project site (identified therein as AHOZ Program Key Site II). The LUE and CE Update EIR concluded that impacts due to noise levels exceeding 65 dBA Ldn along U.S. Highway 101 (Impact N-1) were potentially significant. Mitigation Measures N-1(a) and N-1(b) required development standards for new uses that would attenuate interior and exterior noise levels to below City standards. Noise associated with commercial and industrial operations (Impact N-2) were found to be potentially significant. Noise Element Policy N-4 addressed the prevention and reduction of unwanted noise experienced at residential properties:

Policy N-4: *New commercial and industrial development should incorporate design elements to minimize the noise impact on surrounding residential neighborhoods.*

In addition, Mitigation Measures N-2(a) through N-2(e) required operation and development standards for new uses that would reduce nuisance noise impacts from commercial and industrial land uses on sensitive receptors. Construction-related noise (Impact N-3) was found to be potentially significant. Mitigation Measure N-3(a) required a construction noise ordinance that would reduce impacts associated with construction noise impacts. The LUE and CE Update EIR concluded that with the implementation of identified mitigation measures, noise impacts would be reduced to a less than significant level.

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds. Pursuant to the State CEQA Guidelines, air quality impacts related to the proposed project would be significant if the project would result in:

- *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;*
- *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;*
- *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;*
- *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;*
- *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels; or*
- *For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.*

Based upon the City of Buellton General Plan, noise impacts are considered significant if they would exceed the exterior noise standard of 60 dBA Ldn or the interior standard of 45 dBA Ldn for residential uses, if they would exceed the exterior standard of 65 dBA Ldn for hospital and nursing home, church, school, and library uses, or if they would result in a change of existing noise levels that would exceed the thresholds in Table 4.9-1 or Table 4.9-2.

Construction noise estimates are based upon noise levels reported in the Federal Transit Administration's (FTA) document *Transit Noise and Vibration Impact Assessment* (May 2006). Reference noise levels from that document were then used to estimate noise levels at nearby sensitive receptors based on a standard noise attenuation rate of 6 dB per doubling of distance (line-of-sight method of sound attenuation). Construction noise level estimates do not account for the presence of intervening structures or topography, which could reduce noise levels at receptor locations. Therefore, the noise levels presented herein represent a conservative estimate of actual construction noise.

The project is not within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. For a discussion of impacts determined to result in no impact as a result of the proposed project, refer to Section 5.0, *Effects Found Not To Be Significant*.

b. Project Impacts and Mitigation Measures.

Impact N-1 Project construction could intermittently generate high noise levels on and adjacent to the project site. Project construction would take place adjacent to existing residences, thereby temporarily exposing sensitive receptors to noise levels exceeding City thresholds. Impacts would be Class II, *significant but mitigable*.

The Buellton Municipal Code Section 12.04.410 restricts construction activity during the hours of 7:00 p.m. to 7:00 a.m. weekdays, and during Saturdays or Sundays. However, if short-term noise associated with construction would exceed City standards, it may adversely affect residential uses near the project site. The grading/excavation phase of project construction tends to create the highest construction noise levels because of the operation of heavy equipment. As shown in Table 4.9-3, the noise level associated with heavy equipment typically ranges from about 78 to 88 dBA at 50 feet from the source. During grading operations, the equipment is dispersed in various portions of the site in both time and space. Due to site and equipment limitations, only a limited amount of equipment can operate near a given location at a particular time.

Table 4.9-3 Typical Construction Noise Levels (in dBA)

Equipment	Typical Level 25 Feet from the Source	Typical Level 50 Feet from the Source	Typical Level 650 Feet from the Source
Air Compressor	87	81	59
Backhoe	86	80	58
Concrete Mixer	91	85	63
Grader	91	85	63
Paver	95	89	67
Saw	82	76	54
Scraper	95	89	67
Truck	94	88	66

Source: Typical noise level 50 feet from the source was taken from FTA, May 2006. Noise levels at 25 feet and 650 feet were extrapolated using a 6 dBA attenuation rate for the doubling of distance.

Construction noise levels were extrapolated using the line-of-sight method of sound attenuation [Refer to Section 4.9.3(a), *Methodology and Significance Thresholds*]. The estimated noise level using this method results in a conservative reasonable worst case noise estimate, which does not account for potential attenuation resulting from noise barriers such as buildings or topography. Based upon an assumed average construction noise level of 95 dBA at a distance of 50 feet from the source (which assumes simultaneous use of multiple pieces of construction equipment on-site), the maximum average noise levels would be 60 dBA at a distance of 2,800

feet from the project site. The nearest residences to the project site are single-family residences located approximately 1,450 feet north of the proposed on-site development. Because existing residences would be located within 2,800 feet of construction, construction noise levels would exceed the City's exterior noise standard of 60 dBA.

Development of the proposed senior care facility and the associated infrastructure, including the internal roadways, parking, and walking pathways, would result in short-term construction noise. The nearest sensitive receptors to construction noise sources would be the single-family residences located approximately 1,450 feet north of the proposed on-site development, which would be exposed to construction-phase noise from grading and construction activities. Although of temporary duration, construction impacts are considered potentially significant.

Mitigation Measures. The following mitigation measures shall be required.

N-1(a) **Notification of Temporary Construction Noise**. The applicant shall provide all residential property owners within 2,800 feet of proposed construction on the project site with a construction activity schedule and construction routes at least one week in advance of construction activities. Any alterations or additions shall require one week advanced notification.

N-1(b) **Construction Noise Attenuation Techniques**. Stationary construction equipment shall be shielded to the satisfaction of the Buellton Planning Department. For all construction activity on the project site, noise attenuation techniques shall be employed as needed to ensure that noise at nearby sensitive receptors remains within levels allowed by City noise standards. At a minimum, such techniques shall include:

- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.
- Whenever feasible, electrical power shall be used to run air compressors and similar power tools.
- Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters if within 300 feet of any sensitive receptor.

Significance After Mitigation. The project would be required to comply with City Municipal Code Section 12.04.410, which restricts construction activity during the hours of 7:00 p.m. to 7:00 a.m. weekdays, and during Saturdays or Sundays. With compliance with City construction requirements, and implementation of the required mitigation measures, short-term construction noise impacts would be reduced to a less than significant level (Class II).

Impact N-2 **Development of a senior care facility adjacent to Jonata Park Road and near U.S. Highway 101 would not expose the proposed project to noise levels exceeding City standards. Impacts would be Class III, *less than significant*.**

As discussed in Section 4.9.1(b), noise levels on the project site were above 70 dB within the eastern portion of the project site, and above 65 dB within the entirety of the project site due to roadway noise from U.S. Highway 101 as of 2005 (refer to Figure 4.9-1). General Plan Noise Element Table N-3 indicates that the 65 dB noise contour extends 562 feet from the centerline of U.S. Highway 101 (north of SR 246), which encompasses the entire project site. As discussed in Section 4.9.1(b), daily vehicle traffic along the segment of U.S. Highway 101 north of SR 246 was generally similar between 2005 and 2011 (20,000 AADT in 2005 and 20,500 AADT in 2011). Based on the similar volume of vehicle traffic along this segment between 2005 and 2011, the 2005 noise contours shown in Figure 4.9-1 and described in General Plan Noise Element Table N-3 are expected to be similar to existing noise contours associated with U.S. Highway 101. By 2025 noise levels on the project site are expected to be above 70 dB on the majority of the project site, and above 65 dB within the remainder of the eastern portion of the project site due to roadway noise from U.S. Highway 101 (refer to General Plan Noise Element Figure 4.9-2). General Plan Noise Element Table N-4 indicates that by 2025, the 65 dB noise contour would extend 746 feet from the centerline of U.S. Highway 101, and the 70 dB noise contour would extend 345 feet from the centerline of U.S. Highway 101. The City exterior standard for hospital and nursing home, church, school, and library uses is 65 dBA Ldn; therefore, the project site would be subject to exterior noise levels in excess of the City exterior standard.

As shown in the proposed project site plan (refer to Figure 2-3 in Section 2.0, *Project Description*) proposed outdoor activity areas on the project site would be located within enclosed courtyards and behind proposed project structures. Intervening physical structures located between outdoor activity areas and U.S. Highway 101 would substantially reduce on-site noise levels, and would be expected to result in noise below the City exterior standard of 65 dB. In addition, the project landscape plan includes screen planting along the project site frontage, as well as within the Caltrans right-of-way between U.S. Highway 101 southbound and Jonata Park Road. These design features would further reduce exterior noise on the project site.

The City does not have an interior noise standard for hospital and nursing home, church, school, and library uses. However, because the project would include habitable units related to the proposed extended care facilities, the City's interior residential standard of 45 dB is an appropriate threshold. The outdoor-to-indoor noise reduction for typical buildings is about 25 dB with windows closed. Therefore, interior noise levels within project structures would be expected to be below 45 dB. Noise impacts from U.S. Highway 101 on the proposed project would be less than significant.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact N-3 Traffic generated by the project is anticipated to result in noise level increases along roadways in the project vicinity. Traffic-related increases in noise would not exceed the City standards along three studied roadway segments and impacts would be Class III, *less than significant.*

The project traffic study described traffic increases at seven intersections, which characterize traffic on three roadway segments – including Avenue of Flags and two segments of Damassa

Road. Existing and future noise levels were modeled based on traffic volumes as reported in the project traffic study using the Traffic Noise Model Version 2.5 Look-Up Tables (U.S. Department of Transportation, Federal Highway Administration [FHWA], April 2004). Because Avenue of Flags is a divided road, traffic from the northbound and southbound lanes was combined to calculate noise levels along that roadway segment.

A comparison of pre-project and post-project traffic noise on study area roadways is presented in Table 4.9-4. These values represent increases at 50 feet from the roadway centerline, rather than at the nearest sensitive receptor. In many instances, sensitive receptors are located further from the noise sources.

Table 4.9-4 Comparison of Pre-Project and Post-Project Traffic Noise on Study Area Roadways

Roadway	Projected Noise Level (dBA)				Change In Noise Level (dBA)	
	Existing (1)	Existing + Project (2)	Cumulative (3)	Cumulative + Project (4)	Due to Project Traffic (2-1)	Due to Project Traffic Under Cumulative Conditions (4-3)
Avenue of Flags south of the project site	61.1	62.1	62.6	62.9	1.0	0.3
Damassa Road west of U.S. Highway 101	63.1	63.3	64.0	64.1	0.2	0.1
Damassa Road east of U.S. Highway 101	62.1	62.7	64.1	64.1	0.1	0.0

Estimates of noise generated by traffic from roadway centerline at 50 feet. Cumulative growth was forecasted assuming development of approved and pending projects in the area, based on the Traffic and Circulation Study, prepared by Associated Transportation Engineers (Appendix G).
Refer to Appendix F for detailed noise modeling results. Noise levels presented do not account for attenuation provided by existing topography or barriers or future barriers; therefore, actual noise levels at sensitive receptor locations influenced by study area roadways may in many cases be lower than presented herein.

All three of the studied roadway segments currently have roadway noise levels between 60 and 65 dBA. Based on the City's Standards for Changes in Operational Roadway Noise Exposure, shown in Table 4.9-1, roadway noise increases would be potentially significant if City noise standards are exceeded at a sensitive receptor, and if roadway noise levels increase by 3.0 dB or more. However, the project would not result in an increase of 3.0 dBA at any of the three studied roadway segments under existing + project conditions; therefore, impacts would be less than significant.

Similarly, the project would contribute to cumulative project-area roadway noise by 0.3 dBA or less at each of the studied roadway segments, which would not constitute a significant cumulative noise increase (refer to Section 4.9.3[c]).

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. Cumulative noise impacts would include those related to traffic-generated increases in roadway noise. Traffic-generated increases in roadway noise were evaluated on a cumulative basis, as the project-level noise exposure impact discussions (Impact N-3) analyzed cumulative traffic levels. Table 4.9-4 shows estimates of cumulative + project traffic noise increases of no more than 0.3 dBA on all studied project area roadways. Therefore, the project is not anticipated to result in cumulative noise impacts. Cumulative noise impacts would be less than significant but mitigable (Class III).

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4.10 PUBLIC SERVICES and UTILITIES

4.10.1 Setting

a. Fire Protection and Emergency Medical Services. The City of Buellton has contracted with the Santa Barbara County Fire Department (SBCFD) to provide fire protection for the City. County Fire Station #31 is located at 168 West Highway 246. Station 31 is staffed by one Captain, one Engineer, one Firefighter and one Firefighter-Paramedic, for a total staff of four (Captain Dwight Pepin, County of Santa Barbara Fire Department, personal communication, June 26, 2012).

The emergency response time goal is five minutes. Currently, response times within the City limits are between three and four minutes (Captain Dwight Pepin, County of Santa Barbara Fire Department, personal communication, June 26, 2012). Station 31 responds to a variety of emergencies. On larger incidents, fire departments from the Los Alamos, Santa Ynez, and/or the Lompoc area respond to the City of Buellton with a total of three engines for 1st alarm occurrences. The City of Buellton has a mutual aid agreement with every fire protection agency in the County of Santa Barbara.

In addition to fire protection services, the SBCFD provides First Responder Emergency Medical Services in the event of a medical emergency. Each firefighter is a certified Emergency Medical Technician (EMT). Ambulance service is provided by American Medical Response through contract with Santa Barbara County.

b. Police Protection. The City is presently served by the City of Buellton Police Department, which is a sub-department of the Santa Barbara County Sheriff's Department. The Buellton police substation is located at 140 West Highway 246. The City contracts with the County to have a deputy on duty at all times. Backup support is available on a regular basis from other sheriff deputies that patrol the County. The Buellton Police Department staffs one Lieutenant, one Deputy Sheriff (assigned to the station 24 hours per day), one full-time Traffic Enforcement Officer, and one clerical person who opens the station to the public two days per week (Police Chief Brad McVay, City of Buellton Police Department, personal communication, July 6, 2012). There were approximately 4,600 calls for service and 542 criminal investigations in 2011. The most common calls involve stolen vehicles, non-violent felonies, and misdemeanors (such as drunk driving). The Buellton Police Department has mutual aid agreements with all Santa Barbara County law enforcement agencies via the Santa Barbara County Sheriff's Department, and is a member of the State of California Law Enforcement Region 1-A Mutual Aid Agreement. The Department maintains a response-time goal of five minutes; current response times are less than four minutes (Police Chief Brad McVay, City of Buellton Police Department, personal communication, July 06, 2012). Response time is measured from the time the first available patrol unit is dispatched to the call to the time the first patrol unit arrives on the scene.

The Buellton branch of the California Highway Patrol (CHP) has a force of 21 Officers, two Sergeants, and one Lieutenant. The primary responsibilities of the CHP are traffic control and accident investigation along Highway 101. The CHP and Sheriff's Department have reciprocal agreements to assist in cases of emergencies. Emergency response times range from 10 to 15 minutes. The number of CHP officers stationed at the Buellton branch is based on a combination of total street mileage and population.

c. Parks and Recreation. Three fully developed parks currently exist in the City of Buellton. Oak Park is located at the northwest corner of Sycamore Drive and Second Street, and consists of 1.75 acres of gently sloping lawn with several picnic tables, individual barbecue grills, play structure and playground, restroom, trees, and light landscaping. River View Park, located at 151 Sycamore Drive, consists of approximately 11 usable acres with extensive landscaping. Amenities include a ceremonial pavilion, walking pathways, individual and group picnic areas, a large play structure, a smaller children's playground, two basketball courts, a grass volleyball court, horseshoe pits, two restrooms, and a large grassy playing field (City of Buellton, December 2008). PAWS Park is located at the intersection of La Pita Place and Dawn Drive, and consists of 3.3 acres of fenced area for off-leash dogs. The Avenue of Flags medians are also used as landscaped open space. Facilities include a pedestrian walkway, exhibit areas for sculpture and art, extensive landscaping, community gathering areas and kiosk, and space for community events such as car shows and farmers markets.

The City's standard for park provision is five acres of park area per 1,000 residents (Kyle Abello, Recreation Coordinator Buellton Parks and Recreation Department, personal communication, June 21, 2012). The current population of Buellton is 4,858 (California Department of Finance, May 2012). The current useable parkland in the City is 16.6 acres – the 1.8 acres from Oak Park, 11 acres from River View Park, 3.3 acres from PAWS Park, and 0.5 acres from the Avenue of Flags medians). Therefore, the City currently provides approximately 3.4 acres of park area per 1,000 population, which is below the City's standard, and current (year 2012) developed parkland need of approximately 23 acres. The City plans to develop approximately 1.8 acres of parkland, which includes the development of the park in the Oak Springs Village Specific Plan Area. With the future development of the Oak Springs Village Specific Plan Area the City would have a total of 18.35 acres of parkland. In addition, Buellton residents have access to several County park facilities nearby. Nojoqui Falls County Park (80 acres) and Santa Rosa Park (21 acres) provide hiking and picnicking opportunities (City of Buellton, December 2008).

d. Public Schools and Libraries.

Public Schools. The Buellton Union School District (BUSD) serves grades K-8, and is the only public school system that serves the City. Jonata Middle School provides public education for sixth through eighth grade students from a large geographic area, accepting inter-district students from Los Olivos, Solvang, Lompoc, and Gaviota. The BUSD also includes Oak Valley Elementary School, located near Jonata Middle School on Second Street in the City of Buellton, which serves grades K-5 (City of Buellton, December 2008). BUSD does not contain a high school. Santa Ynez Valley High School in the Santa Ynez Valley Union High School District (SYVUHSD) serves the City of Buellton and is located six miles east of the City. Student enrollment in the BUSD, which includes Jonata and Oak Valley Elementary schools and enrollment at Santa Ynez High School, is reported to the State Department of Education each fall. The locations of Buellton school facilities and student enrollment data for the 2010-2011 academic year are shown in Table 4.10-1.

Table 4.10-1 Buellton School Facilities

Facility	District	Location	Enrollment
Oak Valley Elementary School	BUSD	595 Second Street, Buellton, CA	449
Jonata Middle School	BUSD	301 Second Street, Buellton, CA	210

Table 4.10-1 Buellton School Facilities

Facility	District	Location	Enrollment
Santa Ynez High School	SYVUHSD	2975 East Highway 246, Santa Ynez, CA	1,073

Source: City of Buellton General Plan 2025, December 2008

Libraries. The City of Buellton provides space and utilities to the Buellton branch of the Lompoc Library. The Buellton Library is located at 140 West Highway 246. The library is open Monday and Tuesday from 11:00 a.m. – 8:00 p.m., Wednesday-Friday 10:00 a.m. – 6:00 p.m. and Saturday 12:30 p.m. – 5:30 p.m. The library is closed on Sundays. The Buellton Library is currently staffed with one full-time librarian, three part-time weekday employees, and several volunteers. The City's library does not maintain any library planning standards such as the ratio of library space to residents or ratio of library materials to residents (Liz Chapman, Buellton Branch Manager, City of Buellton Library, personal communication, June 21, 2012).

e. Water Supply. The City of Buellton Public Works Department provides water to approximately 1,573 active service connections (Rose Hess, Director of Public Works, personal communication, June 21, 2012). The City is the sole provider of water service within the City limits; there is only one residence that receives domestic water from a private well rather than the City. The City does not provide water service for agricultural uses, and there are some private agricultural wells within the City boundaries.

Water furnished by the City is supplied from the Buellton Uplands Groundwater Basin, the Santa Ynez River Riparian Basin, and State Water Project (SWP). The filtered water is pumped to three reservoirs located in the hills northwest of the City. The three reservoirs have capacities of 100,000 gallons, 300,000 gallons, and 850,000 gallons, with an overall storage capacity of 1.25 million gallons (City of Buellton, December 2008). The City has the supply necessary to deliver approximately 1,200 acre-feet of water annually (AFY) (Rose Hess, Director of Public Works, personal communication, June 21, 2012). Water allocation from the SWP varies based on local demand. Therefore, the City's SWP supplies may fluctuate based on the quantity of water the City needs to meet demand (Santa Barbara County Public Works Department, December 1, 2009). As discussed in Section 4.7, *Hydrology and Water Quality*, neither groundwater basin is in a state of overdraft, as the natural recharge rates either exceed the capacity of the basin or exceed the rate of pumping from the basin. Furthermore, the Buellton Uplands Groundwater Basin has a net surplus of 800 AFY.

f. Wastewater Disposal. The City of Buellton operates a wastewater treatment plant that serves the City. The City of Buellton Public Works Department maintains the sewage delivery and treatment facilities for approximately 1,525 connections and collects, treats, and disposes an average of 480,000 gallons of wastewater per day. The overall capacity of the City's existing wastewater treatment facility is 650,000 gallons per day (gpd) (Rose Hess, Director of Public Works, personal communication, June 21, 2012). The City maintains two lift stations and approximately 20 miles of collection sewers. All of the water is treated to secondary treatment levels and discharged to percolation basins located on the westerly side of the facility.

The wastewater treatment plant may, in the future, be required to meet tertiary treatment permitting standards from the Regional Water Quality Control Board (RWQCB). Such

improvements could potentially necessitate the acquisition of land for future treatment facilities adjacent to the existing facilities (City of Buellton, December 2008). These future improvements would create an additional source of reclaimed water for the City.

g. Solid Waste Disposal. Weekly garbage collection and disposal for the City is currently provided by Marborg Industries of Santa Barbara. Recyclable materials (including aluminum, cardboard, rigid plastics, household glass, tin, newspaper, used latex paints, motor oil, used batteries, and used oil filters) collection services are also provided by Marborg Industries. Commercial and residential waste from the City of Buellton is initially taken to the Santa Ynez Valley Recycling and Transfer Station, formerly known as the Foxen Canyon Landfill. Santa Ynez Valley Recycling and Transfer Station is a County operated facility located on 4004 Foxen Canyon Road in Los Olivos, California and services the Santa Ynez Valley. Unrecyclable solid waste from the City of Buellton is ultimately disposed at Tajiguas Sanitary Landfill, located near the City of Goleta, approximately 15 miles south of the City. The landfill is a Class III facility owned and operated by the County of Santa Barbara Public Works Department. The landfill is approximately 357 acres in total size, with 118 acres of disposal area (City of Buellton, December 2008).

The landfill has a permitted design capacity of 23,300,000 cubic yards, with a remaining capacity of 6,660,000 cubic yards, as of April 30, 2009 (CalRecycle, June 2012). The facility has a permitted maximum daily tonnage of 1,500 tons per day and currently processes approximately 990 tons per day of solid waste (Marilyn Merrifield, Plan Checker County of Santa Barbara Public Health Department, personal communication, July 2, 2012). The facility is estimated to close on January 1, 2023 (CalRecycle, June 2012). Replacement facilities and technologies for Tajiguas Sanitary Landfill are currently being considered by Santa Barbara County.

The California Integrated Waste Management Board and the City of Buellton indicate that average waste generation in the region is 15.32 pounds per person per day. Approximately 28% of waste is generated from residential uses and 72% of waste is generated from commercial/industrial uses. The City's base year waste diversion rate is 44% (City of Buellton, December 2008).

h. Other Utilities. As described in Section 2.0, *Project Description*, Pacific Gas and Electric would provide the electric service, and Southern California Gas would provide gas service to the site. Verizon would provide phone service, and Comcast Cable would serve the site.

The City's storm drain utilities, including stormwater runoff and pollution in surface and groundwater resources, are identified in Section 4.7, *Hydrology and Water Quality*.

4.10.2 Previous Environmental Review

The 2005 City of Buellton General Plan Land Use and Circulation Element Update EIR (LUE and CE Update EIR) analyzed the potential impacts of development on Key Sites within the City. The project site corresponds with Key Site II as identified in the LUE and CE Update EIR. The LUE and CE Update EIR examined the fire protection, police protection, public schools, community libraries, solid waste, water, wastewater, and recreational setting of the project region and the potential impacts resulting from development facilitated by the LUE and CE Update.

Fire Protection Service. The LUE and CE Update EIR concluded impacts from a decrease in the ratio of firefighters to residents under buildout of the LUE and CE Update EIR were Class III, less than significant, when offset by the payment of development fees. The existing General Plan Hazards Element and Public Facilities and Services Element (1993) policies (Policy HZ-6, HZ-8, S-3, and S-4) address fire protection services. No additional mitigation was required.

Police Protection Service. The LUE and CE Update EIR concluded that development facilitated by the Land Use Element and Circulation Element Update would reduce the service ratio below the City's standard of one law enforcement officer per 1,200 residents. Impacts were determined to be Class III, less than significant, with the payment of development impact fees. Impacts would be mitigated providing that, upon buildout, the Buellton Police Department hired at least two additional deputies (Impact PS-2). No additional mitigation was required.

Parks and Recreation. The LUE and CE Update EIR concluded that development facilitated by the Land Use Element and Circulation Element Update would result in the City's parkland standard of five acres per 1,000 residents experiencing a shortfall of parklands under General Plan year 2025 conditions (Impact REC-1). Impact REC-1 was determined to be Class I, significant and unavoidable, as the payment of park in-lieu fees would be insufficient to achieve consistency with the City's parkland to population ratio standards, unless the General Plan Land Use Element is revised to accommodate additional parklands by re-designating other properties for parks and recreational use.

Public Schools. The LUE and CE Update EIR concluded that development facilitated by the Land Use Element and Circulation Element would contribute to increased demand for public schools. The LUE and CE Update EIR concluded that the payment of statutory fees, in conjunction with Policy S-1 of the Public Facilities and Services Element and the aforementioned policies would reduce Impact PS-3 to a less than significant level, Class III. No additional mitigation was required.

Community Libraries. The LUE and CE Update EIR concluded that development facilitated by the Land Use Element and Circulation Element would contribute to increased demand for library services (Impact PS-4). The LUE and CE Update EIR identified the payment of development impact fees, in conjunction with Policy S-3 and Policy S-4, as ways to mitigate the impacts to library services. No additional mitigation was required.

Water. The LUE and CE Update EIR concluded impacts related to water services (Impact PS-6) were less than significant, due to the total available water supply being sufficient to deliver water to the projected buildout population of the City. The LUE and CE Update EIR also identified policies within the existing General Plan Hazards Element and Public Facilities and Services Element, which address public services, including water services. No additional mitigation was required.

Wastewater. The LUE and CE Update EIR determined that development in accordance with the proposed Land Use Element and Circulation Element Update would exceed the capacity of the City's wastewater treatment plant and require improvements to the City's wastewater conveyance system (Impact PS-7). The LUE and CE Update EIR determined that the payment of development impact fees, along with the aforementioned policies contained in the existing General Plan Hazards Element and Public Facilities and Services Element (1993), would

reduce potential impacts associated with wastewater treatment and conveyance services to a less than significant level.

Solid Waste. The LUE and CE Update EIR concluded that impacts related to increased solid waste generation (Impact PS-5) were less than significant due to existing landfills having adequate capacity to accommodate projected increases in solid waste generation upon buildout of the Land Use Element and Circulation Element Update. The aforementioned policies identified in the existing General Plan Hazards Element and Public Facilities and Services Element address public services, including solid waste. No additional mitigation was required.

4.10.3 Impact Analysis

a. Methodology and Significance Thresholds. According to Appendix G of the *CEQA Guidelines*, significant impacts related to public services would occur if the proposed project would:

- *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:*

    1. *Fire Protection*
    2. *Police Protection*
    3. *Schools*
    4. *Parks*
    5. *Other Public Facilities*

In addition, the proposed project would result in significant impacts (in accordance with Appendix G of the CEQA Guidelines) related to utilities and service systems if the project would:

- *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;*
- *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;*
- *Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;*
- *Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlement ;*
- *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;*
- *Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs;*

- *Fail to comply with federal, state, and local statutes and regulations related to solid waste;*
- *Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or*
- *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

As the proposed project involves the development of a senior care facility, senior care residential uses would not be anticipated to generate additional school-aged children or adversely impact local schools. There would be no impacts related to public school services. Therefore, public schools are discussed in Section 5.0, *Effects Found Not To Be Significant*. Impacts related to fire protection services, police protection services, parks and recreation, community libraries, water supply, wastewater disposal, and solid waste disposal are discussed below, in Section 4.10.3(b).

The following is a description of the specific methodologies and significance criteria used to determine impacts related to fire protection services, police protection services, parks and recreation, community libraries, water supply, wastewater disposal, and solid waste disposal.

Fire Protection. The City's response time goal is five minutes. Currently, response times in the City are between three and four minutes. Therefore, the proposed project would have a significant impact on fire protection services if the project would result in response times that exceed the five minute response time goal.

Police Protection. The Department maintains a response time goal of five minutes and current response times are under four minutes (Police Chief Brad McVay, City of Buellton Police Department, personal communication, July 06, 2012). Therefore, the proposed project would have a significant impact on police protection services if the project would result in response times that exceed the five minute response time goal.

Parks and Recreation. Impacts would be significant if the proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or would be accelerated, or if the proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Community Libraries. The proposed project would have a significant impact on public library facilities and services if the project would substantially interfere with the operations of an existing public library facility, or result in insufficient library services to City residents.

Water. Water demand was estimated using water duty factors contained in the *County of Santa Barbara Environmental Thresholds and Guidelines Manual* (2008). The proposed project would have a significant effect on water supplies if the project would generate demand that would exceed the available supply of water, thereby causing water shortages during average or peak demand periods.

Wastewater. Impacts related to wastewater were estimated using wastewater generation factors contained in the Laguna County Sanitation District's *Sewer Collection System Master Plan* (June 2009). Impacts on the sewer system would be significant if wastewater generated by the proposed project would result in an exceedance of the existing or planned capacity of the wastewater collection or treatment system.

Solid Waste. The California Department of Resources Recycling and Recovery (CalRecycle) and the Santa Barbara Public Works Department's *Guide to Solid Waste and Recycling Plans for Development Projects* indicate that average waste generation for a nursing/retirement facility is five pounds per person per day. A significant impact would occur if solid waste generated by the proposed project would result in an exceedance of the daily permitted capacity of the Tajiguas Sanitary Landfill where such waste would be disposed.

b. Project Impacts and Mitigation Measures.

Impact PSU-1 New senior care facility residents would contribute to the need for additional fire protection services and/or new or expanded facilities. However, the project site would be within the Santa Barbara County Fire Department's response time goal, the proposed project would be required to pay development impact fees based on new building size, and to achieve compliance with SBCFD's established standards for the issuance of Fire Protection Certificates. With the payment of development impact fees and adherence to SBCFD's established standards, impacts would be Class III, *less than significant*.

As discussed above, the average response time for the City of Buellton is between three and four minutes and the City's response time goal is within five minutes (Captain Dwight Pepin, County of Santa Barbara Fire Department, personal communication, June 26, 2012). The project site would be within the five minute response time goal (Captain Dwight Pepin, County of Santa Barbara Fire Department, personal communication, June 26, 2012).

The proposed project would be required to pay development impact fees computed on each new building, including non-habitable spaces (SBCFD, April 13, 2012). Additionally, the proposed project would be required to comply with SBCFD's established standards for the issuance of Fire Protection Certificates, including but not limited to the installation of adequate access ways at the project site, the installation of adequate fire lanes and associated signage, installation of fire hydrants, automatic fire sprinkler systems, fire emergency alarm systems, fire extinguishers, and Knox Box entry system (SBCFD, April 13, 2012). Furthermore, the existing water distribution system is adequate to provide the fire flow pressure that meets the Fire Department's standards (Craig D. Snell, Assistant Resident Engineer MNS Engineers Inc., personal communication, June 14, 2012). With the payment of the required development impact fees and adherence to SBCFD's established standards for the issuance of Fire Protection Certificates, the potential environmental impacts to fire protection would be less than significant.

Mitigation Measures. None required.

Significance After Mitigation. With the payment of the required development impact fees and adherence to SBCFD's established standards for the issuance of Fire Protection Certificates, the potential environmental impacts to fire protection would be less than significant (Class III).

Impact PSU-2 The proposed project would generate senior care facility residents in the City of Buellton. This increase in population would contribute to the need for additional police protection services and/or new or expanded facilities. However, based on the nature and location of the project site, the proposed project would not result in an exceedance of the response time goal. Therefore, impacts would be Class III, *less than significant*.

Based on the assumption that 64 of the 247 units would be single occupancy units and 183 of those 247 units would house a maximum of two senior occupants, the proposed project would be expected to generate approximately 430 residents. An increase of 430 residents could contribute to the need for additional police protection services and/or new or expanded facilities, the construction of which could result in environmental impacts. However, senior care facilities do not generally result in a need for expanded law enforcement services, with the exception of an emergency requiring evacuation of the community (Police Chief Brad McVay, City of Buellton Police Department, personal communication, July 06, 2012). If additional support is needed, the Buellton Police Department has mutual aid agreements with all Santa Barbara County law enforcement agencies, including the California Highway Patrol.

As previously discussed, the Department's goal is to respond to emergency calls within five minutes, and current response times are less than four minutes. The project site is within the Buellton City limits, and development of a new senior care facility is not expected to result in new significant impacts related to emergency response times (Police Chief Brad McVay, City of Buellton Police Department, personal communication, July 06, 2012). Moreover, as discussed in the 2005 LUE and CE Update EIR, development impact fees would be collected by the City to fund service improvements, as needed. Therefore, the potential environmental impacts to police protection would be less than significant.

Mitigation Measures. None required.

Significance After Mitigation. Impacts would be less than significant (Class III).

Impact PSU-3 New senior care facility residents would not be anticipated to result in increased use of recreational facilities, or otherwise contribute to the physical deterioration of these facilities. This is a Class III, *less than significant*, impact.

Based on the assumption that 64 of the 247 units would be single occupancy units and 183 of those 247 units would house a maximum of two senior occupants, the proposed project would be expected to generate approximately 430 residents. An increase of 430 residents could lead to increased use of recreational facilities, and would contribute to the physical deterioration of these facilities. However, as the proposed project is a commercial use with an extended-stay medical facility, the senior residents generated by the proposed project would not be

anticipated to utilize off-site parks. Senior residents at the proposed facility would have access to on-site outdoor activity areas, including two outdoor courtyards in the assisted living building, as well as an enclosed garden in the skilled nursing facility.

No parkland is included in the proposed project, but the project does not preclude the possibility of incorporating parkland into future development projects within the City. Furthermore, the proposed project would not include the development of public recreational facilities, the construction of which could result in adverse impacts on the environment.. Therefore, impacts related to community parks and recreational facilities would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts would be Class III, *less than significant*.

Impact PSU-4 The proposed project would generate senior care facility residents in the City of Buellton. The additional senior residents that would result from development of the proposed project would increase existing demand for library services. With payment of required fees to offset such impacts, the proposed project would result in Class III, *less than significant*, impacts related to demand for libraries.

Based on the assumption that 64 of the 247 units would be single occupancy units and 183 of those 247 units would house a maximum of two senior occupants, the proposed project would be expected to generate approximately 430 residents. An increase of up to 430 new senior residents would increase demand for the City of Buellton library facilities. According to the LUE and CE Update EIR, a portion of the development impact fees required for the proposed project would be applied to the City's general fund. In turn, a portion of the City's general fund would be used to finance improvements to City library facilities and services. With the payment of required City development impact fees, the proposed project would result in less than significant impacts on library facilities and services. It is anticipated that fees would be used to improve existing services rather than construct a new library facilities. Any new library facilities built in the future would be subject to additional environmental review in which potential environmental impacts would be addressed accordingly.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant.

Impact PSU-5 The proposed project would demand an estimated 63.93 acre-feet per year (AFY) of water. The total available water supply to the City is currently 1,200 AFY, which is sufficient to deliver water to the projected buildout population of the City with the proposed project. Therefore the impact of this increase in water use would be Class III, *less than significant*.

Table 4.10-2 below shows the estimated water demand from development of the proposed project. As shown therein, the proposed project would demand an estimated 63.96 AFY of water.

Table 4.10-2 Estimated Water Demand

Use	Units	Water Duty Factor[1]		Water Demand AFY
		Quantity	Unit	
64 Private Units	64 Units	0.26	AFY/Unit	+16.64
183 One-or Two-Bedroom Units	183 Units	0.26	AFY/Unit	+47.58
Existing Residential Unit[2]	1 Unit	0.26	AFY/Unit	-0.26
Total Net Increase in Water Demand				**63.96**

1. Water duty factors are based on the consumptive use values contained in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (2008).
2. Proposed project would involve the demolition of one existing residence.
AFY=acre-feet per year

The City's LUE and CE Update EIR (2005) determined that water demand from all potentially developable land uses in the City under Land Use Element Update buildout conditions would be 587 AFY. The proposed project's water usage of approximately 63.96 AFY would account for approximately 11% of the total water supply needed to serve the buildout conditions described in the 2005 LUCE EIR. As discussed in Section 4.9, *Public Services and Infrastructure*, of the LUE and CE Update EIR, the City's exiting water supplies would be sufficient to accommodate buildout of the City's Land Use Element Update, which includes development of the project site, analyzed as Key Site II therein.

As described above, water allocation from the SWP varies based on local demand, and the City's SWP supply is adjusted based on the quantity of water demanded by the City; therefore additional water demand in Buellton would be accommodated by an increased supply from the SWP in the event that local basins are unable to meet demand. Moreover, neither the Buellton Uplands nor the Santa Ynez River Riparian Basin are in a state of overdraft, and both have available surplus capacity. As these groundwater sources are part of the City's total supply, and additional water supply is available as-needed through the SWP, the proposed project's water usage of 63.96 AFY would not exceed existing City supplies. The project would require the extension of existing water infrastructure systems (i.e. water utility lines) in order to serve the proposed development. Existing water infrastructure runs along the western side of Jonata Park Road, adjacent to the eastern boundary of the project site (Rose Hess, Director of Public Works, personal communication, September 26, 2012). Any extension of water infrastructure would occur along the roadway within an area currently used for water utility lines, and these systems would connect to the City's existing water infrastructure system and convey water to the project site. Furthermore, the extension of water utility lines would be subject to the approval of the Buellton Public Works Department. The potential impacts associated with the installation of these systems are discussed throughout this EIR. Therefore, impacts to water supply and infrastructure would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts to water supply would be less than significant.

Impact PSU-6 The proposed project would generate an estimated 61,707 gallons of wastewater per day. The Buellton Wastewater Treatment Plant has the capacity to accommodate an additional 170,000 gallons per day. Therefore, adequate capacity would be available to serve the proposed project and this impact would be Class III, *less than significant*.

As shown in Table 4.10-3, average wastewater flows from buildout of the proposed project would total approximately 61,707 gallons per day (or 0.62 million gallons per day (MGD)).

Table 4.10-3
Estimated Wastewater Generation for the Proposed Specific Plan at Buildout

Land Use	Units	Generation Factor	Wastewater Generated (GPD)
64 Private Units	64 du	323 GPD/unit	+20,672
183 One-or Two-Bedroom Units	183 du	226 GPD/unit	+41,358
Existing Residential Unit[1]	1 du	323 GPD/unit	-323
Total Wastewater Generated			**61,707 GPD or 0.062 MGD**

*Source: Wastewater generation factors obtained from: [Laguna County Sanitation District. Sewer Collection System Master Plan. June 2009] * du = dwelling unit; GPD/unit = gallons per day per unit*
1. Proposed project would involve the demolition of one existing residence.

The Buellton Wastewater Treatment Plant has a capacity of 0.65 MGD. The current average daily sewage flow into the plant is 0.48 MGD. The wastewater treatment plant is currently operating at approximately 74% of capacity and has a remaining capacity of 0.17 MGD. The proposed project would increase wastewater generation by an estimated 0.062 MGD. The additional daily throughput of 0.062 MGD would not exceed the 0.65 MGD capacity of the City's wastewater treatment plant. The project would require the extension of existing public wastewater infrastructure systems in order to serve the proposed development. Existing water infrastructure runs along the western side of Jonata Park Road, adjacent to the eastern boundary of the project site (Rose Hess, Director of Public Works, personal communication, September 26, 2012). Any extension of wastewater infrastructure would occur along the roadway within an area currently used for water utility lines and would connect to the City's existing wastewater infrastructure and convey wastewater from the project site. Moreover, the extension of wastewater infrastructure would be subject to the approval of the Buellton Public Works Department. The potential impacts associated with the installation of these systems are discussed throughout this EIR. In addition, the precise size of the wastewater conveyance pipes required to accommodate the proposed development on the project site would be determined at the time of installation and would be subject to the approval of the City Public Works department, in order to ensure that the wastewater system would be adequate to the needs of the project. Therefore, impacts related to wastewater capacity and infrastructure would be less than significant.

Mitigation Measures. Impacts to wastewater infrastructure would be less than significant. No mitigation is required.

Significance After Mitigation. Project impacts to the wastewater infrastructure would be less than significant without mitigation.

Impact PSU-7 The proposed project would generate an estimated 1.1 tons of solid waste per day, which would not exceed the surplus capacity of 510 tons per day at the Tajiguas Sanitary Landfill. Therefore, impacts related to solid waste would be Class III, *less than significant*.

The Tajiguas Sanitary Landfill has a permitted design capacity of 23,300,000 cubic yards, with a remaining capacity of 6,660,000 cubic yards, as of April 30, 2009 (CalRecycle, June 2012). The facility has a permitted maximum daily tonnage of 1,500 tons per day and currently processes approximately 990 tons per day of solid waste (Marilyn Merrifield, County of Santa Barbara Public Health Department, personal communication, July 2, 2012). Therefore, the landfill has a surplus capacity of 510 tons per day.

Based on the assumption that 64 of the 247 units would be single occupancy units and 183 of those 247 units would house a maximum of two senior occupants, the proposed project would be expected to generate approximately 430 residents. Average nursing/retirement facility waste generation is approximately five pounds per person per day (CalRecycle, August 2012). Table 4.10-4 shows estimates of the proposed project's solid waste generation.

Table 4.10-4 Estimated Solid Waste Generation

Land Use	Solid Waste Generation Rate	Tons Generated Per Year
247 Senior Care Facility Units[1]	5 pounds/person/day*	392[2]
Total Waste Diverted[3]		*196*
Total Waste Disposed at Landfill		**196**

**Source: CalRecycle, Estimated Solid Waste Generation Rates for Institutions (nursing/retirement home), August 2012.*
[1]The proposed project would add approximately 430 persons, based on the assumption that 64 of the 247 units would be single occupancy units and 183 of those 247 units would house a maximum of two senior occupants.
[2]Five pounds per person per day x 430 persons=2,150 pounds per day=approximately 1.075 tons per day x 365=392 tons per year.
[3]Based on a 50% diversion rate, as required by the California Integrated Waste Management Act.

As shown in Table 4.10-4, based on a 50% diversion rate, the proposed project would generate an estimated 1.1 tons per day of solid waste, which would not exceed the 510 tons per day surplus capacity of the Tajiguas Sanitary Landfill. Waste generated by the project would be accommodated with the surplus capacity at the existing solid waste facility. Therefore, impacts would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts to solid waste services would be less than significant.

c. Cumulative Impacts.

Fire Protection. Cumulative development in Buellton would increase the demand on fire protection services. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. As discussed above in Impact PSU-1, the project site is located within the Fire Department's five minute response time goal, and impacts would be Class III, *less than significant.* Of the City's 2005 LUE and CE Update EIR, buildout in accordance with the Land Use Element and Circulation Element is not anticipated to cause response times to exceed the City's response time goal of five minutes. Buildout in accordance with the Land Use Element and Circulation Element would result in a population increase of about 4,508 new residents to a total population of 8,968 people, which would reduce the existing ratio to 1.3 firefighters to 971 residents (or 1.34 firefighters per 1,000 residents). Development impact fees would be collected by the City to fund required service improvements. Therefore, with the payment of the required development impact fees, cumulative impacts to fire protection services would be *less than significant* (Class III).

Police Protection. Cumulative development in Buellton would increase the demand on police protection services. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. As discussed above in Impact PSU-2, the project site is located within the Police Department's response time goal and impacts would be Class III, *less than significant*. As development continues to occur in the City, it could create the need for new or expanded facilities in the future, the construction of which could result in environmental impacts. However, the location, size and type of such facilities are speculative at this point in time, and would be subject to environmental review. According to the LUE and CE Update EIR, an additional two deputies would be needed to accommodate buildout of the City. Furthermore, it is anticipated that as the City grows, emergency services would be monitored and augmented to provide the standard of emergency care as needed. Development impact fees would be collected by the City to fund service improvements, as needed. Cumulative impacts are therefore *less than significant* (Class III).

Parks and Recreation. Cumulative development in Buellton would increase the demand on City parks and recreation facilities. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. As discussed above in Impact PSU-3, the additional senior residents would not be anticipated to utilize off-site parks and impacts would be Class III, *less than significant*. Future development throughout the City could result in the need for new or expanded parks or recreational facilities, the construction of which could result in environmental impacts. However, the location, size and type of such facilities are speculative at this point in time, and would be subject to environmental review prior to development. In addition, until such facilities are constructed, impacts would continue to be

mitigated on a case-by-case basis in accordance with the Quimby Act, either through the payment of park in-lieu fees or the dedication of parkland as part of future projects. Cumulative impacts are therefore adverse but *less than significant* (Class III).

Community Libraries. Cumulative development in Buellton would increase demand for community library services. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. As discussed above in Impact PSU-4, the additional senior residents generated by the proposed project would increase the demand for library services, but the payment of required library fees would ensure that impacts remain Class III, *less than significant*. The proposed project would incrementally increase the demand for library services. As discussed in Section 4.9, *Public Services and Infrastructure,* of the City's 2005 LUE and CE Update EIR, the Land Use Element Update would generate up to 8,938 new City residents that would increase demand for City library facilities. A portion of the development impact fees required for each new project would be applied to the City's general fund. In turn, a portion of the City's general fund would be used to finance improvements to City library facilities and services. With the payment of required City development impact fees, cumulative development in the City of Buellton would result in *less than significant impacts* (Class III) on library facilities and services.

Water. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. As discussed above in Impact PSU-5, the proposed project's water demand of 63.93 AFY is within the capacity of the City's existing water supplies and impacts would be Class III, *less than significant*. This development would increase the overall demand for water in the City. As discussed above in Impact PSU-5, the 2005 LUE and CE Update EIR concluded that the City of Buellton water supplies would be sufficient to accommodate buildout of the City, up to the year 2025. Furthermore, the LUE and CE Update EIR (2005) determined that water demand from all potentially developable land uses in the City under Land Use Element Update buildout conditions, would be 587 AFY, while currently available water supplies are 1,200 AFY. Therefore, cumulative impacts to water supply and groundwater resources would be *less than significant* (Class III).

Wastewater. Cumulative development in Buellton would result in increased wastewater generation. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. As discussed above in Impact PSU-6, the proposed project's wastewater generation of 61,770 GPD is within the surplus capacity of the City's Wastewater Treatment Plant and impacts would be Class III, *less than significant*. The Buellton Wastewater Treatment Plant has a capacity of 0.65 mgd. As discussed in Section 4.9, *Public Services and Infrastructure,* of the City's 2005 LUE and CE Update EIR, the total wastewater flow at buildout of the City under the existing Land Use Element would be about 0.87 mgd. This would exceed the current treatment capacity of the City's wastewater treatment plant. However, construction of new wastewater facilities would be subject to additional environmental review in which potential environmental impacts would be addressed accordingly. Future development would be

required to pay impact fees to fund improvements and offset impacts on the treatment plant. With payment of these fees, cumulative impacts would be *less than significant* (Class III).

Solid Waste. Cumulative development in Buellton would increase solid waste generation, thereby reducing the lifespan of solid waste landfills serving the area. As shown in Table 3-1 in Section 3.0, *Environmental Setting*, 297 residential units, 441 hotel units, and 110,026 square feet of non-residential development (including commercial uses, industrial uses, hospital uses, etc.) are currently pending, approved, or under construction within the City. As discussed above in Impact PSU-7, the proposed project's solid waste generation of 1.1 tons per day is within the surplus capacity of the Tajiguas Sanitary Landfill and impacts would be Class III, *less than significant*. The proposed project would incrementally contribute to the cumulative impact to landfill capacity. As discussed in Section 4.9, *Public Services and Infrastructure,* of the City's 2005 LUE and CE Update EIR, buildout of the Land Use Element Update would produce a total of 23,516 pounds per day (4,292 tons per year), or approximately 11.8 tons per day, of solid waste. As discussed above in Impact PSU-7, the Tajiguas Sanitary Landfill has a surplus capacity of 510 tons per day. Therefore, cumulative impacts to solid waste generation at local landfills would be *less than significant* (Class III).

4.11 TRANSPORTATION and CIRCULATION

4.11.1 Setting

The transportation and circulation analysis is based on the Traffic and Circulation Study for the Meritage Senior Living Project, prepared by Associated Transportation Engineers (July, 2012).

a. Project Setting. The Meritage Senior Living Project is located on Jonata Park Road, west of U.S. Highway 101 in the City of Buellton. The closest major intersections to the project site include:

- *U.S. Highway 101 Southbound Ramp/Avenue of Flags;*
- *Avenue of Flags Southbound/Damassa Road;*
- *Avenue of Flags Northbound/Damassa Road;*
- *U.S. Highway 101 Southbound Ramps/Damassa Road;*
- *U.S. Highway 101 Northbound Ramps/Damassa Road;*
- *McMurray Road/Damassa Road; and*
- *State Route 246/McMurray Road*

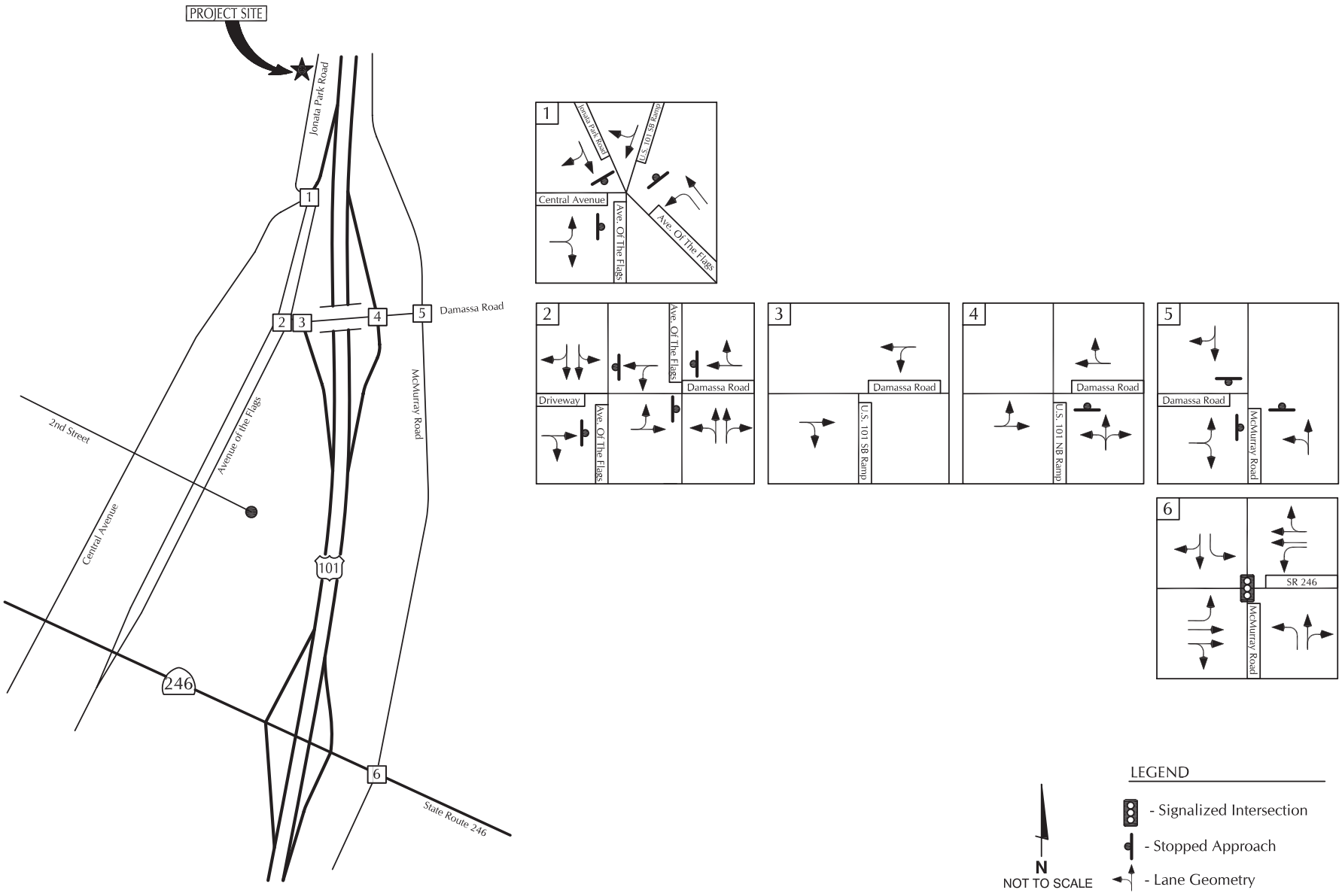
Regional access will be provided by U.S. Highway 101 via the Damassa Road interchange with Jonata Park Road providing direct access. Figure 4.11-1 depicts the proposed project site location and existing street network. The following text provides a brief discussion of major components of the study area street network.

U.S. Highway 101, located east of the project, is a multi-lane highway serving the California coast between Los Angeles and San Francisco. U.S. Highway 101 is 4-lanes wide in the City of Buellton and provides regional access to the project by the unsignalized Damassa Road interchange.

State Route 246, located south of the project site, is an east-west state highway which extends from the Pacific Ocean west of Lompoc through Buellton, Solvang and Santa Ynez to State Route 154 on the east. State Route 246 is a 4-lane arterial from the western Buellton City limit to Freear Drive and narrows to three-lanes approximately 450 feet west of the Thumbelina Drive. Traffic signals control the intersection of State Route 246 at McMurray Road.

McMurray Road, located east of the project site, is a north-south 2-lane roadway that extends southerly from Buell Ranch to its terminus south of State Route 246. McMurray Road provides access to the industrial and commercial areas north of State Route 246 and the commercial uses located south of State Route 246.

Avenue of Flags is a north-south arterial roadway which parallels U.S. Highway 101 on the west side. Avenue of Flags serves the business area of Buellton from the Flying Flags RV Resort to Central Avenue. Avenue of Flags is a divided roadway from south of Shadow Mountain Drive to Central Avenue - Jonata Park Road/U.S. Highway 101 Southbound Ramp - Avenue of Flags intersection. Avenue of Flags joins with Santa Rosa Road at the Santa Ynez River Bridge. North of the bridge, Avenue of Flags is a 2-way roadway until it reaches the



Existing Roadway Network

Figure 4.11-1

Source: ATE, 2012.

City or County

median south of Shadow Mountain Drive. There are 2 northbound lanes from the end of the median to State Route 246 where the easterly lane becomes a right-turn only lane. Avenue of Flags has one northbound lane from State Route 246 to 1st Street. From 1st Street to Central Avenue there are 2 northbound lanes. Southbound Avenue of Flags is 1-lane from Central Avenue to the first median break south of Damassa Road. There are two southbound lanes on Avenue of Flags from the median break to Shadow Mountain Drive. The lanes merge to one southbound lane south of Shadow Mountain Drive and join Santa Rosa Road at the bridge.

Damassa Road is a 2-lane east-west roadway that extends from Avenue of Flags on the west, crossing U.S. Highway 101 to its terminus at McMurray Road on the east. The U.S. Highway 101 interchange provided at Damassa Road includes northbound and southbound on-ramps and a northbound off-ramp. The southbound off-ramp for this interchange is located north of Damassa Road, at the Avenue of Flags/Jonata Park Road/Central Avenue intersection.

Central Avenue located south of the project, is a residential collector street that extends from Jonata Park Road to Zaca Street south of State Route 246.

2nd Street is located south of the project, is a residential collector street that extends west from Avenue of Flags to Via Corona. The Buellton Community Center and Jonata School are located on 2nd Street.

Study intersections were selected based on proximity to the project site and potential to be affected by new traffic from the proposed project. In total, seven intersections were analyzed:

1. US Highway 101 Southbound Ramp/Avenue of Flags
2. Avenue of Flags Southbound/Damassa Road
3. Avenue of Flags Northbound/Damassa Road
4. U.S. Highway 101Southbound Ramps/Damassa Road
5. U.S. Highway 101Northbound Ramps/Damassa Road
6. McMurray Road/Damassa Road
7. State Route 246/McMurray Road

b. Intersection Operations. Traffic flow on urban arterials is most constrained at intersections. Therefore, a detailed analysis of traffic flows must examine the operating conditions of critical intersections during peak travel periods. Existing levels of service for the study-area intersections were calculated using the Highway Capacity Manual (HCM) signalized and unsignalized intersection methodologies as required by the City of Buellton. In rating an intersection's operating condition "Levels of Service" (LOS) A through F are used. LOS A and LOS B represent primarily free-flow operations, LOS C represents stable conditions, LOS D nears unstable operations with restrictions on maneuverability within traffic streams, LOS E represents unstable operations with maneuverability very limited, and LOS F represents breakdown or forced flow conditions (refer to Table 4.11-1). LOS D is considered acceptable by the City of Buellton.

Table 4.11-1 Level of Service Definitions

LOS	Signalized Intersections (Sec. of Delay[1])	Unsignalized Intersections (Sec. of Delay)	Definition
A	≤ 10	≤ 10	Conditions of free unobstructed flow, no delays and all signal phases sufficient in duration to clear all approaching vehicles.
B	> 10 and ≤ 20	> 10 and ≤ 15	Conditions of stable flow, very little delay, a few phases are unable to handle all approaching vehicles.
C	> 20 and ≤ 35	> 15 and ≤ 25	Conditions of stable flow, delays are low to moderate, full use of peak direction signal phases is experienced.
D	> 35 and ≤ 55	> 25 and ≤ 35	Conditions approaching unstable flow, delays are moderate to heavy, significant signal time deficiencies are experienced for short durations during the peak traffic period.
E	> 55 and ≤ 80	> 35 and ≤ 50	Conditions of unstable flow, delays are significant, signal phase timing is generally insufficient, congestion exists for extended duration throughout the peak period.
F	> 80	> 50	Conditions of forced flow, travel speeds are low and volumes are well above capacity. This condition is often caused when vehicles released by an upstream signal are unable to proceed because of back-ups from a downstream signal

1: Average control delay per vehicle in seconds.
Source: Highway Capacity Manual, 2000 Edition

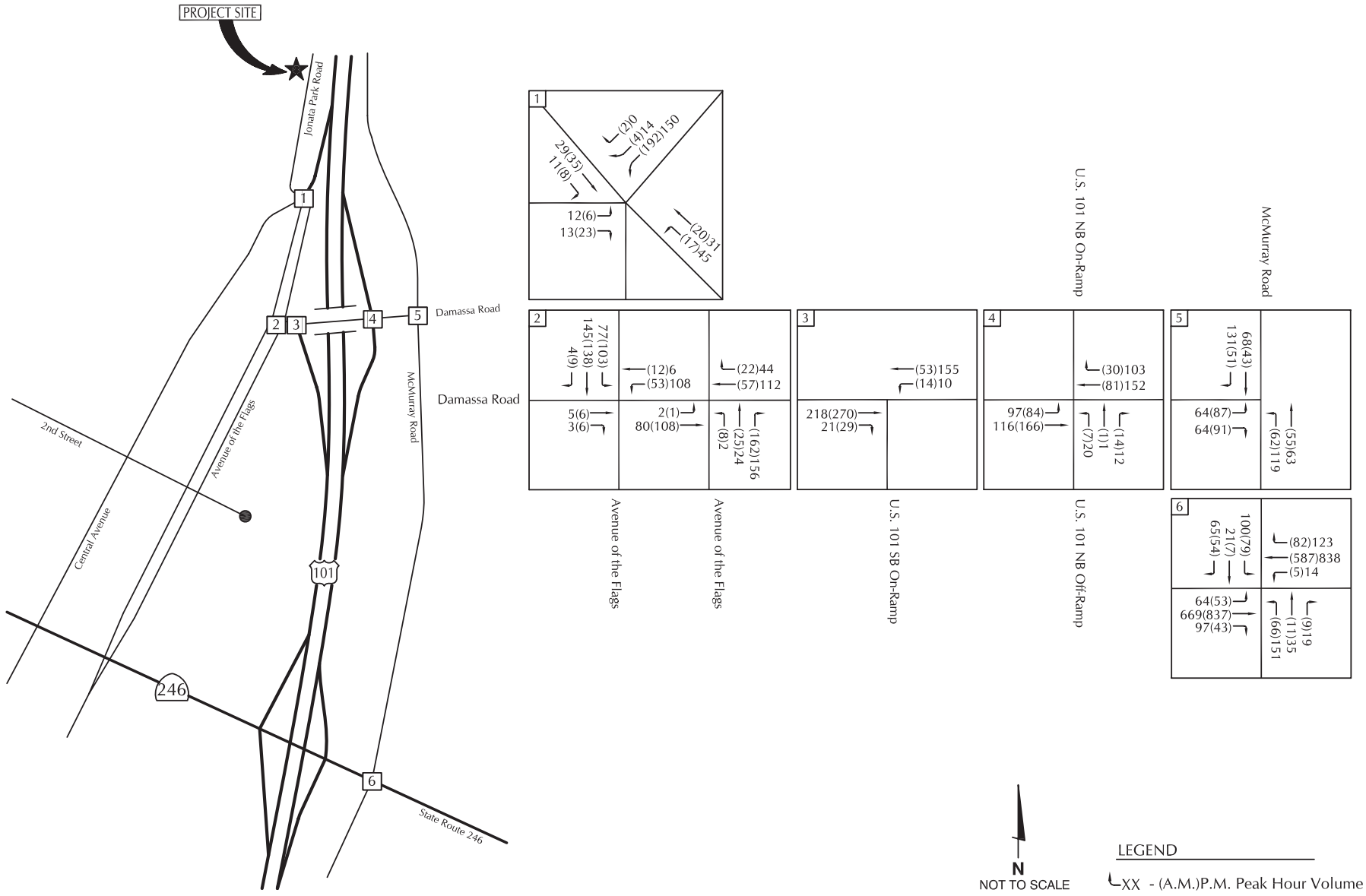
Worksheets illustrating the LOS calculations are contained in the traffic study's Technical Appendix (refer to Appendix G). Figure 4.11-2 shows existing A.M. and P.M. Peak Hour Traffic Volumes. Table 4.11-2 lists the intersection and LOS for the study-area intersections.

Table 4.11-2 Existing Peak Hour Levels of Service

Intersection	Control Type	A.M. Peak	P.M. Peak
		Delay/LOS	Delay/LOS
U.S. Highway 101 Southbound Ramp/Avenue of Flags	STOP-Sign	8.1 sec./LOS A	8.1 sec/LOS A
Avenue of Flags Southbound/Damassa Road	STOP-Sign	9.2 sec./LOS A	9.9 sec./LOS A
Avenue of Flags Northbound /Damassa Road	STOP-Sign	10.7 sec./LOS B	10.6 sec./LOS B
U.S. Highway 101 Southbound Ramps/Damassa Road	STOP-Sign	10.8 sec./LOS B	10.4 sec./LOS B
U.S. Highway 101 Northbound Ramps/Damassa Road	STOP-Sign	8.1 sec./LOS A	9.1 sec./LOS A
McMurray Road/Damassa Road	STOP-Sign	8.1 sec./LOS A	8.6 sec./LOS A
State Route 246/McMurray Road	Signal	25.8 sec./LOS C	29.0 sec./LOS C

The data presented in Table 4.11-2 indicates that the study-area intersections currently operate the LOS A through C range during the A.M. and P.M. peak hour periods.

The U.S. Highway 101 southbound off-ramp/Avenue of Flags/Central Avenue/Jonata Park Road intersection is a special case; this off-ramp is uncontrolled free flow and connects directly to southbound Avenue of Flags. Central Avenue, Jonata Park Road and northbound Avenue of Flags are controlled by stop signs. There are businesses on northbound Avenue of Flags that cater to long-haul truck drivers. Since the access to U.S. Highway 101 in either



Existing Peak Hour Traffic Volumes

Figure 4.11-2

Source: ATE, 2012.

City or County

direction is on Damassa Road, the U.S. Highway 101 southbound off-ramp/Central Avenue/Avenue of Flags intersection must accommodate a truck U-turn radius for California Design Vehicles. This intersection has been identified in the City's Circulation Element as one that needs to be modified to be more conventional and is included as a project in the Traffic Improvement Fee Program. The traffic volume analysis shows that although the intersection functions with an LOS A service level, operationally there are conflicts that can be reduced by improving the intersection.

Funded signal modifications are currently underway for the State Route 246/McMurray Road, there intersection. The current signal phasing for north/south McMurray Road approaches are split/phased. The signal modification will allow protected left-turn phasing on all four approach legs.

4.11.2 Previous Environmental Review

The City of Buellton General Plan Land Use Element and Circulation Element Update Program and associated Environmental Impact Report (EIR) updated the Land Use and Circulation Elements of the General Plan to address buildout of the vacant and under-developed lands within the City limit through the buildout year of 2025, including the current proposed project site (identified therein as AHOZ Program Key Site II). The Land Use Element and Circulation Element Update EIR concluded that future development in accordance with the Land Use and Circulation Elements update would result in unacceptable levels of service at several City intersections (Impact T-1). Mitigation measures were available for this impact but due to the City's fiscal uncertainty with regards to paying for such improvements, significant and unavoidable impacts were identified. The EIR determined that impacts due to increased demands for pedestrian and bicycle facilities within the City (Impact T-2) and increased demand for bus service (Impact T-3) would be Class III, less than significant.

4.11.3 Impact Analysis

a. Methodology.

Trip Generation and Distribution. Trip generation estimates were calculated for the project using rates in the Institute of Transportation Engineering, *Trip Generation*, 8th Edition for Continuing Care Retirement Community (Land-Use #255) were used. Based on these trip generation rates, the proposed project would generate 725 average daily trips, with 46 trips occurring during the A.M. peak hour and 75 occurring in the P.M. peak hour. The trip generation estimates are summarized in Table 4.11-3.

Table 4.11-3 Project Trip Generation

Land Use	Size	ADT		A.M. Peak Hour		P.M. Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
Continuing Care Retirement Community	258 units[1]	2.81	725	0.18	46	0.29	75

1: The difference in units between this analysis and that presented in Section 2.0, Project Description, *is attributed to the fact that the analysis in the traffic study used the number of bedrooms in the assisted living facility, instead of the number of units.*

The project is focused on seniors who have limited abilities to transport themselves and that rely on the transportation provided by the project and visitors. Thus, the primary traffic generated by the project is by employees, doctors and special services providers. The trip distribution and assignment assumes that most of the employees will reside in Buellton with some in residing in the Solvang and Lompoc areas. The project location is such that drivers on U.S. Highway 101 will use the Damassa Road interchange and local streets for their access. The project-generated peak hour traffic volumes were distributed and assigned to the study-area intersections according to the percentages listed in Table 4.11-4. The project trip assignment represents the expected travel routes used by local employees.

Table 4.11-4 Project Trip Distribution

Route	Origin/Destination	Percent
U.S. Highway 101	North South	25% 10%
State Route 246	East West	30% 20%
Avenue of Flags	South	5%
2nd Street	West	10%
	Total:	100%

b. Thresholds of Significance. LOS D is considered acceptable by the City of Buellton. The Santa Barbara County Association of Governments (SBCAG) has developed a set of traffic impact thresholds to assess the impacts of land use decisions made by local jurisdictions on regional transportation facilities located within the Congestion Management Program (CMP) roadway system. The following guidelines were developed by SBCAG to determine the significance of project-generated traffic impacts on the regional CMP system.

1. For any roadway or intersection operating at "Level of Service" (LOS) A or B, a decrease of two levels of service resulting from the addition of project-generated traffic.

2. For any roadway or intersection operating at LOS C, project-added traffic that results in LOS D or worse.

3. For intersections within the CMP system with existing congestion, the following table defines significant impacts.

Level of Service	Project-Added Peak Hour Trips
LOS D LOS E LOS F	20 10 10

4. For freeway or highway segments with existing congestion, the following table defines significant impacts.

Level of Service	Project-Added Peak Hour Trips
LOS D	100
LOS E	50
LOS F	50

Pursuant to the State CEQA Guidelines, traffic impacts related to the proposed project would be significant if the project would:

- *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.*
- *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.*
- *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.*
- *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*
- *Result in inadequate emergency access.*
- *Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.*

There are no airports near the project site, and the project would not result in a change in air traffic patterns. For a discussion of impacts determined to result in no impact as a result of the proposed project, refer to Section 5.0, *Effects Found Not To Be Significant*.

c. Project-Specific Impacts and Mitigation Measures.

Impact T-1 Project construction and equipment staging would temporarily increase truck traffic in the project area, which could affect operations at project area intersections, disrupt the normal use of adjacent streets, and affect parking availability. Impacts would be Class III, *less than significant*.

Construction would cause a temporary increase in traffic to and from the site from construction personnel and equipment and materials delivery. The overall project construction process is estimated to last 19.5 months. This would include grading for site preparation and demolition of the existing on-site structures over approximately 3 months and construction, paving, and architectural coating over an estimated 16.5 months.

The project would generate construction-related traffic that would occur over the entire construction period and would vary depending on the stage of construction. Because of the varying schedule and work shift sizes, the number of construction-related vehicles cannot specifically be identified, but given the project scale and the limited workforce size, the amount of construction-related traffic would be limited. Locations where short-term construction impacts would likely occur include the following intersections:

- *U.S. Highway 101 southbound ramp and Avenue of Flags*
- *Avenue of Flags southbound and Damassa Road*
- *Avenue of Flags northbound and Damassa Road*

As shown in Table 4.11-2, these intersections currently operate at LOS B or better under existing conditions. Traffic resulting from construction truck trips would add to delay times at these intersections; however, construction trips would not be anticipated to cause intersection operations to decrease by more than two levels of service. This impact would be less than significant.

Mitigation Measures. Impacts are less than significant without mitigation. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant (Class III).

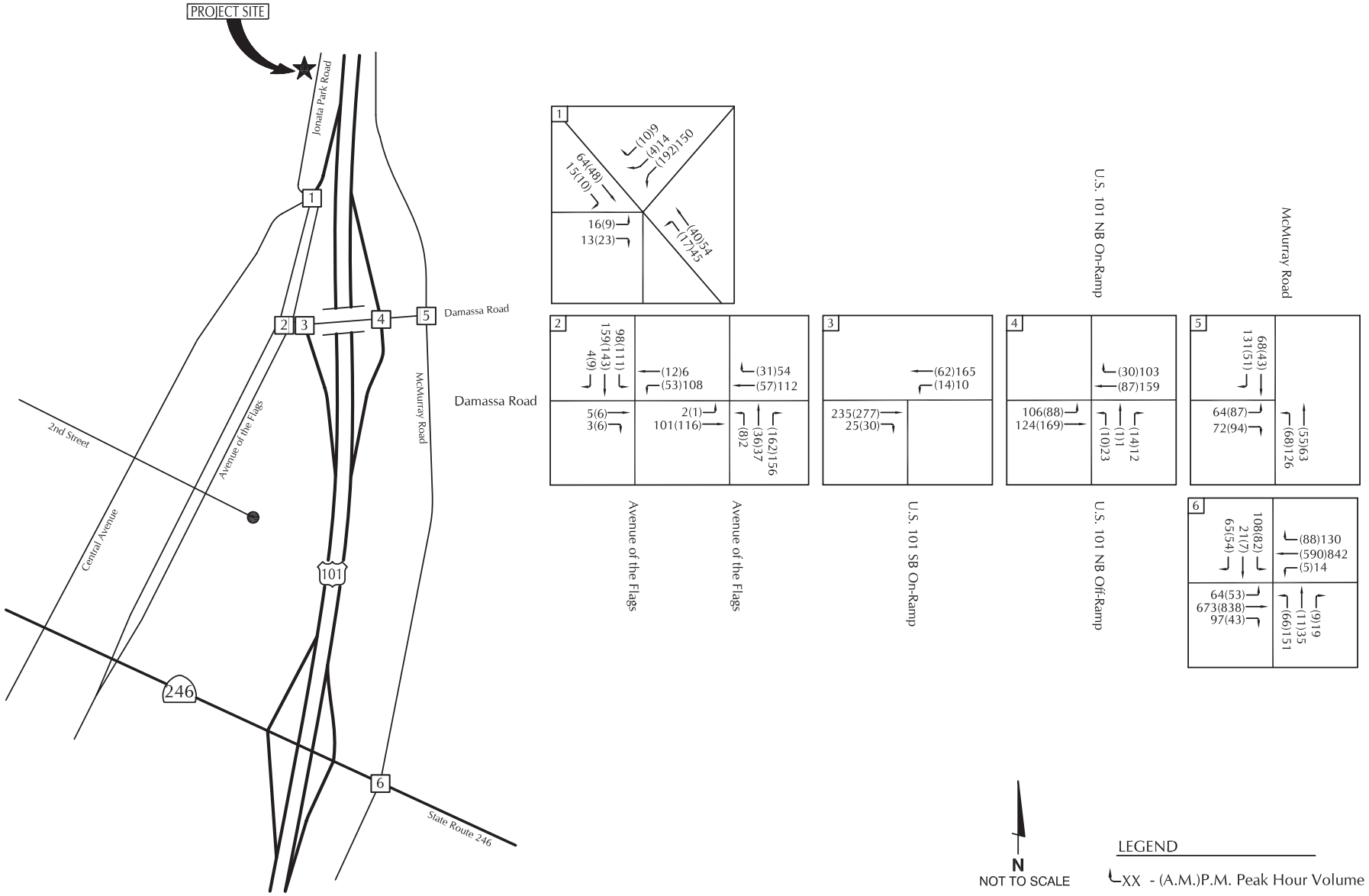
Impact T-2 Operation of the project would result in the addition of 725 average daily trips (46 A.M. and 75 P.M. peak hour trips) to the study area roadways and intersections. The addition of project traffic would not degrade the levels of service at the study area intersections or roadway segments under A.M. or P.M. peak hour conditions. Impacts would be Class III, *less than significant*.

Roadway operations for the critical segments in the study area were evaluated based on existing + project conditions. Table 4.11-5 and Table 4.11-6 show the existing + project peak hour intersection LOS for the critical intersections. Figure 4.11-3 shows the existing + project traffic volumes.

Table 4.11-5 Existing + Project A.M. Peak Hour Intersection Levels of Service

Intersection	A.M. Peak Hour			
	Existing		Existing + Project	
	Delay	LOS	Delay	LOS
U.S. Highway 101 SB Ramp/Ave of Flags	8.1 sec./veh.	LOS A	8.3 sec./veh.	LOS A
Avenue of Flags SB/Damassa Road	9.2 sec./veh.	LOS A	9.3 sec./veh.	LOS A
Avenue of Flags NB/Damassa Road	10.7 sec./veh.	LOS B	10.8 sec./veh.	LOS B
U.S. Highway 101 SB Ramps/Damassa Road	10.8 sec./veh.	LOS B	10.9 sec./veh.	LOS B
U.S. Highway 101NB Ramps/Damassa Road	8.1 sec./veh.	LOS A	8.2 sec./veh.	LOS A
McMurray/Damassa Road	8.1 sec./veh.	LOS A	8.2 sec./veh.	LOS A
State Route 246/McMurray Road	25.8 sec./veh.	LOS C	21.1 sec./veh.[1]	LOS C

1: Protected left-turn phasing on all approaches.



Existing + Project
Peak Hour Traffic Volumes

Figure 4.11-3

Source: ATE, 2012.

Table 4.11-6 Existing + Project P.M. Peak Hour Intersection Levels of Service

Intersection	P.M. Peak Hour			
	Existing		Existing + Project	
	Delay	LOS	Delay	LOS
U.S. Highway 101 SB Ramp/Ave of Flags	8.1 sec./veh.	LOS A	8.3 sec./veh.	LOS A
Avenue of Flags SB/Damassa Road	9.9 sec./veh.	LOS A	10.1 sec./veh.	LOS B
Avenue of Flags NB/Damassa Road	10.6 sec./veh.	LOS B	10.9 sec./veh.	LOS B
U.S. Highway 101 SB Ramps/Damassa Road	10.4 sec./veh.	LOS B	10.5 sec./veh.	LOS B
U.S. Highway 101NB Ramps/Damassa Road	9.1 sec./veh.	LOS A	9.2 sec./veh.	LOS A
McMurray/Damassa Road	8.6 sec./veh.	LOS A	8.7 sec./veh.	LOS A
State Route 246/McMurray Road	29.0 sec./veh.	LOS C	25.0 sec./veh.[1]	LOS C

1: Protected left-turn phasing on all approaches.

The data presented in Tables 4.11-5 and 4.11-6 indicate that with the addition of project-generated traffic the study-area intersections will continue to operate in the LOS A through C range during the A.M. and P.M. peak hour periods. Based on the City of Buellton impact threshold criteria, the project would not have a significant impact to the study-area intersections.

In addition, a Congestion Management Program (CMP) analysis of potential impacts to regional CMP intersections was conducted. The CMP analysis is included as part of the traffic study (Appendix G). The analysis evaluated potential impacts to regional CMP intersections, including the U.S. Highway 101/Damassa Road interchange ramps, the U.S. Highway 101 southbound ramp/Avenue of Flags-Jonata Park Road intersection, and State Route 246/Mc Murray Road intersection. The traffic analysis found that the intersections are forecast to operate at LOS C or better under Existing + Project and Cumulative + Project traffic conditions (refer to Impact T-4, below). These operations are acceptable based on the CMP standards. Therefore, the project would not significantly impact the CMP intersections in the study-area.

The project would add less than 30 peak hour trips to U.S. Highway 101 and SR 246. Based on CMP criteria, the project would not significantly impact the freeway segments within the study-area.

Mitigation Measures. Impacts are less than significant without mitigation. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant (Class III).

Impact T-3 Operation of the project would result in the inclusion of four access connections to Jonata Park Road. The project would provide adequate emergency access, and operation of the proposed project would not result in design hazards at any of the proposed access connections. Impacts would be Class III, *less than significant*.

The project would construct frontage and driveway improvements along Jonata Park Road. These improvements include two 12 foot travel lanes, two 8 foot shoulders with curb, gutter and sidewalk on the project's frontage. All four of the proposed connections would create right-angled three-way intersections on Jonata Park Road. Pedestrian facilities throughout the development link the various residences, medical facilities and amenities. The internal pedestrian facilities would connect to the sidewalk on Jonata Park Road. Project driveways would be designed to City of Buellton design standards for access and egress. Impacts related to potential design hazards would be less than significant.

A 16-foot fire lane for emergency vehicles is provided in the rear of the assisted living/memory care portion of the project site. Impacts related to emergency access to the project site would be less than significant.

Mitigation Measures. No mitigation measures would be required.

Significance After Mitigation. Impacts would be less than significant without mitigation (Class III).

d. Cumulative Impacts and Mitigation Measures. The City of Buellton requires that intersections be analyzed with the addition of traffic generated by developments that are approved/pending that and would be operational by the opening year of the project.

Cumulative traffic volumes were forecast for the study-area intersections assuming development of the approved and pending projects proposed within the City of Buellton. Trip generation estimates were developed for the cumulative development projects using the rates presented in the ITE, *Trip Generation*, 8th Edition. Table 4.11-7 summaries the average daily, A.M. and P.M. peak hour trip generation for the approved/pending development projects.

Table 4.11-7 Approved/Pending Development Projects Trip Generation

No.	Project	Land Use	Size	ADT	A.M. Peak Hour	P.M. Peak Hour
1.	Petersen	Industrial	7,000 s.f.	49	6	7
2.	Village Specific Plan	Commercial Residential Hotel	48,830 s.f. 244 units 225 units.	2,097 1,418 2,007	49 107 151	182 127 158
3.	Farm Supply Co.	Commercial	4,900 s.f.	228	14	17
4.	J.R. Hospital	Hospital	30,000 s.f.	227	17	22
5.	Polo Village	Multi-Family Res.	53 units	308	23	28
6.	S.Y.V. Inn/Racquet Club	Racquet Club Hotel	19,296 s.f. 120 units	1,204	58	90
7.	Bach Hotel	Hotel	96 rooms	856	64	67
8.	Park-N-Ride Lot	Parking Lot	30 spaces	135	22	19
			Total Trips:	8,529	511	717

Source: ATE, Traffic and Circulation Study, Meritage Senior Living Project, July 2012.

The data presented in Table 4.11-7 indicates that the approved/pending projects would generate a total of 8,529 average daily trips, 511 A.M. peak hour trips and 717 P.M. peak hour trips. The approved/pending projects' peak hour traffic volumes were distributed and assigned to the study-area intersections. The trip assignment for the cumulative development projects was developed based on the location of each project, recent traffic studies, existing traffic patterns observed in the study area as well as a general knowledge of the population, employment and commercial centers in Buellton and surrounding Santa Ynez Valley area. Figure 4.11-4 illustrates the cumulative peak hour traffic volumes at the study-area intersections

Impact T-4 Under cumulative plus project conditions, project development would not degrade the levels of service at any study area intersections under A.M. or P.M. peak hour conditions. Impacts would be Class III, *less than significant*.

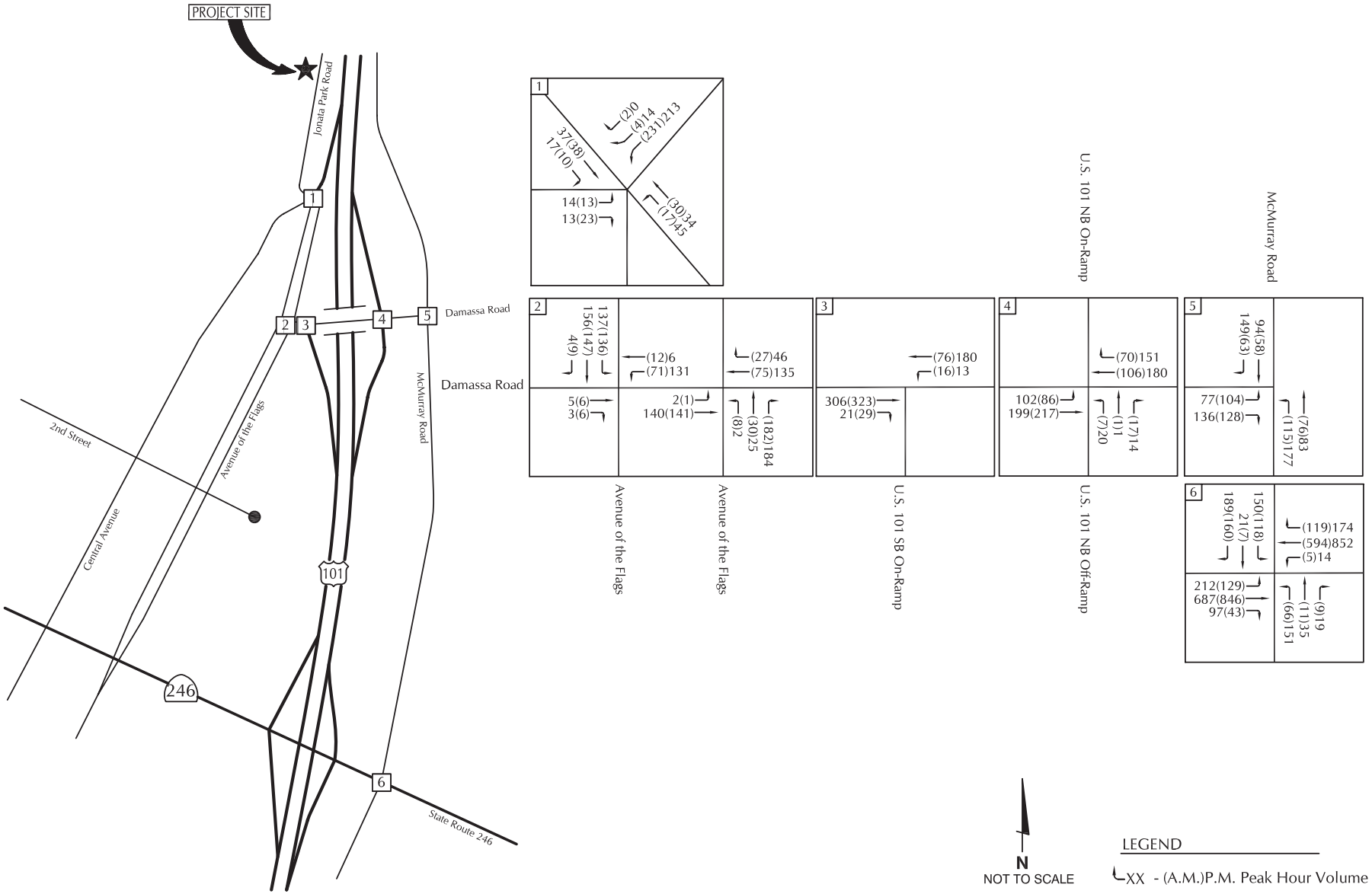
Roadway operations for the critical segments in the study area were evaluated based on cumulative plus project conditions. Tables 4.11-8 and 4.11-9 compare the cumulative and cumulative plus project levels of service for the study area intersections and identify cumulative impacts. Figures 4.11-4 and 4.11-5 show the cumulative plus project traffic volumes.

Table 4.11-8 Cumulative + Project A.M. Peak Hour Intersection Levels of Service

Intersection	A.M. Peak Hour			
	Cumulative		Cumulative + Project	
	Delay	LOS	Delay	LOS
U.S. Highway 101 Southbound Ramp/Avenue of Flags	8.5 sec./veh.	LOS A	8.7 sec./veh.	LOS A
Avenue of Flags Southbound/Damassa Road	9.7 sec./veh.	LOS A	9.8 sec./veh.	LOS B
Avenue of Flags Northbound/Damassa Road	11.3 sec./veh.	LOS B	11.4 sec./veh.	LOS B
U.S. Highway 101 Southbound Ramps/Damassa Road	11.4 sec./veh.	LOS B	11.5 sec./veh.	LOS B
U.S. Highway 101 Northbound Ramps/Damassa Road	8.3 sec./veh.	LOS A	8.6 sec./veh.	LOS A
McMurray Road/Damassa Road	9.1 sec./veh.	LOS A	9. sec./veh.	LOS A
State Route 246/McMurray Road	23.9 sec./veh.	LOS C	24.3 sec./veh.	LOS C

Table 4.11-9 Cumulative + Project P.M. Peak Hour Intersection Levels of Service

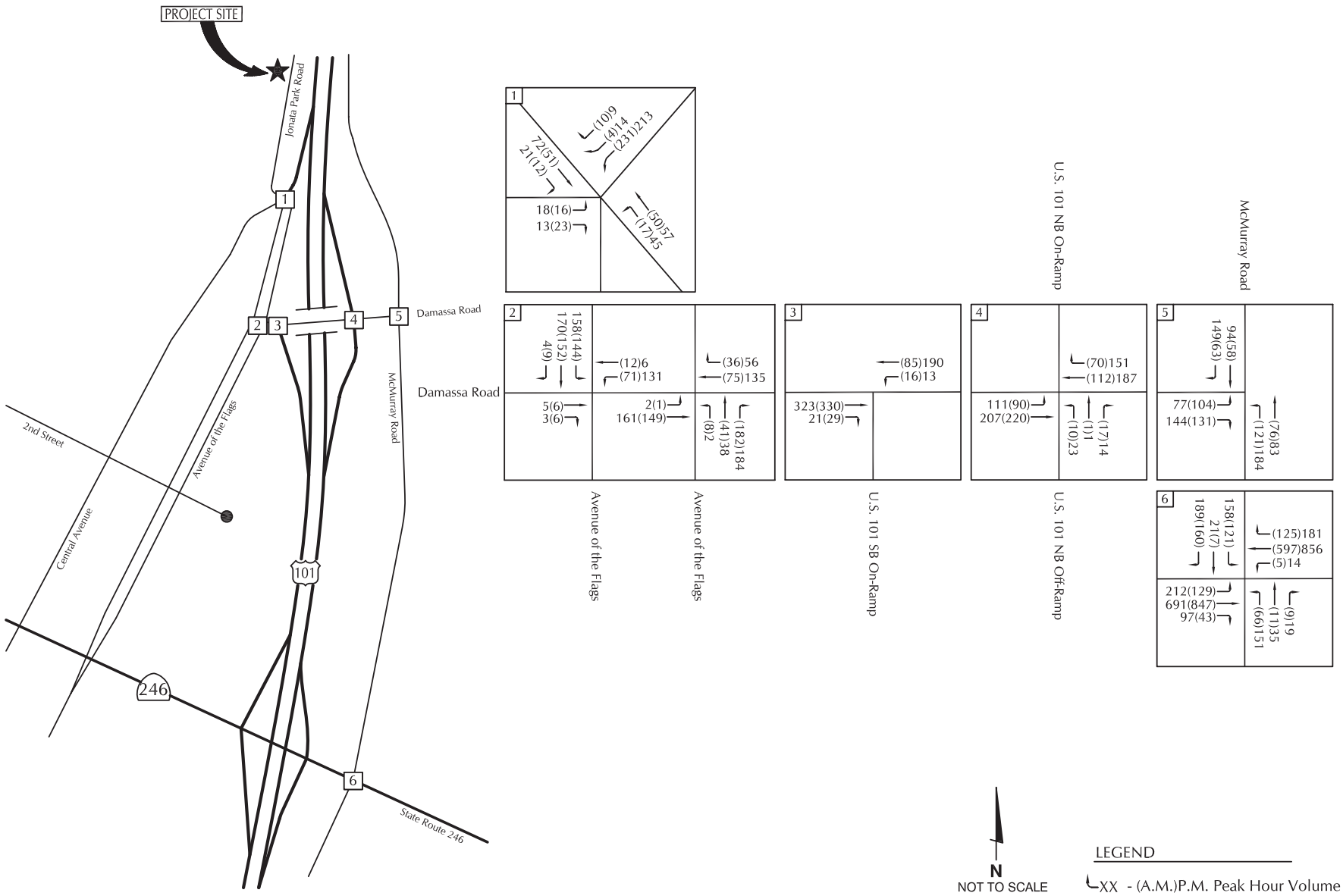
Intersection	P.M. Peak Hour			
	Cumulative		Cumulative + Project	
	Delay	LOS	Delay	LOS
U.S. Highway 101 SB Ramp/Ave of Flags	8.6 sec./veh.	LOS A	8.9 sec./veh.	LOS A
Avenue of Flags SB/Damassa Road	10.9 sec./veh.	LOS B	11.3 sec./veh.	LOS B
Avenue of Flags NB/Damassa Road	11.4 sec./veh.	LOS B	11.7 sec./veh.	LOS B
U.S. Highway 101SB Ramps/Damassa Road	11.1 sec./veh.	LOS B	11.3 sec./veh.	LOS B
U.S. Highway 101NB Ramps/Damassa Road	9.6 sec./veh.	LOS A	9.8 sec./veh.	LOS A
McMurray/Damassa Road	10.1 sec./veh.	LOS B	10.2 sec./veh.	LOS B
State Route 246/McMurray Road	31.4 sec./veh.	LOS C	33.3 sec./veh.	LOS C



Cumulative
Peak Hour Traffic Volumes

Figure 4.11-4

Source: ATE, 2012.



Cumulative + Project
Peak Hour Traffic Volumes

Figure 4.11-5

Source: ATE, 2012.

City or County

The data presented in Tables 4.11-8 and 4.11-9 indicate that with the addition of project-generated traffic the study-area intersections will continue operate in the LOS A through C range during the A.M. and P.M. peak hour periods. Based on the City of Buellton impact threshold criteria, the project would not have a significant impact to the study-area intersections.

Mitigation Measures. Impacts would be less than significant without mitigation. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant (Class III).

Impact T-5 Under cumulative plus project conditions, project development would generate additional residential inhabitants that may require the use of transit facilities. The generation of additional transit riders would not significantly impact existing transit facilities. Impacts would be Class III, *less than significant*.

Santa Ynez Valley Transit (SYVT) provides public transit service between Santa Ynez, Buellton, and Solvang. SYVT Route A includes a stop located at 2nd Street and Avenue of Flags, as well as five other stops throughout Buellton. Route A provides service during the daytime periods, with buses running each hour and twenty minutes from approximately 7:00 A.M. to 5:40 P.M. Monday through Saturday. In addition, SYVT offers Dial-A-Ride service to the general public on Sundays, and throughout the week to seniors (60+ years) and to ADA-certified patrons.

The Wine County Express, operated by the City of Lompoc, provides service between Lompoc, Buellton, and Solvang. The Wine County Express includes a stop located at McMurray Road and SR 246.

The Clean Air Express is a weekday commuter bus program operated by the City of Santa Maria serving residents of Northern Santa Barbara County and the Santa Ynez Valley (Santa Maria, Lompoc, Solvang and Buellton) commuting to their jobs in Goleta and Santa Barbara.

The proposed project would not modify any existing transit facilities or services, and would be served by a variety of public transit options. Therefore, impacts to transit facilities would be less than significant (Class II).

Mitigation Measures. Impacts would be less than significant without mitigation. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant (Class III).

5.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

No further environmental review of these environmental issues is necessary for the reasons summarized in the following discussion. The substantiation for determining that these issues would result in no impact, or a less-than-significant impact, is described below, pursuant to §15128 of the State *CEQA Guidelines*.

A. AESTHETICS/VISUAL RESOURCES

1. Potential Environmental Effects

If the project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway significant impacts could result.

2. Reasons Why Effects Were Not Found Significant

U.S. 101 and SR 246 provide the primary through-travel corridors in the Buellton area. Segments of U.S. 101 have been designated as "Scenic Highways." U.S. Highway 101 is also "eligible for designation" along its entire length in Santa Barbara County. However, neither of these highways are designated scenic highways in the project region. Therefore, the proposed project would not result in damage to scenic resources within a state scenic highway.

B. AGRICULTURAL RESOURCES

1. Potential Environmental Effects

If the project would conflict with existing zoning for, or cause rezoning of, forest land or timberland; or result in the loss of forest land, or conversion of forest land to non-forest use significant impacts could result.

2. Reasons Why Effects Were Not Found Significant

The project site is zoned General Commercial and is currently used for grazing and farming operations. There is no forest land or timberland on or within the area surrounding the project site. Therefore, the proposed project would not result in the loss or conversion of forest land or timberland.

C. AIR QUALITY

1. Potential Environmental Effects

If the project would create objectionable odors affecting a substantial number of people, significant impacts could result.

2. Reasons Why Effects Were Not Found Significant

The proposed project involves the development of a senior care facility. The operation of the proposed project would not involve any activities that would generate substantially objectionable odors. Construction activities may generate some odors associated with paving or painting activities; however, these impacts would be temporary and would not affect a substantial number of people. Therefore, impacts would be less than significant.

D. BIOLOGICAL RESOURCES

1. Potential Environmental Effects

The proposed project would have significant impacts on the environment if it would:

- *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 Game or U.S. Fish and Wildlife Service;*
- *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 Game or US Fish and Wildlife Service;*
- *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;*
- *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;*
- *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or*
- *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

2. Reasons Why Effects Were Not Found Significant

The proposed project involves the development of a senior care facility on the urbanized boundary of the City of Buellton. The project site is bounded by agricultural land uses within the County of Santa Barbara to the north and west, by U.S. Highway 101 to the east, and by existing urban development to the south. Portions of the project site are currently developed with a residence and outbuildings, and the site has historically been used for agriculture. Habitat on the project site consists of disturbed areas, scattered oaks, coastal scrub, and non-native annual grassland.

A California Natural Diversity Database (CNDDB) search was conducted for the Zaca Creek and Solvang U.S. Geological Survey (USGS) 7.5-minute quadrangles

(refer to Appendix I). The project site is located on the southern boundary of the Zaca Creek quadrangle, and the northern boundary of the Solvang quadrangle. The CNDDB search identified documented occurrences of four plant species identified as 'threatened' or 'very threatened' by the California Native Plant Society (CNPS), five habitat types, and 10 vertebrate species identified as endangered, threatened, or species of special concern by the California Department of Fish and Game (CDFG). The results of the CNDDB search are shown in Table 5-1.

Table 5-1
California Natural Diversity Database Search Results

Common Name/Scientific Name	Federal/State Status
Habitat Types	
Southern California steelhead stream	None
Southern coast live oak riparian forest	None
Southern cottonwood willow riparian forest	None
Southern vernal pool	None
Southern willow scrub	None
Plant Species	
Hoover's bent grass (*Agrostis hooveri*)	CNPS threatened
Miles' milk-vetch (*Astragalus didymocarpus var. milesianus*)	CNPS threatened
Mesa horkelia (*Horkelia cuneata var. puberula*)	CNPS very threatened
Black-flowered figwort (*Scrophularia atrata*)	CNPS threatened
Vertebrate Species	
California tiger salamander (*Ambystoma californiense*)	Federally threatened/State threatened; CNPS State species of special concern
Ferruginous hawk (*Buteo regalis*)	None
Townsend's big-eared bat (*Corynorhinus townsendii*)	CNPS State species of special concern
Southwestern willow flycatcher (*Empidonax trailii extimus*)	Federally endangered/State endangered
Western pond turtle (*Emys marmorata*)	CNPS State species of special concern
Southern steelhead – Southern California DPS (*Oncorhynchus mykiss irideus*)	Federally endangered; CNPS State species of special concern
California red-legged frog (*Rana draydonii*)	Federally threatened; CNPS State species of special concern
Western spadefoot (*Spea hammondii*)	CNPS State species of special concern
American badger (*Taxidea taxus*)	CNPS State species of special concern
Two-striped garter snake (*Thamnophis hammondii*)	CNPS State species of special concern

Source: California Natural Diversity Database

None of the documented occurrences of threatened plant species or habitat types were located on or adjacent to the project site. Due to the urban character of the project region and the disturbed nature of the project site, the project is not anticipated to provide habitat capable of supporting sensitive species. Moreover, the project site does not contain any riparian habitat or waterways that would provide habitat for aquatic or amphibious species, such as California tiger salamander, western pond turtle, southern steelhead, California red-legged frog, western spadefoot, or two-striped garter snake. As such, the project would not impact any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services.

According to the 2005 LUE and CE Update EIR, the project site does not contain areas of wetland habitat. As such, there would be no impacts to federally protected wetlands. As discussed in the 2005 LUE and CE Update EIR, the project site contains native oak trees. However, the proposed project does not involve the removal of these trees, or construction adjacent to existing trees. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

As the proposed project would not involve the removal of any on-site native oak trees, the project site is not located within an established wildlife nursery site, and the project site has been previously disturbed by agricultural activities, the proposed project would not 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.

Neither the City of Buellton, nor the County of Santa Barbara has adopted a Habitat Conservation Plan or a Natural Community Conservation Plan (CDFG, January 2012). Moreover, the project site has been previously disturbed by agricultural activities and does not contain viable habitat that would be anticipated to support sensitive species of plants or animals. As such, the proposed 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.

E. GEOLOGY AND SOILS

1. Potential Environmental Effects

If the project would have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater, significant impacts could result.

2. Reasons Why Effects Were Not Found Significant

The proposed project does not involve the use of septic tanks and would not result in impacts related to soil incapability related to wastewater disposal systems.

F. HAZARDS AND HAZARDOUS MATERIALS

1. Potential Environmental Effects

The proposed project would have significant impacts on the environment if it would:

- *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*
- *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*
- *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;*
- *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;*
- *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;*
- *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or*
- *Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.*

2. Reasons Why Effects Were Not Found Significant

The proposed project would not involve the routine transport, use, or disposal of hazardous materials. The project proposes the demolition of the existing on-site residence and outbuildings, which may contain asbestos or lead-based paint. However, adherence to mitigation measures S-3(a) and S-3(b), described in the 2005 LUE and CE Update EIR, which require a General Plan Policy establishing procedures for processing projects which may involve the use or handling of hazardous materials and procedures for the encounter of hazardous waste or other materials during construction, would ensure that no people would be exposed to asbestos or lead-based paint.

The project site is located approximately ½ mile northeast of Jonata Middle School. Based on the nature of the proposed project and its distance from the nearest school, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

According to the LUE and CE Update EIR, all of the City's identified AHOZ-designated sites (including the project site, formerly known as Key Site II) are vacant or underutilized parcels located adjacent to existing development and none of the

AHOZ sites are listed as having an existing business that could potentially contain contaminants associated with hazardous materials releases. And EDR Radius Map™ Report from Environmental Data Resources (August 2012) indicates that the project site is not listed in any of the included databases of environmental records (Appendix J). Therefore, the proposed project would not be located on a site which is included on a list of hazardous materials sites.

The project is not within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The nearest airport is Santa Ynez Airport, located approximately 6.5 miles to the east of the project site. Lompoc Airport is located approximately 15.5 miles to the west. Therefore, the proposed project would not result in airport safety hazards for people residing or working in the vicinity of the project site.

The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project site is not located within a high fire hazard area, as identified in Figure S-4 of the City's General Plan. As such, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

G. HYDROLOGY AND WATER QUALITY

1. Potential Environmental Effects

If the project would place housing or structures within a 100-year flood hazard area, such that those structures would impeded or redirect flood flows, expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam, or be subject to inundation by a seiche, tsunami or mudflow, significant impacts could result.

2. Reasons Why Effects Were Not Found Significant

The project site is not located within an established Federal Emergency Management Act (FEMA) 100-year or 500-year flood hazard area, as identified in Figure S-1 of the Safety Element within the City's General Plan. The only major dam in the Buellton area is the Bradbury Dam at Lake
Cachuma. This dam is located seven miles east of the City and the project site is not located within an inundation area subject to dam failure, as identified in Figure S-2 of the Safety Element within the City's General Plan. Furthermore, the LUE and CE Update EIR determined that there would be no impacts related to flooding or dam inundation at the project site (Key Site II). Therefore, there would be no impacts related to the placement of housing or structures within a FEMA flood zone, the failure of a dam or levee, or inundation by a seiche, tsunami or mudflow.

H. LAND USE/POLICY CONSISTENCY

1. Potential Environmental Effects

If the project would physically divide an established community or conflict with any applicable habitat conservation plan or natural community conservation plan, significant impacts could result.

2. Reasons Why Effects Were Not Found Significant

The proposed project would involve the development of a senior care facility. As the project site is on the edge of existing City development, adjacent to the City limit on the north and west sides, and surrounded to the north and west by undeveloped agricultural land and to the south and east by existing development, the proposed project would not physically divide an established community. Neither the City of Buellton, nor the County of Santa Barbara has adopted a Habitat Conservation Plan or a Natural Community Conservation Plan (CDFG, January 2012). The project would not conflict with a habitat conservation plan or natural community conservation plan, since no such plans have been developed within the City of Buellton or the County of Santa Barbara.

I. MINERAL RESOURCES

1. Potential Environmental Effects

The proposed project would have significant impacts on the environment if it would:

- *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or*
- *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.*

2. Reasons Why Effects Were Not Found Significant

Sand, gravel, and rock are presently extracted from the Santa Ynez River bed near Buellton by Granite Construction and the Buellflat Rock Company. The area mined by the companies totals almost 300 acres, although neither company operates within the Buellton City limit (City of Buellton, December 2008). The City is not known to contain significant mineral resources, including resources classified by the State Geologist. As such, the proposed project would not result in impacts to mineral resources.

J. NOISE

1. Potential Environmental Effects

If the project would be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and

would expose people residing or working in the project area to excessive noise levels, or if the project would be located within the vicinity of a private airstrip and would expose people residing or working in the project area to excessive noise levels, significant impacts could result.

2. Reasons Why Effects Were Not Found Significant

The project is not within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The nearest airport is Santa Ynez Airport, located approximately 6.5 miles to the east of the project site. Lompoc Airport is located approximately 15.5 miles to the west. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels related to airport or airstrip operations.

K. POPULATION AND HOUSING

1. Potential Environmental Effects

The proposed project would have significant impacts on the environment if it would:

- *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or*
- *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.*

2. Reasons Why Effects Were Not Found Significant

The proposed project would result in 44 fewer habitable units and 367 fewer residents than anticipated for the site by the Buellton General Plan and LUE and CE Update EIR. The project therefore would not exceed long-term growth projections for the City. As discussed in Section 2.0, *Project Description*, the project site contains an existing residence and associated outbuildings that would be demolished to make way for the planned development. However, the demolition of one residence and outbuildings would not displace substantial numbers of existing housing or people, requiring the construction of replacement housing elsewhere.

L. PUBLIC SERVICES

1. Potential Environmental Effects

According to Appendix G of the CEQA Guidelines, significant impacts to school services would occur if a project would result in substantial adverse physical impacts associated with the provisions of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts. A project's contribution to cumulative school impacts will be considered significant if the project specific impact, as described above, is considered significant.

2. Reasons Why Effects Were Not Found Significant

The City of Buellton is located within the Buellton Union School District (BUSD) and the Santa Ynez Valley Union High School District. The proposed project would involve the development of a senior care facility, with the potential to add approximately 430 new senior residents to the City's population. As the proposed project is the development of a senior care facility, it would not generate additional school-aged children that would exceed the capacity of local schools or require new or altered school facilities in the future.

M. TRANSPORTATION AND CIRCULATION

1. Potential Environmental Effects

If the project would result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks, a significant impact could result.

2. Reasons Why Effects Were Not Found Significant

There are no airports near the project site, and the project does not involve any land uses that would require or otherwise result in a change in air traffic patterns. The nearest airport is Santa Ynez Airport, located approximately 6.5 miles to the east of the project site. Lompoc Airport is located approximately 15.5 miles to the west. Therefore, the proposed project would not result in an increase in traffic levels or a change in location that results in substantial safety risks related to air traffic.

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6.0 OTHER CEQA-REQUIRED DISCUSSIONS

This section discusses other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Section 4.0, *Environmental Impact Analysis*. These additional issues include: (1) the potential to induce growth; and (2) significant and irreversible impacts on the environment.

6.1 GROWTH INDUCING EFFECTS

Section 15126.2(d) of the *CEQA Guidelines* requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth.

Generally speaking, a project may be considered growth inducing if it results in one of the five conditions identified below:

1. *Induces population growth.*
2. *Induces economic expansion.*
3. *Establishes a precedent setting action (e.g. an innovation, a radical change in zoning or general plan designation).*
4. *Results in development or encroachment in an isolated or adjacent area of open space (i.e. being distinct from "infill" development).*
5. *Removes an impediment to growth (e.g. the establishment of an essential public service or the provision of new access to an area).*

6.1.1 Population Growth

As discussed in Section 2.0, *Project Description*, the proposed project would result in 64 private units and 183 1- and 2-bedroom units (a total of 247 habitable units). The number of new residents generated by the proposed project was estimated based on the assumption that the 64 private units would be single-occupancy and that the 183 1- and 2-bedroom units would house a maximum of two senior residents, for a total of 430 new senior residents.

The project site is designated General Commercial under the Buellton General Plan, with corresponding zoning of General Commercial (CR) under the City's Municipal Code. The project site is included in the City's Affordable Housing Overlay Zone (AHOZ) Program, which is a permissive overlay zoning designation, which allows high density residential development as an alternative to the base zoning of AHOZ-designated sites. The AHOZ Program is City's principle means for accommodating the City's Regional Housing Needs Assessment (RHNA). Under the AHOZ designation, a maximum of 291 high-density residential units could be constructed on the project site (18.2 acres * a maximum of 16/units/acre). This maximum potential level of development would result in approximately 797 new residents (291 units * Buellton's average household size of 2.74 persons per residential unit [Department of Finance, 2012]).

The proposed project is not a residential project (refer to Section 6.1.3, below); the project would result in development of a new senior care facility on an identified key site/AHOZ site in the

Buellton General Plan. The Buellton Planning Commission has determined the proposed project meets the definition of a "Medical Services-Hospitals and Extended Care" use, and therefore would be permissible in the General Commercial (CR) zone. The proposed project would result in 44 fewer habitable units and 367 fewer residents than that anticipated by the Buellton General Plan and GP LUE and CE EIR. Such an increase in population would therefore be less than significant and would be consistent with long-term growth projections for the City. The potential environmental impacts associated with this population growth are analyzed throughout Sections 4.1 through 4.11 of this SEIR.

6.1.2 Economic Growth

The proposed project would result in development of a new senior care facility on a commercially-zoned site. The project would generate short-term employment opportunities during construction, which would draw workers from the existing regional work force. Additionally, the project would generate new permanent jobs. The additional population from the 247 habitable units included in the proposed project would likely contribute to the local economy as demand for general goods increases, which in turn could result in economic growth for various sectors. The proposed project would increase the amount of economic activity, and therefore induce growth; however, the growth would be consistent with the economic development goals and policies that have been adopted for the City in the General Plan, and would not generate environmental impacts beyond those described in the respective sections of this EIR.

6.1.3 Precedent-Setting Action

The development of a new senior care facility is consistent with City land use designation and zoning for the project site. The Buellton Planning Commission has determined the proposed project meets the definition of a "Medical Services-Hospitals and Extended Care" use, and therefore would be permissible in the General Commercial (CR) zone. Therefore, the development of the proposed project would facilitate development expected under the General Plan, and would not represent a precedent-setting action.

6.1.4 Development of Open Space/Vacant Land

Development of open space is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. As discussed above, the Buellton General Plan has identified several key sites within its boundaries that are designated for development. The project site is designated as such and would not extend into land outside of the urban boundary.

6.1.5 Removal of an Impediment to Growth

The proposed project would facilitate development of a new senior care facility on one of the key sites identified for future development in the Buellton General Plan. The General Plan, as a long-term land use plan, is intended to reduce the potential for uncontrolled growth from specific development proposals and their associated environmental impacts. The project site is contiguous to urban land uses designated for urban development, and the site is entirely within

the Buellton City Limits. By focusing development within already urban-designated areas, it is anticipated that implementation of the project would reduce growth pressure in undeveloped areas. This would be expected to reduce the potential for impacts relating to such issues as biological resources, regional traffic, and air quality, as compared to development on agricultural or open space lands outside the Buellton City Limits.

The proposed project would utilize existing water, wastewater, and solid waste facilities that serve the City of Buellton. Service would be provided through necessary extensions of existing utility infrastructure. No additional infrastructure or facilities beyond those necessary to accommodate the proposed project would be required. Overall, the proposed project would not result in the removal of an impediment to growth.

6.2 SIGNIFICANT UNAVOIDABLE EFFECTS

CEQA Guidelines §15126(b) requires that an EIR identify those significant impacts that cannot be reduced to a less than significant level with the application of mitigation measures. As discussed throughout Section 4.0, *Environmental Impact Analysis*, implementation of the proposed project would not result in any new significant and unavoidable impacts.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Guidelines §15126.2(c) requires a discussion of any significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Such significant irreversible environmental changes may include the following:

- *Use of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use unlikely.*
- *Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) which generally commit future generations to similar uses.*
- *Irreversible damage which may result from environmental accidents associated with the project.*

Development of the proposed project would result in the permanent conversion of primarily open, undeveloped lands to a new senior care facility. It would also require building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to the proposed project. The addition of new habitable units would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the Buellton General Plan are expected to offset the demand to some degree. It is not anticipated that growth accommodated under the proposed project would significantly affect local or regional energy supplies.

Growth accommodated under the proposed project would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste

disposal services. In addition, the vehicle trips associated with the proposed project would incrementally contribute local traffic and noise levels and regional air pollutant emissions.

7.0 ALTERNATIVES

7.1 PROJECT ALTERNATIVES

This SEIR addresses four additional alternatives to the currently-proposed Meritage Senior Living project, summarized in Section 7.1.1 below. The alternatives are:

1. New No Project/No Development Alternative
2. AHOZ Development Alternative
3. Typical Commercial Project Alternative
4. Reconfigured Project Alternative

As discussed in this SEIR, the proposed project would not result in any significant and unavoidable (Class I) impacts. No alternative project locations were identified that would avoid or substantially lessen any significant (Class I) impacts of the proposed project.

The future development of the project site under the Buellton General Plan Land Use Element and Circulation Element and four alternatives were previously analyzed in the Buellton General Plan Land Use Element and Circulation Element Update Program EIR (2005). The alternatives analyzed in the LUE & CE Update EIR are summarized in Appendix K.

7.1.1 Description of Alternatives

Alternative 1: New No Project/No Development

This alternative does not propose any new development on the project site. The existing General Commercial (GC/CR) land use and zoning designations for the site would remain unchanged, including the AHOZ overlay zone designation; however, no new development would occur. The existing residence and associated outbuildings that are currently located on the site would not be removed. The project site would remain unchanged from the existing conditions, described in Section 3.0, *Environmental Setting*.

Alternative 2: AHOZ Development

Under this alternative, the proposed senior living facilities would not be constructed. The existing General Commercial (GC/CR) land use and zoning designations for the site would remain unchanged, including the AHOZ overlay zone designation. For the purpose of this analysis, this alternative assumes that the site would be developed with residential units under the AHOZ overlay zone. Development under the AHOZ overlay zone would result in a maximum of up to 330 residential units. As with the proposed project, primary site access would be from Jonata Park Road, and this alternative would involve a similar scale of on-site lighting, landscaping, and off-site improvements to accommodate development of the site, and would be subject to the same existing building height limit (35 feet), development setbacks, and parking requirements.

Alternative 3: Typical Commercial Project

Under this alternative, the proposed senior living facilities would not be constructed. The existing General Commercial (GC/CR) land use and zoning designations for the site would remain unchanged, including the AHOZ overlay zone designation. For the purpose of this analysis, this alternative assumes that the site would be developed with a "typical" commercial development under the existing General Commercial (GC/CR) land use and zoning designations. The GC land use designation applies to lands intended to accommodate commercial, retail, wholesale and office uses, mixed uses (at a maximum density of ten dwellings per gross acre, as determined by the variable limit) as well as similar compatible uses.

The base CR zoning designation does not have a maximum site coverage or floor area; however, this zoning designation has a maximum building height restriction of 35 feet.

For the purpose of this analysis, this alternative assumes that the site is developed with a commercial retail project similar in scale and height to the proposed project, or approximately 290,000 gross square feet (gsf), located on the northernmost four parcels of the subject property (as with the proposed project). As with the proposed project, primary site access would be from Jonata Park Road, and this alternative would involve a similar scale of on-site lighting, landscaping, and off-site improvements to accommodate development of the site.

Alternative 4: Reconfigured Project

Development under this alternative would be similar in scale to the proposed project, but would reconfigure the proposed development to utilize the southern parcels on the project site, which are currently proposed to remain vacant. For the purpose of this analysis, it is assumed that reconfiguration of the proposed development onto the southernmost parcels would result in up to 5 acres of vacant land on the northern portion of the project site, which would allow the proposed retention basin to be relocated onto the project site and within the City of Buellton. Relocation of the proposed retention basin within the City of Buellton would also reduce the area on the adjacent County agricultural land that would be affected by the City agricultural buffer requirement (200-foot buffer between active agricultural uses and sensitive receptors).

7.2 ENVIRONMENTAL ANALYSIS OF ALTERNATIVES

Table 7-1 depicts a comparison of the environmental impacts of the development of the proposed project and each of the SEIR alternatives. The project and the alternatives evaluated in the LUE and CE Update EIR are summarized above in Section 7.1. The comparative analysis of the relative impacts of the proposed project and the alternatives is provided in Sections 7.2.1 through 7.2.4 below.

As shown in Table 7-1, the comparison of the environmental impacts of each alternative addresses the issue areas discussed in detail in Sections 4.1 through 4.11 of this SEIR. Environmental effects found not to be significant for the proposed project, discussed in Section 5.0 of this SEIR, are anticipated to remain less than significant for Alternatives ~~6, 7, 8, and 9~~ **1, 2, 3, and 4** due to the generally similar amount of site disturbance and scale of development that would result from these alternatives.

Table 7-1 Comparison of Environmental Impacts

Environmental Issue	Level of Impact				
	Proposed Meritage Senior Living Project	**Alternative 1: New No Project/No Development**	**Alternative 2: AHOZ Development**	**Alternative 3: Typical Commercial Project**	**Alternative 4: Reconfigured Project**
Aesthetics/Visual Resources					
Public Views	III	III	III	III	III
Light and Glare	II	III	II	II	II
Visual Character	III	III	III	III	III
Cumulative Impacts	III	III	III	III	III
Agricultural Resources					
Grazing and Farming Land	III	III	III	III	III
Agricultural Operations	II	III	II	III	II
Cumulative Impacts	III	III	III	III	III
Air Quality					
Construction Emissions	III	III	III	III	III
Operational Emissions	III	III	II	I	III
Health Risks	III	III	III	III	III
CAP Consistency	III	III	III	I	III
Cumulative Impacts	III	III	III	I	III
Cultural and Historic Resources					
Known Cultural Resources	III	III	III	III	III
Unknown Cultural Resources	II	III	II	II	II
Cumulative Impacts	III	III	III	III	III
Geology/Soils					
Groundshaking	III	III	III	III	III
Settlement/Slope Stability	II	III	II	II	II
Cumulative Impacts	III	III	III	III	III
Greenhouse Gas Emissions					
Operational Emissions	II	III	II	II	II
Hydrology and Water Quality					
Construction Impacts	III	III	III	III	III
Drainage and Runoff	III	III	III	III	III
Cumulative Hydrology/ Water Quality	III	III	III	III	III

Table 7-1 Comparison of Environmental Impacts

Environmental Issue	Level of Impact				
	Proposed Meritage Senior Living Project	Alternative 1: New No Project/No Development	Alternative 2: AHOZ Development	Alternative 3: Typical Commercial Project	Alternative 4: Reconfigured Project
Land Use/Policy Consistency					
Land Use Compatibility	III	III	III	III	III
Policy Consistency	III	III	III	III	III
Cumulative Impacts	III	III	III	III	III
Noise					
Construction Impacts	II	III	II	II	II
Roadway Noise Exposure	III	III	III	III	III
Off-Site Roadway Noise	III	III	III	I	III
Cumulative Operational Noise	III	III	III	I	III
Public Services and Utilities					
Fire Protection	III	III	III	III	III
Police Protection	III	III	III	III	III
Recreational Facilities	III	III	II	III	III
Library Services	III	III	III	III	III
Water Use	III	III	III	III	III
Wastewater Generation	III	III	III	III	III
Solid Waste Generation	III	III	III	III	III
Cumulative Public Services Impacts	III	III	III	III	III
Transportation and Circulation					
Construction Trips	III	III	III	III	III
Operational-Levels of Service	III	III	III	II	III
Traffic Hazards	III	III	III	III	III
Cumulative LOS Impacts	III	III	III	III	III
Cumulative Transit Impacts	III	III	III	II	III

7.2.1 Alternative 1: New No Project/No Development

Because no new development would occur on the project site, no additional residents or property would be subject to impacts associated with geologic hazards, hazardous materials, hydrology and water quality, and fire protection. Without additional development, the City

population would not increase. Since no additional residents would be added to the City, impacts associated with transportation, air quality, greenhouse gas emissions, noise, and public services and utilities would be less than significant. Because no natural resources or adjacent land uses would be disturbed under this scenario, no impacts to biological resources, cultural and historic resources, adjacent agricultural land uses, existing housing, or visual resources would occur. In addition, there would be no additional land use incompatibility issues beyond those that currently occur between commercial, industrial, or agriculture uses and residential uses. No infrastructural circulation improvements would be necessary under this alternative. This alternative could result in a larger portion of the project site being used for active agricultural uses. Based on a water duty factor of 3.30 AFY/acre for agricultural land uses (County of Santa Barbara Environmental Thresholds and Guidelines Manual, 2008), active farming of the entire project site (18.2 acres) would result in approximately 60.06 AFY of water demand, which is lower than the anticipated 127.68 AFY of water usage from the proposed project. Overall, impacts would be substantially less than for the proposed project, as all impacts would be reduced to a less than significant level (Class III).

7.2.2 Alternative 2: AHOZ Development

Aesthetics/Visual Resources. Overall, visual impacts would be similar under this alternative when compared to the proposed project. Construction of up to 330 residential units under this alternative would involve a similar scale of overall development as the proposed project. This alternative would not modify the land use or zoning designations on the project site; therefore, development under this alternative would be subject to the same height limit (35 feet), development setbacks, and landscaping requirements as the proposed project. Impacts to public views, on-site lighting, and the overall visual character of the project site would therefore be similar to the proposed project (Class III). Similar to the proposed project, this alternative would have the potential to result in increased glare that may adversely affect occupants of new buildings on-site as well as adjacent properties. As with the proposed project, Mitigation Measure AES-2 would reduce this impact to a less than significant level (Class II). Because this alternative would be similar in size and scale to the proposed project, cumulative impacts to visual/aesthetic resources would also be similar to the proposed project (Class III).

Agricultural Resources. Construction of up to 330 residential units under this alternative would involve a similar amount of site disturbance when compared to the proposed project. Project-specific impacts related to conversation of grazing and farming land to non-agricultural uses would be similar to the proposed project (Class III). Because this alternative would involve the development of residential uses on the project site, potential conflicts between sensitive receptors and adjacent agricultural operations would be similar to the proposed project (Class II). Cumulative agricultural impacts associated with this alternative would remain less than significant (Class III).

Air Quality. Construction of up to 330 residential units under this alternative would involve a similar amount of overall site disturbance and development, when compared to the proposed project. Therefore, temporary construction-related emissions would be similar to the proposed project, and would be less than significant (Class III). Construction activities would be expected to comply with SBCAPCD standard dust and emissions control measures. This alternative would result in a greater number of operational vehicle trips than the proposed project,

which would result in increased operational criteria pollutant emissions. Based on the Institute of Transportation Engineers' Trip Generation, 8th Edition, this alternative would result in approximately 2,175 daily vehicle trips (6.59 trips/day from low-rise apartments, which is the residential land use anticipated under the AHOZ overlay zone designation), which is greater than the 725 daily vehicle trips estimated in the traffic study for the proposed project. Operational emissions, including area source and energy-related emissions, from this alternative were calculated using the CalEEMod software program and similar methodologies to those described for the proposed project in Section 4.3, *Air Quality*. The estimated emissions from this alternative are shown in Table 7-2.

Table 7-2 Unmitigated Operational Emissions for Alternative 2

Source	Maximum Emissions (lbs/day)		
	ROG	NO_X	PM_{10}
Area Source	10.81	0.33	0.15
Energy	0.15	1.30	0.10
Mobile	14.27	26.72	22.41
Total	**25.23**	**28.35**	**22.66**
Threshold (area + energy +mobile)	*55*	*55*	*80*
Threshold Exceeded?	**No**	**No**	**No**
Threshold (mobile only)	*25*	*25*	*n/a*
Threshold Exceeded?	**No**	**Yes**	**n/a**

Source: CalEEMod v.2011.1, modeling results contained in Appendix C.
**indicates exceedance of a threshold*

As shown in Table 7-2, the anticipated increase in vehicle traffic under this alternative would result in operational emissions that would exceed SBCAPCD threshold for mobile NO_X emissions by 1.72 lbs/day. Because the exceedance is primarily due to vehicle trips, and is relatively small, it is anticipated that transportation demand measures, including (but not limited to) an on-site bus/transit stop or on-site electric vehicle charging stations would reduce this impact to a less than significant level (Class II).

Construction of up to 330 residential units under this alternative would involve sensitive receptors located in a similar area on the project site when compared to the proposed project. Because this alternative would result in sensitive receptors in similar locations, relative to the location of U.S. Highway 101, health risk impacts from exposure to diesel particular matter emitted from vehicles traveling on U.S. Highway 101 would remain less than significant, similar to the proposed project (Class III).

The 330 residential units under this alternative would result in a greater number of new long-term residents in Buellton than the proposed project. Based on the City's average persons per household of 2.743 (Department of Finance, 2012), this alternative would result in approximately 905 new long-term residents, which would not exceed the population increase of 2,000 forecasted under the 2010 Clean Air Plan (CAP) between 2015 and 2040. Therefore, cumulative air quality impacts would be greater than the proposed project, but would remain less than significant (Class III).

Cultural and Historic Resources. This alternative would involve a similar amount of site disturbance, when compared to the proposed project. The project site does not contain known cultural or architectural resources; therefore, impacts to known cultural resources on the project site would be less than significant, as with the proposed project (Class III). Due to the overall

archaeological sensitivity of the general area, Mitigation Measure CR-2 would be required to prevent impacts to unknown archaeological resources (Class II). Cumulative impacts to these resources would be less than significant, as with the proposed project (Class III).

Geology/Soils. The project site is subject to groundshaking and soil stability hazards. As with the proposed project, this alternative would expose site occupants and structures to these geologic hazards. Therefore, this alternative would require mitigation similar to the proposed project (Mitigation Measures G-2) to ensure that future development is engineered according to the requirements of the geotechnical investigation and the Uniform Building Code. Therefore, impacts related to geologic hazards would remain less than significant with mitigation. Similar to the proposed project, cumulative geology/soils impacts would be less than significant.

Greenhouse Gas Emissions. As described in the Air Quality discussion above, the 330 residential units with this alternative would result in higher operational emissions compared to the proposed project, including GHG emissions. Operational emissions from this alternative were calculated using the CalEEMod software program, calculation methods provided by the California Climate Action Registry General Reporting Protocol (January 2009), and similar methodologies to those described for the proposed project in Section 4.6, *Greenhouse Gas Emissions*. The estimated GHG emissions from this alternative are shown in Table 7-2.

As shown in Table 7-3, this alternative would generate more greenhouse gas emissions than the proposed project, and would exceed the County's significance criteria of 1,100 metric tons CO_2E/year for non-stationary sources used in this SEIR by 2,274 metric tons CO_2E/year. Mitigation Measure GHG-1 would be required in order to reduce impacts from GHG emissions under this alternative. As indicated in Section 4.6, *Greenhouse Gas Emissions*, there are a total of approximately 500 MT CO_2E/year "reduction credits" available if all GHG reductions are incorporated into on-site development. Because the total available reductions are lower than the amount by which the project GHG emissions would exceed the significance criteria (2,274 MT CO_2E/year), reducing project GHG emissions below the level of significance through a GHG Reduction Plan is not expected to be possible. Therefore the project applicant would be required to include roof photovoltaic (solar) energy systems or purchase carbon offsets to reduce GHG emissions below threshold levels under this alternative. Impacts related to GHG emissions under this alternative would be greater than under the proposed project, but would be reduced to a less than significant level with mitigation (Class II).

Table 7-3 Combined Annual Emissions of Greenhouse Gases – Alternative 2

Emission Source	Annual Emissions
Construction	41 metric tons CO_2E
Operational	761 metric tons CO_2E
Mobile	2,572 metric tons CO_2E
Alternative 2 Total MT CO_2E/year	**3,374 MT CO_2E/year**

Sources: CalEEMod 2011 (v.2011.1).
See Appendix C for calculations and for GHG emission factor assumptions.

Hydrology and Water Quality. Construction of up to 330 residential units under this alternative would involve a similar amount of site disturbance, and would result in similar grading requirements and similar new impervious surfaces, as compared to the proposed project. Since construction activity would disturb more than one acre, the development would be subject to the requirements of an NPDES permit, and would have to prepare a SWPPP, as described in Section 4.7, *Hydrology and Water Quality*. As with the proposed project, adherence to existing NPDES regulatory measures would ensure that construction-related impacts to water quality would remain less than significant (Class III). As with the proposed project, the amount of impermeable surfaces created by development of this alternative would not substantially alter existing drainage patterns, increase storm water runoff, result in increased flooding, result in a substantial decrease in percolation to groundwater basins, or exceed existing drainage infrastructure capacity. This alternative would require stormwater retention similar to that proposed for the project, which would be required to be designed to ensure that post-development discharge would not exceed existing conditions. In addition, this alternative would be required to comply with City SWMP BMPs. Therefore, impacts associated with storm water runoff, such as increased rates of runoff and a reduction in groundwater percolation, would remain less than significant (Class III). As with the proposed project, impacts would be less than significant at the project level, and would not be cumulatively considerable (Class III).

Land Use/Policy Consistency. The 330 residential units under this alternative would involve a similar scale of overall development, when compared to the proposed project. Implementation of existing City policies including the Municipal Code requirements, Community Design Guidelines, and General Plan policies, would ensure that impacts related to the scale of development on the project site would remain less than significant (Class III). This alternative would be consistent with the existing AHOZ overlay zone designation. As with the proposed project, this alternative would not conflict with land use policies contained in the City's General Plan and Zoning Ordinance. Thus, all project-specific and cumulative land use impacts under this alternative would be less than significant without mitigation (Class III).

Noise. This alternative would involve a similar scale of overall development, when compared to the proposed project. Therefore, temporary construction-related noise would be similar to the proposed project, and would require Mitigation Measures N-1(a) and N-1(b) to ensure that impacts remain less than significant (Class II). Construction activities would be expected to comply with City Municipal Code Section 12.04.410, which requires limitations on construction hours. As with the proposed project, the 330 residential units under this alternative would be exposed to roadway noise from Jonata Park Road and U.S. Highway 101. However, interior noise levels within residences would be expected to be below 45 dB; therefore impacts would be less than significant (Class III), similar to the proposed project.

This alternative would result in a greater number of operational vehicle trips than the proposed project, which would result in increased noise affecting nearby sensitive receptors. Based on the Institute of Transportation Engineers' Trip Generation, 8th Edition, this alternative would result in approximately 2,175 daily vehicle trips (6.59 trips/day from low-rise apartments, which is the residential land use anticipated under the AHOZ overlay zone designation), which is greater than the 725 daily vehicle trips estimated in the project traffic study for the proposed project. The higher number of vehicle trips that would result under this alternative would be expected to further increase roadway noise levels, as shown in Table 7-4.

Table 7-4 Comparison of Pre-Development and Post-Development Traffic Noise on Study Area Roadways – Alternative 2

Roadway	Projected Noise Level (dBA)				Change In Noise Level (dBA)	
	Existing (1)	Existing + Development (2)	Cumulative (3)	Cumulative + Development (4)	Due to Development Traffic (2-1)	Due to Development Traffic Under Cumulative Conditions (4-3)
Avenue of Flags south of the project site	61.1	63.8	62.6	63.7	2.7	1.1
Damassa Road west of U.S. Highway 101	63.1	63.8	64.0	64.6	0.7	0.6
Damassa Road east of U.S. Highway 101	62.1	63.1	64.1	64.4	0.5	0.3

Estimates of noise generated by traffic from roadway centerline at 50 feet. Cumulative growth was forecasted assuming development of approved and pending projects in the area, based on the Traffic and Circulation Study, prepared by Associated Transportation Engineers (Appendix G).
Refer to Appendix F for detailed noise modeling results. Noise levels presented do not account for attenuation provided by existing topography or barriers or future barriers; therefore, actual noise levels at sensitive receptor locations influenced by study area roadways may in many cases be lower than presented herein.

As shown in Table 7-4, added vehicle trips under this alternative would not be expected to increase roadway noise by more than 3.0 dBA at any of the studied roadway segments, which is the applicable City threshold for Changes in Operational Roadway Noise Exposure. Therefore, this alternative would result in less than significant impacts with respect to operational traffic (Class III). Likewise, cumulative roadway noise levels would be greater than the proposed project, but would remain less than significant (Class III).

Public Services and Utilities. Implementation of the 330 residential units under this alternative would result in a greater number of new long-term residents in Buellton than the proposed project. Based on the City's average persons per household of 2.743 (Department of Finance, 2012), this alternative would result in approximately 905 new long-term residents which would place an added burden on public service and utilities in the City. As with the proposed project, this alternative would still be within the County of Santa Barbara Fire Department's five minute response time goal. Therefore, with the payment of the required development impact fees and adherence to SBCFD's established standards for the issuance of Fire Protection Certificates, the potential environmental impacts to fire protection would remain less than significant (Class III). The anticipated increase of 905 new residents under this alternative could contribute to the need for additional police protection services and/or new or expanded facilities, the construction of which could result in environmental impacts. As with the proposed project, development impact fees would be collected by the City to fund service improvements, as needed. The potential environmental impacts to police protection would be

slightly greater than the proposed project, but payment of required development impact fees would ensure that impacts would remain less than significant (Class III). The anticipated increase of 905 new residents under this alternative would result in increased use of recreational facilities, and would contribute to the City's existing need for additional parkland in order to meet the City's standard for park provision of five acres of park area per 1,000 residents. Therefore this alternative would be required to pay parkland in-lieu fees ("Quimby" fees) in order to mitigate potential impacts to parks and recreational facilities from this alternative. This impact would be potentially significant but mitigable (Class II). Similarly, this alternative would increase demand for the City of Buellton library facilities. However, with the payment of required City development impact fees, this alternative would result in less than significant impacts on library facilities and services (Class III).

Based on a water duty factor of 0.57 AFY/habitable unit, this alternative's water usage would be approximately 188.1 AFY, which is greater than the anticipated 127.68 AFY of water usage from the proposed project. As discussed in Section 4.10, *Utilities and Service Systems*, the City's water supply includes an allocation from the State Water Project (SWP), which is adjusted based on the quantity of water demanded by the City, and additional water demand in Buellton would be accommodated by an increased supply from the SWP in the event that local basins are unable to meet demand. Because both of the region's existing groundwater basins have available surplus capacity, and additional water supply is available as-needed through the SWP, this alternative's water usage of 85.5 AFY would not exceed existing City supplies, and would result in a less than significant impact (Class III).

Based on a wastewater generation factor of 226 gallons per day (GPD)/habitable unit, this alternative's wastewater generation would be approximately 74,257 GPD (0.074 million gallons per day [MGD]), which is greater than the anticipated 55,596 GPD (0.056 MGD) of wastewater generation from the proposed project. As with the proposed project, the wastewater generated by this alternative would not exceed the 0.65 MGD capacity of the City's wastewater treatment plant. In addition, the precise size of the wastewater conveyance pipes required to accommodate the proposed development on the project site would be determined at the time of installation and would be subject to the approval of the City Public Works department, in order to ensure that the wastewater system would be adequate to the needs of the on-site development. Therefore, this alternative would not necessitate the construction of new wastewater treatment facilities, and impacts would be less than significant (Class III).

Based on a solid waste generation factor of 5 pounds/person/day, this alternative's solid waste generation would be approximately 826 tons/year, which is greater than the anticipated 196 tons/year of solid waste generation from the proposed project. Based on a 50% diversion rate, the proposed project would generate an estimated 1.1 tons per day of solid waste, which would not exceed the 510 tons per day surplus capacity of the Tajiguas Sanitary Landfill. Therefore, waste generated by this alternative would be accommodated with the surplus capacity at the existing solid waste facility. Therefore, impacts would be less than significant (Class III).

Transportation and Circulation. Construction of up to 330 residential units under this alternative would involve a similar amount of overall development, when compared to the proposed project. Therefore, as with the proposed project, the temporary increase in vehicle trips due to project construction would be less than significant (Class III). This alternative would also

result in similar site ingress, egress, and emergency access compared to the proposed project, which would result in less than significant impacts (Class III). However, this alternative would result in a greater number of operational vehicle trips than the proposed project. Using trip generation rates from the Institute of Transportation Engineers' Trip Generation, 8th Edition, this alternative would result in approximately 2,175 daily vehicle trips (6.59 trips/day from low-rise apartments, which is the residential land use anticipated under the AHOZ overlay zone designation), which is greater than the 725 daily vehicle trips estimated in the project traffic study for the proposed project. Based on the Meritage Senior Living Project Alternative Project Traffic Analysis, prepared by Associated Transportation Engineers (September, 2012), with the addition of alternative residential project-generated traffic, the study area intersections would continue to operate in the LOS A to LOS C range during the A.M. and P.M. peak hour periods. Based on the City of Buellton impact threshold criteria, the AHOZ Development alternative would have a less than significant (Class III) impact to study area intersections. Likewise, cumulative traffic levels would be greater than the proposed project, but would reasonably be anticipated to remain less than significant (Class III).

As with the proposed project, this alternative would not modify any existing transit facilities or services, and would be served by a variety of public transit options. Therefore, impacts to transit facilities would be less than significant (Class III).

7.2.3 Alternative 3: Typical Commercial Project

Aesthetics/Visual Resources. Overall, visual impacts would be similar under this alternative when compared to the proposed project. Construction of approximately 290,000 gross square feet of commercial retail development under this alternative would involve a similar scale of overall development when compared to the proposed project. This alternative would not modify the land use or zoning designations on the project site; therefore, development under this alternative would be subject to the same height limit (35 feet), development setbacks, and landscaping requirements as the proposed project. Impacts to public views, on-site lighting, and the overall visual character of the project site would therefore be similar to the proposed project (Class III). Similar to the proposed project, this alternative would have the potential to result in increased glare that may adversely affect occupants of new buildings on-site as well as adjacent properties. As with the proposed project, Mitigation Measure AES-2 would reduce this impact to a less than significant level (Class II). Because this alternative would be similar in size and scale to the proposed project, cumulative impacts to visual/aesthetic resources would also be similar to the proposed project (Class III).

Agricultural Resources. This alternative would involve a similar amount of site disturbance, when compared to the proposed project. Therefore, impacts related to conversation of grazing and farming land to non-agricultural uses would be similar to the proposed project (Class III). This alternative would not involve the development of habitable structures on the project site; therefore, potential conflicts between on-site development and adjacent agricultural operations would be reduced, as compared to the proposed project. Mitigation Measures AG-2(a) and AG-2(b) would not be required, and impacts would be less than significant (Class III). Cumulative agricultural impacts associated with this alternative would remain less than significant (Class III).

Air Quality. This alternative would involve a similar scale of overall development, when compared to the proposed project. Therefore, temporary construction-related emissions would be similar to the proposed project, and would be less than significant (Class III). Construction activities would be expected to comply with SBCAPCD standard dust and emissions control measures. This alternative would result in a greater number of operational vehicle trips than the proposed project, which would result in increased operational criteria pollutant emissions. Based on the Institute of Transportation Engineers' Trip Generation, 8th Edition, this alternative would result in approximately 12,453 daily vehicle trips (42.94 trips/day per 1,000 square feet of shopping center development, which is the retail land use anticipated under the General Commercial [GC/CR] land use), which is substantially greater than the 725 daily vehicle trips estimated in the project traffic study for the proposed project. Operational emissions from this alternative, including area source and energy-related emissions, were calculated using the CalEEMod software program and similar methodologies to those described for the proposed project in Section 4.3, *Air Quality*. The estimated emissions from this alternative are shown in Table 7-5.

Table 7-5 Unmitigated Operational Emissions for Alternative 3

Source	Maximum Emissions (lbs/day)		
	ROG	NO_X	PM_{10}
Area Source	8.05	0.00	0.00
Energy	0.02	0.19	0.01
Mobile	54.81	84.42	60.49
Total	**62.88**	**84.61**	**60.50**
Threshold (area + energy +mobile)	*55*	*55*	*80*
Threshold Exceeded?	**Yes**	**Yes**	**No**
Threshold (mobile only)	*25*	*25*	*n/a*
Threshold Exceeded?	**Yes**	**Yes**	**n/a**

Source: CalEEMod v.2011.1, modeling results contained in Appendix C.
**indicates exceedance of a threshold*

As shown in Table 7-5, the anticipated increase in vehicle traffic under this alternative would result in operational emissions that would substantially exceed SBCAPCD thresholds for ROG and NO_X emissions, as well as for mobile ROG and NO_X emissions. Due to the infeasibility of mitigating emissions and the substantial exceedance of SBCAPCD thresholds, it is anticipated this this would be a significant and unavoidable impact (Class I).

This alternative would not result in any new habitable units on the project site. Commercial workers at commercial retail development under this alternative would potentially be subject to carcinogenic and non-carcinogenic acute health risks from exposure to diesel particular matter emitted from vehicles traveling on U.S. Highway 101; however, as with the proposed project, health risks for a 30-year commercial/facility worker would be less than significant. Because this alternative would result in less than significant impacts to commercial workers, and would not result in any new sensitive receptors within 500 feet of U.S. Highway 101, health risk impacts would be somewhat lower than the proposed project, and would be less than significant overall (Class III).

Commercial or industrial projects are determined to be consistent with the 2010 CAP if they are consistent with SBCAPCD rules and regulations. Because the 290,000 gross square feet of commercial retail development under this alternative would result in emissions that exceed SBCAPCD operational emissions thresholds, this alternative would conflict with the goals of the 2010 CAP. Per Santa Barbara County Air Pollution Control District thresholds, a project would

have a significant cumulative impact if a project's air pollutant emissions of either of the ozone precursors (NO_X or ROG) exceed the long-term thresholds and if emissions have not been taken into account in the most recent CAP growth projections. As discussed above, the exceedance of SBCAPCD operational emissions thresholds would be a significant and unavoidable impact; therefore, cumulative air quality impacts under this alternative would be a significant and unavoidable impact (Class I).

Cultural and Historic Resources. Construction of approximately 290,000 gross square feet of commercial retail development under this alternative would involve a similar amount of site disturbance, when compared to the proposed project. The project site does not contain known cultural or architectural resources; therefore, impacts to known cultural resources on the project site would be less than significant, as with the proposed project (Class III). Due to the overall sensitivity of the general area, Mitigation Measure CR-2 would be required to prevent impacts to unknown archaeological resources (Class II). Cumulative impacts to these resources would be less than significant, as with the proposed project (Class III).

Geology/Soils. The subject property is subject to groundshaking and soil stability hazards. As with the proposed project, this alternative would expose site occupants and structures to these geologic hazards. Therefore, this alternative would require mitigation similar to the proposed project (Mitigation Measures G-2) to ensure that development is engineered according to the requirements of the geotechnical investigation and the Uniform Building Code. Therefore, impacts related to geologic hazards would remain less than significant with mitigation. Similar to the proposed project, cumulative impacts would be less than significant.

Greenhouse Gas Emissions. As described in the Air Quality discussion above, the approximately 290,000 gross square feet of commercial retail development under this alternative would result in higher operational emissions compared to the proposed project, including GHG emissions. Operational emissions from this alternative were calculated using the CalEEMod software program, calculation methods provided by the California Climate Action Registry General Reporting Protocol (January 2009), and similar methodologies to those described for the proposed project in Section 4.6, *Greenhouse Gas Emissions*. The estimated GHG emissions from this alternative are shown in Table 7-6.

Table 7-6 Combined Annual Emissions of Greenhouse Gases – Alternative 3

Emission Source	Annual Emissions
Construction	36 metric tons CO_2E
Operational	1,230 metric tons CO_2E
Mobile	6,433 metric tons CO_2E
Alternative 3 Total MT CO_2E/year	**7,699 MT CO_2E/year**
Proposed Project Total MT CO_2E/year	**1,455 MT CO_2E/year**

Sources: CalEEMod 2011 (v.2011.1).
See Appendix C for calculations and for GHG emission factor assumptions.

As shown in Table 7-6, this alternative would generate more greenhouse gas emissions than the proposed project, and would exceed the County's significance criteria of 1,100 metric tons

CO_2E/year for non-stationary sources used in this SEIR by 6,599 metric tons CO_2E/year. Mitigation Measure GHG-1 would be required in order to reduce impacts from GHG emissions under this alternative. As indicated in Section 4.6, *Greenhouse Gas Emissions*, there are a total of approximately 500 MT CO_2E/year "reduction credits" available if all GHG reductions are incorporated into on-site development. Because the total available reductions are lower than the amount by which the project GHG emissions would exceed the significance criteria (6,599 MT CO_2E/year), reducing project GHG emissions below the level of significance through a GHG Reduction Plan is not expected to be possible. Therefore the project applicant would be required to include roof photovoltaic (solar) energy systems or purchase carbon offsets to reduce GHG emissions below threshold levels under this alternative. Impacts related to GHG emissions under this alternative would be greater than under the proposed project, but would be reduced to a less than significant level with mitigation (Class II).

Hydrology and Water Quality. Construction of approximately 290,000 gross square feet of commercial retail development under this alternative would involve a similar amount of site disturbance, and would result in similar grading requirements and similar new impervious surfaces, as compared to the proposed project. Since construction activity would disturb more than one acre, the development would be subject to the requirements of an NPDES permit, and would have to prepare a SWPPP, as described in Section 4.7, *Hydrology and Water Quality*. As with the proposed project, adherence to existing NPDES regulatory measures would ensure that construction-related impacts to water quality would remain less than significant (Class III). As with the proposed project, the amount of impermeable surfaces created by development of this alternative would not substantially alter existing drainage patterns, increase storm water runoff, result in increased flooding, result in a substantial decrease in percolation to groundwater basins, or exceed existing drainage infrastructure capacity. This alternative would require stormwater retention similar to that proposed for the project, which would be required to be designed to be designed to ensure that post-development discharge would not exceed existing conditions. In addition, this alternative would be required to comply with City SWMP BMPs. Therefore, impacts associated with storm water runoff, such as increased rates of runoff and a reduction in groundwater percolation, would remain less than significant (Class III). As with the proposed project, impacts would be less than significant at the project level, and would not be cumulatively considerable (Class III).

Land Use/Policy Consistency. This alternative would involve a similar scale of overall development, when compared to the proposed project. Implementation of existing City policies including the Municipal Code requirements, Community Design Guidelines, and General Plan policies, would ensure that impacts related to the scale of development on the project site would remain less than significant (Class III). This alternative would be consistent with the existing General Commercial (GC/CR) land use. As with the proposed project, this alternative would not conflict with land use policies contained in the City's General Plan and Zoning Ordinance. Thus, all project-specific and cumulative land use impacts under this alternative would be less than significant without mitigation (Class III).

Noise. This alternative would involve a similar scale of overall development, when compared to the proposed project. Therefore, temporary construction-related noise would be similar to the proposed project, and would require Mitigation Measures N-1(a) and N-1(b) to ensure that impacts remain less than significant (Class II). Construction activities would be

expected to comply with City Municipal Code Section 12.04.410, which requires limitations on construction hours. As with the proposed project, the development under this alternative would be exposed to roadway noise from Jonata Park Road and U.S. Highway 101. Commercial development is not identified as a noise-sensitive land use in the Buellton General Plan Noise Element. In addition, interior noise levels within the proposed development would be expected to be below 45 dB; therefore impacts would be less than significant (Class III), similar to the proposed project.

This alternative would result in a greater number of operational vehicle trips than the proposed project, which would result in increased noise affecting nearby sensitive receptors. Based on the Institute of Transportation Engineers' Trip Generation, 8th Edition, this alternative would result in approximately 12,453 daily vehicle trips (42.94 trips/day per 1,000 square feet of shopping center development, which is the retail land use anticipated under the General Commercial [GC/CR] land use), which is greater than the 725 daily vehicle trips estimated in the traffic study for the proposed project. The higher number of vehicle trips that would result under this alternative would be expected to further increase roadway noise levels, as shown in Table 7-7.

Table 7-7 Comparison of Pre-Development and Post-Development Traffic Noise on Study Area Roadways – Alternative 3

Roadway	Projected Noise Level (dBA)				Change In Noise Level (dBA)	
	Existing (1)	Existing + Development (2)	Cumulative (3)	Cumulative + Development (4)	Due to Development Traffic (2-1)	Due to Development Traffic Under Cumulative Conditions (4-3)
Avenue of Flags south of the project site	61.1	68.8	62.6	67.0	7.7	4.4
Damassa Road west of U.S. Highway 101	63.1	66.2	64.0	66.6	3.1	2.6
Damassa Road east of U.S. Highway 101	62.1	64.6	64.1	65.1	2.0	1.5

Estimates of noise generated by traffic from roadway centerline at 50 feet. Cumulative growth was forecasted assuming development of approved and pending projects in the area, based on the Traffic and Circulation Study, prepared by Associated Transportation Engineers (Appendix G).
Refer to Appendix F for detailed noise modeling results. Noise levels presented do not account for attenuation provided by existing topography or barriers or future barriers; therefore, actual noise levels at sensitive receptor locations influenced by study area roadways may in many cases be lower than presented herein.

As shown in Table 7-7, added vehicle trips under this alternative would cause roadway noise to increase by more than 3.0 dBA along two of the three studied roadways, which is the applicable City standard for an increase in operational roadway noise exposure. Therefore, this alternative would have potentially significant impacts with respect to roadway noise levels. Due to the lack of

feasible mitigation for off-site roadway noise impacts to nearby sensitive receptors, this impact would be considered significant and unavoidable (Class I). Likewise, cumulative roadway noise levels would exceed the applicable City standard for an increase in operational roadway noise exposure, and would be significant and unavoidable (Class I).

Public Services and Utilities. Commercial retail development with this alternative would not directly result in any new long-term residents in Buellton. As with the proposed project, this alternative would still be within the County of Santa Barbara Fire Department's five minute response time goal. Therefore, with the payment of the required development impact fees and adherence to SBCFD's established standards for the issuance of Fire Protection Certificates, the potential environmental impacts to fire protection would remain less than significant (Class III). The anticipated increase in retail development under this alternative could contribute to the need for additional police protection services and/or new or expanded facilities, the construction of which could result in environmental impacts. As with the proposed project, development impact fees would be collected by the City to fund service improvements, as needed. Therefore, the potential environmental impacts to police protection would be slightly greater than the proposed project, but would remain less than significant (Class III). This alternative would not result in new long term residents that would lead to increased use of recreational facilities or contribute to City's existing need for additional parkland. Therefore, as with the proposed project, this alternative would result in a less than significant impact to parks and recreational facilities (Class III). Similarly, this alternative would not increase demand for the City of Buellton library facilities. Therefore, this alternative would result in less than significant impacts on library facilities and services (Class III).

Based on a water duty factor of 0.30 AFY/1,000 sf for commercial land uses[1] (County of Santa Barbara Environmental Thresholds and Guidelines Manual, 2008), this alternative's water usage would be approximately 87.0 AFY, which is lower than the anticipated 127.68 AFY of water usage from the proposed project. As discussed in Section 4.10, *Utilities and Service Systems*, the City's water supply includes an allocation from the State Water Project (SWP), which is adjusted based on the quantity of water demanded by the City, additional water demand in Buellton would be accommodated by an increased supply from the SWP in the event that local basins are unable to meet demand. Because both of the region's existing groundwater basins have available surplus capacity, and additional water supply is available as-needed through the SWP, this alternative's water usage of 12.0 AFY would not exceed existing City supplies, and would result in a less than significant impact (Class III).

Based on a wastewater generation factor of 6,011 gallons per day (GPD)/acre (Laguna County Sanitation District, Sewer Collection System Master Plan, June 2009), this alternative's wastewater generation would be approximately 75,738.6 GPD (0.076 million gallons per day [MGD]), which is greater than the anticipated 55,596 GPD (0.056 MGD) of wastewater generation from the proposed project. As with the proposed project, the wastewater generated by this alternative would not exceed the 0.65 MGD capacity of the City's wastewater treatment plant. In addition, the precise size of the wastewater conveyance pipes required to accommodate the proposed development on the project site would be determined at the time of installation and would be subject to the approval of the City Public Works department, in order

[1] *This water duty factor applies to commercial (C-H, C-2, C-3) development in the Los Alamos Valley, which is the closest region within Santa Barbara County for which a commercial water duty factor is available.*

to ensure that the wastewater system would be adequate to the needs of the on-site development. Therefore, this alternative would not necessitate the construction of new wastewater treatment facilities, and impacts would be less than significant (Class III).

Based on a solid waste generation factor of 0.046 pounds/square foot/day for commercial retail land uses (CalRecycle Estimated Solid Waste Generation Rates for Commercial), this alternative's solid waste generation would be approximately 2,435 tons/year, which is greater than the anticipated 196 tons/year of solid waste generation from the proposed project. Based on a 50% diversion rate, the proposed project would generate an estimated 3.3 tons per day of solid waste, which would not exceed the 510 tons per day surplus capacity of the Tajiguas Sanitary Landfill. Therefore, waste generated by this alternative would be accommodated with the surplus capacity at the existing solid waste facility. Therefore, impacts would be less than significant (Class III).

Transportation and Circulation. Construction of approximately 290,000 gross square feet of commercial retail development under this alternative would involve a similar scale of overall development, when compared to the proposed project. Therefore, the temporary increase in vehicle trips due to project construction would be less than significant (Class III). This alternative would also result in similar site ingress, egress, and emergency access conditions to the proposed project, which would result in less than significant impacts (Class III). However, this alternative would result in a greater number of operational vehicle trips than the proposed project. Using trip generation rates from the Institute of Transportation Engineers' Trip Generation, 8th Edition, this alternative would result in approximately 12,453 daily vehicle trips (42.94 trips/day per 1,000 square feet of shopping center development, which is the retail land use anticipated under the General Commercial [GC/CR] land use), which is greater than the 725 daily vehicle trips estimated in the project traffic study for the proposed project. Based on the Meritage Senior Living Project Alternative Project Traffic Analysis, prepared by Associated Transportation Engineers (September, 2012), with the addition of alternative commercial project-generated traffic, the study area intersections would continue to operate in the LOS A to LOS C range during the A.M. peak hour period; however, based on the City of Buellton impact threshold criteria, the Typical Commercial Project alternative would have a significant impact to the U.S. Highway 101 southbound off-ramp/Avenue of Flags study area intersection during the P.M. peak hour period. Improvements to the U.S. Highway 101 southbound off-ramp/Avenue of Flags intersection have been identified by the City of Buellton. The City has adopted a "Traffic Improvement Fee Program" to offset the capital improvement cost required to implement traffic improvement measures to accommodate development within the City. Since the Typical Commercial Project alternative would not require a zone change and General Plan Amendment, this alternative would be required to pay the Traffic Improvement Fee. Payment of fees would reduce impacts to a less than significant level; therefore, impacts to area intersection operations would be significant but mitigable (Class II). Likewise, cumulative traffic levels would be greater than the proposed project, but would reasonably be anticipated to be mitigated through payment of the Traffic Improvement Fee (Class II).

As with the proposed project, this alternative would not modify any existing transit facilities or services, and would be served by a variety of public transit options. Therefore, impacts to transit facilities would be less than significant (Class III).

7.2.4 Alternative 4: Reconfigured Project

Aesthetics/Visual Resources. Overall, visual impacts would be similar under this alternative. This alternative would involve a similar scale of overall development, but would be located further to the south on the project site than the proposed project. Locating the proposed development father to the south and closer to existing development would slightly increase visual continuity between the proposed development and existing development to the south. This alternative would not modify the land use or zoning designations on the project site; therefore, development under this alternative would be subject to the same height limit (35 feet), development setbacks, and landscaping requirements as the proposed project. However, reconfiguration of the proposed development onto the southernmost parcels would result in vacant land on the northern portion of the project site, which would allow the proposed retention basin to be relocated onto the project site and within the City of Buellton. The relocated retention basin would be visible from public viewpoints, including Jonata Park Road and Highway 101; however, the retention basin would not constitute a substantial change to public views or the overall visual character of the site, and compliance with existing City policies, including the Community Design Guidelines and General Plan policies related to visual resources in the City, these impacts would be expected to remain less than significant (Class III). Impacts to on-site lighting would be similar to the proposed project (Class III). Similar to the proposed project, this alternative would have the potential to result in increased glare that may adversely affect occupants of new buildings on-site as well as adjacent properties. As with the proposed project, Mitigation Measure AES-2 would reduce this impact to a less than significant level (Class II). Because this alternative would be similar in size and scale to the proposed project, cumulative impacts to visual/aesthetic resources would also be similar to the proposed project (Class III).

Agricultural Resources. This alternative would involve a similar amount of site disturbance, and would be located further to the south on the project site than the proposed project. Because the overall footprint of development on the project site would be generally similar, project-specific impacts related to conversation of grazing and farming land to non-agricultural uses would be similar to the proposed project (Class III). As with the proposed project, this alternative would involve the development of extended-care habitable units on the project site, which would result in potential conflicts between sensitive receptors and adjacent agricultural operations. This alternative would relocate habitable units further south on the project site, away from the active agricultural uses located adjacent to the project site boundary to the north and northwest; however, these units would still be located within 200 feet of land zoned for agricultural use within the Count of Santa Barbara. Therefore, impacts would be slightly reduced, but would still require Mitigation measures AG-2(a) and AG-2(b) to be reduced to a less than significant level (Class II). Cumulative agricultural impacts associated with this alternative would remain less than significant (Class III).

Air Quality. This alternative would involve a similar scale of overall development, but would be located further to the south on the project site than the proposed project. Therefore, temporary construction-related emissions would be similar to the proposed project, and would be less than significant (Class III). **This alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed. ~~C~~However, c**onstruction activities would be expected to comply with

SBCAPCD standard dust and emissions control measures. Due to the similar overall scale of development, area source and energy-related operation emissions would also be similar for this alternative. Because this alternative would involve the same land uses and amount of development as the proposed project, this alternative would result in the same number of operational vehicle trips as compared to the proposed project. Therefore, operational criteria pollutant emissions would be identical to the proposed project, and would not be expected to result in operational emissions that would exceed SBCAPCD thresholds. Therefore, this alternative would result in less than significant impacts with respect to operational criteria pollutant emissions (Class III).

Because this alternative would involve the same land uses and amount of development as the proposed project, at a similar distance from traffic on U.S. Highway 101, health risk impacts from exposure to diesel particular matter emitted from vehicles traveling on U.S. Highway 101 would be expected to be less than significant, similar to the proposed project (Class III).

Because this alternative would result in the same land uses, as compared to the proposed project, it would be consistent with the 2010 CAP. Therefore, cumulative air quality impacts would be identical to the proposed project, and would remain less than significant (Class III).

Cultural and Historic Resources. This alternative would involve the same amount of overall development, but would be located further to the south on the project site than the proposed project. The project site does not contain known cultural or architectural resources; therefore, impacts to known cultural resources on the project site would be less than significant, as with the proposed project (Class III). Due to the overall sensitivity of the general area, Mitigation Measure CR-2 would be required to prevent impacts to unknown archaeological resources (Class II). Cumulative impacts to these resources would be less than significant, as with the proposed project (Class III).

Geology/Soils. The project site is subject to groundshaking and soil stability hazards. This alternative would expose the same amount of site development and future project site occupants to geologic hazards, as compared to the proposed project, but would be located further to the south on the project site than the proposed project. The site constraints described in the geotechnical investigation (refer to Appendix D) apply to the entire subject property, and would therefore result in a similar potential impact, as compared to the proposed project. Therefore, this alternative would require mitigation similar to the proposed project (Mitigation Measures G-2) to ensure that future development is engineered according to the requirements of the geotechnical investigation and the Uniform Building Code. Therefore, impacts related to geologic hazards would remain less than significant with mitigation. As with the proposed project, cumulative impacts would be less than significant.

Greenhouse Gas Emissions. As described in the Air Quality discussion above, this alternative would involve the same amount of overall development, but would be located further to the south on the project site than the proposed project, which would generate similar emissions, including GHG emissions. **This alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed. However, short-term construction emissions are a relatively small component of the project's total GHG emissions (2.8%); therefore, a small increase in this component of the project's GHG emissions would not result in a substantial overall increase in the project's GHG emissions.** Although this alternative would generate greenhouse gas emissions

and thereby incrementally contribute to climate change, as with the proposed project, these emissions would be reduced to a less than significant impact with incorporation of Mitigation Measure GHG-1 (Class II).

Hydrology and Water Quality. This alternative would be located further to the south on the project site than the proposed project, but would involve a similar scale of overall development, which would result in similar ~~grading requirements and similar~~ new impervious surfaces, as compared to the proposed project. **However, this alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed.** Since construction activity would disturb more than one acre, the development would **still** be subject to the requirements of an NPDES permit, and would have to prepare a SWPPP, as described in Section 4.7, *Hydrology and Water Quality*. As with the proposed project, adherence to existing NPDES regulatory measures would ensure that construction-related impacts to water quality would remain less than significant (Class III). As with the proposed project, the amount of impermeable surfaces created by development of this alternative would not substantially alter existing drainage patterns, increase storm water runoff, result in increased flooding, result in a substantial decrease in percolation to groundwater basins, or exceed existing drainage infrastructure capacity. This alternative would allow the relocation of the proposed retention basin onto the project site and within the Buellton City limit, but would still require the basin to be designed to ensure that post-development discharge would not exceed existing conditions. In addition, this alternative would be required to comply with City SWMP BMPs. Therefore, impacts associated with storm water runoff, such as increased rates of runoff and a reduction in groundwater percolation, would remain less than significant (Class III). As with the proposed project, impacts would be less than significant at the project level, and would not be cumulatively considerable (Class III).

Land Use/Policy Consistency. This alternative would involve a similar scale of overall development, but would be located further to the south on the project site than the proposed project. Implementation of existing City policies including the Municipal Code requirements, Community Design Guidelines, and General Plan policies, would ensure that impacts related to the scale of development on the project site would remain less than significant (Class III). As with the proposed project, this alternative would not conflict with land use policies contained in the City's General Plan and Zoning Ordinance. Thus, all project-specific and cumulative land use impacts under this alternative would be less than significant without mitigation (Class III).

Noise. This alternative would involve a similar scale of overall development, but would be located further to the south on the project site than the proposed project. This would reorient proposed development further from sensitive receptors to the north of the project site, and closer to sensitive receptors to the south of the project site; however, construction would still occur within 2,800 feet of existing sensitive receptors, and would exceed the City's exterior noise standard of 60 dBA. Therefore, temporary construction-related noise would be similar to the proposed project, and would require Mitigation Measures N-1(a) and N-1(b) to ensure that impacts remain less than significant (Class II). Construction activities would be expected to comply with City Municipal Code Section 12.04.410, which requires limitations on construction hours. As with the proposed project, future site residents and occupants with this alternative would be exposed to roadway noise from Jonata Park Road and U.S. Highway 101. However, interior noise levels within residences would be expected to be below 45 dB; therefore impacts would be less than significant

(Class III), similar to the proposed project. This alternative would result in the same number of operational vehicle trips, when compared to the proposed project. Traffic resulting from the proposed project was found not to increase roadway noise along any of the study area roadway segments by more than 1.0 dBA, which is below the threshold usually noticed by people (refer to Section 4.9, *Noise*, for a detailed discussion of sound measurement). Therefore, this alternative would have a less than significant impact with respect to operational traffic (Class III). Likewise, cumulative roadway noise levels would be less than significant, identical to the proposed project, and would be potentially significant (Class III).

Public Services and Utilities. This alternative would involve the same amount of overall development, compared to the proposed project. Therefore, as with the proposed project, this alternative would not result in significant impacts related to the increased need for fire protection services, police protection services, recreational facilities, library services, water supply, wastewater treatment capacity, or landfill space to accommodate solid waste. Because this alternative would result in the same total development as compared to the proposed project, impacts related to public services and utilities would remain less than significant (Class III). Similarly, cumulative impacts would remain less than significant (Class III).

Transportation and Circulation. This alternative would involve the same amount of overall development as the proposed project. Because the overall footprint of development on the project site would be generally similar, the temporary increase in vehicle trips due to project construction would be less than significant (Class III). This alternative would also result in similar site ingress, egress, and emergency access conditions as the proposed project, which would result in less than significant impacts (Class III). This alternative would result in the same number of operational vehicle trips, when compared to the proposed project. Therefore, this alternative would have less than significant impacts with respect to operational traffic (Class III). Likewise, cumulative traffic levels would be similar to the proposed project, and would be less than significant (Class III). As with the proposed project, this alternative would not modify any existing transit facilities or services, and would be served by a variety of public transit options. Therefore, impacts to transit facilities would be less than significant (Class III).

7.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This discussion identifies the environmentally superior alternative by assessing the degree to which each alternative avoids significant and unavoidable environmental impacts. The *CEQA Guidelines* do not define a precise methodology regarding the determination of the Environmentally Superior Alternative. For the purposes of this analysis, each alternative has been compared within each issue area to the proposed project, and a determination has been made as to whether the alternative was superior, inferior, or similar to the proposed project. For the purpose of this EIR, the analysis assumes that each impact is equally weighted. Decision makers and the community in general may choose to emphasize one issue or another, which could lead to differing conclusions regarding environmental superiority. If the No Project Alternative is identified as the Environmentally Superior Alternative for a given issue area, the development scenario among the remaining alternatives that produces the fewest impacts is noted, in accordance with CEQA.

The New No Project/No Development Alternative (Alternative 1) would be environmentally superior overall, since no new development would occur on the project site. This would reduce all identified project impacts, including impacts related to light and glare, agricultural operations, previously undiscovered cultural resources, settlement/slope stability, operational GHG emissions, and short-term noise impacts during construction to a less than significant level.

Among the remaining alternatives, the AHOZ Development Alternative (Alternative 2) and the Typical Commercial Project Alternative (Alternative 3) would result in increased impacts, as compared to the proposed project, and would therefore be environmentally inferior to the proposed project. Specifically, the increased number of habitable units that would be developed under Alternative 2 would result in added vehicle trips, which would contribute to potentially significant impacts related to operational criteria pollutant emissions, local intersection levels of service, and cumulative traffic levels. In addition, the increased number of habitable units would also result in new long-term residents in Buellton, which would contribute to the City's existing need for new recreational facilities. All of the impacts identified under Alternative 2 would be potentially significant but mitigable (Class II). Similarly, the commercial retail development under Alternative 3 would result in a substantial increase in new vehicle trips, which would contribute to potentially significant impacts related to operational criteria pollutant emissions, Clean Air Plan consistency, cumulative air quality, off-site roadway noise levels, cumulative roadway noise levels, local intersection levels of service, and cumulative traffic levels. Impacts to operational criteria pollutant emissions, Clean Air Plan consistency, cumulative air quality, off-site roadway noise, and cumulative roadway noise levels under Alternative 3 would be significant and unavoidable (Class I). However, because Alternative 3 would involve commercial retail development, this alternative would eliminate potential conflicts between adjacent agricultural land uses and sensitive receptors.

The Reconfigured Project Alternative (Alternative 4) would not reduce or increase any of the project impacts identified in this SEIR, but it would allow the proposed retention basin to be relocated within the City limit. **This alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed.** ~~Because~~ **As shown in Table 7-1,** Alternative 4 would result in similar impacts to the proposed project~~, it~~**. Therefore, Alternative 4** would ~~therefore~~ be considered environmentally superior among the remaining alternatives. As discussed in this SEIR, the proposed project would not result in any significant and unavoidable (Class I) impacts; therefore this alternative would not eliminate or any significant and unavoidable impacts. Furthermore, Alternative 4 does not present any new significant impacts that were determined to be less than significant for the proposed project. For these reasons, the Reconfigured Project Alternative (Alternative 4) is identified as the Environmentally Superior Alternative among the remaining alternatives.

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8.1.2 Contacts

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McVay, Brad. Lieutenant. North County Operations Division. City of Buellton Police Chief. Personal Communication. July 06, 2012.

Snell, Craig D. Assistant Resident Engineer. MNS Engineers, Inc. Personal Communication with the City of Buellton Public Works Department. June 14, 2012.

8.2 EIR PREPARERS

The City of Buellton prepared this EIR with the assistance of Rincon Consultants, Inc. Angela Perez served as the project manager for the City. Rincon Consultants' staff involved in the preparation of the EIR are listed below.

Richard Daulton, Principal in Charge
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9.0 RESPONSES to COMMENTS on the DRAFT SEIR

9.1 INTRODUCTION

In accordance with § 15088 of the State of California Environmental Quality Act (CEQA) Guidelines, the City of Buellton, as the lead agency, has reviewed the comments received on the Draft Subsequent Environmental Impact Report (Draft SEIR) for the Meritage Senior Living Project and has prepared written responses to the written comments and verbal testimony received. The Draft SEIR was circulated for a 45-day public review period that began December 20, 2012 and concluded on February 4, 2013.

Each written comment that the City received is included in this Comments and Responses document. Responses to these comments have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the Draft SEIR addresses pertinent environmental issues. The comment letters included herein were submitted by public agencies, local interest groups, and private citizens.

The Draft SEIR and this Responses to Comments report collectively comprise the Final SEIR for the project. Any changes made to the text of the Draft SEIR correcting information, data or intent, other than minor typographical corrections or minor working changes, are noted in the Final SEIR as changes from the Draft SEIR.

The focus of the responses to comments is the disposition of environmental issues that are raised in the comments, as specified by § 15088 (c) of the State CEQA Guidelines. Detailed responses are not provided to comments on the merits of the proposed project. However, when a comment is not directed to an environmental issue, the response indicates that the comment has been noted. All comments received on the Draft SEIR will be provided to City decision-makers for review and consideration.

Where a comment results in a change to the Draft SEIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeouts (~~strikeouts~~) where text is removed and by bold font (**bold font**) where text is added. If text is added where the font is already bold, additions are noted using underlined bold font (**underlined bold font**).

9.2 ERRATA

In addition to changes made to the Draft SEIR as a result of comments received during the 45-day public review period, additional changes were made to correct typographical errors, formatting errors, and minor factual errors that do not alter the nature of the project described or the results of the environmental analysis. These changes include:

The project applicant requested that the Project Applicant Representative, described in the Executive Summary and in Section 2.0, *Project Description*, be modified to accurately reflect the fact that Mark Edwards contracts directly with the project applicant. Therefore, pages ES-1 and 2-1 of the Draft SEIR were modified as follows:

Mark Edwards
~~Parton & Edwards Construction, Inc.~~
922 Laguna Street
Santa Barbara, California 93101

Section 7.0, *Alternatives*, incorrectly identified the numbering of project alternatives in one instance. Therefore, Pages 7-5 and 7-6 of the Draft SEIR have been modified as follows:

> As shown in Table 7-1, the comparison of the environmental impacts of each alternative addresses the issue areas discussed in detail in Sections 4.1 through 4.11 of this SEIR. Environmental effects found not to be significant for the proposed project, discussed in Section 5.0 of this SEIR, are anticipated to remain less than significant for Alternatives ~~6, 7, 8, and 9~~ **1, 2, 3, and 4** due to the generally similar amount of site disturbance and scale of development that would result from these alternatives.

Section 7.0, *Alternatives*, was revised to reflect that Alternative 4 may require increased grading, as compared to the proposed project. Therefore, Pages 7-19, 7-20, and 7-23 of the Draft SEIR have been modified as follows:

Page 7-19:

> Air Quality. This alternative would involve a similar scale of overall development, but would be located further to the south on the project site than the proposed project. Therefore, temporary construction-related emissions would be similar to the proposed project, and would be less than significant (Class III). **This alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed. ~~C~~However, c**onstruction activities would be expected to comply with SBCAPCD standard dust and emissions control measures. Due to the similar overall scale of development, area source and energy-related operation emissions would also be similar for this alternative. Because this alternative would involve the same land uses and amount of development as the proposed project, this alternative would result in the same number of operational vehicle trips as compared to the proposed project. Therefore, operational criteria pollutant emissions would be identical to the proposed project, and would not be expected to result in operational emissions that would exceed SBCAPCD thresholds. Therefore, this alternative would result in less than significant impacts with respect to operational criteria pollutant emissions (Class III).

Page 7-20:

> Greenhouse Gas Emissions. As described in the Air Quality discussion above, this alternative would involve the same amount of overall development, but would be located further to the south on the project site than the proposed project, which would generate similar emissions, including GHG emissions. **This alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed. However, short-term construction emissions are a relatively small component of the project's total GHG emissions (2.8%); therefore, a small increase in this component of the**

project's GHG emissions would not result in a substantial overall increase in the project's GHG emissions. Although this alternative would generate greenhouse gas emissions and thereby incrementally contribute to climate change, as with the proposed project, these emissions would be reduced to a less than significant impact with incorporation of Mitigation Measure GHG-1 (Class II).

Hydrology and Water Quality. This alternative would be located further to the south on the project site than the proposed project, but would involve a similar scale of overall development, which would result in similar ~~grading requirements and similar~~ new impervious surfaces, as compared to the proposed project. **However, this alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed.** Since construction activity would disturb more than one acre, the development would **still** be subject to the requirements of an NPDES permit, and would have to prepare a SWPPP, as described in Section 4.7, *Hydrology and Water Quality*. As with the proposed project, adherence to existing NPDES regulatory measures would ensure that construction-related impacts to water quality would remain less than significant (Class III). As with the proposed project, the amount of impermeable surfaces created by development of this alternative would not substantially alter existing drainage patterns, increase storm water runoff, result in increased flooding, result in a substantial decrease in percolation to groundwater basins, or exceed existing drainage infrastructure capacity. This alternative would allow the relocation of the proposed retention basin onto the project site and within the Buellton City limit, but would still require the basin to be designed to ensure that post-development discharge would not exceed existing conditions. In addition, this alternative would be required to comply with City SWMP BMPs. Therefore, impacts associated with storm water runoff, such as increased rates of runoff and a reduction in groundwater percolation, would remain less than significant (Class III). As with the proposed project, impacts would be less than significant at the project level, and would not be cumulatively considerable (Class III).

Page 7-23:

The Reconfigured Project Alternative (Alternative 4) would not reduce or increase any of the project impacts identified in this SEIR, but it would allow the proposed retention basin to be relocated within the City limit. **This alternative may result in increased grading, due to the varied topography of the southern portion of the project site, as compared to the off-site area where the retention basin is proposed.** ~~Because~~ **As shown in Table 7-1,** Alternative 4 would result in similar impacts to the proposed project~~, it~~**. Therefore, Alternative 4** would ~~therefore~~ be considered environmentally superior among the remaining alternatives. As discussed in this SEIR, the proposed project would not result in any significant and unavoidable (Class I) impacts; therefore this alternative would not eliminate or any significant and unavoidable impacts. Furthermore, Alternative 4 does not present any new significant impacts that were determined to be less than significant for the proposed project. For these reasons, the Reconfigured Project Alternative (Alternative 4) is identified as the Environmentally Superior Alternative among the remaining alternatives.

Note that these modifications do not result in revisions to the conclusions of the conclusions related to the environmentally superior alternative in Section 7.0.

9.3 WRITTEN COMMENTS AND RESPONSES ON THE DRAFT SEIR

Each written comment regarding the Draft SEIR that the City of Buellton received is included in this section (refer to Table 9-1). Responses to these comments have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the Draft SEIR addresses pertinent environmental issues. The comment letters included herein were submitted by public agencies, local interest groups, and private citizens. Each comment letter has been numbered sequentially and each separate issue raised by the commenter, if more than one, has also been assigned a number. Each comment letter is reproduced in its entirety with the issues of concern lettered in the right margin. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 2.1, for example, indicates that the response is for the first issue raised in Comment Letter 2).

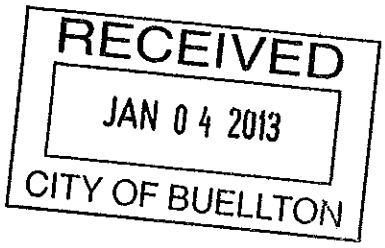
Table 9-1 Written Comments on the Draft SEIR

Commenters on the Draft SEIR			
Letter	**Commenter**	**Agency**	**Date**
Federal, State, and Local Public Agencies			
1	Dave Singleton, Program Analyst	Native American Heritage Commission	December 24, 2012
2	Betty J. Courtney, Environmental Program Manager	Department of Fish and Wildlife, South Coast Region	January 15, 2013
3	Eric Peterson, Division Chief/Fire Marshal	Santa Barbara County Fire Department	January 17, 2013
4	Glenn S. Russell, Director	County of Santa Barbara, Planning and Development	January 23, 2013
5	Cathleen M. Fisher, Agricultural Commissioner	County of Santa Barbara Agricultural Commissioner's Office	January 23, 2013
6	Matt van der Linden, Public Works Director/City Engineer	City of Solvang, Public Works Department	January 28, 2013
7	Chandra L. Waller, County Executive Officer	County of Santa Barbara, Executive Office	January 31, 2013
8	Eric Gage, Air Quality Specialist	Santa Barbara County Air Pollution Control District	February 1, 2013
9	Adam Fukushima, PTP	California Department of Transportation, District 5	February 4, 2013
10	Bob Braitman, Executive Officer	Santa Barbara Local Agency Formation Commission	February 4, 2013
Local Interest Groups and Private Citizens			
11	Ricardo Soto	Global Human Rights Charity	December 25, 2012
12	Freddie Romero	Santa Ynez Band of Chumash Indians Elder's Council	December 27, 2012
13	Judith Dale, Mayor	Private Citizen	January 22, 2013
14	Cathie McHenry	Women's Environmental Watch	February 2, 2013

Letter 1

STATE OF CALIFORNIA — Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net



December 24, 2012

Ms. Angela Perez, Project Planner
City of Buellton Planning Department
107 West Highway 246
Buellton, CA 93427

Re: SCH#2012041088; CEQA Notice of Completion; draft Subsequent Environmental Impact Report (DSEIR) for the **"Meritage Senior Living Project;"** located in the City of Buellton; Santa Barbara County, California

Dear Ms. Perez:

The California Native American Heritage Commission (NAHC) is the State of California 'trustee agency' for the preservation and protection of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendment s effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously. 1.1

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you

make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.' 1.1

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

2.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts
Santa Barbara County
December 24, 2012

Ernestine DeSoto
1311 Salinas Place # 5 Chumash
Santa Barbara CA 93101
805-636-3963

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennslie, Chairwoman
365 North Poli Ave Chumash
Ojai , CA 93023
jtumamait@sbcglobal.net
(805) 646-6214

Beverly Salazar Folkes
1931 Shadybrook Drive Chumash
Thousand Oaks, CA 91362 Tataviam
folkes@msn.com Ferrnandeño
805 492-7255
(805) 558-1154 - cell

Patrick Tumamait
992 El Camino Corto Chumash
Ojai , CA 93023
(805) 640-0481
(805) 216-1253 Cell

Owl Clan
Dr. Kote & Lin A-Lul'Koy Lotah
48825 Sapaque Road Chumash
Bradley , CA 93426
mupaka@gmail.com
(805) 472-9536

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
1030 Ritchie Road Chumash
Grover Beach CA 93433
(805) 481-2461
(805) 474-4729 - Fax

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson
P.O. Box 517 Chumash
Santa Ynez , CA 93460
varmenta@santaynezchumash.
(805) 688-7997
(805) 686-9578 Fax

John Ruiz
1826 Stanwood Drive Chumash
Santa Barbara CA 93103
(805) 965-8983

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012041088; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Meritage Senior Living Project; located in the City of Buellton; Santa Barbara County, California.

Native American Contacts
Santa Barbara County
December 24, 2012

Gilbert M. Unzueta Jr.
571 Citation Way
Thousand Oaks, CA 91320
uhuffle@aol.com
(805) 375-7229
Chumash

Randy Guzman - Folkes
6471 Cornell Circle
Moorpark , CA 93021
ndnRandy@yahoo.com
(805) 905-1675 - cell
Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley , CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL
Chumash

Coastal Band of the Chumash Nation
Toni Cordero, Chairwoman
P.O. Box 4464
Santa Barbara CA 93140
cordero44@charter.net
805-964-3447
Chumash

Stephen William Miller
189 Cartagena
Camarillo , CA 93010
(805) 484-2439
Chumash

Charles S. Parra
P.O. Box 6612
Oxnard , CA 93031
(805) 340-3134 (Cell)
(805) 488-0481 (Home)
Chumash

Santa Ynez Tribal Elders Council
Adelina Alva-Padilla, Chair Woman
P.O. Box 365
Santa Ynez , CA 93460
elders@santaynezchumash.org
(805) 688-8446
(805) 693-1768 FAX
Chumash

Santa Ynez Band of Mission Indians
Tribal Administrator/Counsel Sam Cohen
P.O. Box 517
Santa Ynez , CA 93460
info@santaynezchumash.
(805) 688-7997
(805) 686-9578 Fax
Chumash

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Native American Contacts
Santa Barbara County
December 24, 2012

Carol A. Pulido
165 Mountainview Street Chumash
Oak View , CA 93022
805-649-2743 (Home)

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive Chumash
Rancho Pales Verdes CA 90275
310-831-5295

Melissa M. Parra-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964
(805) 248-8463 cell

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
805-987-5314

Frank Arredondo
PO Box 161 Chumash
Santa Barbara CA 93102
ksen_sku_mu@yahoo.com
805-617-6884
805-893-1459
ksen_sku_mu@yahoo.com

Coastal Band of the Chumash Nation
Janet Darlene Garcia
P.O. Box 4464 Chumash
Santa Barbara CA 93140
805-689-9528

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Conslnt
P.O. Box 365 Chumash
Santa Ynez , CA 93460
805-688-7997, Ext 37
freddyromero1959@yahoo.com

Coastal Band of the Chumash Nation
Crystal Baker
P.O. Box 4464 Chumash
Santa Barbara CA 93140
805-689-9528

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012041088; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Meritage Senior Living Project; located in the City of Buellton; Santa Barbara County, California.

Letter 1

COMMENTER: Dave Singleton, Program Analyst, Native American Heritage Commission

DATE: December 24, 2012

RESPONSE:

The commenter summarizes the role of the Native American Heritage Commission (NAHC) in the CEQA process, portions of the CEQA statute that apply to historical and archaeological resources, and relevant portions of the Public Resources Code and California Government Code. The commenter provides a list of Native American contacts for the Santa Barbara County region, and recommends consultation with these contacts in order to determine whether the proposed project may impact Native American cultural resources and obtain their recommendations concerning the proposed project. A cultural resources records search was completed for the project in July 2012, and included consultation with the NAHC. The NAHC indicated that no sacred lands or other Native American cultural resources were identified within the project area.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

Letter 2

January 15, 2013

Ms. Angela Perez
City of Buellton
P.O. Box 1819
Buellton, CA 93427
Fax No.: (805) 686-1729

Subject: Draft Subsequent Environmental Impact Report for the Meritage Senior Living Project, SCH #2012041088, Santa Barbara County

Dear Ms. Perez,

The California Department of Fish and Wildlife (Department), has reviewed the Draft Subsequent Environmental Impact Report (DSEIR) for impacts to biological resources. The proposed project site is 18.2 acres located on Jonata Park Road, at the north end of the City of Buellton (City), in northern Santa Barbara County (County). The site is bordered by Jonata Park Road and Highway 101 on the east, a Caltrans facility on the south, and agricultural land and open space on the north and west. Portions of the site are currently used for grazing and farming. The southern 5.58 acres of the proposed project site would remain vacant. Based on the site plan contained in the DSEIR, a stormwater retention basin of unknown acreage would be constructed west of the project site on County property. Stormwater conveyances would be constructed around the perimeter of the proposed development.

Habitat on the project site consists of disturbed areas, scattered oaks, coastal scrub, and annual grassland. The DSEIR found there to be no significant effects from the proposed project on biological resources, therefore no analyses of impacts to biological resources were performed.

2.1

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines §15386(a)). As trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species.

California Wildlife Action Plan

The California Wildlife Action Plan, a Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the City to minimize impacts to fish and wildlife resources with a focus on these stressors.

Impacts to Sensitive Biological Resources

The DSEIR states, on page 5-4, "Due to the urban character of the project region and the disturbed nature of the project site, the project is not anticipated to provide habitat capable of supporting sensitive species ", and concludes "...the project would not impact any species

2.2

identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services." The conclusion was based on a California Natural Diversity Database (CNDDB) search conducted for the Zaca Creek and Solvang U.S. Geological Survey (USGS) 7.5-minute quadrangles. No site specific surveys for biological resources were conducted by the City on the proposed project site (Angela Perez, pers. com.). The Department conducted its own CNDDB search and discovered at least one special status species, the California Species of Special Concern American badger (*Taxidea taxus*), with a record of occurrence which included the proposed project site (attached).

The Department submitted a comment letter for the Notice of Preparation on the proposed project, on May 29, 2012. In that letter we recommended thorough surveys for plant and animal species conducted on the proposed project site, and a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. These recommendations were detailed in items 1 and 2 of the May 29, 2012 letter, which is attached to the DSEIR in Appendix A.

In our May 29, 2012 letter we identified several special status species with potential to be affected by the proposed project. Upon reviewing the DSEIR, the Department maintains the potential exists for the proposed project to affect at least 8 sensitive wildlife species. These are, in addition to American badger, the California Species of Special Concern tri-colored blackbird (*Agelaius tricolor*), silvery legless lizard (*Anniella pulchra pulchra*) and coast horned lizard (*Phrynosoma coronatum*); and the California Native Plant Society List 1B black-flowered figwort (*Scrophularia atrata*), Miles' milk-vetch (*Astragalus didymocarpus var. milesianus*), Hoover's bent grass (*Agrostis hooveri*), and mesa horkelia (*Horkelia cuneata ssp. puberula*). The lack of CNDDB records for most of the above species on the proposed project site is not evidence that they do not exist on, or utilize, the site. The CNDDB is a tool used to provide current information on any previously reported sensitive species and habitats, and should not be used in place of focused, site specific surveys. We therefore recommend biological resource surveys be conducted on the proposed project site (including the proposed retention basin on County property, and associated conveyances). The baseline biological resource survey results should be incorporated into the environmental settings of the DSEIR (CEQA Guidelines §15125(a)). A discussion of the impacts or effects of the proposed project on those resources, along with proposed mitigation to off-set significant impacts, should be incorporated into the DSEIR, as outlined in our May 29, 2012 letter. 2.2

The proposed project site is adjacent to the urban setting of the City to the south and east; it is also adjacent to extensive open space to the north and west. In December 2012, the Department's staff conducted a site visit and observed the majority of the proposed project site contains annual grasses and coastal scrub habitats, which could be used for grazing livestock. Inspection of aerial images of the land to the north and west of the proposed project site show habitats similar to the proposed project site. Most native wildlife species can co-exist with livestock when appropriate grazing practices are implemented, therefore the Department does not agree with the City's assertion that the proposed project site is disturbed to an extent that would prevent it from providing habitat for candidate, sensitive, or special status species.

Urban-Wildlife Interface

The proposed project site is located adjacent to open space to the west and north. The adjacent open space contains habitat which supports a variety of wildlife species (e g., deer, mountain 2.3

lion, hawks, etc.). The proposed project configuration will result in adverse edge effects to adjacent habitat. Examples of adverse edge effects include invasion by non-native plants and animals, chemical drift, displacement of wildlife by lighting and noise, nuisance water from summer irrigation, vehicle traffic, domestic pets, and other factors. Adverse edge effects can degrade natural habitats where they abut development and extend for many hundreds of feet beyond the development footprint.

Also, County-required fuel modifications (designed to minimize the risk of wildfire to the development) may result in substantial adverse effects to the remaining native habitats both within the project site and potentially extending onto offsite property. Fuel modifications typically involve mechanical removal or reduction of vegetation, and result in substantial degradation of wildlife habitat values associated with oak savannah, coastal scrub and annual grasslands, even if individual oak trees or specific shrubs are retained. Fuel modifications should be performed using hand tools to minimize ground disturbance. All fuel modification zones should be included as project-related impacts in the DSEIR. 2.3

Finally, introduction of irrigated landscaping, ground disturbance and creation of impervious surfaces associated with road construction may lead to invasion of non-native Argentine ants, which can have a cascading, negative effect on a variety of species associated with habitat types found on and off the proposed project site (Suarez, et al. 1998; CBI, 2000). To prevent the spread of non-native ants, landscaping materials (bare root plants, container stock, sod, etc.) should be inspected and treated for non-native ants prior to removal from the nursery and delivery to the site. In addition, all landscape area should be design to use little or no irrigation.

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Martin Potter, Staff Environmental Scientist at (805) 640-3677.

Sincerely,

Betty J. Courtney

Betty J. Courtney
Environmental Program Manager
South Coast Region

Literature Cited

Conservation Biology Institute, 2000. Review of potential edge effects on the San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*). Prepared for the Ahmanson Land Company. 43 pp.

Suarez, A.V., D.T. Bolger, and T.J. Case. 1998. Effects of fragmentation and invasion on native ant communities in coastal southern California. Ecology 79(6):2,041- 2,056.

cc: Mr. Martin Potter, CDFW, Ojai
Mr. Scott Morgan, State Clearinghouse, Sacramento

California Department of Fish and Game
Natural Diversity Database
Full Report with Sources for Selected Elements

Taxidea taxus

American badger

Element Code: AMAJF04010

Status
Federal: None
State: None

NDDB Element Ranks
Global: G5
State: S4

Other Lists
CDFG Status: SC

Habitat Associations
General: MOST ABUNDANT IN DRIER OPEN STAGES OF MOST SHRUB, FOREST, AND HERBACEOUS HABITATS, WITH FRIABLE SOILS.
Micro: NEEDS SUFFICIENT FOOD, FRIABLE SOILS & OPEN, UNCULTIVATED GROUND. PREYS ON BURROWING RODENTS. DIGS BURROWS.

Occurrence No. 249 Map Index: 57260 EO Index: 57276
Occ Rank: Unknown
Origin: Natural/Native occurrence
Presence: Presumed Extant
Trend: Unknown

Dates Last Seen
Element: 1989-06-26
Site: 1989-06-26

Record Last Updated: 2004-10-06

Quad Summary: Solvang (3412062/169C), Zaca Creek (3412062/169B)
County Summary: Santa Barbara

Lat/Long: 34.62118° / -120.19676°
UTM: Zone-10 N3834608 E757009
Mapping Precision: NON-SPECIFIC
Symbol Type: POINT
Radius: 1 mile

Township: 06N
Range: 32W
Section: 12 Qtr: XX
Meridian: S
Elevation: 400 ft

Location: NORTHWEST OF BUELLTON.
Location Detail: LOCATION GIVEN AS U.S. 101, 1 MILE WEST BUELLTON. LOCATION MAPPED JUST NW OF BUELTON TO INCLUDE POINTS ALONG HWY 101 AND WEST ON HWY 245, 1 MILE FROM BUELLTON.
Ecological:
Threat:
General: ROAD KILL OBSERVED ON 26 JUN 1989.
Owner/Manager: UNKNOWN

Sources

RAW89F0005 RAWLINSON, D. (CDFG). FURBEARER OBSERVATION FORM FOR TAXIDEA TAXUS. 1989-06-26.

Letter 2

COMMENTER: Betty J. Courtney, Environmental Program Manager, Department of Fish and Wildlife, South Coast Region

DATE: January 15, 2013

RESPONSE:

Response 2.1

The commenter summarizes the proposed project the existing habitat on the project site, the Department of Fish and Wildlife's jurisdiction and role in the SEIR review process, and characterizes the California Wildlife Action Plan, which identifies stressors affecting wildlife and habitat in the project area.

Response 2.2

The commenter notes that the Draft SEIR concludes that the project would not impact any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (now Department of Fish and Wildlife) or U.S. Fish and Wildlife Service, based on a CNDDB records search conducted for the Zaca Creek and Solvang U.S. Geological Survey 7.5-minute quadrangles. The commenter notes that the Department of Fish and Wildlife conducted a separate CNDDB records search, which identified a record of occurrence for the American badger (*Taxidea taxus*) on the project site. As described in Section 5.0, *Effects Found Not To Be Significant*, none of the documented occurrences of threatened plant species or habitat types identified in the CNDDB records search conducted pursuant to the Draft SEIR were located on or adjacent to the project site. The record of occurrence for the American badger described by the commenter was a road kill observed on June 26, 1989, with the location mapped as northwest of Buellton, including points along U.S. Highway 101; the latitude and longitude associated with this occurrence is approximately ½ mile southwest of the southwestern corner of the project site. This occurrence was also identified in the CNDDB records search included in the Draft SEIR. Table 5-1 of the Draft SEIR listed the habitat types, plant species, and vertebrate species identified in the CNDDB records search conducted for the Zaca Creek and Solvang quadrangles, which included five habitat types, four plant species, and ten vertebrate species, including American badger. Based on an analysis of the existing and historic uses of the project site, existing habitats on the project site, and the results of the CNDDB records search, the Draft SEIR concluded that the project would not impact any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services.

The commenter notes that the Department of Fish and Wildlife submitted a comment letter in response to the Notice of Preparation for the proposed project, dated May 29, 2012, in which the Department recommended that surveys be conducted for plant and animal species on the project site, and that the Draft SEIR include a thorough discussion of direct, indirect, and cumulative adverse impacts to biological resources. In addition, the commenter notes that the

May 29, 2012 letter identified special status species with the potential to be affected by the proposed project. This letter is included in Appendix A to the Draft SEIR.
The commenter states that the Department of Fish and Wildlife maintains that the potential exists for the project to affect at least eight sensitive wildlife species, and adds that the lack of CNDDB records for potentially affected species on the project site is not evidence that they do not exist on, or utilize the site. The commenter recommends that biological resources surveys be conducted on the project site, including the proposed retention basin on County property, and associated conveyances, and that the results of these surveys be incorporated into the Draft SEIR. As the commenter notes, the Draft SEIR analysis did not include site specific surveys for plant and animals species, but rather an analysis of the existing and historic uses of the project site, existing habitats on the project site, and a CNDDB records search for occurrences of candidate, sensitive, or special status species and habitat types. The commenter states that the project site is adjacent to open space to the north and west, and describes a site visit conducted in December 2012 by Department of Fish and Wildlife staff, during which staff observed that the majority of the project site contains annual grasses and coastal scrub habitats, which can be used for grazing livestock. The commenter notes that native wildlife species can co-exist with livestock when appropriate grazing practices are implemented, and disagrees with the Draft SEIR's conclusion that the project site is disturbed to an extent that would prevent it from providing habitat for candidate, sensitive, or special status species. As described in Section 5.0, *Effects Found Not To Be Significant*, the project site is bounded to the north and west by agricultural land uses, and by U.S. Highway 101 and existing urban development to the east and south. Portions of the project site are currently developed with a residence and outbuildings, and the site has historically been used for agriculture. The northern portion of the project site is currently in agricultural production, and the southern portion of the project site is currently used for grazing. Habitat on the project site consists of disturbed areas, scattered oaks, coastal scrub, and non-native annual grassland. Due to the disturbed nature of the project site, lack of high-quality habitat, urban character of the project region, and the fact that none of the documented occurrences of threatened plant species or habitat types were located on or adjacent to the project site, the project is not anticipated to provide habitat capable of supporting sensitive species. On this basis, the Draft SEIR determined that the proposed project would not impact any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, and that a Biological Resources Assessment is not warranted.

Response 2.3

The commenter states that the project site is located adjacent to open spaces to the west and north, and that the adjacent open spaces contains habitat which supports a variety of wildlife species, including deer, mountain lion, and hawks. The commenter states that the project would result in adverse edge effects to adjacent habitat, such as invasion by non-native plants and animals, chemical drift, displacement of wildlife, nuisance water from irrigation, vehicle traffic, domestic pets, and other factors. As with the project site, adjacent open space lands are generally disturbed, and are used for crop growing as well as grazing. Habitat on the project site, as well as adjacent open space land consists of disturbed areas, scattered oaks, coastal scrub, and non-native annual grassland. Due to the disturbed nature of the site and adjacent land, lack of high-quality habitat, urban character of the project region, and presence of non-native annual grassland, the project is not anticipated to substantially increase invasion by non-

native plants and animals or displacement of wildlife. The proposed senior care facility would replace active agricultural uses on the project site, and therefore would replace existing potential sources of chemical drift and nuisance water from irrigation; overall, chemical drift onto adjacent parcels and irrigation would not be expected to substantially increase as a result of the project. Because the proposed project is a senior care facility, the project is not anticipated to result in adverse effects from domestic pets. Potential hazards resulting from increased vehicle traffic are discussed in Section 4.11, *Transportation and Circulation*.

The commenter also states that County-required fuel modifications may result in adverse effects to the remaining native habitats within the project site and on adjacent properties. The commenter suggests that fuel modifications be conducted using hand tools to minimize ground disturbance, and fuel modification zones should be included as project-related impacts in the Draft SEIR. The proposed project would be subject to Santa Barbara County Fire Department requirements, including fuel modification adjacent to habitable structures. As shown in Figure 2-3 of the Draft SEIR, proposed structures would be surrounded by on-site driveways, parking, and landscaped area, and as such, may not require additional fuel modification. If fuel modification is required, it would take place on adjacent open space land that is comprised of disturbed areas, scattered oaks, coastal scrub, and non-native annual grassland, and is currently used for agriculture and grazing. Therefore, such fuel modification conducted pursuant to County Fire Department requirements would not be anticipated to be substantially impacted. The commenter's request is noted.

Finally, the commenter states that introduction of irrigated landscaping, ground disturbance, and impervious surfaces may lead to invasion of non-native Argentine ants. The commenter suggests that landscaping materials should be inspected and treated for non-native ants prior to delivery to the site, and landscaped areas should be designed to minimize irrigation. Argentine ants are known to occur in the Buellton area and are likely associated with existing development adjacent to the project site to the south and west, as well as the existing agricultural activity on the project site and to the north and west. As such, Argentine ants are expected to already be present on the project site. The commenter's request is noted.

Letter 3

Fire Department

"Serving the community since 1926"

HEADQUARTERS

4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

Michael W.Dyer
Fire Chief
County Fire Warden

Christian J. Hahn
Deputy Fire Chief

January 17, 2013

Mr. Marc P. Bierdzinski
Planning Director
City of Buellton
107 W. Highway 246
Buellton, CA 93427

Dear Mr. Bierdzinski:

SUBJECT: Subsequent Environmental Impact Report for Meritage Senior Living Project

The above project is located within the jurisdiction of the Santa Barbara County Fire Department. To comply with the established standards, we submit the following with the understanding that the Fire Protection Certificate application may involve modifications, which may determine additional conditions.

GENERAL NOTICE

1. Stop work immediately and contact the County Fire Department, Hazardous Materials Unit if visual contamination or chemical odors are detected while implementing the approved work at this site. Resumption of work requires approval of the HMU, 805-686-8170.

3.1

Please notify the Fire Prevention Division of any changes to the project proposal. Further intensification of use or change in the project description may require additional review.

As always, if you have any questions or require further information, please call 805-681-5523 or 805-681-5500.

In the interest of life and fire safety,

Eric Peterson
Division Chief/Fire Marshal

EP: mkb

Serving the cities of Buellton, Goleta and Solvang, and the Communities of Casmalia, Cuyama, Gaviota, Hope Ranch, Los Alamos, Los Olivos, Mission Canyon, Mission Hills, Orcutt, Santa Maria, Sisquoc , Vandenberg Village

Letter 3

COMMENTER: Eric Peterson, Division Chief/Fire Marshal, Santa Barbara County Fire Department

DATE: January 17, 2013

RESPONSE:

The commenter notes that the project is within the jurisdiction of the Santa Barbara County Fire Department (SBCFD), and recommends that the Fire Protection Certificate includes a provision requiring that construction of the proposed project be stopped immediately if visual contamination or chemical odors are detected during approved work at the site. The proposed project's potential impacts with respect to hazards and hazardous materials are discussed in Section 5.0, *Effects Found Not To Be Significant*. As discussed therein, the project site is not listed as having an existing business that could potentially contain contaminants associated with hazardous materials releases. A hazardous materials records search from Environmental Data Resources (August 2012) indicates that the project site is not listed in any of the included databases of environmental records (Appendix J). The project proposes the demolition of the existing on-site residence and outbuildings, which may contain asbestos or lead-based paint. However, adherence to mitigation measures S-3(a) and S-3(b), described in the 2005 LUE and CE Update EIR, which require a General Plan Policy establishing procedures for processing projects which may involve the use or handling of hazardous materials and procedures for the encounter of hazardous waste or other materials during construction, would ensure that no people would be exposed to asbestos or lead-based paint. The proposed project would be required to comply with all federal and State laws, as well as local regulations that apply to discovery of potential contamination and handling of hazardous materials. In addition, as discussed under Impact PSU-1, the proposed project would be required to comply with SBCFD's established standards for the issuance of Fire Protection Certificates. As the commenter states, the Fire Protection Certificate application may involve modifications, which may determine additional conditions on the proposed project. The commenter requests that the Fire Prevention Division be notified of any changes to the project proposal. Coordination with SBCFD is required as part of project permitting; therefore, this comment does not require changes to the Draft SEIR.

Letter 4

County of Santa Barbara
Planning and Development

Glenn S. Russell, Ph.D., Director
Dianne Black, Assistant Director

January 23, 2013

Mr. Marc Bierdzinski, AICP, Planning Director
City of Buellton
Planning Department
P.O. Box 1819
Buellton, CA 93427

RE: Comments on the Draft Subsequent Environmental Impact Report for the Meritage Senior Living Project

Dear Mr. Bierdzinski:

Thank you for the opportunity to comment on the Draft Subsequent Environmental Impact Report (DSEIR) for the Meritage Senior Living Project. Although we appreciate the goals of the project to provide much needed senior housing and care for the residents of the Santa Ynez Valley, we have some substantial concerns about the location, design, and potential environmental impact of the proposed project as stated below:

Project Description

1. The project proposes a storm water retention basin (including cut & fill materials) and perimeter road with parking spaces within the unincorporated county. These project components are urban uses associated with the proposed senior living project which are not permitted on rural agriculturally designated land. As currently proposed, the project is inconsistent with the Santa Barbara County Comprehensive Plan and Land Use and Development Code. We strongly suggest the project be redesigned and/or relocated so all necessary project components are located within the Buellton city limits and concurrent Sphere of Influence. 4.1

2. Figure 2-2 (Project Site Location) and Figure 2-3 (Proposed Site Plan) are vague and should be revised to clearly indicate the project boundary extends beyond the Buellton city limit line.

Section 4.1 Aesthetics/Visual Resources

1. The proposed project site is a visually prominent portion of the Highway 101 viewshed with a rural background. The project design should seek to maximize compatibility with the rural agricultural visual setting utilizing alternative structural layouts and heights, architectural treatments, and accompanying landscaping. In addition, impacts due to night 4.2

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624 W. Foster Road, Santa Maria, CA 93455 · Phone: (805) 934-6250 · FAX: (805) 934-6258
www.sbcountyplanning.org

lighting should be minimized by limiting the number, wattage, and height of installed luminaires. Also, installed luminaires should be fully shielded (full cutoff) to avoid glare impacts. 4.2

Section 4.2 Agricultural Resources

1. The Land Evaluation and Site Assessment (LESA) model was used to quantify potential impacts to agricultural resources. It is unclear from the information provided if the LESA model analysis included the total acreage of agricultural land within the county that would be converted to accommodate the proposed retention basin (and associated cut and fill) and the perimeter road with parking spaces. The impact analysis for Impact AG-1 omits any reference to the permanent conversion and loss of prime and non-prime agricultural soils within the county as a result of the proposed project. The DSEIR should be revised to include a full assessment of potential impacts to agricultural resources within the unincorporated county.

2. Figure 4-2.1 should be revised to clearly indicate the project boundary extends beyond the Buellton city limit line.

3. Agricultural Buffer: The project description (page 2-8) states: "*...the applicant will provide an agricultural buffer of no less than 200 feet between the senior facilities and active agricultural operations on the adjacent parcel*". 4.3

   Effective agricultural buffers require siting the non-agricultural development away from adjacent agricultural land. In reviewing the proposed site plan (Figure 2-3), the northern extent of the senior facility buildings appear to be within 75 feet of the agricultural property line. The northern agricultural land consists of prime soils which historically have been used for cultivated agriculture and have been farmed up to the common property line. As currently proposed, the 200 foot agricultural buffer would predominantly be on the agricultural land. If implemented, the agricultural buffer would place a burden upon the agricultural operator to alter their farming choices and practices in order to adhere to the agricultural buffer requirements. This would result in a long-term impact to agriculture that was not analyzed in the DSEIR. The County believes that the project should be re-designed so that the agricultural buffer would be located entirely on the project site.

Section 4.8 Land Use/Policy Consistency

1. As stated above, components of the project are proposed within the unincorporated county and are inconsistent with the County of Santa Barbara Comprehensive Plan and Land Use and Development Code. Section 4.8 Land Use/Policy Consistency should be revised to include this analysis. 4.4

If you have any questions or comments regarding this letter, or would like to discuss these issues further, please call David Lackie (805) 568-2023.

Sincerely,

Glenn S. Russell, Ph.D., Director

cc: Chron File

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Letter 4

COMMENTER: Glenn S. Russell, Director, County of Santa Barbara, Planning and Development

DATE: January 23, 2013

RESPONSE:

Response 4.1

The commenter describes the location of the proposed retention basin within the unincorporated portion of Santa Barbara County, and states that these project components are not permitted on agriculturally designated land, and are therefore inconsistent with the Santa Barbara County Comprehensive Plan and Land Use and Development Code. The commenter requests that the project be redesigned and/or relocated so that all necessary project components are located within the Buellton City limit and concurrent Sphere of Influence. As discussed in Section 2.0, *Project Description*, of the Draft SEIR, and shown in Table 2-1, the portion of the proposed project that would be used for the proposed off-site retention basin, located within the County of Santa Barbara, is zoned Agriculture under the Santa Barbara County Zoning Ordinance. As stated on page 2-9 of the Draft SEIR, "the County of Santa Barbara will be responsible for permitting related to the proposed off-site retention basin, which is located outside of the Buellton City limit." In addition, Section 7.0, *Alternatives*, of the Draft SEIR discusses the potential impacts of Alternative 4, Reconfigured Project, which would relocate the proposed retention basin onto the project site and within the City of Buellton. It should be noted that Alternative 4, Reconfigured Project, is identified as the environmentally superior alternative, excluding the New No Project/No Development Alternative (Alternative 1). Potential inconsistencies with the Santa Barbara County Comprehensive Plan and Land Use and Development Code are discussed under Response 4.4, below.

The Reconfigured Project Alternative (Alternative 4) would not reduce or increase any of the project impacts identified for the proposed project, but it would allow the proposed retention basin to be relocated within the City limit. As discussed in this SEIR, the proposed project would not result in any significant and unavoidable (Class I) impacts; therefore this alternative would not eliminate or any significant and unavoidable impacts. Furthermore, Alternative 4 does not present any new significant impacts that were determined to be less than significant for the proposed project. For these reasons, the Reconfigured Project Alternative (Alternative 4) is identified as the Environmentally Superior Alternative among the remaining alternatives.

The commenter further states that Figure 2-2 and Figure 2-3 should be revised to clearly indicate the project boundary extends beyond the Buellton City limit. Figure 2-3 already depicts the layout of the proposed project, including the proposed off-site retention basin; however, Figure 2-2 has been revised to include the approximate footprint of the proposed retention basin.

Response 4.2

The commenter suggests that the project design should maximize compatibility with the rural agricultural visual setting. Changes to the visual character of the project site are discussed in Section 4.1, *Aesthetics/Visual Resources*, of the Draft SEIR. As discussed under Impact AES-3, the proposed building heights are consistent with the height requirements of the General Commercial (CR) zoning designation, and with development to the south of the project site, which is composed of a mix of two-story and one-story structures. Building heights of proposed project structures would taper off to single-story development to the north, where the project would abut existing agricultural land. Buellton does not have a Board of Architectural Review; however, the architectural design of the project would be subject to review by the Planning Commission and City Council, along with the review of the permits required for the project, in order to ensure that the project design complies with the City's Community Design Guidelines.

The commenter further suggests that night lighting be minimized by limiting the number, wattage, and height of on-site lighting, and fully shielding on-site lights. Potential impacts related to on-site night lighting are discussed in Section 4.1, *Aesthetics/Visual Resources*, of the Draft SEIR. As discussed under Impact AES-2, the City of Buellton Community Design Guidelines require lighting to be shielded to confine light to the subject site. Additionally, all exterior lighting would be shielded in accordance with the City's Night Lighting Standards. Compliance with these City policies would minimize impacts related to new sources of lighting on the project site to a less than significant level.

Response 4.3

The commenter states that it is unclear from the information in Section 4.2, *Agricultural Resources*, whether the portion of the adjacent agricultural parcel proposed for the off-site retention basin was included in the LESA model calculations for the project. The discussion of the LESA model has been revised to include the applicable portion of the adjacent agricultural parcel, and to exclude the southern portion of the project site on which development is not proposed, as follows:

> The Land Evaluation and Site Assessment (LESA) model was utilized to quantify potential impacts to these agricultural resources within the vicinity of the project site**, including the portion of the adjacent parcel proposed for an off-site retention basin**. The LESA model provides a quantitative metric for determining the significance of potential agricultural lands conversion impacts based on a score of 0 to 100. According to the LESA model, the Land Evaluation of the project site scored a total of ~~24.85~~ **24.55**, while the Site Assessment portion scored a total of ~~16.75~~ **15.25**, for a total combined score of ~~41.60~~ **39.80** (Table 4.2-4). The worksheets used for the LESA analysis can be found in Appendix B of this EIR.

Table 4.2-4 Summary of LESA Model Score Sheet

Factor Name	Factor Rating (0-100 Points)	X	Factor Weighting (Total = 1.0)	=	Weighted Factor Rating
Land Evaluation					
1. Land Capability Classification	~~71.81~~ **70.98**	X	0.25	=	~~17.95~~ **17.75**
2. Storie Index Rating	~~27.59~~ **27.21**	X	0.25	=	~~6.90~~ **6.80**
Site Assessment					
1. Project Size	~~10~~ **0**	X	0.15	=	~~1.50~~ **0.00**
2. Water Resource Availability	65	X	0.15	=	9.75
3. Surrounding Agricultural Lands	30	X	0.15	=	4.50
4. Protected Resource Lands	20	X	0.05	=	1.00
				Total:	***~~41.60~~ 39.80***

A project that scores ~~between 40 to 59~~ **less than 40** points is **not** considered significant ~~only if both the Land Evaluation and Site Assessment scores are each greater than 20. As shown in Table 4.2-4, the Site Assessment score is less than 20~~.

The commenter further states that Impact AG-1 does not discuss the permanent conversion and loss of prime and non-prime agricultural soils within the County as a result of the proposed project. The LESA model, discussed above, accounts for the fact that the project site is approximately 65% Ballard gravely fine loam, 2 to 9 percent slopes, which is identified as a Class II, prime agricultural soil. As discussed in Section 4.2, *Agricultural Resources*, the LESA model provides a quantitative metric for determining the significance of potential agricultural lands conversion impacts based on soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. According to the LESA model, the project site has a total combined score of 39.80 (refer to Table 4.2-4 in Section 4.2, *Agricultural Resources*). A project that scores less than 40 points is not considered significant.

In addition, the commenter requests that Figure 4.2-1 be revised to clearly indicate that the project boundary extends beyond the Buellton City limit. Figure 4.2-1 has been revised to show the location of the proposed off-site retention basin.

Finally, the commenter states that the proposed agricultural buffer would place a burden upon the adjacent agricultural operator to alter their farming practices in order to adhere to the buffer requirements. The commenter further asserts that this alteration would result in a long-term impact not analyzed in the Draft SEIR. The commenter recommends that the agricultural buffer be located entirely on the project site. As discussed in Section 2.0, *Project Description*, the project applicant and site owner is also the owner of the adjacent parcel of the land to the west and north; therefore, the applicant would provide the proposed agricultural buffer as part of the project. The buffer would be maintained as a long-term project component through a condition of approval which would require an easement for the buffer area. The current owner and operator of the adjacent agricultural parcel would still be able to utilize the area within the proposed buffer for agriculture; however, the buffer would restrict certain agricultural practices which may conflict with residential uses, including herbicide and pesticide spraying, uses that would result in objectionable odors, and heavy vehicle movement that may generate substantial dust.

Response 4.4

The commenter states that the components of the proposed project that are located within the unincorporated portion of Santa Barbara County are inconsistent with the Santa Barbara County Comprehensive Plan and Land Use and Development Code, and requests that Section 4.8, *Land Use/Policy Consistency*, of the Draft SEIR, be revised to reflect this determination. As the commenter indicates, the retention basin is proposed on County land, and would require County consideration and approval. Section 7.0, *Alternatives*, of the Draft SEIR evaluates a reconfigured project alternative, which would be similar in scale to the proposed project, but would reconfigure the proposed development to utilize the southern parcels on the project site and relocate the proposed retention basin onto the project site and within the City of Buellton. It should be noted that Alternative 4, Reconfigured Project, is identified as the environmentally superior alternative, excluding the New No Project/No Development Alternative (Alternative 1).

Letter 5

Agricultural Commissioner's Office
Weights & Measures ■ County of Santa Barbara

Cathleen M. Fisher
Commissioner / Director

January 23, 2013

Marc P. Bierdzinski
Planning Director
City of Buellton
107 W. Highway 246
Buellton, CA 93427

Dear Mr. Bierdzinski:

As the Agricultural Commissioner of Santa Barbara County, I would like to submit the following comments regarding the Meritage Senior Living Project. After reviewing the draft Subsequent Environmental Impact Report dated December, 2012, I have the following concerns that I do not find adequately addressed in the report:

- There is no detailed analysis of the project's impacts on the surrounding agriculture
- The project includes the conversion of an existing agriculture operation on prime farmland to non-ag use
- The methodology in determining a buffer zone of 200 feet is not discussed and there is no stated basis for the statement that the buffer will "maintain a safe distance to prevent residents of the senior care facilities from being affected by adverse agricultural uses"
- There is no mention of soil and dust complaints associated with the Williams ag operation and a wind event on June 11, 2011, and there no mention of a need or means to mitigate such an event
- The location of the 200 foot buffer zone is not clear as to which property it is on
- There is no mention of the types of activities that can or cannot occur in the buffer zone
- The Agricultural Commissioner's ability to create or impose restrictions on pesticide use is limited to specific situations. There is no determination that the existing ag operation falls into this category
- California law prohibits local jurisdictions from implementing the type of Notice of Intent requirement proposed as mitigation
- The storm water retention basin appears to be proposed for construction on land that is under Williamson Act contract with no discussion of consequences
- Comments and mitigations associated with the Agricultural Commissioner's Office were made without consultation with this department and without a clear understanding this department's role and authority

5.1

263 Camino del Remedio • Santa Barbara, California 93110
Phone (805) 681-5600 • Fax (805) 681-5603
www.countyofsb.org/agcomm/

I suggest that representatives from our two agencies meet to discuss the authority and jurisdiction of the Agricultural Commissioner's Office to clarify our role in this matter. Please feel free to contact me at 805-681-5600 if you have any questions.

Sincerely,

C Fisher

Cathleen M. Fisher
Agricultural Commissioner

263 Camino del Remedio • Santa Barbara, California 93110
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www.countyofsb.org/agcomm/

Letter 5

COMMENTER: Cathleen M. Fisher, Agricultural Commissioner, County of Santa Barbara Agricultural Commissioner's Office

DATE: January 23, 2013

RESPONSE:

The commenter raises several concerns related to the proposed project's potential impacts on agricultural resources on the project site as well as on adjacent agricultural land. These concerns include conversion of existing agriculture on prime farmland to non-agricultural use, the proposed 200--foot agricultural buffer, soil and dust issues associated with wind events, restrictions on pesticide use, the required Notice of Intent to apply agricultural chemicals from the approved LUE and CE Update EIR, the potential location of the proposed off-site retention basin on land that is under a Williamson Act contract, and consultation with the County of Santa Barbara Agricultural Commissioner's Office.

Specifically, the commenter states that the Draft SEIR does not include detailed analysis of the project's impacts on surrounding agriculture, and includes the conversion of an existing agricultural operation on prime farmland to non-prime use. The project's potential impacts to agricultural resources are described in Section 4.2, *Agricultural Resources*, of the Draft SEIR. Impact AG-1 includes a discussion of existing agricultural operations on the project site and on adjacent parcels. In addition, the Land Evaluation and Site Assessment (LESA) model was used to quantify potential impacts to these agricultural resources within the vicinity of the project site. Refer to Response 4.3 for a discussion of revisions that have been made to this language in response to comments from the County of Santa Barbara Planning and Development Department.

The commenter also requests clarification for the methodology used to develop the proposed 200-foot agricultural buffer, the specific location of the proposed buffer, and the types of activities that could or could not occur in the buffer zone. As discussed in Section 4.2.2, the LUE and CE Update EIR included Mitigation Measure LU-1b, which required a minimum 200-foot buffer between proposed structures and active agricultural uses, in order to mitigate potential impacts identified in that EIR related to compatibility between future development and existing agricultural uses. The proposed buffer was included in the proposed project in order to ensure consistency with this existing mitigation measure. The proposed agricultural buffer would be located on the adjacent agricultural parcel in the County of Santa Barbara. As discussed in Reponses 4.3, the project applicant and site owner is also the owner of the adjacent parcel of the land to the west and north; therefore, the applicant would provide the proposed agricultural buffer as part of the proposed project. The buffer would be maintained as a long-term project component through a condition of approval which would require an easement for the buffer area. As discussed in Reponses 4.3, the current owner and operator of the adjacent agricultural parcel would still be able to utilize the area within the proposed buffer for agriculture; however, the buffer would restrict certain agricultural practices which may conflict with residential uses, including herbicide and pesticide spraying, uses that would result in objectionable odors, and heavy vehicle movement that may generate substantial dust. It should be noted that the adjacent agricultural parcel is currently used for organic farming; therefore it does not involve

several of the practices that would be restricted with implementation of the proposed agricultural buffer.

The commenter states that the Draft SEIR does not address soil and dust complaints associated with the William's agricultural operation and a wind event on June 11, 2011, or the need to mitigate such events. It is assumed that the commenter is referring to dust complaints associated with the existing on-site and adjacent agricultural activities. Impacts associated with dust from agricultural operations are discussed generally under Impact AG-2 in Section 4.2, *Agricultural Operations*, of the Draft SEIR. The proposed agricultural buffer, as well as Mitigation Measures AG-2(a) and AG-2(b), would maintain a safe distance to prevent residents of the senior care facility from being significantly affected by adverse agricultural uses such as dust.

The commenter notes that the Agricultural Commissioner's ability to create or impose restriction on pesticide use is limited to specific situations, and there is no determination that the existing agricultural operation falls into this category. It should be noted that the Draft SEIR does not impose specific restrictions on pesticide use; Mitigation Measures AG-2(a) and AG-2(b) provide specific standards and monitoring for the proposed 200-foot agricultural buffer. As discussed in Section 2.0, *Project Description*, the project applicant and site owner is also the owner of the adjacent parcel of the land to the west and north; therefore, the applicant would provide the proposed agricultural buffer as part of the project. As discussed under Response 4.3, the proposed buffer would be maintained as a long-term project component through a condition of approval which would require an easement for the buffer area.

The commenter states that California law prohibits local jurisdictions from implementing the type of Notice of Intent requirements proposed as mitigation in the Draft SEIR. The Draft SEIR describes Mitigation Measure LU-1(a) from the LUE and CE Update EIR, which requires the City of Buellton to work with the Santa Barbara Agricultural Commissioner to implement a Notice of Intent to apply agricultural chemicals; however, the Draft SEIR does not include a Notice of Intent requirements.

The commenter also notes that the storm water retention basin appears to be proposed for construction on land that is under Williamson Act contract. Figure 4.2-2 of the Draft SEIR depicts Williamson Act lands adjacent to the project site, based on 2010 data from the Farmland Mapping and Monitoring Program. However, the Williamson Act contract on the adjacent County parcel has since expired. In order to clarify the status of the adjacent parcel, Figure 4.2-2 has been removed from the Draft SEIR, and Page 4.2-2 of the Draft SEIR has been modified as follows:

> Property to the north and west of the site is zoned for agriculture by Santa Barbara County (Santa Barbara Planning and Development, 2011), and are designated Prime Farmland and Unique Farmland by the FMMP. ~~These areas are also designated as Williamson Act Prime Agricultural Land Non-Renewal properties.~~ As discussed in Section 2.0, *Project Description*, the project applicant and site owner is also the owner of the adjacent parcel of the land to the west and north, which is under the jurisdiction of Santa Barbara County. As part of the proposed project, the applicant would provide an agricultural buffer of no less than 200 feet between the senior center facilities and active agricultural operations on the adjacent parcel. The project site is not subject to a

Williamson Act agricultural preserve contract ~~(refer to Figure 4.2-2)~~. There are no wells or drainages located on the project site.

Finally, the commenter states that comments and mitigation measures associated with agricultural resources were included in the Draft SEIR without consultation with the County of Santa Barbara Agricultural Commissioner's Office, and without a clear understanding of the Office's role and authority. The commenter suggests that representatives from the Agricultural Commissioner's Office and the City of Buellton meet to discuss the authority and jurisdiction of the Agricultural Commissioner's Office. The Agricultural Commissioner's Office is not a Responsible Agency for the proposed project. However, the commenter's request is noted and will be forwarded to City decision-makers for consideration.

From: Matthew van der Linden [mailto:mattv@cityofsolvang.com]
Sent: Monday, January 28, 2013 9:28 AM
To: Marc Bierdzinski
Cc: Jose Perez
Subject: SYVT comments on Meritage Senior Living Project - Draft Subsequent EIR

Marc:

As you may be aware, the City of Solvang administers the Santa Ynez Vally Transit (SYVT). We have the following comment regarding the Draft Subsequent EIR for the Meritage Senior Living Project:

The project layout and design should incorporate a bus stop with turn-around route along Jonata Park Road for possible future service by the Santa Ynez Valley Transit (Fixed Route and/or Dial-A-Ride service). The bus stop should be designed with a shelter and bench. The turn-around route should be designed to allow for a bus to safely turn around without having to make a U-turn. Please note that this request does not imply a commitment on the part of the Santa Ynez Valley Transit to provide Fixed Route bus service to the proposed project. 6.1

Please incorporate our comment into the record. Thank you.

Matt van der Linden, P.E.
Public Works Director/City Engineer
City of Solvang
411 Second Street
Solvang, CA 93463
(805) 688-5575

Letter 6

COMMENTER: Matt van der Linden, Public Works Director/City Engineer, City of Solvang, Public Works Department

DATE: January 28, 2013

RESPONSE:

The commenter requests that the project design incorporate a bus stop along Jonata Park Road for possible future service by Santa Ynez Valley Transit (SYVT). Impacts related to transit services are discussed in Section 4.11, *Transportation and Circulation*, of the Draft SEIR. Impact T-5 discusses impacts related to the provision of transit facilities for the proposed project. As identified under Impact T-5, this impact would be less than significant, because the project would be served by a variety of public transit options, including Santa Ynez Valley Transit (SYVT) Dial-A-Ride service, the Lompoc Wine County Express, and the Santa Maria Clean Air Express. The commenter does not indicate that the requested bus stop is intended to address an environmental impact; therefore, no changes to the Draft SEIR are required. However, the commenter's request is noted and will be forwarded to City decision-makers for consideration.

Letter 7

County Of Santa Barbara

Chandra L. Wallar
County Executive Officer

105 East Anapamu Street, Room 406
Santa Barbara, California 93101
805-568-3400 • Fax 805-568-3414
www.countyofsb.org

Executive Office

January 31, 2013

Mr. Marc Bierdzinski
AICP, Planning Director
City of Buellton, Planning Department
P.O. Box 1819
Buellton, CA 93427

Email: marcb@cityofbuellton.com

Re: Draft Subsequent Environmental Impact Report for the Meritage Senior Living Project

Dear Mr. Bierdzinski:

Thank you for the opportunity to comment on the Draft Subsequent Environmental Impact Report for the Meritage Senior Living Project. At this time, the County submits comments from the Planning and Development Department, the Fire Department, and the Agricultural Commissioner's Office for your consideration.

The County looks forward to continued dialogue on the Meritage Senior Living Project. If you should have further questions, please do not hesitate to contact my office directly or Glenn Russell, Director, Planning and Development Department, at (805) 568-2085.

7.1

Sincerely,

Chandra L. Wallar
County Executive Officer

cc: Glenn Russell, Director, Planning and Development Department
Jeff Hunt, Deputy Director, Long Range Planning Division
Eric Peterson, Division Chief/Fire Marshal, Fire Department
Cathleen Fisher, Agricultural Commissioner

Enclosures: Planning and Development Department comment letter
Fire Department comment letter
Agricultural Commissioner's comment letter

Renée E. Bahl
Assistant County Executive Officer
rbahl@co.santa-barbara.ca.us

Terri Maus-Nisich
Assistant County Executive Officer
tmaus@countyofsb.org

Dennis Bozanich
Assistant to the County Executive Officer
dbozanich@co.santa-barbara.ca.us

Letter 7

COMMENTER: Chandra L. Waller, County Executive Officer, County of Santa Barbara, Executive Office

DATE: January 31, 2013

RESPONSE:

The commenter submits comments from the Santa Barbara County Planning and Development Department, the County Fire Department, and the County Agricultural Commissioner's Office. These comments are attached as Letter 4, Letter 3, and Letter 5, respectively, and the comments in these letters are addressed separately, above. The commenter does not provide further comments on the Draft SEIR.

Letter 8

Santa Barbara County
Air Pollution Control District

RECEIVED
FEB 04 2013
CITY OF BUELLTON

February 1, 2013

Marc Bierdzinski
City of Buellton Planning Department
PO Box 1819
Buellton, CA 93427

Re: APCD Comments on Draft SEIR for Meritage Senior Living Project

Dear Mr. Bierdzinski:

The Air Pollution Control District (APCD) has reviewed the draft Subsequent Environmental Impact Report (SEIR). The project site consists of two parcels, identified as APNs 099-400-064 and 099-400-065, and totaling approximately 18 acres in the City of Buellton. Existing structures on the site, including a small single-family residence and accessory structures, would be demolished. The applicant proposes to divide the two parcels into six parcels and construct a senior residential project with assisted living, skilled nursing facilities, and recreational components housed in several buildings. The proposed structures include a two-story skilled nursing building of approximately 22,600 square feet, a two-story memory care building of approximately 32,400 square feet, a three-story assisted living building of approximately 118,300 square feet, 92 independent living units with various sizes and configurations, a community building of 3,100 square feet and enclosed garages of 5,500 square feet. 8.1

Air Pollution Control District staff offers the following comments on the draft SEIR:

1. **Air Quality Section, Setting, Pg. 4.3-3:** The second paragraph makes references to the attainment status of the South Central Coast Air Basin (SCCAB). This section should be revised to refer specifically to the attainment status of Santa Barbara County, as the APCD does not have jurisdiction in the other counties within the SCCAB.

2. **Air Quality Section, Regulatory Setting, Pg. 4.6-8:** The first paragraph identifies the Santa Barbara County Air Pollution Control District as a jurisdiction having an interim approach for GHG significance. The District does not have an approach beyond the CEQA requirement to make significance findings for GHG impacts, which all lead agencies are subject to. Please remove this reference. 8.2

3. **Greenhouse Gas Emissions Section, Impact Analysis, Pg. 4.6-14:** Table 4.6-6 identifies mitigation measures to be applied to the project including irrigation control and low-maintenance landscaping applied to 12.6 acres, which is the total developed acreage for the project. The landscaped area should exclude structures, paved areas, and undeveloped open space. 8.3

   The GHG mitigation measures identified in Table 4.6-6 should be included as conditions of approval for the land use and building permits to ensure their enforceability. If another implementation mechanism will be utilized to require these mitigations, that mechanism should be described further.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8893 or via email at edg@sbcapcd.org.

Sincerely,

Eric Gage,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: Project File
TEA Chron File

Letter 8

COMMENTER: Eric Gage, Air Quality Specialist, Santa Barbara County Air Pollution Control District

DATE: February 1, 2013

RESPONSE:

Response 8.1

The commenter describes the proposed project and the project setting, and requests that references to the attainment status of the South Central Coast Air Basin (SCCAB) be revised to refer specifically to the attainment status of Santa Barbara County. Paragraph 2 on page 4.3-2 of the Draft SEIR has been revised, as follows:

> ~~The SCCAB~~ **Santa Barbara County** is designated in attainment for the State one-hour ozone standard, and the federal PM_{10} standard. ~~The SCCAB~~ **Santa Barbara County** is designated unclassifiable/attainment for the federal eight hour ozone standard. ~~The SCCAB~~ **Santa Barbara County** is designated nonattainment for the state eight-hour ozone standard and the state standards for PM_{10}. The major sources for large particulate matter are quarries, grading, demolition, agricultural tilling, road dust, and vehicle exhaust. PM_{10} levels in the area are primarily due to agricultural operations, grading and motor vehicle emissions. Ozone is a secondary pollutant that is not produced directly by a source, but rather it is formed by a reaction between NO_X and reactive organic gases (ROG) in the presence of sunlight. Reductions in ozone concentrations are dependent on reducing the amount of these precursors. ~~The SCCAB~~ **Santa Barbara County** is in unclassified/attainment for the federal $PM_{2.5}$ standard and unclassified for the state $PM_{2.5}$ standard (based on monitored data from 2007 to 2009). No other state or federal standard, including standards for carbon monoxide or nitrogen dioxide, were exceeded during the years 2009 to 2011.

Response 8.2

The commenter requests that Section 4.6, *Greenhouse Gas Emissions*, of the Draft SEIR be revised to reflect that the SBCAPCD does not have an interim approach for GHG significance. While SBCAPCD does not have an interim approach for GHG significance, the County of Santa Barbara has provided interim guidance for projects under the County's jurisdiction. Because neither SBCAPCD nor the City of Buellton has adopted guidance for determining the significance of GHG emissions under CEQA, the County of Santa Barbara's interim guidance is used for the purposes of the EIR analysis. The Draft SEIR describes the County of Santa Barbara's interim approach to quantifying and assessing the significance of GHG emissions under CEQA. The County of Santa Barbara's interim guidance documents have been added to Appendix C of the Draft SEIR, and page 4.6-8 of the Draft SEIR has been revised to refer to these guidance documents, as follows:

Local Regulations and CEQA Requirements. Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant. To date, the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), the San Joaquin Air Pollution Control District (SJVAPCD), and the San Luis Obispo Air Pollution Control District (SLOAPCD) have adopted quantitative significance thresholds for GHGs. Districts/jurisdictions with an interim approach include ~~the Santa Barbara County Air Pollution Control District (SBCAPCD),~~ SCAQMD, Santa Monica, **Santa Barbara County,** and San Diego County. The City of Buellton is located in the County of Santa Barbara, which has developed an interim approach to the establishment of GHG significance thresholds **(refer to Interim GHG Emissions – Evidentiary Support and Interim Procedures for Evaluating Greenhouse Gas Emissions, Appendix C)**. The County's interim approach is described below in Section 4.6.3 (a).

Response 8.3

The commenter requests that Table 4.6-6 of the Draft SEIR be revised to reflect irrigation control and low-maintenance landscaping for only the landscaped areas of the site, rather than for the total developable acreage. Table 4.6-6 has been revised as follows:

Table 4.6-6 Potential Project GHG Reduction Plan Measures and Greenhouse Gas Reduction

Annual CO_2e Reduction (metric tons/year)	Per Square Foot ~~(288,655 sf)~~	Per Acre ~~(12.6)~~
Energy Efficient Lighting		
Efficient Lighting Retrofit	0.001	
Water Conservation		
Irrigation Control		0.27
Low-maintenance Landscaping		0.60
Green Roofs	0.001	

Table 4.6-6 Potential Project GHG Reduction Plan Measures and Greenhouse Gas Reduction

Annual CO_2e Reduction (metric tons/year)	Per Square Foot ~~(288,655 sf)~~	Per Acre ~~(12.6)~~
Total Emissions Reduction per ~~Unit~~ Square Foot/Acre[1]	0.002	0.87
Total Potential Emissions Reduction[2]	~~487.8~~ 577.3	~~11.0~~ 0.4

*1. **288,655 square feet, 0.5 acres (estimated total acreage of landscaped area on the project site).***
***3.** Emissions reduction for the 247 proposed habitable units, determined by multiplying total emissions reduction per ~~habitable unit~~ **square foot/acre** by the total number of proposed ~~habitable units~~ **square feet/acres** ~~(247)~~.*
Source: Climate and Air Pollution Planning Assistant (CAPPA), Local Governments for Sustainability USA (ICLEI).

In addition, the commenter requests that the GHG reduction measures identified in Table 4.6-6 of the Draft SEIR be included as conditions of approval for the land use and building permits, in order to ensure their enforceability. The measures provided in Table 4.6-6 are intended to illustrate the achievability of the performance standard specified in Mitigation Measure GHG-1. Mitigation Measure GHG-1 requires that the project applicant develop a GHG Reduction Plan that would reduce GHG emissions to a less than significant level, using any combination of measures described in the Mitigation Measure, specified in Table 4.6-6, or other quantifiable GHG reduction measures. Implementation of Mitigation Measure GHG-1 would be required prior to permit approval.

Letter 9

February 4, 2013

Mr. Marc P. Bierdzinski
City of Buellton
PO Box 1819
Buellton CA 93427

05-SB-101-57.8

Subject: Draft Subsequent EIR for the Meritage Senior Living Project

Dear Mr. Bierdzinski:

Thank you for the opportunity to review the draft subsequent EIR for the Meritage Senior Living Project. The project is within relative proximity to US 101 and State Route 246. Caltrans offers the following comment on the draft:

9.1

The property drains toward US 101. Once work begins on the plans, Caltrans requests to see drainage calculations showing that the flow coming from the property will not be increased. In some of the drawings included in the draft subsequent EIR, a detention basin is shown. This basin will most likely be needed to reduce the flow. Caltrans has three culverts crossing US 101 in the area. They are at Postmile 57.99, 58.20, and 58.35.

If you have questions or concerns about this letter please contact me at (805) 549-3131.

Sincerely,

Adam Fukushima, PTP
Caltrans District 5
Development Review

CC: Lyn Wickham (Caltrans – Hydraulics)
Jim Mills (Caltrans – Hydraulics)
Larry Newland (Caltrans – Planning)

Letter 9

COMMENTER: Adam Fukushima, PTP, California Department of Transportation (Caltrans), District 5

DATE: September 26, 2012

RESPONSE:

The commenter requests that Caltrans be provided with drainage calculations subsequent to the beginning of work on the project site, showing that the flow coming from the property will not be increased, as compared to existing conditions. The commenter notes that the proposed retention basin will likely be needed to reduce flow from the project site. The commenter describes existing Caltrans culverts crossing U.S. Highway 101 in the area of the project site. Runoff from the project site during and post-construction is described in Section 4.7, *Hydrology and Water Quality*, of the Draft SEIR. As described under Impact HWQ-2, the natural drainage area is from the top of the hillside down to Jonata Park Road, where water is diverted under the road at a culvert at the southern edge of the property. The project proposes an off-site storm water retention basin to control runoff rates. The preliminary drainage study described in the Draft SEIR (refer to Appendix E to the Draft SEIR) notes that the proposed retention basin would discharge at or below existing drainage conditions.

Letter 10

LAFCO

Santa Barbara Local Agency Formation Commission
105 East Anapamu Street ◆ Santa Barbara CA 93101
805/568-3391 ◆ FAX 805/647-7647
www.sblafco.org ◆ lafco@sblafco.org

February 4, 2013

Marc P. Bierdzinski, AICP
Planning Director
City of Buellton
PO Box 1819
Buellton CA 93427

Meritage Senior Living Project

Dear Marc:

We have reviewed the Draft Subsequent EIR for the above-referenced development project and find it is sufficient for LAFCO to utilize when a request to annex the property is submitted.

10.1

The EIR complies with our earlier letter requesting it describe adequacy of public services for the intended uses, although we did not find a discussion evaluating alternative project locations.

Let me know if you would like to discuss.

Sincerely,

BOB BRAITMAN
Executive Officer

cc: Richard Daulton, Rincon Consultants

Letter 10

COMMENTER: Bob Braitman, Executive Officer, Santa Barbara Local Agency Formation Commission

DATE: February 4, 2013

RESPONSE:

The commenter states that the Draft SEIR is sufficient for LAFCO's informational purposes, if a request to annex the property is submitted. Furthermore, the commenter states that the Draft SEIR complies with LAFCO's earlier request that the analysis describe the adequacy of public services for intended uses. Finally, the commenter notes that the Draft SEIR does not include a discussion of alternative project locations. No annexation is proposed as part of the project. Alternatives to the proposed project are discussed in Section 7.0, *References*, of the Draft SEIR. Section 15126.6(f)(2)(A) of the CEQA Guidelines directs lead agencies to consider 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. As discussed in the Draft SEIR, the proposed project would not result in any significant and unavoidable (Class I) impacts. No alternative project locations were identified that would avoid or substantially lessen any significant (Class I) impacts of the proposed project.

Based on Section 15126.6(f)(2)(A) of the CEQA Guidelines, if the lead agency concludes that no feasible alternative locations exist, Section 15126.6(f)(2)(B) states that the lead agency must disclose the reasons for this conclusion, and should include the reasons in the EIR. Therefore, the following language has been added on page 7-1 of the Draft SEIR:

> **As discussed in this SEIR, the proposed project would not result in any significant and unavoidable (Class I) impacts. No alternative project locations were identified that would avoid or substantially lessen any significant (Class I) impacts of the proposed project.**

Letter 11

December 25, 2012

City of Buellton
Buellton, CA 93427

PO Box 2189
Santa Barbara, CA 93120

RE: NOTICE OF COMPLETION OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT IN THE CITY OF BUELLTON FOR THE MERITAGE SENIOR LIVING PROJECT

Dear City of Buellton,

I received a letter by Marc P. Bierdzinski AKA Planning Director with no date, but with an envelope dated 122012. I know that the City of Buellton has been criticized about Brown Act violations before, but this project is sudden news to me.

I believe you are sending this letter because the property is within a certain distance away and have suddenly decided to inform any property owners or occupants of such report. I know that the philosophy of the city is to merely point to its website and say check for any updates. However, not everyone has such access, or even ability to stay up-to-date.

11.1

In an effort to inform the public, your police department attempted to counter the work of community organizing efforts through intimidation tactics.

District wide, so-called community leaders gathered to make matters worse for truckers rather than work together.

I already spoke to your council on trucker rights. I do not need to be there in person at every council meeting as once is enough to make my point. In fact, Andrisek informed me at a public visioning workshop that he agreed with me on truckers, but then said on record that he did not. The plans for Buellton show one road lanes and roundabouts, which does not even take into consideration any trucker rights. There have been two trucker deaths already near Buellton.

I foresee more tragedies due to these policies. I have seen cars race down Bobcat Springs Road onto Jonata Springs Road towards Buellton. I once chased after one wondering who it was in the dark colored sports car with tinted windows. However, I was met by a vehicle that pulled out of The Village on your one-lane creation and the car that sped was already at the Avenue of Flags / Highway 246 stop light. What will happen when a car breaks down on your single land road? What will happen when someone

needs medical emergency and cannot get through? Hello, seniors.

I am not so confident in our helicopters constant abilities due to eight police-involved shootings within the county and not one helicopter came to its medical attention.

This one-lane issue and roundabouts, as well as, anti-trucker mentality should have been brought to a public vote on Election Day.

This letter reveals to me how things can be hidden for so long until its "notice of completion."

The public visioning process was for one to two years, but even attending it revealed groups who ignored reason. There is a group of people that really believes Buellton is their town. I even created a petition, gathered signatures, informed the council, and nothing is in the plans. Buellton has always welcomed truckers and now they have no rights? 11.1

The Village was built where Hispanics use to live. Now, your "notice of completion" states a "small residence and some outbuildings are currently on the site and will be removed." This residence houses Hispanics. Have these Hispanics been informed along the process and really participated? Or, are these Hispanics merely being sent a "notice of completion"?

I notice this letter accepts public comments in writing up to February 04, 2013, which is after the Demo Construction Phase running into the Site Prep.

This is not democracy.

Ricardo Soto, Incorporator
Global Human Rights Charity
815-301-5491

Candidate for Juris Doctorate (JD)
*prior to 2025

Letter 11

COMMENTER: Ricardo Soto, Global Human Rights Charity

DATE: December 25, 2012

RESPONSE:

The commenter states that they received the Notice of Completion for the Draft SEIR. The commenter states an opinion that the City's efforts to inform property owners and occupants of completed environmental documents is inadequate. The Notice of Completion is a document that indicates that a Draft EIR has been prepared for a project, pursuant to CEQA. The Notice of Completion was filed with the Office of Planning and Research as soon as the Draft SEIR was completed. The City, as CEQA Lead Agency, provided public notice of the availability of a Draft SEIR at the same time that it sent the Notice of Completion to the Office of Planning and Research. Pursuant to Public Resources Code §21092.3, notice was given to all organizations and individuals who had requested such notice. Notice was also given by publication in the Santa Ynez Valley News and direct mailing to property owners within 300 feet of the project site and the agencies that received the NOP.

The commenter raises concerns related to trucker rights, trucker safety, and community safety related to trucking in Buellton, including single-lane roads, roundabouts, and emergency vehicle access. No single-lane roads or roundabouts are proposed by the project. Emergency vehicle access is discussed under Impact T-3, in Section 4.11, *Transportation and Circulation*, of the Draft SEIR.

In addition, the commenter raises a concern regarding the displacement of existing housing. A residence and some outbuildings are currently located on the site, and would be removed as part of the proposed development. As described in Section 5.0, *Effects Found Not To Be Significant*, the demolition of one residence and outbuildings would not displace substantial numbers of existing housing or people, requiring the construction of replacement housing elsewhere.

Finally, the commenter expresses a concern about the closing date of the public comment period relative to the timing of construction phases. It appears that the commenter is referring to construction dates associated with the CalEEMod air pollutant modeling results contained in Appendix C of the Draft SEIR. It should be noted that the dates used for the CalEEMod air pollutant modeling represent an approximation of the earliest schedule during which construction is expected to occur. These dates do not represent scheduled construction dates. An estimate of project-specific construction dates is not yet available, but construction would not begin until after project approval, and would be assumed to take approximately 18-24 months.

Letter 12

From: Freddie Romero [mailto:freddyromero1959@yahoo.com]
Sent: Thursday, December 27, 2012 4:09 PM
To: Angela Perez
Subject: Meritage project

Ms. Perez,

I have looked at preliminary drawings of this project and see that it consist of considerable ground disturbance for it's construction. I will be reviewing the EIR as well, but I would like for you to consider a meeting between the applicant/agent and myself or the Elders council to discuss concerns and the need for archaeological testing prior to any approval.

12.1

I would be willing to meet, but as for the Elders, they are on sabatical until February and have a full schedule and would not be to meet until March or so.

If this is a possibility, please do not hesitate to contact me.

Freddie Romero
Cultural Preservation Consultant
SYBCI Elders Council
805-688-7997 X37

Letter 12

COMMENTER: Freddie Romero, Santa Ynez Band of Chumash Indians Elder's Council

DATE: December 27, 2012

RESPONSE:

The commenter notes that the proposed project would require considerable ground clearance, and requests a meeting with the project applicant/agent and the Santa Ynez Band of Chumash Indians Elder's Council to discuss concerns and the potential need for archaeological testing prior to project approval. Potential impacts to cultural resources on the project site are discussed in Section 4.4, *Cultural and Historic Resources*, of the Draft SEIR. In addition, City staff and the project applicant's representative have met with the commenter, as requested. The commenter requested that an extended Phase 1 cultural resources analysis be conducted on the site prior to approval of the project. City staff has indicated that such an analysis would not be required; however, the project applicant will continue to coordinate with the Santa Ynez Band of Chumash Indians Elder's Council on this issue. As described in Mitigation Measure CR-2, the nature and significance of any archaeological resources encountered on the site must be evaluated by an archaeologist, and the find must be appropriately mitigated.

Letter 13

EIR CONCERNS FOR MERITAGE SENIOR LIVING PROJECT REPORT

TO: MARC BIERZINSKI, City Planner
Buellton City Council Members
Buellton City Manager
Buellton Planning Commission

FROM: JUDITH DALE
381 Thumbelina Dr.
Buellton, CA 93427

Re: Written comments on the draft SEIR for the Meritage Senior Living Project.

The draft SEIR contains many errors and omissions. They fall into four main categories: Planning Commission approval, Zoning, Economic Impact, Quality of Life for Residents.

Planning Commission Approval

On page 2-4 of the SEIR, it states:

> *The Buellton Planning Commission has determined the proposed project meets the definition of a "Medical Services-Hospitals and Extended Care" use, and therefore would be permissible in the General Commercial (CR) zone.*

This statement is an error. First, this project is non-conforming and therefore the Buellton Planning Commission cannot make that determination; only the City Council has that authority. The SEIR should have inserted Buellton's Municipal Code Section 19.12.020 to explain the requirement that must be met to qualify as Medical Service project and Section 19.08.110 to explain the steps for submitting, reviewing and approving any non-conforming project that requires modifications and/or a Conditional Use Permit. 13.1

This project is in the processing stage and has not yet qualified to be reviewed for approval by the Buellton City Council. As presented, this project SEIR does not meet the requirements of revenue generating Commercial/Retail zoning for future economic development.

Secondly, the record of the April 15, 2010 Planning Commission Meeting states the project could be processed as a Medical Services Hospital and

Extended Care project. It was not approved as stated in the SEIR. The project presented in the SEIR is either:

A. Incomplete, as only 10 %, the Skilled Nursing portion, meets the definition of Medical Services as stated in Chapter 19.12.020 of the Buellton Municipal Code. The other 90% of the project (Memory Assisted Living, Assisted Living, and Independent Living) are by definition, residential programs. In order for this project to qualify under Medical Services it must contain more true medical services and less residential units. 13.1

B. Located in the wrong zone. This project is proposed in a commercial retail zone, yet is 90% residential. That is what makes it non-conforming. This leads to the second issue: zoning

Zoning

The SEIR does not deal with the long-term economic consequences of the project to the City of Buellton. The project is proposed in a Commercial Retail zone yet is 90% residential. If built, the Meritage Senior Living Project would take over 18 acres out of a commercial retail zone and replace it with residential units that would not generate sales tax revenue to the city. This will have serious negative economic consequences to Buellton's future. This is a serious omission and must be addressed in the SEIR. This leads to the third issue: economic impact on the City of Buellton.

Economic Impact

Buellton is a small community and has only XXX acres of Commercial Retail land. Taking 18 acres of Commercial Retail lands that front Highway 101 and making them residential would have disastrous economic consequences to Buellton's future. Most of Buellton's revenue comes from TOT (Transient Occupancy Tax) and sales tax on car and truck sales. The 18 acres in question is a perfect area for an additional hotel or car dealership. 13.2

It is also ideally situated for light industry or a business park, both of which would provide mid-level to high paying jobs. Traditionally the majority of jobs in residential, senior extended care facilities (which is 90% of this project) pay very low wages.

The negative economic impact of building a residential project in a commercial retail zone must be quantified in this SEIR.

Quality of Life for Residents

The proposed project fronts California State Highway 101, a major freeway. The traffic noise and exhaust pollution, let alone the athletics, do not make this location advisable for a senior living project. This area is designed for commercial retail, not senior residential living. Once again, the SEIR does not make mention of this fact.

Also, the project is located away from major destinations in town: convenient shopping, the post office, the library, city hall, and theaters. Residents cannot safely walk to any of these amenities. And, in order to drive to these areas, the residents must traverse one of the most dangerous and complicated intersections in Buellton. Four roads: Jonata Park Road (the location of the proposed project), Highway 101 off-ramp, Avenue of Flags, and Central Avenue all converge in one very confusing intersection. This is a disaster waiting to happen. 13.3

Once again, the SEIR is incomplete, as it does not deal with the increased traffic this project will create and the inadequacy of the roads leading to the project.

This is a great project in the wrong location. The project itself has great merit, but putting it in a Commercial Retail zone that fronts one of the busiest highways in the state of California, away from city amenities, with inadequate roads is not the way to build and design a desirable senior living facility.

Summary

In summary, the current SEIR does not address many serious issues: Approval, Zoning, Economic Impact, and Quality of Life for Residents. When these issues are taken into account, a complete SEIR will show that this project is not located in a suitable location.

Letter 13

COMMENTER: Judith Dale, Mayor, Private Citizen

DATE: January 22, 2013

RESPONSE:

Response 13.1

The commenter states that the Draft SEIR contains errors related to planning commission approval, zoning, economic impact, and quality of life for residents. Zoning and economic impact are discussed under Response 13.2, below. Quality of life for residents is discussed under Response 13.3, below.

The commenter states that the proposed project is non-conforming, that the Buellton Planning Commission cannot make a determination that the project meets the definition of a "Medical Services- Hospitals and Extended Care" use, and that the project is not permissible in the General Commercial zone. The existing site characteristics, including the existing zoning and General Plan designation, are discussed in Section 2.0, *Project Description*, of the Draft SEIR. Under the authority of the Buellton Municipal Code (Section 19.01.050[c]), the City Planning Commission made the determination that the proposed project meets the definition of a "Medical Services- Hospitals and Extended Care" use, and therefore conforms to the zone. In order to clarify this determination, the definition of this use from Section 19.12.020 of the Municipal Code has been added to Page 2-5 of the Draft SEIR, as follows:

> The Buellton Planning Commission has determined the proposed project meets the definition of a "Medical Services-Hospitals and Extended Care" use, and therefore would be permissible in the General Commercial (CR) zone. **As described in Section 19.12.020 of the Buellton Municipal Code, this land use is defined as follows:**
>
> > ***Medical services—hospitals and extended care (land use)" means hospitals and similar establishments primarily engaged in providing diagnostic services, extensive medical treatment including surgical and other hospital services; such establishments have an organized medical staff, inpatient beds, and equipment and facilities to provide complete health care. May include accessory retail pharmacies, and emergency heliports. Also includes residential establishments providing nursing and health related care as a principal use with in-patient beds, such as: skilled nursing facilities (facilities allowing care for physically or mentally disabled persons, where care is less than that provided by an acute care facility); extended care facilities; convalescent and rest homes; board and care homes. Long-term personal care facilities that do not emphasize medical treatment are classified in "residential care.***

The proposed project is consistent with this land use definition; therefore, the project would be consistent with the existing General Commercial (CR) zoning designation.

Response 13.2

The commenter states that the Draft SEIR does not address the long-term economic consequences of the project to the City of Buellton, and would remove land from the General Commercial (CR) zone. As described in § 15131 of the State CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment, except in cases where the economic effects of a project may lead directly to physical environmental effects, such as urban blight. The nature of the project as a medical facility located in the General Commercial (CR) zone does not suggest a connection between potential economic effects of the project and physical degradation of existing commercial uses in Buellton, and the commenter does not offer evidence that the project would be expected to result in urban blight, or other physical environmental effects related to the economic impacts of the proposed project. No changes are required to the Draft SEIR; however, the comment is noted for City decision-makers review and consideration.

Response 13.3

The commenter states that traffic noise from U.S. Highway 101, vehicle exhaust pollution, and aesthetic impacts make the project site an inadvisable location for a senior living project. The potential noise impacts to the proposed project are discussed in Section 4.9, *Noise*; the potential air quality impacts related to the proposed project are discussed in Section 4.3, *Air Quality*; and the potential aesthetic impacts of the proposed project are discussed in Section 4.1, *Aesthetics/Visual Resources*. All direct and cumulative impacts in these sections of the Draft SEIR were determined to be less than significant (Class III) or potentially significant but mitigable (Class II). Potentially significant impacts related to these issues would be reduced to a less than significant level through implementation of Mitigation Measure AES-2 Exterior Building Materials, Mitigation Measure N-1(a) Notification of Temporary Construction Noise, and Mitigation Measure N-1(b) Construction Noise Attenuation Techniques.

The commenter also states that the project is located away from convenient shopping, the post office, the library, City Hall, and theaters, such that residents cannot walk to these amenities. The existing City sidewalks along Jonata Park Road extend north in front of the Buellton Self Storage facility located immediately south of the Caltrans facility, but not in front of the Caltrans facility, or the southern two parcels of the project site not proposed for development. The proposed sidewalk along Jonata Park Road as part of the project would not connect directly with these existing City sidewalks. The portion of Jonata Park Road between the proposed development and the existing sidewalk in front of the Buellton Self Storage facility that would not be served by sidewalks is approximately 0.2 mile. However, the proposed senior living project is primarily a medical facility that includes residential units for senior residents in need of long-term care. The proposed walking paths on the project site are intended to provide outdoor recreation for residents of the senior care facility, but it is not anticipated that project residents would walk to and from local amenities. No changes to the Draft SEIR are required.

The commenter further states that, in order to drive to these amenities, residents would need to drive through the U.S. Highway 101 southbound off-ramp/Avenue of Flags/Central Avenue/Jonata Park Road intersection, which the commenter identifies as dangerous. This off-ramp is uncontrolled free flow and connects directly to southbound Avenue of Flags. All other

roads connected with this intersection – Avenue of Flags, Central Avenue, and Jonata Park Road – include stop signs to control traffic. As described on page 4.11-6 of the Draft SEIR, this intersection has been identified in the City's Circulation Element as one that should be modified to be more conventional and is included as a project in the Traffic Improvement Fee Program. The City of Buellton Municipal Code Chapter 3 Section 3.40.040 establishes a traffic mitigation fee program, which applies to all new development that would generate additional p.m. peak hour trips. Therefore, the proposed project would be required to contribute its share to the City's Traffic Improvement Fee Program, which would fund future improvements to the S. Highway 101 southbound off-ramp/Avenue of Flags/Central Avenue/Jonata Park Road intersection on a schedule to be determined by the City. However, this intersection has not been identified as a specific or unique hazard in need of immediate improvements. As noted above, traffic from the U.S. Highway 101 off-ramp is uncontrolled, and the three other roadways connected with this intersection include stop signs to control traffic.

In addition, as discussed in Impact T-2 and Impact T-3, the project would not result in a substantial increase in congestion, or a substantial in hazards related to a design feature. As discussed in Section 7.0, *Alternatives*, the Typical Commercial Project alternative (Alternative 3) would result in substantially more vehicles trips than the proposed project (approximately 12,453 daily vehicle trips, as compared to the 725 daily vehicle trips estimated in the project traffic study for the proposed project).

Letter 14

W.E.WATCH

Women's Environmental Watch

Working together to sustain the beauty and environment of the Santa Ynez Valley

February 2, 2013

TO: Marc Bierdzinski, Planning Director, City of Buellton

FROM: Cathie McHenry, President

RE: Comments regarding SEIR for Meritage Senior Living project

We have studied the Final Draft SEIR for the Meritage Senior Living project and have the following comments:

1. Alternative 4, Reconfigured Project Alternative. (page ES-1) We agree with the SEIR preparers that this alternative is environmentally superior. It will move the retention basin within the Buellton city limits, simplifying requirements for the developer, the city and the county now and in the future.

Alternative 4 will move the project slightly farther away from the active agricultural land, providing more protection for both the agriculturist and the development's residents and staff. Even with this alternative, will there be active agricultural land west of some of the Independent Living buildings in addition to active agriculture north of them? Including retention basin, how wide will the buffer be? Will this be enough to adequately protect residents from air quality and noise problems? 14.1

2. IMPACT AES-2. Light and Glare. (page 4.1-12) We have the following recommendations for mitigating the Class II impacts of Light and Glare:

a. On non-slope areas of the site and on first floors of buildings, require **fully** shielded outdoor light fixtures (emit no light above a 90 degree angle), not just shielded fixtures. Pole height needs to be minimized to prevent light trespass into the site's buildings as well as off site.

For any balcony light fixtures on second or third floors of buildings or on interior walkways and streets above the level of Jonata Park Road, particular care is needed in selecting light fixtures. The lamp needs to be recessed beyond the "fully shielded/full-cutoff angle" to prevent light trespass problems within and beyond the site. Controlling pole height is even more critical for walkway and street lights. 14.2

b. Because changes in eye function occur as a result of aging, maximizing light

on the ground and eliminating glare become especially important for the safety and well being of the project's residents.

14.2

(A resource for advice on both interior and exterior lighting for seniors is The Center of Design for an Aging Society, Eunice@centerofdesign.org.)

3. IMPACT 4.6 Greenhouse Gas Emissions. (page 4.6-14) We support the SEIR recommendations for mitigating greenhouse gas emissions listed in GHG-1, GHG Reductions Measures as reasonable activities which will make the project more sustainable and will be cost effective long-term for the developer.

14.3

4. IMPACT N-2. Noise. (page 4.9-8,9) We recommend that additional soundproofing/insulation be required on sides and ends of buildings facing Jonata Park Road **to be sure** the inside of buildings is less than 25dB when windows are closed. The development's proximity to Highway 101 is its least appealing feature because of the road noise. Every effort needs to be made to mitigate this source of noise to protect residents as much as possible.

14.4

5. IMPACT- Transportation, Highway 101 Southbound off ramp(page 4.11-4,5) In the report, the SEIR preparers address the inherent danger in the off ramp from Highway 101 which enters the Avenue of the Flags -Jonata Park Road-Central Avenue intersection as follows:

"The U.S. Highway 101 southbound off-ramp/ Avenue of Flags/Central Avenue/Jonata Park Road intersection is a special case; this off-ramp is uncontrolled free flow and connects directly to southbound Avenue of Flags. Central Avenue, Jonata Park Road and northbound Avenue of Flags are controlled by stop signs. There are businesses on northbound Avenue of Flags that cater to long-haul truck drivers. Since the access to U.S. Highway 101 in either direction is on Damassa Road, the U.S. Highway101 southbound off-ramp/Central Avenue/ Avenue of Flags intersection must accommodate a truck U-turn radius for California Design Vehicles. This intersection has been identified in the City's Circulation Element as one that needs to be modified to be more conventional and is included as a project in the Traffic Improvement Fee Program. The traffic volume analysis shows that although the intersection functions with an LOS A service level, operationally there are conflicts that can be reduced by improving the intersection."

14.5

But the preparers include no mitigation for this "accident waiting to happen," which needs to be dealt with before adding senior drivers from the 92 Independent Living units to this intersection. The SEIR needs to forcefully address this issue. At the very least, begin to mitigate by requiring a stop sign on the exit ramp so it is no longer a "special case of uncontrolled free flow." This ramp is such an anomaly that CALTRANS should have changed it long ago.

6. Circulation. Page 4.11-12 (See Policy L-9) The CALTRANS facility has no sidewalk. Isn't some kind of mitigation needed so Meritage sidewalk will connect to the city's sidewalk system?. Whose responsibility will it be? 14.6

We hope our comments will prove helpful to both the city and the developer as this project moves through the planning process.

Letter 14

COMMENTER: Cathie McHenry, Women's Environmental Watch

DATE: February 2, 2013

RESPONSE:

Response 14.1

The commenter states a preference for Alternative 4, Reconfigured Project, as compared to the proposed project. The commenter's opinion is noted.

The commenter also requests information related to adjacent agricultural activities west of the proposed project, as well as the width of the agricultural buffer described in Section 2.0, *Project Description*, and whether the proposed buffer would adequately reduce potential impacts related to air quality and noise to adjacent residents of the senior care facility. Existing and historical agricultural uses to the west of the project site include crop production and pasture land. As discussed in Section 2.0, *Project Description*, the project applicant and site owner is also the owner of the adjacent parcel of the land to the west and north, which is under the jurisdiction of Santa Barbara County. In addition, the adjacent agricultural parcel is currently used for organic farming. As part of the proposed project, the applicant would provide an agricultural buffer of no less than 200 feet between the senior center facilities and active agricultural operations on the adjacent parcel. As discussed under Impact AG-2, the proposed 200-foot buffer, as well as Mitigation Measures AG-2(a) and AG-2(b) would ensure that the buffer would maintain a safe distance to prevent residents of the senior care facility from being affected by adverse agricultural uses including herbicide and pesticide spraying, objectionable odors, and dust. The proposed agricultural buffer, and associated agricultural impacts and mitigation, is discussed in the Response to Letter 5, above.

Response 14.2

The commenter provides recommendations for mitigating potentially significant impacts related to light and glare, discussed in Section 4.1, *Aesthetics/Visual Resources*, of the Draft SEIR. These include fully shielded outdoor lighting, limitations on pole heights, and additional shielding for balcony fixtures on second and third floors or on interior walkways and streets above the level of Jonata Park Road. As discussed under Impact AES-2, the City of Buellton Community Design Guidelines require lighting to be shielded to confine light to the subject site. Additionally, all exterior lighting would be shielded in accordance with the City's Night Lighting Standards. Compliance with these City policies would minimize impacts related to new sources of lighting on the project site to a less than significant level. City decision-makers may consider additional restrictions and requirements for on-site lighting as conditions of approval for the proposed project.

Response 14.3

The commenter states that they support the measures included in the Draft SEIR to mitigate potential impacts related to greenhouse gas emissions. These measures are described under Mitigation Measure GHG-1, in Section 4.6, *Greenhouse Gas Emissions*, of the Draft SEIR.

Response 14.4

The commenter recommends that additional subroofing/insulation be required on sides and ends of buildings facing Jonata Park Road to ensure that interior noise levels are below 25 dBA when windows are closed. As described in Section 4.9, *Noise*, of the Draft SEIR, the City of Buellton does not have an interior noise standard for hospital and nursing home, church, school, and library uses; however, because the project would include habitable units related to the proposed extended care facilities, the City's interior residential standard of 45 dB is an appropriate threshold. Impact N-2 describes existing and anticipated future noise levels on the project site. Based on existing and anticipated noise levels on the project site, in addition to screening provided by proposed landscape plantings and existing plantings within the Caltrans right-of-way between U.S. Highway 101 southbound and Jonata Park Road, roadway noise from traffic along U.S. Highway 101 is not expected to exceed the City's 45 dB interior noise threshold. City decision-makers may consider additional requirements for reducing interior noise levels as conditions of approval for the proposed project. The commenter's recommendations are noted.

Response 14.5

The commenter describes the existing conditions at the U.S. Highway 101 southbound off-ramp/Avenue of Flags/Central Avenue/Jonata Park Road intersection, which has been identified in the City's Circulation Element as an intersection that needs to be modified to be more conventional and is included as a project in the Traffic Improvement Fee Program. The commenter states that the Draft SEIR does not include mitigation for improvements at this intersection. As described on page 4.11-6 of the Draft SEIR, the U.S. Highway 101 southbound off-ramp/Avenue of Flags/Central Avenue/Jonata Park Road intersection is included as a project in the City's Traffic Improvement Fee Program. The City of Buellton Municipal Code Chapter 3 Section 3.40.040 establishes a traffic mitigation fee program, which applies to all new development that would generate additional p.m. peak hour trips. Therefore, the proposed project would be required to contribute its share to the City's Traffic Improvement Fee Program, which would fund future improvements to the S. Highway 101 southbound off-ramp/Avenue of Flags/Central Avenue/Jonata Park Road intersection on a schedule to be determined by the City. Refer also to Response 13.3, above.

In addition, as discussed in Impact T-2 and Impact T-3, the project would not result in a substantial increase in congestion, or a substantial increase in hazards related to a design feature.

Response 14.6

The commenter notes that the Caltrans facility located to the south of the project site does not have a sidewalk along Jonata Park Road, and asks whether mitigation is required in order to connect the proposed project to the City's sidewalk system. Pedestrian facilities provided by the proposed project are described in Section 2.0, *Project Description*, and Section 4.11, *Transportation and Circulation*, of the Draft SEIR, and would include walking paths throughout the site and a sidewalk on the project's frontage along Jonata Park Road. The existing City sidewalks along Jonata Park Road extend north in front of the Buellton Self Storage facility located immediately south of the Caltrans facility, but not in front of the Caltrans facility, or the southern two parcels of the project site not proposed for development. The proposed sidewalk along Jonata Park Road as part of the project would not connect directly with these existing City sidewalks. The portion of Jonata Park Road between the proposed development and the existing sidewalk in front of the Buellton Self Storage facility that would not be served by sidewalks is approximately 0.2 mile. However, the proposed senior living project is primarily a medical facility that includes residential units for senior residents in need of long-term care. The proposed walking paths on the project site are intended to provide outdoor recreation for residents of the senior care facility, but it is not anticipated that project residents would walk to and from local amenities. No changes to the Draft SEIR are required.