
Draft
**Initial Study/ Negative Declaration
for the
2015 Housing Element Update
14-ND-02**

Prepared for:
City of Buellton
107 West Highway 246
Buellton, California 93427



Prepared by:
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INTRODUCTION

LEGAL AUTHORITY

This Initial Study/ Negative Declaration (IS/ND) has been prepared in accordance with the *CEQA Guidelines* and relevant provisions of the California Environmental Quality Act (CEQA) of 1970, as amended.

Initial Study. Section 15063(c) of the *CEQA Guidelines* defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. The purposes of an Initial Study are:

- (1) To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a (Mitigated) Negative Declaration;
- (2) To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR; and
- (3) To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project have been adequately mitigated.

IMPACT ANALYSIS AND SIGNIFICANCE CLASSIFICATION

The following sections of this IS/ND provide discussions of the possible environmental effects of the proposed project for specific issue areas that have been identified in the CEQA Initial Study Checklist. For each issue area, potential effects are isolated.

A “significant effect” is defined by Section 15382 of the *CEQA Guidelines* as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by a project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.” According to the *CEQA Guidelines*, “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.”

INITIAL STUDY

PROJECT TITLE

City of Buellton – 2015 Housing Element Update

LEAD AGENCY and CONTACT PERSON

City of Buellton
Planning Department
331-B Park Street
Buellton, CA 93427
Marc Bierdzinski, Planning Director (805) 688-7474

PROJECT APPLICANT

City of Buellton
Planning Department
140 W. Hwy 246
Buellton, CA 93427

PROJECT SITE CHARACTERISTICS

Location and Surrounding Land Uses: The City of Buellton is located along U.S. Highway 101 in Santa Barbara County, the western gateway to the Santa Ynez Valley. It is midway between the cities of Santa Maria and Santa Barbara, as shown in Figure 1. The City has a mix of residential, commercial, and industrial uses within its 1.6 square miles and is surrounded by equestrian ranches, farms, vineyards and wineries. As of 2014, Buellton has an estimated population of 4,893 (California Department of Finance, 2014).

PROJECT DESCRIPTION

The proposed project is an update of the 2009 City of Buellton Housing Element. A Draft 2015 Housing Element has been prepared by the City to comply with the legal mandate that requires each local government to adequately plan to meet the existing and projected housing needs of all economic segments of the community. The Housing Element is one of the seven state mandated elements of the local general plan.

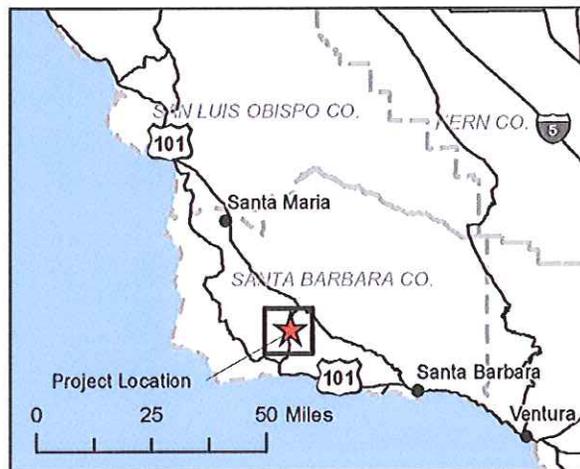
The Housing Element sets forth goals and policies that have been developed to encourage the preservation, production, maintenance, and improvement of housing in the City of Buellton. These goals and policies are designed to:

1. Preserve and improve housing and neighborhoods;
2. Promote the production of a diversity of housing;
3. Provide adequate sites for a variety of housing types;
4. Remove or mitigate constraints to housing investment; and
5. Promote equal housing opportunity.



0 2.5 5 Miles

★ Project Location



Base map sources: U.S. Bureau of the Census Tiger 2000 data and ESRI, 2002.

Regional Location Map

Figure 1

The proposed Housing Element provides programs, policies and actions that together evidence the ability to meet the City’s regional fair share of housing needs by the year 2023. The number assigned to the City of Buellton pursuant to the Regional Housing Needs Allocation (RHNA) process is 275 new dwelling units. The RHNA allocation for the 2009 Housing Element required the City to provide 279 affordable dwelling units. The current Land Use Element dedicated land sufficient to meet this requirement, and as such, the City will have sufficient land resources to achieve the new RHNA allocation for the 2015 Housing Element without the need to rezone additional land. In addition, through various implementing actions including density bonuses and application of the Affordable Housing Overlay Zone, the production of housing units in the City could exceed the City’s RHNA allocation.

The Housing Element does not require the construction of these units but rather establishes policies that will allow for and support their development. It is also the purpose of the Housing Element to define any revisions to existing policies and programs that are adopted in response to statutory requirements. The Land Use Element implements the Housing Element by designating various lands for residential uses and designating land sufficient to accommodate the RHNA allocation.

PUBLIC AGENCIES WHOSE APPROVAL MAY BE REQUIRED FOR SUBSEQUENT ACTIONS (e.g. permits, financing approval, or participation agreement):

- California State Department of Housing and Community Development certification of the Draft 2015 Housing Element

REFERENCES

This Initial Study was prepared using the following information sources:

- Buellton General Plan
- Buellton Municipal Code
- Buellton Zoning Ordinance
- General Plan EIR
- California Department of Finance
- California Department of Conservation

ENVIRONMENTAL FACTORS AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture Resources	<input type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Geology / Soils
<input type="checkbox"/> Hazards & Hazardous Materials	<input type="checkbox"/> Hydrology / Water Quality	<input type="checkbox"/> Land Use / Planning
<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing
<input type="checkbox"/> Public Services	<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation/Traffic
<input type="checkbox"/> Utilities / Service Systems		

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



City of Buellton



Date

EVALUATION OF ENVIRONMENTAL IMPACTS

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. AESTHETICS - Would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
<p>a - c) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. Because the 2015 Housing Element is required to provide for fewer residential units as compared to the 2009 Housing Element, the project will not affect scenic resources or the visual character of the City beyond that already anticipated by the City's adopted Land Use Element. It should be noted that the Housing Element Update does not specify designs of proposed dwelling units; nor does it compel construction of any kind. Future development would be reviewed to determine compliance with the City's development standards and Community Design Guidelines, as well as to determine impacts to scenic vistas, or resources that may be specific to the project. In order to obtain the necessary building permits, the project will have to meet the Zoning Ordinance that is already in place, including provisions to protect scenic vistas and incorporate acceptable aesthetic designs in the City of Buellton. Projects will be required to comply with applicable General Plan Conservation and Open Space policies requiring new development to protect scenic resources. No mitigation measures are required for the Housing Element Update.</p> <p>d) As discussed above, the City's 2015 RHNA allocation is lower than the allocation for the 2009 Housing Element and as such, the City's current Land Use Element and Zoning dedicate land sufficient to accommodate the level of development required under RHNA. Potential impacts related to light and glare associated with development in accordance with the 2015 Housing Element would not exceed that already anticipated by the City's adopted Land Use Element. It should be noted that future development anticipated by the Housing Element Update would be required to comply with applicable General Plan Land Use Element policies for any new lighting that would result from housing development. In addition, through the City's development review process, future development would be required to avoid significant glare impacts. No mitigation measures are required for the Housing Element Update.</p>				

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES - Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to nonagricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use?				X

a), c) Growth envisioned in the Housing Element, including provision of farmworker housing, would not exceed that already anticipated by the existing General Plan Land Use Element. In addition, future development in the City will require additional environmental review. Future development would be reviewed to determine compliance with the City's Zoning Ordinance, development standards, as well as to determine impacts to agricultural resources. The proposed Housing Element does not include policies to re-designate any agriculturally zoned land. No mitigation measures are required for the Housing Element Update.

b) There are no properties under a Williamson Act Contract within the City of Buellton, according to the State Williamson Act status report (California Department of Conservation, 2012). The proposed Housing Element does not include policies to re-designate any agriculturally zoned land. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
III. AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation the applicable air quality plan?			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?			X	

a - e) The City of Buellton is located within the South Central Coast Air Basin (SCCAB), which includes all of San Luis Obispo, Santa Barbara, and Ventura counties and is within the jurisdiction of the Santa Barbara County Air Pollution Control District (SBAPCD). The SCCAB is currently designated as non-attainment for the state eight-hour ozone standard, the state standard for PM₁₀ and the federal standard for PM₁₀. The proposed Housing Element Update sets policies that will facilitate the construction of 275 dwelling units between 2015 and 2023, which may contribute to the SCCAB's non-attainment status. However, the Housing Element is a policy document, and does not entitle or propose actual construction of housing units. Rather, the Land Use Element implements the policies of the Housing Element. The General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation required for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish growth that would result in increased air emissions beyond that anticipated by the General Plan Land Use Element. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES - Would the project:				
a) Have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			X	
c) 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?			X	
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?			X	
<p>a) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in biological resource impacts beyond that already anticipated by the General Plan Land Use Element. It should be noted that the future development will be reviewed on a project specific basis to determine compliance with the City's Zoning Ordinance as well as to determine impacts to candidate, sensitive, or special status species in the City. Specific projects will be required to comply with applicable General Plan Conservation and Open Space policies imposing mitigation measures for significant biological impacts and preservation of creek corridors for the protection of biological resources. Any potentially significant impacts to biological resources will be mitigated on a project specific basis in accordance with all applicable state and federal agency guidelines set forth by California Department of Fish and Game (CDFG) and (if appropriate) the U.S. Fish and Wildlife Service (USFWS) as a standard part of the application and review process for development in the City. No mitigation measures are required for the Housing Element Update.</p> <p>b) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in biological resource impacts beyond that already anticipated by the General Plan Land Use Element. It should be noted that future development will be reviewed on a project specific basis to determine compliance with the City's development standards as well as to assess potential impact to riparian habitat or other sensitive natural communities identified in local or regional plans, policies or regulations. Specific projects will be required to comply with applicable General Plan Conservation and Open Space policies imposing mitigation measures for significant biological impacts and preservation of creek corridors for the protection of biological resources. As each specific project will be required to evaluate sensitive biological resources present in the proposed project area,</p>				

mitigation will be required, as appropriate, through the City’s development review process to minimize or eliminate potential impacts to biological resources present on-site. Impacts will be assessed and mitigated for each future project. No mitigation measures are required for the Housing Element Update.

c) The proposed Housing Element Update identifies an assigned growth need of 275 units for development between 2015 and 2023. Each individual project will be required to fully evaluate potential impacts to biological resources and to minimize or eliminate potentially adverse impacts to sensitive resources in conformance with City Zoning Ordinance and General Plan policies, and all applicable U.S. Army Corps of Engineers, CDFG and USFWS guidelines and policies. No mitigation measures are required for the Housing Element Update.

d - f) The Housing Element Update identifies an assigned growth need that will be accommodated on vacant and underutilized land. The vacant parcels potentially available for development are located throughout the City. Although development could occur on vacant and underutilized land, the General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in biological resource impacts beyond that already anticipated by the General Plan Land Use Element and Public Facilities and Services Element. In addition, proposed future development on these parcels will be reviewed on a project specific basis to determine compliance with the City’s Zoning Ordinance and General Plan as well as to determine impacts to migratory fish or wildlife species in the City. Specific projects will be required to comply with applicable General Plan Conservation and Open Space imposing mitigation measures for significant biological impacts and preservation of creek corridors for the protection of biological resources. Any potentially significant impacts to biological resources will be mitigated on a project specific basis in accordance with all applicable state and federal agency guidelines set forth by California Department of Fish and Game (CDFG) and (if appropriate) the U.S. Fish and Wildlife Service (USFWS) as a standard part of the application and review process for development in the City. In addition, future developments will be reviewed to determine compliance with any adopted Habitat Conservation Plans or Natural Community Conservation Plans. Projects will be required to minimize or eliminate potential impacts to a less than significant level on a project specific basis. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES - Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
d) Disturb any human remains, including those interred outside of formal cemeteries?			X	

a - d) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in cultural resource impacts beyond that anticipated by the General Plan Land Use Element. In addition, each specific future housing development project will be required to be evaluated for the potential for occurrence of historical resources on-site, and to comply with applicable General Plan Land Use Element and Conservation and Open Space policies requiring that sites be evaluated for cultural resources and appropriate mitigation measures are taken to prevent the loss of important historical, archeological, and paleontological resources in accordance with CEQA. Proposed future development will be reviewed by the City for compliance with CEQA Guidelines Section 15000 et. Seq., the City General Plan, and City Zoning Ordinance. Projects will be reviewed relative to

the following inventories: National Register of Historic Places, California Archaeological Inventory, California Historic Resources Inventory, California Historical Landmarks and Points of Historic Interest, and relative to the Archaeological Information Center. Specific projects will also be analyzed for compliance with all applicable state and federal guidelines for the preservation of historical, archeological, and paleontological resources. In addition, specific housing projects will be reviewed for compliance with City development standards and with regard to the disruption of human remains, will be required to comply with CEQA Guidelines Section 15000 et. seq. which set procedures for notifying the County Coroner and Native American Heritage Commission for identification and treatment of human remains if they are discovered during construction. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS - Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) 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?				X
c) Be located on expansive soil creating substantial risks to life or property?				X
d) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

a), b) There are no known active or potentially active faults in close proximity to Buellton. For this reason the potential hazard from a fault rupture in the City is very low. Two potentially active faults that could cause groundshaking in Buellton in the future are the San Andreas, located about 50 miles to the northwest, and the Santa Ynez Fault, located approximately six miles to the south. The San Andreas would generate a very large earthquake which would cause some groundshaking in Buellton. However, the damage resulting from such an earthquake is not expected to be severe. 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. 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. Liquefaction hazards can be avoided with proper foundation engineering based on an analysis of the soils on a given building site.

The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in geologic impacts

beyond that anticipated by the General Plan Land Use Element and Safety Element. In addition, individual projects to be constructed in support of the assigned Housing Element Update will be evaluated for consistency with the City Zoning Ordinance, California Building Code, and City General Plan. Each project will be evaluated on a project specific basis for land use compatibility in Alquist-Priolo Special Studies Zones and Fault Hazards Zones, seismic ground shaking, ground failure, inundation, landslides, and flooding. Such projects will also be reviewed for consistency with all goals, objectives, and policies of the City General Plan Safety Element minimizing hazards to public health, safety, and welfare resulting from natural and manmade phenomena. Geotechnical reports will be required for individual projects as needed and as set forth in policies embodied in the General Plan Safety Element. Seismic safety issues would be addressed through the CBC and implementation of the recommendations on foundation and structural design contained in geotechnical investigations for specific projects as stated in the General Plan Safety Element and companion Program EIR. No mitigation measures are required for the Housing Element Update.

c) The City's established development review process will ensure that no adverse impacts related to geologic and soil hazards would result. Future development that would occur in conformance with the proposed Housing Element would be required to prepare geotechnical studies, as appropriate, as stated in the General Plan Safety Element and companion Program EIR, to determine necessary measures to reduce potential geological hazards and soil-related hazards to levels that are less than significant. No mitigation measures are required for the Housing Element Update.

d) Future developments that occur in conformance with the proposed Housing Element Update are anticipated to be developed in areas where local sewer system infrastructure is available. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VII. HAZARDS AND HAZARDOUS MATERIALS				
- Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) 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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) 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?			X	
e) 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?				X
f) 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?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
h) 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?			X	
<p>a - c). Implementation of the Housing Element Update's assigned growth need would not require the use of any significant amounts of hazardous materials. No significant amounts of hazardous materials will be transported, used, or disposed of in conjunction with housing units specified by the Housing Element. There would be no long-term significant hazards associated with the project. Incidental amounts of hazardous materials could be used during construction operations. Small quantities of household hazardous materials, such as cleaning material and solvents, may be used in conjunction with future housing projects. However, each development would be subject to environmental review and an analysis of hazards and hazardous materials. No mitigation measures are required for the Housing Element Update.</p> <p>d) Future residential development anticipated by the Housing Element Update may be located on or in the vicinity of sites identified on hazardous material lists. Through the City's development review process, it would be determined whether a Phase 1 Environmental Site Assessment would be necessary to determine whether a proposed development site is on or within the immediate vicinity of any known hazardous material sites. Where appropriate, mitigation measures would be required at that time to reduce potential hazards to the public to a level that is less than significant. No mitigation measures are required for the Housing Element Update.</p> <p>e), f) The City is not in the vicinity of an airstrip or within an airport land use plan. No mitigation measures are required for the Housing Element Update.</p> <p>g) Without specific details regarding future residential developments, it is infeasible to identify specific potential conflicts with an emergency response plan with any precision. Through the City's development review process, future development projects will be evaluated for consistency with adopted emergency response plans and will include measures if necessary to ensure that impacts are less than significant. No mitigation measures are necessary.</p> <p>h) Wildland fires are particularly acute in the Santa Ynez Valley due to its dry climate. Prolonged dry periods from the late spring through the fall and seasonal winds increase local fire hazards. High fire risk areas often correspond to dense chaparral plant associations, which contain scrubs that emit volatile oils when heated. Through the City's development review process, future residential development projects will be evaluated to determine potential hazards related to the exposure of people or structures to a significant risk of loss due to wildland fires. The review process will ensure consistency with applicable General Plan Safety Element policies setting standards and imposing mitigation for ensuring fire safety. Each future development project would be required to demonstrate consistency with the goals, policies and actions of the General Plan. No mitigation measures are required for the Housing Element Update.</p>				

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VIII. HYDROLOGY AND WATER QUALITY - Would the project:				
a) Violate any water quality standards or waste discharge requirements?			X	
b) 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c) 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?			X	
d) 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?			X	
e) 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?			X	
f) Otherwise substantially degrade water quality?			X	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
i) 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?			X	
j) Inundation by seiche, tsunami, or mudflow?			X	
<p>a) As housing units are developed in conformance with the Housing Element Update, wastewater will be discharged into the local sewer system and on-site drainage will flow into the local storm drain system. As part of section 402 of the Clean Water Act, the U.S. Environmental Protection Agency has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control both construction and operation (occupancy) storm water discharges. In California, the State Water Quality Control Board administers the NPDES permitting program and is responsible for developing permitting requirements. Each proposed future project will be evaluated as appropriate on an individual basis for reduction of impacts in conformance with the NPDES program, and in conformance with any requirements for the preparation of an erosion and sediment control program, otherwise termed a Storm Water Pollution Prevention Plan (SWPPP). These measures are part of the existing development review process for development projects in the City, and will ensure that impacts are maintained at a less than significant level. The Housing Element does not provide for development of industrial or commercial uses for which waste discharge requirements may be required. No mitigation measures are required for the Housing Element Update.</p> <p>b) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result increase water demand beyond that anticipated by the General Plan Land Use Element and Public Facilities and Services Element. In addition, through the City's development review process, future development will be evaluated as appropriate</p>				

for potential impacts to groundwater supply and recharge on a local as well as regional basis as each future development project is proposed. Additional development review in conjunction with State water legislation will also be performed. No mitigation measures are required for the Housing Element Update.

c) -f) Ultimate build-out of the dwelling units assigned in the Housing Element Update is not expected to substantially alter the existing drainage pattern of the 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-site or off-site. The General Plan Update identifies an assigned growth need for housing that can be met using vacant, under developed, underutilized and public-owned sites located throughout the City. Some of these vacant sites may involve slight changes to the existing on-site drainage network. However all developed sites would connect to the existing storm drain system and as such are not anticipated to generate significant erosion, siltation or stormwater impacts. Each future residential development will be evaluated regarding drainage patterns and stormwater runoff on an individual basis in order to obtain building permit approval. No mitigation measures are required for the Housing Element Update.

g), h) Future developments that would occur in conformance with the Housing Element Update would be subject to floodplain development requirements to limit the personal and property damage that may occur due to flooding and inundation. Each development will be evaluated on an individual basis and will be required to comply with California Building Codes and regulations, FEMA rules, the General Plan and City Zoning Ordinance. Policies embodied in the General Plan Safety Element set standards and mitigation measures for development in flood prone areas that prevents flood damage. No mitigation measures are required for the Housing Element Update.

i) 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. In the unlikely event of a dam failure, floodwaters would inundate some properties in the City that are adjacent to the Santa Ynez River. Neighborhoods that could potentially be impacted as a result of a failure of the Bradbury Dam, include neighborhoods closest to the river, south of Highway 246. However, the proposed Housing Element Update does not establish a growth need that would result in additional population within a dam inundation area beyond that anticipated by the General Plan Land Use Element and Safety Element. It should be noted that mitigation measures already required by the environmental review of the adopted Land Use Element mitigate potential dam inundation impacts to a less than significant level. These mitigation measures apply to all development within City limits. No mitigation measures are required for the Housing Element Update.

j) Inundation by a seiche or tsunami is unlikely given the distance between the City and the Pacific Ocean. The proposed Housing Element Update does not establish a growth need that would result in potential mudflow impacts beyond that anticipated by the General Plan Land Use Element and Safety Element. In addition, individual projects to be constructed in conformance with the Housing Element Update will be evaluated for consistency with the City Zoning Ordinance, California Building Code, and City General Plan. Each project will be evaluated on a project specific basis for issues related to slope instability and mudflow potential. Geotechnical reports for individual projects will be required as needed and as set forth in policies embodied in the General Plan Safety Element. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?			X	
b) 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?			X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?			X	
<p>a - c) Implementation of the Housing Element Update could involve a change from vacant to residential urban uses, but would not significantly divide any community or reduce access to community amenities. All future residential development projects would be reviewed for consistency with the General Plan and Zoning Ordinance and other applicable plans. There are no habitat conservation plans or natural community conservation plans that would apply to future development in the City. No mitigation measures are required for the Housing Element Update.</p>				

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
X. MINERAL RESOURCES - Would the project:				
a) 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?				X
b) 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?				X
<p>a - b) The General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in impacts to mineral resources beyond that anticipated by the General Plan Land Use Element. In addition, future development in conformance with the Housing Element will require City review to determine compliance with all applicable General Plan policies and development guidelines related to minerals, mining activities, and other potential environmental constraints. Projects will be required to comply with City and State standards governing mineral resources. No mitigation measures are required for the Housing Element Update.</p>				

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. NOISE - Would the project result in:				
a) 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?			X	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) 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 expose people residing or working in the project area to excessive noise levels?				X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X
<p>a – d) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result noise levels beyond that anticipated by the General Plan Land Use Element and the Noise Element. In addition, future residential development anticipated in the Housing Element Update will be subject to the General Plan Noise Element and noise guidelines incorporated therein. The General Plan discusses the effects of noise exposure on the population and sets land-use compatibility goals aimed at protecting its residents from undue noise. The Housing Element Update identifies an assigned housing need that will be implemented through the construction of individual projects. Individual projects to be constructed in support of the assigned housing need will be evaluated for consistency with the City General Plan and Zoning Ordinance. No mitigation measures are required for the Housing Element Update.</p> <p>e), f) The proposed project area is not located within the vicinity of an airport or private airstrip and therefore would not be affected by air traffic noise impacts. No mitigation measures are required for the Housing Element Update.</p>				

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XII. POPULATION AND HOUSING -- Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

a) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result a population beyond that anticipated by the General Plan Land Use Element. No mitigation measures are required for the Housing Element Update.

b), c) Future developments that would be constructed in conformance with Housing Element Update would be on vacant, under developed and underutilized land in the City. No existing housing is anticipated to be displaced that would not be replaced. Implementation of the Housing Element Update would increase access to decent, affordable housing to meet housing needs within the City. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. PUBLIC SERVICES - Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?			X	
e) Other public facilities?			X	

a), b), d), e) The General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in a need for public services beyond that anticipated by the General Plan Land Use Element and the Public Facilities and Services Element. In addition, as growth in conformance with the Housing Element Update occurs, any needs that arise will be addressed and met as each development is proposed, and will be funded through the payment of appropriate development fees or project specific mitigation, as appropriate. No mitigation measures are required for the Housing Element Update.

c) The proposed Housing Element Update does not establish a growth need that would impact schools beyond that anticipated by the General Plan Land Use Element and the Public Facilities and Services Element. In addition, future residential development in conformance with the Housing Element will be evaluated for impacts to the schools under the City's development review process. Each project will also be evaluated for compliance with the City General Plan and Zoning Ordinance. As growth in conformance with the Housing Element Update occurs, any needs that arise will be addressed and met as each development is proposed, and will be funded through the payment of appropriate development fees. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIV. RECREATION -				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	
<p>a), b) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in a need for parkland beyond that anticipated by the General Plan Land Use Element and the Parks and Recreation Element. In addition, future residential development in conformance with the Housing Element Update would be subject to the City's development review process where impacts to parkland would be further evaluated and required to pay Quimby fees, which is the funding equivalent to the provision of parkland. No mitigation measures are required for the Housing Element Update.</p>				

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. TRANSPORTATION/TRAFFIC - Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			X	
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			X	
c) 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?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e) Result in inadequate emergency access?			X	
f) Result in inadequate parking capacity?				X
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X	
<p>a), b) The existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in traffic impacts beyond that anticipated by the General Plan Land Use Element and Circulation Element. In addition, through the City's development review process, future development projects would be evaluated for potential traffic impacts. Appropriate mitigation measures would be required to reduce potential project specific traffic impacts in order to</p>				

maintain consistency with the General Plan and the Zoning Ordinance. No mitigation measures are required for the Housing Element Update.

c) The Housing Element Update would not result in any impacts to air traffic patterns, as no airports and private airstrips are located in the vicinity of the City. No mitigation measures are required for the Housing Element Update.

d), e) Through the City's development review process, future development projects will be required to maintain consistency with the General Plan Safety Element and all other applicable guidelines and regulations related to providing adequate emergency access in the City. Future residential development in conformance with the Housing Element will be evaluated on a project specific basis to determine adequacy of emergency access. No mitigation measures are required for the Housing Element Update.

f) Future residential development in conformance with the Housing Element Update will be required to satisfy City parking standards. Future residential development will be evaluated to determine adequacy of parking as part of the standard City development review process. No mitigation measures are required for the Housing Element Update.

g) The City of Buellton General Plan Circulation Element encourages facilities that promote the use of alternate modes of transportation, including bicycle lanes, pedestrian and hiking trails, park-and-ride lots and facilities for public transit shall be incorporated into new development. Through the City's development review process, future residential development in conformance with the Housing Element Update will be required to maintain consistency with the General Plan and all other applicable guidelines and regulations related to alternative transportation. No mitigation measures are required for the Housing Element Update.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. UTILITIES AND SERVICE SYSTEMS - Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) 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?			X	
c) 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?			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			X	
a) The protection of water quality in the region is under the jurisdiction of the Regional Water Quality Control Board, Central Coast Region (RWQCB). The regulatory authority of the RWQCB is provided by the federal and state Clean Water Acts (CWA). The RWQCB Basin Plan sets standards for water contaminant levels. The				

existing General Plan Land Use Element and current Zoning already dedicate land sufficient to accommodate the RHNA allocation of 279 units for the 2009 Housing Element. The RHNA allocation for the proposed Housing Element is 4 units less than the allocation for the 2009 Housing Element. As such, the proposed Housing Element Update does not establish a growth need that would result in wastewater treatment needs beyond that anticipated by the General Plan Land Use Element and the Public Facilities and Services Element. Through the City's development review process, future development projects will be required to maintain consistency with the Basin Plan as well as City standards. Appropriate mitigation measures would be required of individual residential developments to reduce potential project specific water quality impacts to a level that is less than significant. No mitigation measures are required for the Housing Element Update.

b), c) The proposed Housing Element Update does not establish a growth need that would result in wastewater treatment or drainage infrastructure needs beyond that anticipated by the General Plan Land Use Element and the Public Facilities and Services Element. In addition, future residential development in conformance with the Housing Element will be evaluated to determine adequacy of utility infrastructure as part of the standard City development review process. No mitigation measures are required for the Housing Element Update.

d) All of the City's water is obtained from five wells that draw from two sources: the Santa Ynez River Underflow and the Buellton Upland Groundwater Basin. The City retains surplus water supply to address full buildout of the City. The proposed Housing Element Update does not establish a growth need that would result in water demand beyond that anticipated by the General Plan Land Use Element and the Public Facilities and Services Element. In addition, future specific housing projects will be reviewed for compliance with all applicable City policies and development standards. No mitigation measures are required for the Housing Element Update.

e) The proposed Housing Element Update does not establish a growth need that would result in wastewater treatment needs beyond that anticipated by the General Plan Land Use Element and the Public Facilities and Services Element. In addition, specific housing projects will be reviewed for compliance with applicable City policies and development standards. No mitigation measures are required for the Housing Element Update.

f) Weekly garbage collection and disposal for the City is currently provided by Marborg Industries of Santa Barbara. Waste is ultimately disposed at Tajiguas Sanitary Landfill, located approximately 15 miles southeast of the City. The landfill serves waste disposal needs for the unincorporated areas of the south coast of Santa Barbara County, the City of Santa Barbara, Santa Ynez Valley and the Cuyama Valley. The proposed Housing Element Update does not establish a growth need that would result in solid waste disposal needs beyond that anticipated by the General Plan Land Use Element and the Public Facilities and Services Element. In addition, future development in conformance with the Housing Element will be reviewed for compliance with applicable City policies and development standards. No mitigation measures are required for the Housing Element Update.

g) Future development in conformance with the Housing Element will be reviewed for compliance with applicable Federal, State and City policies and development standards. No mitigation measures are required for the Housing Element Update.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X
<p>a) No significant biological or historical impacts are anticipated to result from implementation of the proposed Housing Element Update, as each specific project to be implemented in conformance with the Housing Element Update will be required to conform to the City General Plan and development standards. In addition, through the City's development review process, future development projects will be evaluated for potential direct and indirect impacts on biological and cultural resources. Appropriate mitigation measures will be required to reduce potential impacts to a level that is less than significant and thus in conformance with the General Plan and Zoning Ordinance. No mitigation measures are necessary for the Housing Element Update.</p> <p>b) The proposed project involves the implementation of the Housing Element Update for the City of Buellton. The Housing Element is a policy document designed to assist the City in future planning. The Housing Element identifies an assigned growth need for additional housing units within the City. Through the City's development review process, future development projects will be evaluated for potential cumulative impacts and for consistency with all applicable policies of the City General Plan and Zoning Ordinance. Through this review process, potential cumulative impacts to various natural and man-made resources will be evaluated and mitigated as appropriate. No mitigation measures are necessary as the existing City development review process is sufficient to maintain impacts at a less than significant level.</p> <p>c) The Housing Element is a policy document designed to assist the City in future planning. Nothing in the Housing Element Update would harm human beings. To the contrary, the purpose of the Housing Element is to establish policies that remove barriers and encourage housing development and a variety of programs designed to increase access to decent affordable housing for all economic segments of society. Although the Housing Element Update identifies an assigned growth need for additional housing units within the City, all units will not necessarily be constructed. Through the City's development review process, future residential development projects will be evaluated for potential direct and indirect impacts on human beings. Appropriate mitigation measures will be required to reduce potential impacts to a level that is less than significant. No mitigation measures are necessary for the Housing Element Update.</p>			