ATTACHMENT 9

ORCUTT KEY SITE 3 PROJECT

PROPOSED FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

REVISION LETTER #1

SCH #2007091023

November 17, 2011

Project Case Nos. 06GPA-00000-00016, 06RZN-00000-00007, 06TRM-00000-00004/TTM 14,714, 06DVP-00000-00015, and 10CUP-00000-00001

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I. PROJECT DESCRIPTION

The project as evaluated in the March 2011 Proposed Final Subsequent Environmental Impact Report (Final SEIR) involves a Comprehensive Plan Amendment, Rezone, Vesting Tentative Tract Map, and Development Plan entitlements to subdivide an existing 138.6-acre parcel into 172 parcels for the development of 156 residential units. The development evaluated in the March 2011 Final SEIR included the construction of 145 single-family residential units under the proposed Development Plan, and the future development of 11 "estate homes" on the south side of Orcutt Creek as part of the proposed Vesting Tract Map. A Conditional Use Permit is also required for areas of the project that would have walls exceeding eight feet in height. The property is identified as Assessor's Parcel Number (APN) 129-151-026. It is within the Orcutt Community Plan (OCP) area and is referred to as Key Site 3.

II. BACKGROUND

A Draft SEIR (SCH #2007091023) for the project was circulated for a 45-day public review period that began June 30, 2010 and concluded on August 13, 2010. On August 2, 2010, County staff conducted a public hearing at the Betteravia Government Center in Santa Maria regarding the Draft SEIR for the Orcutt Key Site 3 Project. In response to public comments, revisions were made and the Proposed Final SEIR was released in March 2011, including written responses to comments received on the draft document.

Based on Planning Commission comments made during the April 13th and July 20, 2011 Planning Commission hearing, the project applicant has proposed revisions to the Key Site 3 Project. These changes are discussed below in Section III.A, and this Revision Letter has been prepared to update the Proposed Final SEIR to reflect the changes related to modifications to the Key Site 3 Project, as well as provide the required environmental analysis. Pursuant to CEQA Guidelines, Section 15088.5, these project modifications and associated analyses documented in this Revision Letter do not require recirculation of the SEIR as they do not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

III. REVISIONS TO THE EIR IMPACT ANALYSIS

III.A. Modified Key Site 3 Development Plan

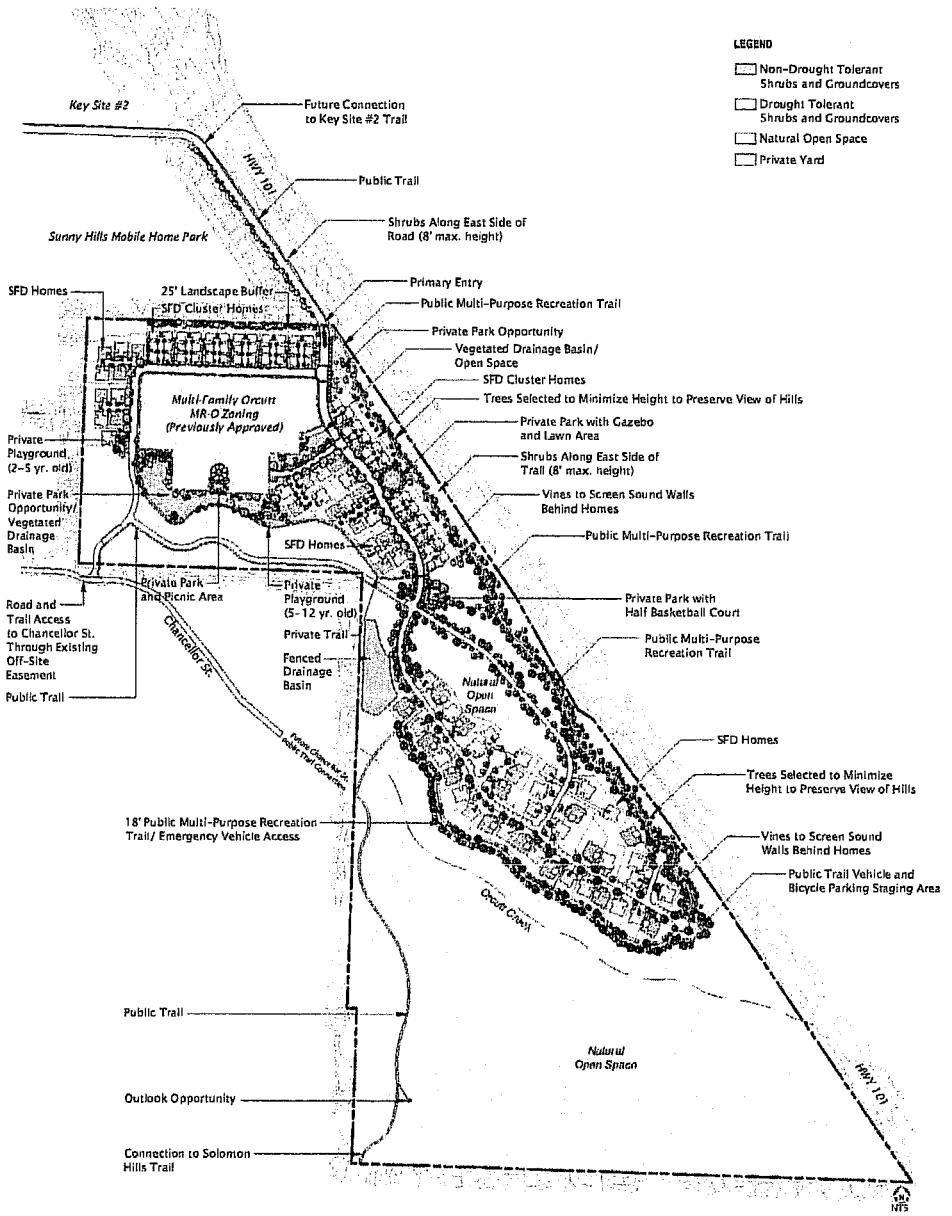
The proposed modifications to the Key Site 3 Project include a reduction in total units, an increase in setback from Highway 101, an increased buffer from the project boundary for residences along the northern and western portion of the Northern Mesa area, and elimination of the 11 estate lots previously proposed on the south side of Orcutt Creek. The number of single-family home cluster units within the Northern Mesa has been reduced from 99 to 85.

Within the Northern Mesa area, the row of 15 single-family home cluster units adjacent to the Highway 101 right-of-ay (formerly Lots 50, 51, 56, 57, 62,63, 68, 69, 74, 75, 80, 81, 84, 85 and

86) have been eliminated, and one single-family cluster unit to the west of "Road A" has been added, for a net reduction of 14 units. Furthermore, the number of single-family homes within the Central Plain area has been reduced from 46 to 40. Within the Central Plain area, six homes near the southern portion of this development area have been eliminated, and minor site plan changes were made to provide a 125-foot minimum setback from the edge of the Highway 101 right-of-way. With the revised project's removal of the 11 estate lots in the South Hills, the associated span bridge over Orcutt Creek on the southeastern portion of the site has also been eliminated.

Elimination of the row of 15 units in the Northern Mesa area, adjacent to Highway 101, has increased the setback from property line to the closest unit from 94 feet to 125 feet. In addition, setbacks from the site's western property line for the single-family cluster units on Lots 5, 6, 9, and 10 have been increased from 25 feet to 50 feet. Similarly, the setbacks from the site's northern property line to the closest unit on Lots 15, 16, 21, 22, 27, 28, 33, 34, 39, 40, 45, and 46 have increased from 44 feet to 50 feet, which includes a 25-foot wide undeveloped buffer between the rear property lines of the residential units to the northern site boundary and 25-foot rear yard building setbacks.
Overall, these modifications would result in a reduction from 156 units as originally proposed to 125 units, or a total of 31 units, which includes a reduction of 14 units in the Northern Mesa, six units in the Central Plain, and 11 estate homes in the South Hills. The revised site plan is shown in Figure 1.

Figure 1 Revised Site Plan



Illustrative Site Plan- Full Site

III.B. Environmental Analysis of Proposed Modifications

The following analysis discusses the potential impacts of the revised project as compared to the original project.

Aesthetics/Visual Resources. The revised project would result in 14 fewer residential units in the Northern Mesa area and six fewer units in the Central Plain area. It would also exclude development within the South Hills. As such, aesthetic impacts associated with development in Northern Mesa and Central Plain areas would be reduced, and aesthetic impacts within the South Hills would be eliminated. However, development would occur in the Northern Mesa and Central Plain areas within in the same general footprint, albeit with an increased setback from the Highway 101 ROW. Thus, aesthetic and visual impacts in these areas would be similar though somewhat reduced when compared to the original project. Light and glare impacts would also be reduced in comparison with the proposed project with the reduction of development in the Northern Mesa and Central Plain and elimination of residential development in the South Hills area. However, the development of 125 residences on the Northern Mesa and Central Plain area would still present potentially significant light and glare impacts. Impacts to visual character and scenic views would remain significant and unavoidable (Class I). Mitigation Measures AES-1(a-c) which would require architectural design guidelines, design of infrastructure to follow prevailing contours, and preparation of a graffiti prevention plan, would still be required for development within the Northern Mesa and Central Plain areas. When combined with the 160 units planned for the MR-O zone, and other development in the Orcutt area, cumulative aesthetic impacts, although reduced, would also remain significant and unavoidable (Class I).

Agricultural Resources. The FEIR evaluated agricultural resources and concluded that the project site does not contain significant agricultural lands. As such, as with the original project, the revised project's impacts to agricultural resources would be less than significant. Moreover, the buffer between agricultural uses to the east of the project site, across Highway 101, would be further increased by approximately 30 feet for the single-family cluster area adjacent to Highway 101 in the Northern Mesa, and at least a 350 feet buffer would continue to be maintained for the single-family homes in the Central Plain area. Impacts would remain less than significant (Class III). Additionally, as with the original project, the revised project's contribution to cumulative agricultural resource impacts would be less than significant (Class III).

Air Quality. The 20% reduction in total residential development under the revised project would proportionately reduce temporary construction emissions, and impacts would remain less than significant (Class III). Long term operational emissions associated with vehicle trips and energy use would also be proportionately reduced, and impacts would similarly remain less than significant (Class III). Mitigation measures OCP EIR AQ-11 and AIR-2, which would encourage various energy conservation measures and payment of fees to improve public transportation, are still recommended. With the site plan changes, 19 fewer residential units would be exposed to potential toxic air contaminant health risks associated with Highway 101. However, Lots 49-71, 100, 101, 107, 108, and 109 as shown in the revised site plan (refer to Figure 1) would still be exposed to

potential health risks because they would be located within 300 feet of the centerline of Highway 101. Therefore, Mitigation Measure AIR-3, which requires forced air ventilation with filter screen on outside air intake ducts for residences within 300 feet, notification to future residents of the need to maintain filters, and weather proofed windows, would still apply for these residences. As with the original project, impacts related to Clean Air Plan consistency and cumulative air quality impacts associated with the revised project would be less than significant (Class III).

Biological Resources. The revised project would result in similar impacts within the creekside area due to the construction of the multi-use trail and therefore similarly impact primary movement corridors that are found on the central portions of the site. Impacts to the riparian corridor would be reduced with the elimination of residential development in the South Hills and the elimination of the eastern bridge over Orcutt Creek for the road that was formerly proposed to serve the estate lots. However, the construction of the bridge near Chancellor Street would be retained in the revised project, and this would impact riparian habitat. According to the revised *Key Site 3 Biological Study* (November, 2011), impacts to riparian habitat would be reduced 0.91 acres to 0.26 acres under the revised project. Impacts to riparian habitat and disturbances to wildlife would remain significant but mitigable (Class II). Implementation of Mitigation Measures BIOL-1(a-b), which require a lighting plant to reduce light pollution and a riparian habitat restoration plan, would still be required.

Impacts related to flood control maintenance would remain less than significant (Class III).

Impacts related the removal of sensitive plant species for fire management purposes would be eliminated because no development would occur in the South Hills. According to the revised *Key Site 3 Biological Study* (November, 2011), impacts to Central Maritime Chaparral would be reduced from 0.99 acres to 0.06 acres under the revised project and impacts to Central Dune Scrub (4.56 acres) would be completely eliminated under the revised project. Mitigation Measure BIOL-3(a) would not be required for fire management purposes; however, Mitigation Measure BIOL-3(b) which requires a landscape plan that includes drought tolerant, locally native plan species would still be required to minimize the potential for the introduction of native species. This impact would remain significant but mitigable (Class II)

Construction and development activities associated with the revised project could result in direct loss of non-native grassland, coastal scrub, oak woodland, oak riparian, and central dune scrub habitats. Impacts however, would be reduced from significant and unavoidable (Class I) to significant but mitigable (Class II) because under the revised project, no development would occur in the South Hills, where the vast majority of sensitive habitats are located. As indicated by the revised *Key Site 3 Biological Study* (November, 2011), impacts to sensitive habitats would be reduced from 6.46 acres to 0.32 acres under the revised project (refer to Table 1). The need for restoration would be reduced from 18.75 acres to 3.73 acres under the revised project. Mitigation Measures BIOL-4(a-d) which requires habitat restoration, avoidance of oak trees, mitigation where oak trees cannot be avoided and sensitive habitat avoidance would still apply.

Table 1 Habitat Impacts Changes Under Revised Project

Habitat Type	Acreage of Impacted Habitat Original Project	Acreage of Impacted Habitat Revised Project	Replace. Ratio	Revised Project Restoration Acreage
Central Maritime Chaparral	0.99	0.06	3:1	0.18
Central (Lucian) Coastal Scrub	26.56	17.59	None	0
Central Dune Scrub	4.56	0	2:1	0
Central Coast Live Oak Riparian Forest	0.91	0.26	2:1	0.53
Central Coast Arroyo Willow Riparian Forest	0.01	0.02	2:1	0.04
Coast Live Oak Woodland	1.17	0.01	2:1	0.20
Non-native Grassland	34.71	32.21	None	0
Dry Wash	0.06	0.03	None	0
Planted Trees	0.14	0.18	None	0
Seasonal wetland	2.78	2.78	1:1	2.78
PROJECT SITE TOTAL	**71.89**	**53.23 (-18.66)**	**varies**	**3.73 (-15.02)**

As with the original project, the revised project would result in the complete and unavoidable loss of the seasonal wetland in the eastern portion of the mesa area and would include the construction of a bridge for secondary site access off of Chancellor Road, which would result in impacts to the Orcutt Creek riparian corridor. However, as discussed above, the second bridge for the access road to the estate homes would no longer be necessary, which would reduce impacts to the Orcutt Creek riparian corridor. Nonetheless, implementation of Mitigation Measures BIOL-5(a-c), which require wetland restoration, Orcutt Creek avoidance and agency consultation, would be required. Impacts would remain significant but mitigable (Class II).

By eliminating residential development in the South Hills, the revised project would reduce impacts related to wildlife movement and habitat fragmentation. However, development of the Northern Mesa and the Central Plain would still restrict habitat available to grassland-dependent species. Impacts to wildlife would remain significant and unavoidable (Class I) for the revised project. Mitigation Measure BIOL-6(a) would no longer be required, as this applied to estate home development in the South Hills. Mitigation Measures BIOL-6(b-c), which require an open space management plan and wildlife avoidance, would be required.

Impacts to biological resources during construction activity would be reduced under the revised project due to the elimination of residential development in the South Hills. However, impacts would remain significant but mitigable (Class II), and Mitigation Measures BIOL-7(a-c), which require best management practices, invasive weed protection, and sensitive resource education, would still be required.

The revised project would not significantly impact rare plants, which are primarily located in the South Hills. However, the potential for rare plants to occur in the central portion of the site cannot be ruled out. Mitigation Measures BIOL-8(a-c), which require special status plant surveys, sensitive plant species avoidance, and special status plant mitigation, would still apply, but Mitigation Measure BIOL-8(d) would not be required. Impacts to special status animal species would be reduced under the revised project, but would still require Mitigation Measures BIOL-9 (a-d) to reduce impacts to nesting birds, badgers, burrowing owls, and sensitive reptiles that may utilize the grassland habitat on the rest of the site.

With implementation of applicable mitigation measures and the dedication and management of the open space area in the South Hills, the revised project would reduce its cumulative habitat loss and cumulative impacts to biological resources in general in comparison to the original project. However, given that potential impacts to sensitive habitat and wildlife remain significant and unavoidable under the revised project, cumulative biological resource impacts remain significant and unavoidable (Class I).

Cultural and Historic Resources. The Key Site 3 property contains four known cultural resource sites, three of which would not be in an area of residential development. The two sites along the eastern frontage of the Key Site 3 property could potentially be affected by the recreational trail in this area, which is retained in the revised project. Mitigation Measures CR-1(a-d) described in Section 4.5, *Cultural Resources,* would be required to ensure that these existing sites are avoided during construction, or appropriately documented and curated (in the event that avoidance cannot be ensured) and protected from indirect impacts. Due to the overall sensitivity of the general area and the Key Site 3 property specifically, construction monitoring and discovery measures (Mitigation Measures CR-2 and CR-3) would be required to prevent impacts to unknown cultural or paleontological resources because development would occur in the same general vicinity as compared to the original project. Hence, project-specific impacts to cultural resources would remain significant but mitigable (Class II). Cumulative impacts to these resources would be less than significant (Class III), as with the original project.

Geologic Resources. The Key Site 3 property is subject to groundshaking and has moderate potential for damage due to settlement of surface soils. The revised project would require mitigation similar to that required for the original project (Mitigation Measures G-1 and G-3) to ensure that future development is engineered according to the requirements of the geotechnical study and the Uniform Building Code. Potential impacts related to slope stability would be eliminated under the revised project because development would only occur on the Northern Mesa and Central Plain areas, and not on the sloped bluffs or hillsides. Mitigation Measure G-2 would not be required. Further, a decrease in the number of proposed residential units would also expose fewer people and structures to geologic hazards than the proposed project. Similar to the originally proposed project, cumulative impacts would be less than significant (Class III).

Greenhouse Gas Emissions. As described in the Air Quality discussion above, the revised project would result in 20% fewer residential units than the proposed project, and would generate proportionately fewer emissions. Since the 20% fewer residential units would result in 20% fewer greenhouse gas (GHG) emissions, the annual GHG emissions of the revised project would be 1,768

MT CO_2e /yr, which would still exceed the significance criteria of 1,100 MT CO_2e/yr. Similar to the proposed project, the per service population (SP) annual GHG emissions rate would be 5.08 MT CO_2e/SP/yr, which exceeds the significance criteria of 4.6 MT CO_2e/SP/yr. As with the proposed project, mitigation measures to reduce GHG emission rates to below this criterion would be required, and GHG emissions impacts would be less than significant with mitigation (Class II). Mitigation Measure GHG-1, which requires preparation of a GHG reduction plan, would still be required.

Hazardous Materials/Risk of Upset. Most project-specific and all cumulative hazards and hazardous materials-related impacts would be less than significant under the revised project (Class III). Since no development would occur near the existing oil well in the southeast corner of the site, potential hazards and contamination issues would be avoided and would be less significant (Class III). Mitigation Measures HAZ-1 and HAZ-2 would not be required. In addition, no residential development would occur on the steep slopes south of Orcutt Creek, and the revised project therefore has reduced wildfire hazard risks. While fewer residences would be exposed to fire hazards in Northern Mesa and Central Plain areas, Mitigation Measures HAZ-3(a) and HAZ 3(b), which require a fire management plan and fire prevention construction techniques, would still be required to reduce wildland fire impacts. Impacts would remain significant but mitigable (Class II).

Potential impacts associated with chemical usage on adjacent agricultural properties would still be prevented through existing regulations and the existing buffer created by Highway 101, which would be further expanded with the revised project.

Cumulative wildland fire impacts would be reduced to less than significant (Class III) under the revised project because residential development would not be located in the South Hills.

Hydrology and Water Quality. Due to elimination of development in the southern hillside and overall reduction of units in the Northern Mesa and Central Plain, hydrology and water quality impacts would be reduced under the revised project. However, 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 storm water pollution prevention plan (SWPPP). Impacts would remain significant but mitigable (Class II), and Mitigation Measure HWQ-1 would still be required. The *Key Site 3 Preliminary Drainage Report* (October 2011) prepared for the revised project indicates that slight modifications to the drainage system would occur to accommodate the revised project. The original drainage plan for the Northern Mesa area was to include five detention basins; however, the revised project would include three basins. As indicated in the *Key Site 3 Preliminary Drainage Report* (October 2011), the three basins in the Northern Mesa area would mitigate stormwater runoff to criteria set forth by the Santa Barbara County Flood Control District. The drainage plan for the Central Plain area would remain the same as originally proposed. Because stormwater would still outfall into Orcutt Creek, the plan for development of the Northern Mesa and Central Plain areas would still require the use of low impact development (LID) technologies, drainage pipe re-design, operational erosion control, storm water management, and detention basin maintenance measures, as described in Mitigation Measures HWQ-2 (a-e).

Similar to the original project, potential impacts associated with locating the Central Plain residential units within a 100-year flood zone would be avoided by compliance with County requirements for floodway setbacks and finish floor elevation requirements. Impacts related to flooding would remain less than significant (Class III). Impacts would remain less than significant with mitigation at the project level and would not be considered cumulatively considerable.

Land Use and Planning. Land use impacts would be lessened under the revised project, considering the elimination of residential units in the South Hills and the retention of this area as a contiguous open space area. Although impacts to open space would be reduced in this alternative, the project's significant and unavoidable (Class I) impacts to loss of open space would not be avoided because development in the central plain area would fragment the open space into smaller less desirable open space areas. General quality of life impacts related to overall compatibility with adjacent land uses would be reduced as compared to the original project. Although there would be a similar number of residences in the Northern Mesa and Central Plain areas in proximity to existing residences, impacts would be reduced with the provision of larger development buffers for the residences along the northern and western portion of the Northern Mesa area. The setbacks and buffers provided in the revised project, in combination with the restriction to single-story homes closest to existing development and adherence to architectural design standards in the Orcutt Community Plan (OCP), would result in impacts that are adverse, but less than significant (Class III).

Noise. Overall, temporary construction-related noise would be slightly reduced as compared to the proposed project, due to the elimination of residential units in the South Hills and 20 fewer units in the Northern Mesa and Central Plain areas. However, because the majority of development would be similar to that of the original project, construction and operational impacts, including noise impacts from Highway 101 and traffic generated noise along nearby roadways, would be similar. Project specific noise impacts would remain significant but mitigable (Class II), and Mitigation Measures N-1 through N-3 which require, construction timing limitations, notification of temporary construction noise, construction noise attenuation techniques, sound barriers, noise resistant construction materials, and construction of a sound barrier along Sunny Hills Road would still be applicable. As with the originally proposed project, cumulative roadway noise would not be considerable with mitigation (Class II), and the project's contribution to cumulative roadway noise levels on Sunny Hills Road south of Clark Avenue would not be considerable (Class III).

Public Services and Facilities. Because the revised project would result in 31 fewer residential units and therefore generate fewer residents and students, impacts related to fire and police protection and schools would proportionately be reduced. In addition, standard development fees would be required to ensure that incremental impacts to these facilities are offset by new development. Overall, project-specific and cumulative impacts to public services and facilities would remain less than significant (Class III).

Recreation. The revised project would result in 20% fewer residential units and impacts to recreation would be similar in comparison to the proposed project. Similar to the original project, the revised project would provide dedicated parkland within the developed areas; however, this

parkland would be private, and in-lieu fees would still be required. A larger contiguous open space area would be provided under the revised project, with the elimination of development south of Orcutt Creek, and Mitigation Measure REC-1, which recommends an easement dedication for the multi-use trail, would still be recommended. Cumulative impacts to recreation would remain less than significant under the revised project (Class III).

Transportation and Circulation. The revised project would result in similar level of soil hauling and construction activities when compared to the original project. Thus, conflicts between existing traffic and project-generated soil hauling and construction traffic have the potential to occur. Mitigation Measure T-1 would still be required.

The revised project would result in less overall development and thereby result in fewer vehicle trips. However, as indicated in the revised *Key Site 3 Residential Project Traffic Study* (October, 2011), the revised project would continue to impact the Clark Avenue/U.S. 101 Southbound ramps during the P.M. peak hour under Existing + Project conditions despite the reduced number of units. The revised project would cause this intersection to operate at a Level of Service (LOS) D, similar to the original project. As such, Mitigation measure T-2, which requires multiple roadway improvements, would still be required. Impacts would remain significant but mitigable (Class II).

The revised project would further degrade LOS at the U.S. 101Southbound ramp during P.M. peak hour under Cumulative + Project conditions, similar to the original project. This intersection is projected to operate at a LOS F without the project. The intersection would continue to operate at LOS F with the project, but would increase congestion by adding 47 trips during the P.M. peak hour. According to County thresholds, a significant impact would occur with the addition of 5 or more trips when the intersection operates at LOS F. As such, Mitigation measure T-3(a-b), which requires multiple roadway improvements and payment of Transportation Impact Fees, would still be required. Impacts would remain significant but mitigable (Class II).

The revised project would also cause the Clark Avenue/U.S. 101 Northbound ramp to degrade from LOS D to LOS E during the P.M. peak hour. The primary reason the revised project would impact this intersection, despite an overall reduction in development and trips, is due to the use of revised baseline cumulative data in the revised *Key Site 3 Residential Project Traffic Study*. Using the revised baseline cumulative data, this intersection would operate at LOS D without the project, whereas under the original project and original cumulative data, this intersection would operate at LOS B without the project. Although the revised project would impact this intersection, the level of impact would be less under the revised project than under the original project, as the revised project would result in 21 P.M. peak hour trips and the original project would result in 27 P.M. peak hour trips at this intersection. In addition, this impact would be mitigated by Mitigation Measures T-2 and T-3(a-b) identified in in the Final SEIR and no new mitigation would be required. These mitigation measures would result in multiple roadway improvements, require payment of Transportation Impact Fees and require bicycle path improvements. The specific roadway improvements that would mitigate impacts to Clark Avenue/Highway 101 Northbound ramp as required by Mitigation Measure T-2 include:

1. Widening of the south side of Clark Avenue between the realigned Sunny Hills Road and the U.S. 101 Southbound Ramps to provide two eastbound lanes.
2. Reconstruction of the Clark Avenue/U.S. 101 Northbound Ramps intersection. This includes realignment of the U.S. 101 northbound on-ramp to the east opposite the off- ramp, widening of the off-ramp to provide two separate turning lanes and widening of the on-ramp to two receiving lanes.
3. Signalization of the Clark Avenue/U.S. 101 northbound ramps intersection. The existing + project peak hour volumes would satisfy peak hour signal warrants.
4. Restripe of both ramp intersections and the overpass to maximize eastbound flow to the northbound on-ramp.

In addition, relative to Mitigation Measure T-3(a), the revised project would contribute fair share fees or would construct the improvements above and develop a fair share reimbursement mechanism for other key development projects in the Orcutt Area. Implementation of these measures would mitigate the project's contribution to the cumulative impact at the Clark Avenue/U.S. 101 Southbound and Northbound Ramps. According to the revised *Key Site 3 Residential Project Traffic Study*, with implementation of Mitigation Measures T-2 and T-3(a-b), LOS at the Clark Avenue/U.S. 101 Southbound and Northbound Ramps intersections would be improved to LOS A and B, respectively, under Cumulative + Project conditions. Therefore, cumulative traffic impacts would remain significant but mitigable (Class II).

Utilities and Service Systems. The revised project represents a 20% reduction of residential units compared to the original project. Consequently, a corresponding reduction can be applied to the project's calculated water demand, wastewater and solid waste quantities, and gas and electric service demands.

Water demand would decrease from 88 acre feet per year (AFY) to 66 AFY. The Supplemental Water Purchase Agreement with the City of Santa Maria stipulates that the City will provide 200 AFY for the purposes of consumptive use for the proposed project. As such, water impacts would remain less than significant (Class III). Mitigation Measures U-1(a-b) are still recommended to further reduce water demand. Existing demand plus cumulative buildout demand, including the project would total 12,270 AFY, while currently available supplies are 20,475 AFY. Therefore, cumulative impacts to water supply and groundwater resources would be less than significant (Class III).

According to the revised Key Site 3 Sewer Study (October 2011), the revised project would generate an average of 0.014 million gallons of wastewater per day (MGD). The Laguna County Sanitation District Treatment Plant has the capacity to treat up to 3.7 MGD and currently has an excess capacity of 1.3 MGD. Thus adequate wastewater treatment capacity exists, and impacts would remain less than significant (Class III). As with the original project, cumulative development is expected to exceed the 75% "check point" threshold. The proposed project would contribute to this wastewater check-point exceedance. Thus, the revised project's contribution to cumulative impacts would continue to be significant and unavoidable (Class I).

The revised project would generate an estimated 162 tons of solid waste per year, assuming that the state mandated diversion rate of 50% is implemented. This amount of solid waste is below the County's 196 tons per year significance threshold. Thus, impacts would be reduced under the revised project from significant and unavoidable to less than significant (Class III). According to County thresholds, a project that would generate 40 tons of solid waste per year would be considered cumulatively significant. Since the revised project would exceed the threshold for cumulative solid waste generation, cumulative impacts would remain significant and unavoidable (Class I).

The revised project would require approximately 20% less electricity and natural gas due to the 20% reduction in proposed number of units. Thus, impacts would remain less than significant (Class III). Cumulative impacts would also be less than significant (Class III).

III.B.1 Summary of Impacts

Table 2 below summarizes the differences in impact classifications of the original project compared to the revised project.

Table 2 Impact Comparison Summary for Original and Revised Project

Environmental Issue	Level of Impact	
	Original Key Site 3 Project	Revised Key Site 3 Project
Aesthetics		
Visual Character	I	I
Scenic Views	I	I
Light/Glare	I	I
Cumulative Impacts	I	I
Agricultural Resources		
Conversion	III	III
Agriculture/Urban Conflicts	III	III
Cumulative Loss	III	III
Air Quality		
Construction Emissions	III	III
Operational Emissions	III	III
Health Risks	II	II
CAP Consistency	III	III
Cumulative Impacts	III	III
Biological Resources		
Multi-Use Path Impacts	II	II
Flood District Maintenance Impacts	III	III
Vegetation Removal for Fire Mgt.	II	II
Sensitive Habitat Loss	I	II
Wetlands	II	II
Impacts to Wildlife	I	I
Construction Impacts	II	II

Table 2 Impact Comparison Summary for Original and Revised Project

Environmental Issue	Level of Impact	
	Original Key Site 3 Project	Revised Key Site 3 Project
Rare Plants	I	II
Special Animals	II	II
Cumulative Habitat Loss	I	I
Cultural Resources		
Known Cultural Resources	II	II
Unknown Cultural Resources	II	II
Paleontological Resources	II	II
Indirect Impacts	II	II
Cumulative Impacts	III	III
Geologic Resources		
Groundshaking	II	II
Slope Stability	III	III
Settlement	II	II
Cumulative Impacts	III	III
Hazardous Materials/Risk of Upset		
Oil Well Hazards	III	III
Contamination	II	III
Fire Hazards	II	II
Cumulative Impacts	II	III
Hydrology and Water Quality		
Construction Impacts	II	II
Drainage and Runoff	II	II
Flood Hazards	III	III
Cumulative Hydrology/ Water Quality	III	III
Cumulative Flood Hazards	III	III
Land Use and Planning		
Quality of Life	II	III
Loss of Open Space	I	I
Cumulative Impacts	I	III
Noise		
Construction Impacts	II	II
Roadway Noise Exposure	II	II
Operational Noise	II	II
Cumulative Operational Noise	II	II
Public Services and Facilities		
Fire Protection	III	III
Medical and Emergency Services	III	III
Fire Flow	III	III
Police Protection	III	III
Schools	III	III
Cumulative Impacts	III	III

Table 2 Impact Comparison Summary for Original and Revised Project

Environmental Issue	Level of Impact	
	Original Key Site 3 Project	Revised Key Site 3 Project
Recreation		
Parks Demand	III	III
Cumulative Impacts	III	III
Traffic		
Construction Trips	II	II
Operational-Level of Service	II	II
Cumulative Traffic Impacts	II	II
Utilities and Service Systems		
Water Demand	III	III
Wastewater	III	III
Solid Waste	I	III
Gas and Electric Service	III	III
Cumulative Wastewater Impacts	I	I
Cumulative Solid Waste Impacts	I	I
Greenhouse Gas Emissions		
Operational Emissions	II	II

Class I: Potentially significant and unavoidable impact
Class II: Potentially significant but mitigable impact
Class III: Less than significant impact