

ATTACHMENT 5

SANTA BARBARA COUNTY PLANNING COMMISSION

Staff Report for Orcutt Key Site #3

Hearing Date: December 14, 2011

Staff Report Date: December 2, 2011

Case No.: 06GPA-00000-00016; 06TRM-00000-00004/
TM14,714; 06DVP-00000-00015; 06RZN-00000-00007
10CUP- 00000-00001

Env. Document: Exempt Sec. 15270

Deputy Director: Doug Anthony

Division: Development Review North

Supervising Planner: Zoraida Abresch

Supervising Planner Phone # 934-6585

Staff Contact: John Zorovich

Planner's Phone #: 934-6297

OWNER:

Ernie Mansi

SB Clark, LLC

300 Esplanade Dr., Ste 430

Oxnard, CA 93036

(805) 988-4114

APPLICANT:

John Franklin

Franklin Real Estate Development, LLC

3159 Eaglewood Avenue

Thousand Oaks, CA 91362

(805) 907-5124

ENGINEER:

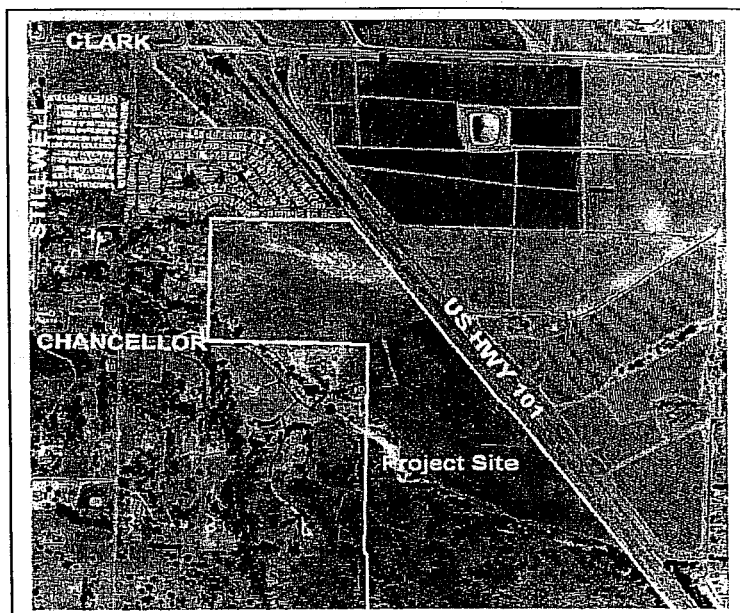
Ray Severn

Penfield & Smith

210 E. Enos Drive, Suite A

Santa Maria, CA 93454

(805) 925-2345



This site is identified as Assessor Parcel Number 129-151-026, located approximately 0.5 miles south of the Clark Avenue /U.S. Highway 101 intersection, in the Orcutt area, 4th Supervisorial District.

Applications Filed: October 2, 2006

Application Complete: July 19, 2007

Processing Deadline: 180 days from certification of EIR

1.0 REQUEST

Hearing on the request of John Franklin, on behalf of the owner, SB Clark, LLC, to consider the following cases on property located in the RR-10/MR-O zones.

- 1.1 **Comprehensive Plan Amendment (06GPA-00000-00016)** proposing to amend the Santa Barbara County Orcutt Community Plan by changing the Land Use Designation from Residential Ranchette to Planned Development;

- 1.2 **Zoning Map Amendment with a Development Plan (06RZN-00000-00007 & 06DVP-00000-00015)** proposing to rezone 138.6 acres from RR-10 to PRD in compliance with Chapter 35.104 of the County Land Use and Development Code; and approval of a Final Development Plan in compliance with Section 35.82.080 of the County Land Use and Development Code to develop 125 residential units;
- 1.3 **Vesting Tentative Tract Map (06TRM-00000-00004/TTM 14,714)** for approval of a Tentative Map in compliance with County Code Chapter 21 to divide 138.6 acres into: 1) 125 residential lots that range in size from 3,422 square feet to 9,700 square feet; 2) one public open space lot; 3) seven private open space lots; 4) seven lots for private roadways; and, 5) two lots for condominium development, on property zoned RR-10/MR-O;
- 1.4 **Minor Conditional Use Permit (10CUP-00000-00001)** to allow for walls taller than eight feet in height in compliance with Section 35.24.030 of the LUDC; and,

to certify the Subsequent EIR (10-EIR-4) to the Environmental Impact Report (95-EIR-01), including EIR Revision Letter dated November 17, 2011, pursuant to the State Guidelines for Implementation of the California Environmental Quality Act. As a result of this project, significant effects on the environment are anticipated in the following categories: aesthetics/visual resources, biological resources, land use and public services (solid waste and wastewater). The application involves AP No. 129-151-026, located approximately 0.5 miles south of the Clark Avenue /U.S. Highway 101 intersection in the Orcutt area, Fourth Supervisorial District.

The Subsequent EIR and all documents referenced therein may be reviewed at the Planning and Development Department, 624 West Foster Road, Suite C, Santa Maria. The Subsequent EIR is also available for review at the Central Branch of the City of Santa Barbara Library, 40 E. Anapamu St., Santa Barbara.

2.0 RECOMMENDATION AND PROCEDURES

Staff recommends denial of the Key Site 3 Project applications (Case Nos. 06GPA-00000-00016, 06RZN-00000-00007, 06DVP-00000-00015, 06TRM-00000-00004/TTM 14,714, and 10CUP-00000-00001) marked "Officially Accepted, County of Santa Barbara (December 1, 2011) County Planning Commission Exhibits A-B", based upon the project's inconsistency with the Comprehensive Plan, including the Orcutt Community Plan, and based on the inability to make the required findings.

Your Commission's motion should include the following:

Recommend that the Board of Supervisors

1. Make the required findings to deny the project specified in Attachment A of this staff report.
2. Determine the project to be exempt from CEQA pursuant to CEQA Guideline Section 15270 of CEQA (Attachment C).
3. Deny the project (06GPA-00000-00016, 06RZN-00000-00007, 06DVP-00000-00015, 06TRM-00000-00004, and 10CUP-00000-00001).

Refer back to staff if the County Planning Commission takes other than the recommended action for appropriate findings and conditions.

3.0 JURISDICTION

This project is being considered by the Planning Commission, acting in an advisory capacity to the Board of Supervisors. Section 35.80.020.B.2 of the County Land Use & Development Code (LUDC) that states, "if the Board is the review authority for a project, due to a companion discretionary application (e.g., Zoning Map amendment), the Commission shall make an advisory recommendation to the Board on each project."

4.0 ISSUE SUMMARY

4.1 Background

In April 2011, the Planning Commission considered the original project and directed staff to work with the applicant in reconfiguring the project to avoid environmental impacts and conflicts with the Orcutt Community Plan (OCP). On July 20, 2011, the applicant provided a conceptual reconfiguration of the project that eliminated development south of Orcutt Creek and reduced the number of proposed residential units from 156 to 125. P&D did not support the conceptual reconfigured project; staff's analysis was the reconfigured project remained inconsistent with the OCP open space and visual policies. A majority of the Planning Commissioners individually expressed that they too could not support the conceptual reconfigured because of its inconsistency with OCP policies. Further, a majority of the Commissioners individually stated that development should be limited to the northern mesa consistent with the OCP Key Site 3 policies and development standards.

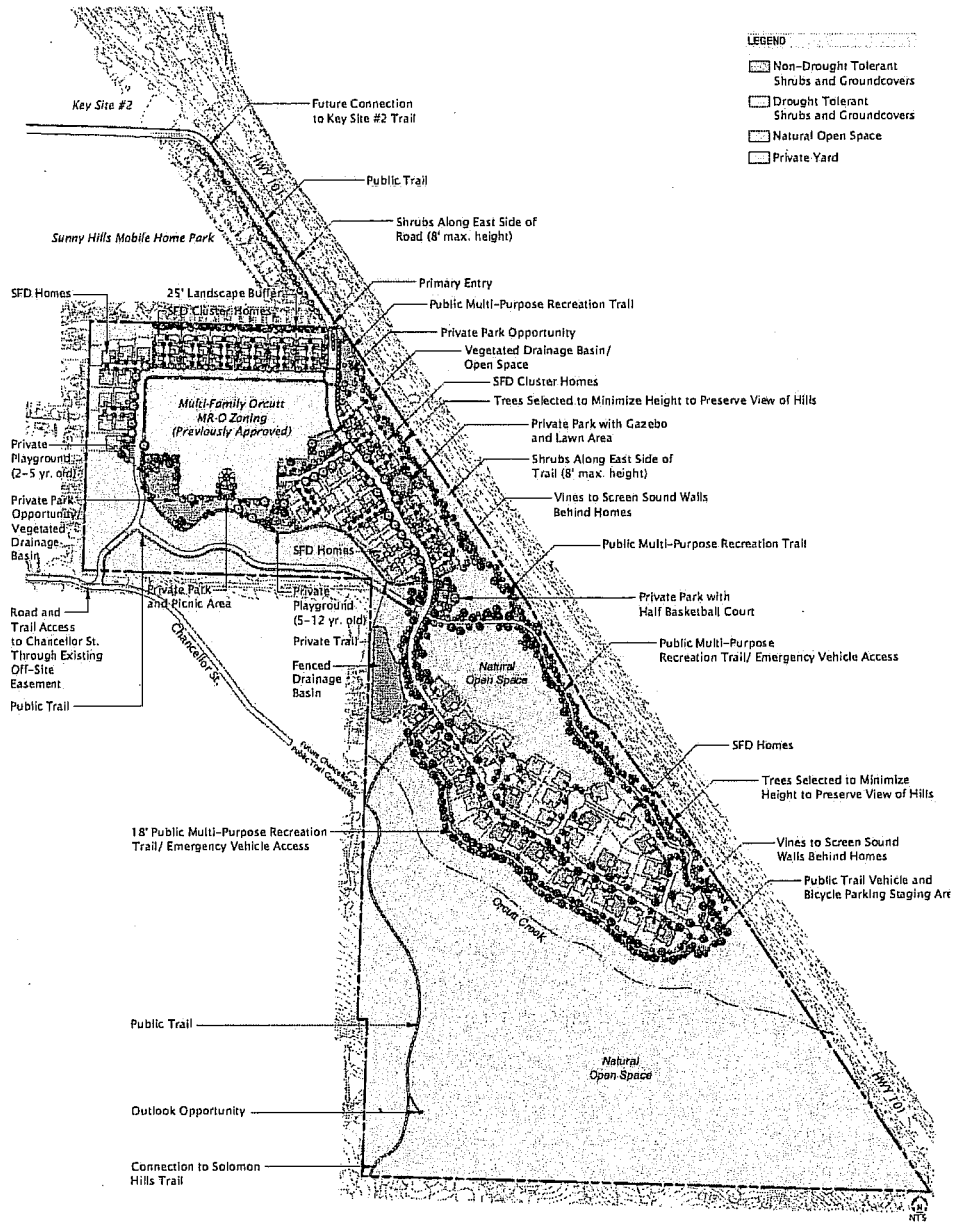
Orcutt Key Site 3

06GPA-00000-00016, 06RZN-00000-00007, 06DVP-00000-00015, 06TRM-00000-00004/TTM 14,714, 10CUP-00000-00001

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Figure 1



Illustrative Site Plan- Full Site

4.2 Reconfigured Project

On October 21, 2011 the applicant submitted a detailed reconfigured project, which resembles the conceptual reconfigured project presented to the Planning Commission at the July 20, 2011 hearing (Figure 1). The applicant has indicated to staff the revised project is better suited for the site because it provides a greater diversity of housing types and is more compatible with the previously approved MR-O multi-family project. The applicant has made the following minor changes to the project since the July 20th hearing:

- Recontoured berm located along eastern perimeter which reduces noise levels from Highway 101 and improves visual screening of the project.
- Public trail and emergency access road relocated to the west of the berm to provide greater separation from Highway 101.
- Revised landscape palette to include tree species that have a smaller height at maturity. Also, added shrubbery along the eastern perimeter of the site to improve visual screening of homes and improve screening from Highway 101, while still allowing significant long views to the South Hills and open space areas.
- Varied front yard setbacks along interior roads to provide more visual diversity and varied street scene.

4.3 Staff Analysis

As discussed during both the April 13th and July 20th hearings for this project, P&D believes that the intent of the OCP open-space policies and development standards is to provide: 1) a large contiguous amount of open-space area that can be used for passive-recreational uses; and, 2) protection of sensitive biological, visual and cultural resources. The revised project would provide a slightly greater amount open-space acreage than what the OCP requires (100 acres vs. 98 acres per the OCP); however, locating some of the development south of the northern mesa (in the designated open space area) would result in a series of small open-space areas, bordered on several sides by residential development, rather than one large contiguous open-space area envisioned in the OCP. Thus, while the proposed reconfigured project proposes more open space than what is required by the OCP, it also includes smaller pockets of open space which do not offer the same natural resource protection and preservation opportunities as would be experienced and achieved with one large contiguous open space.

As noted in the previous staff report dated July 8, 2011, P&D does not support the proposal to relocate the open-space boundary to the south and allow development of 40 units in the designated open-space area for the following reasons:

- First, it is inconsistent with the overall goals of the OCP policies that pertain to the protection of the site's visual, biological, and cultural resources.
- Second, future development in the designated open-space area would not only detract from the semi-rural character of the area, which the OCP open-space policies are in place to

protect, but would not be prudent since there is already a sufficient inventory of similar size residential lots in the Orcutt area. There are over 100 residential lots within the Orcutt area (which are similar in size to the proposed Creekside lots) that were approved six to ten years ago on portions of Key Sites 6, 7, and 12 that remain undeveloped. This would suggest that there is a sufficient supply of similar sized residential lots to meet the existing and future housing needs in the Orcutt area without having to develop in the designated open-space areas. Thus, there is no basis for overriding considerations of the class I impacts to visual and biological resources.

- Third, there are other undeveloped OCP Key Sites (e.g., Key Sites 14, 15, and 18) that are designated for large residential-lot development, which could also satisfy the future housing needs in Orcutt.

As a result, staff recommends denial of the proposed revised project and OCP amendments because:

- 1) the finding that the proposed project provides a public benefit, and is in the interest of the general community welfare, cannot be made; and,
- 2) the project is inconsistent with the OCP policies that pertain to protection of visual, biological and cultural resources.

5.0 PROJECT INFORMATION

5.1 Site Information

Table 1	
Site Information	
Comprehensive Plan Designation	Residential Ranchette /Residential 20
Ordinance, Zone	Land Use Development Code, RR-10/MR-O
Site Size	138.6
Present Use & Development	Grazing/Vacant
Surrounding Uses/Zone(s)	North: Mobile Home Park/ MHP South: Agriculture/ AG-II-100 East: Highway 101; Agricultural Production, A-II-100 West: Single Family Residential/ 1-E-1; RR-5
Access	Clark Ave. through Key Site 2; Chancellor St. from the west.
Public Services	Water Supply: Golden State Water Company/ City of Santa Maria Sewage: Laguna County Sanitation District Fire: SB Co., Station 21

5.2 Setting

Slope/Topography/Soils: Key Site 3 consists of 138.6 acres of vacant land that is currently used for livestock grazing. It contains two relatively level areas north of Orcutt Creek, a northern

mesa of approximately 32 acres separated by a bluff with an average slope of 20-25% from a central low-lying area of approximately 33 acres. Orcutt Creek and its associated floodplain extend from east to west across the southern edge of the central low-lying area along the base of the Solomon Hills. South of the Creek, approximately 50 acres of the site ascends into the foothills to elevations between 620 and 780 feet. This area is characterized by steep slopes, some in excess of 30%.

Soils which underlie the site include: Gary sandy loam 2-9% slopes and Marina sand 2-9% slopes in the northern portion, Betteravia loamy sand, Botella loam 2-15% eroded slopes and Mariana sand 9-30% in the central portion; and Arnold sand 15-45% slopes throughout the Orcutt Creek.

Flora/Fauna: Nine habitat types were identified within Key Site 3: Central Maritime Chaparral, Central (Lucian) Coastal Scrub, Central Dune Scrub, Central Coast Live Oak Riparian Forest, Coast Live Oak Woodland, Non-native Grassland, Seasonal Wetland, Dry Wash, and Planted Trees. The northern mesa contains non-native grasslands currently used for livestock grazing. The central low lying area was cultivated until the early 1980s, but has since been re-colonized by coyote bush and non-native grasses. The Central Maritime Chaparral, Central Dune Scrub, Coast Live Oak Woodland habitats were found south of Orcutt Creek. Central Coast Live Oak Riparian Forest habitat was found along the majority of Orcutt Creek. The areas along Orcutt Creek and extending to the site's southern boundary have not been exposed to significant disturbances, and continue to support a wide variety of plant and wildlife species.

5.3 Statistics

Table 2		
Statistics		
Item	Proposed	Ordinance Standard
Structures (floor area)	Mesa SFD Cluster Homes – 85 market rate units (maximum floor area of 3,151 SF with a maximum garage of 440 SF) Creekside SFD Homes – 40 market rate units (maximum floor area 3,303 SF with a maximum garage of 800 SF) Private Parks with picnic areas, gazebos, trails, open play areas, and children play structures.	No standard
Max. Height of Structure(s)	Mesa SFD Cluster Homes – 35' Creekside SFD Homes – 35'	35 feet
Building Coverage (footprint)	Mesa SFD Cluster Homes – 168,000 SF total; range of 1,100 SF to 3,750 SF per home. Maximum coverage per lot – 45%.	No Limit

Table 2		
Statistics		
Item	Proposed	Ordinance Standard
	Creekside Homes – 143,000 SF total; range of 3,400 SF to approx.3,950 SF per home. Maximum coverage per lot – 35%.	
Roads	Total of 10,292 lineal feet of new private roadways: 2,947 lineal feet of new private roadway extended southerly from Clark Avenue; 7,345 lineal feet proposed to serve the Mesa, and Creekside neighborhoods Estimated Neighborhood Driveways 2.1 acres of hardscape	Not Applicable
Parking (covered/uncovered, ratio)	<u>Mesa Single Family Clustered Homes</u> (2 car garages per unit) 129 Designated Visitor Parking Spaces <u>Creekside Single Family Homes</u> (2-3 car garages per unit) 50 Designated Visitor Parking Spaces	Minimum Standard 2 car garages per unit
Walkways	Public Multi-purpose Recreational Trails: 10,064 linear feet (l.f.). Private Trail (currently designated along top of bluff of Mesa): 1,620 l.f. Mesa Neighborhood street sidewalks: 8,884 l.f.	No walkway standard
Open Space Public Private landscaping Undeveloped/Other	Total of 100 acres of Open Space provided: 42.74 acres of public open space are provided for Recreation, Trails, and Basins along the Mesa and Creekside neighborhood areas. Approximately 15 acres are proposed to be maintained landscaping and 68 acres are proposed to be natural vegetation areas. Private open space within the home lot areas accounts for approximately 2.42 ac	Public/Common open space at least 40% (62.4 acres)
Number of Dwelling	125	General Plan Amendment

Table 2		
Statistics		
Item	Proposed	Ordinance Standard
Units		and Rezoning Request is for PRD -125
Project Density	0.96 DU/ac	0.96 DU/ac (Project Area / PRD-125)
Grading	(340,000 yd ³ total) 180,000 yd ³ cut; 160,000 yd ³ fill. Area of Disturbance: 59.86 ac Area of No Disturbance: 78.74 ac	No Limit

5.4 Project Description

The proposed project is a request by John Franklin, as agent for the owners, for approval of a Vesting Tentative Tract Map (VTM), General Plan Amendment, Rezone, and Development Plan entitlements for the 138.6-acre Key Site 3 (the VTM request includes the 8-acre portion that was rezoned to MR-O as part of the Focused Rezone Program). The project proposes to develop 85 small and medium single-family homes on the northern portion of the site and 40 large single-family homes on the central low-lying portion of the site. Hence the total residential buildout of this project would be 125 residential units. Figure 1 above illustrates the preliminary site plan. Landscaping, including street trees and an entry monument at the primary entrance to the development, is proposed, as are decorative street lights and lighted bollards along pedestrian paths. In addition, approximately 100 acres (72%) of the site is proposed as open space. The open space area includes the upper mesa bluff area, Orcutt Creek, private parks and trails, public multi-use and hiking trails, landscaped basins, and natural and restored habitat on hillsides and along the creek.

The VTM proposes a total of 141 lots to be created on the site, as shown in Table 3. Three of these lots (including one of the private road lots) are for the MR-O zoned portion of the Key Site 3 property, and are not part of the proposed project evaluated in the project EIR. However, the subdivision of the MR-O area is part of the proposed project. The proposed Development Plan provides the necessary details of site development in the area proposed to be zoned Planned Residential Development (PRD) and developed with 125 detached single-family residential units. Each of the project components is described in greater detail below.

Table 3
Vesting Tentative Tract Map Proposed Lots

Use	Number of Lots
Private Roadway	7
Private Open Space	6
Public Open Space	1
Condominium (MR-O) ¹	2

Single-family Homes (Creekside PRD)	40
Single-family Cluster Homes (Mesa PRD)	85
Total	141

1. MR-O portion of the Key Site 3 property, with impacts evaluated in the Focused Rezone Program EIR (Santa Barbara County, 2008).

The General Plan Amendment for the proposed project would change the Land Use Designation of Residential Ranchette with corresponding Zoning of RR-10 to Planned Development with corresponding Zoning of Planned Residential Development (PRD-125). The Rezone application proposes to establish a PRD zone on 131 acres. The proposed Key Site 3 Planned Residential Development Zone Standards are summarized in Table 4 below.

Table 4
Key Site 3 Planned Residential Development Zone Standards

Development Feature	Mesa Clustered Homes	Creekside Homes
Number of Units Planned ¹	85 units	40 units
Minimum Lot Size	3,200 S.F.	9,700 S.F.
Setbacks: <i>Front</i>	Average 13' Minimum 2'	Minimum 20'
<i>Side</i>	Minimum One Side 7' Minimum Opposite Side 0'	Minimum 5'
<i>Rear</i>	Minimum 11'	Minimum 25'
<i>Accessory Structures</i>	CC&Rs to be consistent w/ Co LUDC Sect 35.42.020	CC&Rs to be consistent w/ Co LUDC Sect 35.42.020
<i>Building Separation</i>	Minimum 10'	Minimum 10'
Site Coverage	45% maximum	35% maximum
Height Limit ²	35' ³	35'
Parking	Covered Parking 2 spaces/unit Visitor Parking on Street	Covered Parking 2 spaces min/unit Visitor Parking provided for in special designated areas on Street
Road Network	Primary access to Clark Ave.; secondary access to Stillwell/Chancellor Rd. (see Development Plan Maps for precise connection points)	Primary access to Clark Ave.; secondary access to Stillwell/Chancellor Rd. (see Development Plan Maps for precise connection points)

Development Feature	Mesa Clustered Homes	Creekside Homes
Utility Service ⁴	Water - Golden State Sewer - LCSD Cable TV-Comcast Phone-Verizon Power-PG&E	Water - Golden State Sewer - LCSD Cable TV-Comcast Phone-Verizon Power-PG&E

The applicant also requests to amend several Orcutt Community Plan policies and development standards to facilitate the goals of the project including, but not limited to, density and open space standards, as contained in the Orcutt Community Plan. The requested OCP amendments are presented in Table 5, below. The applicant’s overall goals for these proposed changes are to allow for more efficient land use, as well as a variety of housing types for more choice and affordability. A Conditional Use Permit (Case no. 10CUP-00000-00001) is also required for areas of the project that will have perimeter and sound walls exceeding eight feet in height.

**Table 5
Proposed Orcutt Community Plan Amendments**

OCP Policy	Proposed Text Amendment
Policy KS3-1	Key Site 3 (APN 129-151-26) is designated Res Ranch and PD, Res. 20.0, and Open Space and zoned RR-10 and PRD-125, MR-O, and Rec. 12-R-1 . Any proposed development on Key Site 3 shall comply with the following development standards.
Policy KS3-2	The County shall consider redesignating / rezoning portions of Key Site 3 to PD/PRD-125/125 units only if: A. The areas identified as “Open Space” on Figure KS 3-1 have been dedicated to the County or other County-approved group or agency; are left significantly undeveloped (i.e., at least 70% open space or recreation uses) with public trails, bike paths, and flood control emergency access roads accessible to the County and public provided for by the Developer; and, B. The property owner has demonstrated compliance with Action SCHO-1.3.
DevStd KS3-1	Development of the site shall be limited to concentrated within the northern mesa (at least 80% of dwelling units) as designated on Figure KS3-1 (north of the “neck” created by the NE corner of lots on Chancellor Street). Limited development (no more than 20%) near the lower creek area may be allowed provided riparian, and oak woodland areas are adequately protected and mitigations are provided for any habitat impact, and OCP required public trails, bike paths and flood control emergency access roads can be implemented.
DevStd KS3-2	In order to provide compatibility with existing adjacent development, density shall transition from “lower” at the southern and western perimeters of the mesa to “higher” for the internal development. The area extending from the top of the bluff to the southern site boundary, and a 75 foot strip along the entire eastern site boundary shall remain in natural, undeveloped open space. No development except bikepaths, hiking trails, rural landscaping, the proposed rest area and other passive recreational areas (e.g. seating areas) shall be permitted within this area. of future development with the County established MR-O zone within the site, a planned development proposal on the mesa, in conjunction with limited development of the lower creekside area may be considered. The area south of the bluff edge must transition to a density lower than the planned development on the mesa and have recreation and open space areas that allow the Orcutt Trail System to be developed and connected as planned.
DevStd KS3-6	No development, other than a secondary access road from Oakbrook Lane to Chancellor Street, shall occur within 100 feet of the dripline of the vegetation in the southwest corner of the northern mesa bluff area, or within a 25 foot-buffer from the top of bluff of the canyon in the

**Table 5
Proposed Orcutt Community Plan Amendments**

OCP Policy	Proposed Text Amendment
	northeast corner of the site.
DevStd KS3-7	Primary access to the site shall be from the frontage road along US Hwy 101. The existing easement over Site 2 shall be renegotiated to accommodate development of Site 2 and to align with the "preferred access point" intersection. The developer shall coordinate with P&D, Public Works Transportation Division, and the Fire Department to ensure appropriate secondary access from Oakbrook Lane . <u>Chancellor Street using developer's existing Chancellor Street easement.</u>
DevStd KS3-9:	Development proposed on Key Sites that have been surveyed by a County-qualified archaeologist within setbacks shall be applied to identified archeological resources (see EIR, Vol. III) The areas within the identified setbacks shall be incorporated into the project design and designated on construction drawings as "Undevelopable Open Space." These areas shall be seeded with shallow-rooted vegetation <u>can be approved provided (1) the developer contribute a durable monument indicating the interpretative value of the resource along a nearby public trail and (2) that the County finds the resource is of secondary importance and not in conflict with protective State Historical and Archaeology laws.</u>

A. Project Components. This section describes the proposed Key Site 3 project components, including residential zones and parks and trails.

Residential Zones. The project would establish two distinct residential neighborhoods on 131 acres: The two neighborhoods are named: Mesa and Creekside. A description of each follows:

Mesa Neighborhood. The northern portion of site, adjacent to Sunny Hills Mobile Home Park, would consist of a Planned Residential Development (PRD), designed for the development of 85 clustered single-family detached dwelling units, along with parks, trails, and other supporting improvements. Of the 85 units, 35 would be single-story units located on the project perimeter adjacent to the existing mobile home park to the north, single-family homes to the west, bluff edge and adjacent to U.S. 101 on the east. The remaining 50 units would be one- and two-story homes. The 85 residences in the Mesa Neighborhood would range in size from about 1,100 square feet to 3,200 square feet. All of the single-family detached units would have enclosed garage parking for two vehicles.

Creekside Neighborhood. The central portion of site, north of Orcutt Creek, would consist of a Planned Residential Development (PRD), which would be developed with 40 single-family homes along with trails, emergency-access roads, parking areas and other supporting improvements. All the homes would be one-story units ranging in size from about 2,700 square feet to about 3,300 square feet. All of the single-family detached cluster units would have enclosed garage parking for three vehicles.

Parks, Trails and County Open Space. The proposed project includes recreational amenities, such as an entrance park, bluff top parks and trails, dual use park/detention basins, and the portion of the OCP trail system within the project boundary (Figure 4). The project as designed would meet

the public multi-purpose trail requirements of the OCP. Additional features for the public would include a bicycle and vehicle parking and trail head staging area. The project includes the provision of dedicated County open space, easements and development of trails and bike paths for public use as required by the OCP. However, the trails, bike paths, and the parking staging area not in the dedicated County open space would be owned and maintained by the project Home Owners Association (HOA). In the private open space areas that have public trails, paths, emergency vehicle access, and parking a perpetual easement over these areas for public access and use and environmental preservation is proposed to be dedicated to the County.

B. Infrastructure/Access Components. This section describes infrastructure (including roadways and grading) proposed within the project area.

Roadway Access. Primary access to the project site would be provided via a new private road off of Clark Avenue and through Key Site 2 to the north (Figure 5). In addition, a second access road into the site would be provided from the Mesa neighborhood and the Creekside neighborhood to Chancellor Street, which connects to Stillwell Road. The secondary access to the site off of Chancellor Street would require a bridge over Orcutt Creek. The Mesa neighborhood area would be served by a looped road. The Creekside area would be served by a road south to its terminus in a cul de sac. This area would include an emergency-access trail to create a loop. All roads would be two-lane roads with ROWs varying from 28 feet to 52 feet in width. Roads would have a 24-foot pavement width, with sidewalks or a trail on either or both sides of the road, in most cases. Wider roads would provide for on-street parking. The majority of the Creekside neighborhood would not have sidewalks; however, public trails would be provided in the adjacent open-space area to the southwest and northeast of these homes. Shared driveways serving the Mesa area cluster homes would be between 20 and 26 feet in width, and sidewalks would be provided in the courtyard areas for 68 of the 85 cluster homes.

Water Infrastructure. There is no existing water infrastructure on Key Site 3. Drinking water for grazing livestock is currently provided by an offsite property. Existing nearby facilities include an 8-inch diameter polyvinyl chloride (PVC) pipe along Oak Brook Lane, an 8-inch PVC pipe along Chancellor Street, an 8-inch PVC pipe along Black Oak Drive, an 8-inch PVC pipe along Stillwell Road between Chancellor Street and Oak Brook Lane, and a 12-inch PVC pipe along Stillwell Road between Oak Brook Lane and Caraway Court, west of the project site. Water utility connections to existing off-site infrastructure would be planned in two places along the project's western boundary (at Oakbrook Lane and Chancellor Street) with the existing Golden State water system and one place to the north on Clark Avenue at the future intersection of the proposed private road.

The proposed water system for the project would consist of a 12-inch diameter supply main through the northern portion of the project site, effectively completing an 8-inch diameter piping system for residential service. All water lines would be located under the public right-of-way, residential streets, or contained within public utility easements traversing the property.

The proposed water system was designed to meet applicable standards, including system criteria set forth in California Code of Regulations Title 22 and Santa Barbara County Standards. Domestic water lines would be PVC throughout, with selected pipe sizes adequate to meet applicable standards.

Wastewater Infrastructure. There is no existing wastewater infrastructure on Key Site 3. Existing nearby infrastructure includes the 10-inch diameter Solomon Creek Trunk Sewer. Sewer service for the project would be supplied to the proposed project through a connection to existing Laguna County Sanitation District (LCSD) facilities.

The proposed sewer collection system would consist of 6-inch and 8-inch PVC pipes and a 3-inch force main and lift station which would convey flows into the Solomon Creek Trunk Sewer. Wastewater would flow from the Creekside homes and be collected by the 6-inch and 8-inch PVC pipes and routed to a lift station. The lift station would feed flows through a 3-inch PVC force main to the beginning of the collection system for the Mesa area. The lift station would be publicly owned and designed to run 20 minutes per hour during peak flow conditions. Flow from the Mesa system would be collected by 6-inch and 8-inch PVC pipes and routed to a 10-inch PVC pipe which would carry all site flow across Orcutt Creek to Chancellor Street. Offsite flow would continue along Chancellor Street via a new 10-inch PVC pipe. This 10-inch collector pipe would then connect to the 10-inch Solomon Creek Trunk Sewer at Stillwell Road and Orcutt Creek.

The proposed collection system would conform to LCSD Standard Specifications for the Construction of Sanitary Sewers. Proposed improvements would be dedicated to LCSD for management and future maintenance.

Drainage Infrastructure. Existing storm drain infrastructure on Key Site 3 is limited to a drainage inlet and outfall at the head of an erosional feature near the northwest corner of the property and directs runoff to Orcutt Creek south of the bluff. All drainage from the site would ultimately be directed to Orcutt Creek, similar to the current largely undeveloped drainage pattern. In accordance with Santa Barbara County Flood Control Standards, drainage generated from development on the site would be attenuated through a series of detention basins and/or catch basins prior to discharging to Orcutt Creek.

The Mesa neighborhood area is proposed to contain a series of staged, shallow basins. A shallow basin is defined as having a water depth of two feet or less. A total of three shallow basins on the Mesa are proposed, with one outlet to the Orcutt Creek. One of these basins (basin 2) is located within the MR-O zone. Since the basins would be staged, all overland escape of surface water would be from the lowest basin in the series. This overland escape would be routed through a spillway at the lowest basin. Before the runoff would be directed down the slope to the creek, it would be dispersed through natural energy-dissipation devices to ensure that the flow is not concentrated. All energy dissipation and spillway structures would remain above the bluff edge. Overland escape from the lowest shallow basin located in the southwesterly corner of the Mesa

would be integrated into the open space landscape of the slope with rocks, stones, and other natural energy-dissipating design elements prior to discharge into Orcutt Creek.

A single deep basin is proposed for the Creekside neighborhood area. This basin would be located immediately adjacent to the creek, and would outlet to the creek for its primary outlet and for overland escape.

Grading. The proposed project would require extensive grading operations. Nearly all areas within the project site that would be developed with either access roads or residences would require some level of grading. Grading would also be required for the new primary access road through Key Site 2, and where Stillwell Road turns into Chancellor Street in order to accommodate emergency vehicles. On a development-wide basis, grading operations would result in approximately 340,000 cubic yards (180,000 cubic yards of cut and 160,000 cubic yards of fill).

6.0 PROJECT ANALYSIS

6.1 Environmental Review

Staff is recommending denial of the project. Pursuant to Section 15270 of the CEQA Guidelines "CEQA does not apply to projects which a public agency rejects or disapproves." Please see Attachment C, Notice of Exemption. Although the statutory exemption is intended to allow an initial screening of project for quick disapproval prior to the initiation of the CEQA process, staff did prepare a Subsequent EIR (SEIR) for the project. If the Planning Commission follows staff's recommendation and does not recommend approval of the project to the Board of Supervisors, staff would not recommend certification of the SEIR and revision.

The 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. 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 hearings, the project applicant has proposed revisions to the Key Site 3 Project. A Revision Letter (Attachment B) 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, the project modifications and associated analyses documented in the 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.

6.1.1 Impacts/Mitigation

The proposed FEIR, and EIR Revision Letter dated November 17, 2011, have identified significant and unavoidable (Class I) environmental impacts resulting from project implementation in the areas of Aesthetics/Visual Resources, Biological Resources (project and cumulative), and Land Use and Public Services (cumulative solid waste and wastewater) including: AES-1, alteration of the predominantly rural aesthetic character of the project site; AES-2, loss of unobstructed views of the Solomon Hills experienced by traveler on U.S. Highway 101; BIO-4, loss of non-native grassland, coastal scrub, oak woodland, and oak riparian; BIO-6, loss of habitat and disruption of wildlife corridors; BIO-8, impacts to special status plant species; LU-2, fragmentation/loss of public open space relative to current OCP policies. Potentially significant but mitigable (Class II) impacts were identified in the issue areas of air quality, biological resources, cultural resources, geology, hazardous materials, greenhouse gas emissions, drainage and water quality, noise, and transportation. Adverse but less than significant (Class III) project impacts have been identified in the areas of Aesthetics/Visual Resources, Agriculture, Air Quality, Biological Resources, Cultural Resources, Public Services and Facilities (fire protection, emergency health care services, police protection, schools), Recreation, Geological Processes, Hazardous Materials/Risk of Upset, and Hydrology and Water Quality. No beneficial impacts (Class IV) resulting from project implementation were identified. The Revision Letter provides a more complete summary of the impacts of the project and suggested mitigation measures.

6.2 Comprehensive Plan Consistency

6.2 Comprehensive Plan Consistency

Rather than provide an extensive discussion of policy consistency, staff has only prepared policy consistency analysis of those policies and development standards with which the project is considered to be inconsistent. The proposed project is consistent or potentially consistent with other county policies and development standards that are not discussed below¹. Staff is not recommending approval of the proposed project and OCP amendments because the finding that the proposed project provides a public benefit, and is in the interest of the general community welfare, cannot be made.

Requirement	Consistency Discussion
Land Use Element – Hillside and Watershed Protection Policies	
Policy 1. <i>Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</i>	Inconsistent. Nearly all areas within the project site that would be developed with either access roads or residences would require some level of grading. However, there are areas where the proposed project would require extensive

¹ For a detailed policy consistency analysis which includes policies and development standards that the project is considered to be consistent with see section 5.0 of the Final EIR.

Requirement	Consistency Discussion
	<p>grading operations. For example, the applicant is proposing five-to-seven feet of cut/ fill for several of the proposed Creekside home lots (lots nos.93, 94-101, 106-108), which is an areas identified as open space in the OCP. On a development-wide basis, grading operations would result in approximately 180,000 cubic yards of cut and 140,000 cubic yards of fill, for a net export of 40,000 cubic yards. Therefore, the project is inconsistent with this policy.</p>
<p>Policy 2. <i>All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</i></p>	<p>Inconsistent. The proposed project would exceed permitted residential density by 31 units, which would increase the total area of disturbance beyond that anticipated by the OCP or evaluated in the OCP EIR. As such, grading would not be kept to an absolute minimum. According to Section 4.8 <i>Hydrology and Water Quality</i> of the Final SEIR, portions of the central plain area are located within the 100-year flood zone; however, finished floor elevations are proposed to be two-feet above the flood plain and set back a minimum of 50 feet from the floodway, in accordance with OCP development standards and mitigation measures as well as County Flood Control District requirements. The applicant prepared a preliminary drainage report and proposes the construction of on-site retention facilities and drainage facilities designed to convey drainage outlet flows in the direction of stream flow, and include energy dissipaters to minimize erosion. In addition, analysis in Section 4.4 of the Final SEIR, states that proposed project would result in Class I impacts to native vegetation, including Coastal Dune Scrub, Maritime Chaparral and Oak Woodland. Because the proposed project would not minimize grading and would result in the loss of native vegetation, it would be inconsistent with this policy.</p>
ORCUTT COMMUNITY PLAN	
Orcutt Community Plan – Land Use	Orcutt Community Plan – Land Use
<p>Policy LU-O-8: <i>In order to preserve the semi-rural character of Orcutt, protect natural resources, and avoid development in hazardous</i></p>	<p>Inconsistent. As discussed in Section 4.9 <i>Land Use</i> of the Subsequent Final EIR, the OCP identifies the southern 98 acres of Key Site 3 as</p>

Requirement	Consistency Discussion
<p><i>areas, the County shall provide for large useable areas of (public or private) open space within the community. Appropriate planning tools should be explored and adopted which provide for the clustering or relocation of development from hazardous, environmentally sensitive or visually prominent areas, or other sites which are deemed unsuitable for development, to areas appropriate for development.</i></p>	<p>open space, thereby limiting development to the northernmost 39.1 acres of the site. However, the proposed project would develop residential units within this area identified for open space. The project applicant seeks to amend the OCP to accommodate development within this area. Should these requested amendments be adopted, the project would not conflict with applicable Key Site 3-specific OCP policies. However, as discussed above in section 4.0 of the staff report, the proposed project would result small fragmented open-space areas rather than one large contiguous open-space area as required in the OCP Open Space Plan. Therefore, the proposed project would be inconsistent with this policy.</p>
<p>Orcutt Community Plan – Parks/Recreation/Trails/Open Space Policies</p>	
<p>Policy OS-O-1: <i>When considering approval of development projects within or adjacent to areas identified for potential public open space (see Table 21), the County shall review the appropriate mix of public and/or private open space, and to the maximum extent feasible require dedication of contiguous areas identified as a priority for public acquisition as public open space based on the following criteria:</i> <i>Location within designated open space corridors and proximity of adjacent open space;</i> <i>The criteria and intent of the PRD zone district;</i> <i>and</i> <i>Demonstration of rough proportionality between the level of permitted development, its associated impact, and the open space dedication, consistent with applicable laws.</i></p> <p>Action OS-O-6.1: <i>On sites being considered for a rezone from rural or more open space uses (e.g., agriculture, ranchette) or sites receiving substantial increases in density and/or developable area, the County should delay approval of the rezone to a higher density until the preferred public open space lands on these sites have either been dedicated to the County or secured by other mechanism (e.g., development agreement).</i></p>	<p>Inconsistent. Table 21 of the Orcutt Community Plan identifies Key Site 3 as a high priority site for public open space. The OCP designates the southern 98 acres of Key Site 3 as part of an open space overlay, thereby limiting development to the northernmost 39.1 acres of the site. Furthermore, in accordance with the OCP, "...as a condition of development...part or all of the identified open space will be dedicated to the County or an appropriate land trust to mitigate the impacts of development."</p> <p>As discussed below in the analysis of Policy KS3-2, the applicant has requested a revision to this policy to allow for development of portions of the OCP identified Open Space Overlay. If the request is approved, then the project would be consistent with the amended policy. However, the proposed project would result in fragmented open-space areas rather than one large contiguous open-space area as required in the OCP Open Space Plan. Thus, the project is inconsistent with this policy and action item.</p>
<p>Policy OS-O-4: <i>Development adjacent to, or within</i></p>	<p>Inconsistent. The OCP designates the southern</p>

Requirement	Consistency Discussion
<p><i>designated open space areas, shall be sited and designed to protect and enhance the natural resources of these areas, and accommodate appropriate recreation opportunities as identified in the Parks, Recreation and Trails section of this Plan.</i></p>	<p>98 acres of Key Site 3 as part of an open-space overlay, thereby limiting development to the northernmost 39.1 acres of the site. The proposed project would result in fragmented open space areas rather than the large contiguous band of open space that was approved in the Orcutt Community Plan. In addition, the project would result in significant unavoidable impacts to biological and visual resources, which would not be impacted had the project adhered to the OCP Open Space Plan. Therefore, the proposed project is inconsistent with this policy.</p>
<p>DevStd OS-O-4.1: <i>Prior to approval for any development within or adjacent to an open space area, a determination must be made that the proposed development is consistent with all applicable open space policies of the OCP, the OCP Open Space Map, as well as the regulations of the base zone district.</i></p>	<p>Inconsistent. The applicant has requested revisions to OCP policies to allow for development of portions of the OCP identified Open Space Overlay. While an amendment would make the project consistent with these policies, the proposed project would result in fragmented open-space areas rather than the large contiguous band of open space that was approved in the Orcutt Community Plan. In addition, the project would result in significant impacts to biological and visual resources which would not be impacted had the project adhered to the OCP Open Space Plan. Therefore, the proposed project is inconsistent with this development standard.</p>
<p>DevStd OS-O-4.2: <i>Designated open space boundaries may be subject to minor adjustments inward or outward from the designated open space area on a case-by-case basis in order to allow for substantial improvements in project design, enhance fire safety buffers and fuel management zones, to protect visual qualities from and of adjacent open space areas, or to include biological historic or archaeological sites. The OCP, EIR and other available data shall be used in determining the location, width, and extent of the open space boundary adjustment. Decision makers shall make a determination that such a minor boundary adjustment would be consistent with the overall goals of the Open Space Plan and Biological/History/Archaeology policies, and would avoid disruption of significant natural resources and recreation opportunities located within</i></p>	<p>Inconsistent. The applicant has requested revisions to OCP policies to allow for development of portions of the OCP identified Open Space Overlay. The augmented boundary would be inconsistent with overall goals and policies that pertain to the protection of open space for recreational purposes and for the protection of biological and visual resources. Therefore, the proposed project is inconsistent with this development standard.</p>

Requirement	Consistency Discussion
<i>designated open space areas.</i>	
<p>DevStd OS-O-4.3: <i>No structures shall be located within a designated open space area with the exception of: related structures necessary for the provision of active and passive recreation opportunities that would not adversely affect open space areas, and flood control projects where no other method for protecting existing structures in the floodplain is feasible and where such protection is necessary for public safety (including retention basins). Culverts, crossings, roads, pipelines, fences, and bridges may be permitted when no alternative route or location is feasible, or where other constraints or site design considerations (e.g. public safety)c would require such structure.</i></p>	<p>Inconsistent. The project proposes 40 single-family homes, approximately one mile of roadway, in the identified open space area. Therefore, the project is inconsistent with this policy.</p>
<p>Policy OS-O-5: <i>The County shall encourage public use of trails and recreation facilities within designated open space areas consistent with protection of natural resources. Such public trails and recreation facilities shall be sited and designed to reduce conflicts with adjacent private property through use of unobtrusive fencing, landscape screening, appropriate setbacks, signage, etc.</i></p>	<p>Inconsistent. The applicant has requested revisions to OCP policies to allow for development of portions of the OCP identified Open Space Overlay. The augmented boundary would be inconsistent with overall goals and policies that pertain to the protection of open space for recreational purposes and for the protection of biological resources. Therefore, the proposed project is inconsistent with this development standard.</p>
<p>Policy OS-O-6: <i>The County should acquire the open space lands prioritized for public acquisition through dedication by working with property owners and interested groups, or through purchase. Where dedication is required, the County shall offset fees as required. If dedication is not required, the County may consider purchase, use of the TDC program or permitting the property to remain as private open space, consistent with the standards of this plan for natural resource protection and provision of passive and active recreation opportunities.</i></p>	<p>Inconsistent. Table 21 of the Orcutt Community Plan identifies Key Site 3 as a high priority site for public open space. As discussed below in the analysis of Policy KS3-2, the applicant has requested revisions to OCP policies to allow for development of portions of the OCP identified Open Space Overlay. Should these amendments be approved, the proposed project would result small fragmented open space areas rather than one large contiguous open-space area identified in the OCP. Therefore, the proposed project is inconsistent with this policy.</p>
<p>Policy KS3-2: <i>The County shall consider redesignating/rezoning portions of Key Site 3 to PD/PRD 125 units only if: The areas identified as "Open Space" on Figure KS 3-1 have been dedicated to the County or other County-approved group or agency, and, The property owner has demonstrated compliance</i></p>	<p>Inconsistent. As noted above under the Policy LU-O-8 analysis, the proposed project would develop residential units within the area identified in the OCP for open space. In addition, the proposed open-space area would not be the large contiguous open-space area depicted in the OCP, but smaller areas bordered</p>

Requirement	Consistency Discussion
<p><i>with Action SCH-O-1.3.</i></p> <p>DevStd KS3-1: <i>Development of the site shall be limited to the northern mesa as designated on Figure KS3-1 (north of the “neck” created by the NE corner of lots on Chancellor Street).</i></p> <p>DevStd KS3-2: <i>In order to provide compatibility with existing adjacent development, density shall transition from “lower” at the southern and western perimeters of the mesa to “higher” for the internal development. The area extending from the top of the bluff to the southern site boundary, and a 75 foot strip along the entire eastern site boundary shall remain in natural, undeveloped open space. No development except bikepaths, hiking trails, rural landscaping, the proposed rest area and other passive recreational areas (e.g. seating areas) shall be permitted within this area.</i></p>	<p>by residential development. However, the project seeks to amend the following Key Site 3-specific OCP policies pertaining to open space, and rezone the project site in order to eliminate any conflicts with the current open space and density land use policies and/or zoning ordinances that would limit development to 39 acres on the upper mesa. The requested revisions to the OCP are:</p> <p><i>Policy KS3-2: The County shall consider redesignating / rezoning portions of Key Site 3 to PD/PRD 125156 units only if:</i></p> <p><i>A. The areas identified as “Open Space” on Figure KS 3-1 have been dedicated to the County or other County-approved group or agency; are left significantly undeveloped (i.e., at least 50% open space or recreation uses) with public trails, bike paths, and flood control emergency access roads accessible to the County and public provided for by the Developer and maintained by the Homeowners Association of the MR-O and PD development areas; and,</i></p> <p><i>B. The property owner has demonstrated compliance with Action SCH-O-1.3.</i></p> <p><i>DevStd KS3-1: Development of the site shall be limited to concentrated within the northern mesa (at least 80% of dwelling units) as designated on Figure KS3-1 (north of the “neck” created by the NE corner of lots on Chancellor Street). Limited development (no more than 20%) near the creek and southern foothills may be allowed provided riparian, and oak woodland areas are adequately protected and mitigations are provided for any habitat impact, and OCP required public trails, bike paths and flood control emergency access roads can be implemented.</i></p> <p><i>DevStd KS3-2: In order to provide compatibility with existing adjacent development, density shall transition from “lower” at the southern and western perimeters of the mesa to “higher” for the internal</i></p>

Requirement	Consistency Discussion
	<p><i>development. The area extending from the top of the bluff to the southern site boundary, and a 75 foot strip along the entire eastern site boundary shall remain in natural, undeveloped open space. No development except bikepaths, hiking trails, rural landscaping, the proposed rest area and other passive recreational areas (e.g. seating areas) shall be permitted within this area. of future development with the County established MR-O zone within the site, a planned development proposal on the mesa, in conjunction with limited development of the creekside and southern foothill areas may be considered. The area south of the bluff edge must transition from a density lower than the planned development on the mesa and reach its lowest density at the southerly boundary within recreation and open space areas that allow the Orcutt Trail System to be developed and connected as planned.</i></p> <p>Should these requested amendments be adopted, the project would not conflict with these Key Site 3-specific OCP policies. However, such amendments would result in fragmented open-space areas, which is inconsistent with policies that pertain to the protection of open space for biological protection and recreational purposes as well as preserving the semi-rural character of the Orcutt area.</p>
Orcutt Community Plan – Visual/Aesthetic Policies	
<p>Policy VIS-O-1: <i>Significant scenic and visual natural resources in Orcutt shall be protected in order to preserve the semi-rural character of the OPA.</i></p> <p>DevStd VIS-O-1.1: <i>All development including buildings, understories, fences, water tanks and retaining walls adjacent to designated natural open space areas shall be sited and designed to protect the visual character of these areas and blend in with natural landforms through the use of such methods as setbacks, building orientation, materials and colors (earth tones and non-reflective paints), landscape buffers, shielded exterior lighting, screening of parking areas and inclusion of</i></p>	<p>Inconsistent. Development of 125 residential units throughout the Key Site.3 property would result in a Class I significant unavoidable impact on scenic and visual resources as discussed in Section 4.1 <i>Aesthetics/ Visual Resources</i> of the Key Site 3 Subsequent Final EIR. The Key Site 3 property is identified as a gateway area in the Orcutt Community Plan. Mitigation measures AES-1(a) through AES-1(c) would minimize the aesthetic impacts of the project, and Board of Architectural Review (BAR) would help ensure that the project provides an inviting and visually pleasing entrance to the community. However, the proposed mitigation would not prevent the</p>

Requirement	Consistency Discussion
<p><i>perimeter roads to allow maintenance of open space corridors.</i></p> <p>Policy VIS-O-2: <i>Prominent public view corridors (U.S. 101, State Routes 1 & 135, Clark Ave., Santa Maria Way, and Union Valley Parkway) and public viewsheds (Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek) shall be protected.</i></p> <p>DevStd VIS-O-2.1: <i>Development shall be sited and designed to minimize the disruption of important public view corridors and viewsheds through building orientation, minimization of grading on slopes, landscaping, and minimization of sound walls.</i></p> <p>DevStd VIS-O-2.2: <i>New homes on lots on the edge of bluff tops and canyon walls along significant open space/view corridors shall be of single story or partial second story design to minimize impacts to public view corridors (i.e., public roads, trails, etc.)</i></p> <p>Policy VIS-O-3: <i>Parcels along primary entryways into Orcutt are designated as "Gateway" parcels (Key Sites #1, 2, 3, 14, 15, 21, 22, 25, and part of 18). These gateway parcels shall be developed in a manner that preserves the semi-rural character and provides an inviting and visually pleasing entrance to the community.</i></p>	<p>conversion of this gateway area open space to a built environment.</p> <p>As discussed above, the applicant has requested several amendments to the land-use and open-space planning policies for the site, including Policy KS3-2 and Development Standards KS3-1 and KS3-2. Should the requested amendments to the above noted Key Site 3 Policy and Development Standards, be approved, the development would be consistent with OCP visual resource policies. However, such an amendment would result in significant and unavoidable impacts (Class I) to biological and visual resources including the fragmentation of open-space areas. Therefore, this amendment would be inconsistent with these policies and development standards that pertain to the preservation of visual resources and the semi-rural character of the Orcutt area.</p>
<p>Orcutt Community Plan- Biological Resources Policies, Actions, and Development Standards</p>	
<p>Policy BIO-O-1: <i>Important natural resources in Orcutt, including sandhill chaparral, central dune scrub, wetlands, oak trees and woodland, Bishop pine forest, specimen trees, and central sage scrub shall be protected, consistent with the Open Space Plan and the standards below, unless this would prevent reasonable development of a property.</i></p> <p>DevStd BIO-O-1.1: <i>Development shall be sited and designed to avoid disruption and fragmentation of significant natural resources within and adjacent to designated undeveloped natural open space areas, minimize removal of significant native vegetation and trees, preserve wildlife corridors</i></p>	<p>Inconsistent. As proposed, development of Key Site 3 could result in direct loss of non-native grassland, wetland, coastal scrub, oak woodland, and oak riparian. The proposed project would result in impacts to populations of wildlife through direct loss of habitat and disruption of wildlife corridors. Mitigation Measures described in Section 4.4, <i>Biological Resources</i> of the Subsequent Final EIR, would reduce impacts to the extent feasible. Mitigation Measures BIOL-1(b) and BIOL-4(a) would require the preparation of a habitat restoration plan, which would ensure consistency with DevStd BIO-O-1.2.</p>

Requirement	Consistency Discussion
<p><i>and provide reasonable levels of habitat restoration. Where possible, significant natural resources, such as specimen trees, adjacent to designated, natural undeveloped open space corridors should be preserved.</i></p> <p>DevStd BIO-O-1.2: <i>Development within or adjacent to designated natural open space areas shall be reviewed for, and required to implement, habitat restoration where site- specific impacts require restoration. If restoration on or near the site is not feasible, acquisition and preservation of additional habitat acreage should be considered, as a last resort if no other like-kind habitat mitigation options are available, payment into a mitigation bank program within the OPA that is acceptable to the County as provided for by new DevStd BIO-O-1.8. Mitigation and restoration plans should identify acreage impacted, replacement ratios, success criteria, remedial measures, and funding and responsibility for long-term maintenance and monitoring. All such restoration projects shall utilize native plants derived from local (Orcutt) seed and cutting stock, or as deemed biologically acceptable by a County qualified biologist. Wildlife relocation should be avoided. However, any wildlife relocation should be coordinated with Fish and Game and be consistent with applicable State standards.</i></p> <p>DevStd BIO-O-1.3: <i>Landscaping for development on the edge of designated natural undeveloped open space areas shall include native trees and shrubs, with habitat restoration efforts focused on buffers. Planting of highly invasive weedy plants (e.g., iceplant, pampas grass, veldt grass, monterey pine, eucalyptus, spiny clobur, and Australian fireweed) shall be prohibited within 500 feet of natural undeveloped open space areas as designated on the Open Space map (Figure 20).</i></p> <p>DevStd BIO-O-1.5: <i>The edges of designated undeveloped natural open space areas shall be clearly delineated and fenced where necessary to protect resources both during construction and, when appropriate, over the life of the project. Long</i></p>	<p>Mitigation Measure BIOL-3(b) requires the preparation of a landscape and the use of drought tolerant and locally native plants, which would ensure consistency with DevStd BIO-O-1.2. Mitigation Measure BIOL-6(a) requires minimal use of fencing in order to avoid the movement of wildlife in open space areas, which ensure consistency with DevStd BIO-O-1.5. However, several impacts to these resources would remain significant and unavoidable, and would present inconsistencies with some of these policies, such as DevStd BIO-O-1.1 and Policy BIO-O-1. Furthermore, the project is proposing development within the OCP-designated open space area, which was in part implemented to avoid impacts to sensitive biological resources. The proposed project is requesting amendments to several OCP policies pertaining to open space (Policy KS3-2 and Development Standards KS3-1, KS3-2, KS3-6, and KS3-9). However, such amendments would result in significant and unavoidable impacts to biological and visual resources including the fragmentation of open-space areas which would not accomplish a major policy goal of the OCP, as the OCP has designated this area for open space. Therefore, the proposed project would be inconsistent with this policy and these development standards.</p>

Requirement	Consistency Discussion
<p><i>term fencing shall be designed to accommodate wildlife passage where appropriate.</i></p>	
<p>DevStd KS3-6: <i>No development, other than a secondary access road from Oakbrook Lane, shall occur within 100 feet of the dripline of the vegetation in the southwest corner of the northern mesa, or within a 25 foot-buffer from the top of bluff of the canyon in the northeast corner of the site.</i></p>	<p>Potentially Inconsistent. As noted above, the proposed project would develop residential units within the area identified in the OCP for open space. If approved, the project would result in fragmented open-space areas rather than providing one large contiguous open space area identified in the OCP Open Space Plan. As discussed above, the project seeks to amend the following Key Site 3-specific OCP development standard, in order to eliminate any conflicts.</p> <p><i>DevStd KS3-6: No development, other than a secondary access road from Oakbrook Lane to Chancellor Street, shall occur within 100 feet of the dripline of the vegetation in the southwest corner of the northern mesa-bluff area, or within a 25 foot-buffer from the top of bluff of the canyon in the northeast corner of the site.</i></p> <p>However, because of the proposed encroachment into the open-space area resulting in the fragmentation of smaller open space areas which are discouraged in the OCP Open Space Plan, staff is not recommending approval of the proposed project and amendments to the OCP. Therefore, the proposed project would be inconsistent with this development standard.</p>
<p>Orcutt Community Plan- Cultural Resources Policies, Actions, and Development Standards</p>	
<p>DevStd KS3-9: <i>Development setbacks shall be applied to identified archeological resources (see EIR, Vol. III) The areas within the identified setbacks shall be incorporated into the project design and designated on construction drawings as "Undevelopable Open Space." These areas shall be seeded with shallow-rooted vegetation.</i></p>	<p>Inconsistent. As noted above, the proposed project would develop residential units within the area identified in the OCP for open space. If approved, portions of the development located in the central portion of the site would have a potentially significant impact on two of the four identified cultural resources. Therefore, the project would be inconsistent with this development standard.</p> <p>As discussed above, the project seeks to amend the following Key Site 3-specific OCP development standard, in order to eliminate any conflicts.</p>

Requirement	Consistency Discussion
	<p><i>DevStd KS3-9: Development setbacks shall be applied to identified archeological resources (see EIR, Vol. III) The areas within the identified setbacks shall be incorporated into the project design and designated on construction drawings as "Undevelopable Open Space." These areas shall be seeded with shallow rooted vegetation <u>can be approved provided (1) the developer contribute a durable monument indicating the interpretative value of the resource along a nearby public trail and (2) that the County finds the resource is of secondary importance and not in conflict with protective State Historical and Archaeology laws.</u></i></p> <p>However, because of the proposed encroachment into the open-space areas resulting in the impacts to cultural resources, as described above, staff is not recommending approval of the proposed project and amendments to the OCP. Thus, the proposed project would be inconsistent with this development standard.</p>
Orcutt Community Plan – Flooding and Drainage Policies	
<p>DevStd FLD-O-1.3: <i>No development shall be permitted within the floodplain of Orcutt, Pine Canyon or Graciosa Creeks unless such development would either be necessary to:</i></p> <ol style="list-style-type: none"> <i>1. Permit reasonable development of the site and would not lead to disturbance or removal of significant riparian/wetland vegetation; or</i> <i>2. Accomplish a major public policy goal of the Orcutt Community Plan.</i> 	<p>Inconsistent. The proposed project would result in development of 40 single family homes in the central plain/lower mesa area, which has been identified as within the 100-year floodplain. Residential home sites within the floodplain would not result in the removal or disturbance of riparian or wetland vegetation; however, riparian areas would be impacted by the construction of bridge across Orcutt Creek for project roadways. Development within this area would not accomplish a major policy goal of the OCP, as the OCP has designated this area for open space. Therefore, the proposed project would be inconsistent with this development standard.</p>

6.3 Zoning: Land Use and Development Code Compliance

6.3.1 Compliance with Land Use and Development Code Requirements

The project site is currently zoned RR-10 and MR-O under the Land Use Development Code. The applicant is requesting a change to the zoning from RR-10 to Planned Residential Development (PRD). The purpose and intent of the PRD zone district is to ensure comprehensively planned development of large acreage within designated urban areas intended primarily for residential use. More specifically, the PRD zone district is intended to:

- ✓ Promote flexibility and innovative design to provide desirable aesthetic and efficient use of space and preserve natural, scenic, and cultural resources;
- ✓ Encouraging clustering of development;
- ✓ Allow for a diversity of housing types;
- ✓ Provide for recreational opportunities for both project residents and the public.

The proposed project could be considered consistent with the purpose and intent of the PRD zone district because it provides: 1) a wide range of market rate units; and 2) open space and hiking trails opportunities. The reconfigured project includes provisions for approximately 100 acres of parkland and open space areas. The majority of the proposed trails would be open to the public. Developed park areas would be private with use restricted to the residents of the Key Site 3 development.

The reconfigured project does cluster development within the following two pods: 1) the Mesa Clustered area; and, 2) the Creekside development. However, as described above in section 4.3 and 6.2 of this staff report, the Creekside development would be located south of the northern mesa in an area identified in the OCP as open space. Thus, the Creekside development fragments the large, contiguous, open-space area into smaller less desirable open-space areas.

There are no setback requirements for the PRD zone district. However, the following setbacks are included in the Project Description for the three neighborhood areas:

Mesa Clustered Homes

- Front yard = 13 feet (average) with 2 foot minimum from the property line
- Side yard = 7 feet on one side; 0-foot on opposite side except where the side yard abuts a road, public parking area or walk, said yard shall not be less than 10 feet
- Rear yard = 11 feet

Creekside Homes

- Front yard = 20 feet from the right-of-way line of the street.
- Side yard = 5 feet.
- Rear yard = 25 feet.

All residential development will be limited to the proposed development envelopes, which provide for substantial separation between residential units and surrounding development.

Maximum structure height allowed in the PRD zone district is 35 feet. Under the proposed Architectural and Landscape Design Guidelines, building height would be limited to 35 feet as defined under the LUDC, thus ensuring consistency with the building height standards. Parking would be provided in compliance with the residential parking requirements of the LUDC for both the market rate and affordable units. All proposed streets to serve the project would be private but constructed to County standards. Building coverage would be well below the 30% maximum allowed under the PRD zone district. Site plans depicting the project in detail are included as Attachment D.

6.4 Design Review

The NBAR considered the applicant's conceptual redesigned project on June 24th and a more detailed version of the project on November 28, 2011. Minutes from June 24th meeting were included in the staff memorandum dated July 8, 2011. The unapproved minutes from the November 18th meeting are provided below.

UNAPPROVED NBAR COMMENTS:

- The MR-O conceptual design is very acceptable. Earlier provision would have alleviated many concerns with integrated site design. The paseos and structures will blend well with the proposed adjacent development.

Site Design:

- The screening provisions and revised locations are much improved.

7.0 APPEALS PROCEDURE

Comprehensive Plan amendments and Ordinance Amendments recommended for approval or denial are automatically forwarded to the Board of Supervisors for final action, therefore no appeal is required.

ATTACHMENTS

- A. Findings
- B. Revision Letter dated November 17, 2011
- C. Notice of Exemption
- D. Site Plans

ATTACHMENT A: FINDINGS

1.0 CEQAFINDINGS

1.1 DISAPPROVAL OF A PROJECT

The Planning Commission finds that the proposed project is exempt from environmental review under the California Environmental Quality Act pursuant to Section 15270 of the CEQA Guidelines. Please see Attachment C, Notice of Exemption. This statutory exemption is intended to allow an initial screening of projects on the merits for quick disapprovals prior to the initiation of the CEQA process where the agency can determine that the project cannot be approved.

1.2 LOCATION OF RECORD OF PROCEEDINGS

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Secretary of the Santa Barbara County Planning Commission, located at 624 West Foster Road, Santa Maria, CA 93455.

2.0 ADMINISTRATIVE FINDINGS

2.1 AMENDMENT TO THE DEVELOPMENT CODE, LCP AND ZONING MAP (REZONE) FINDINGS

Findings required for all Amendments to the County Land Use and Development Code, the Local Coastal Program, and the County Zoning Map. In compliance with Section 35.104.060 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for an Amendment to the Development Code, Local Coastal Program, or Zoning Map the review authority shall first make all of the following findings:

2.1.1 The request is in the interests of the general community welfare.

The proposed Key Site 3 project would result in direct loss of wetland, coastal scrub, oak woodland, oak riparian and non-native grassland. The proposed project would also result in impacts to populations of wildlife through disruption of wildlife corridors as well as permanently alter the area identified for open space in the OCP. Mitigation Measures described in the Subsequent Final EIR would reduce impacts to the extent feasible. However, several impacts to the biological and visual resources would remain significant and unavoidable (Class I). Moreover, the proposed project would develop residential units within the area identified in the OCP for open space resulting in the creation of small, fragmented open-space areas rather than one large contiguous open-space area as required in the OCP Open Space Plan. These fragmented open-space areas are inconsistent with the policies that pertain to the protection of biological and visual resources as well as preserving the semi-rural character of the Orcutt area. Therefore, the

requested rezone is not in the interest of the general community welfare.

2.1.2 The request is consistent with the Comprehensive Plan, the requirements of the State planning and zoning laws, and this Development Code. If the Amendment involves an Amendment to the Local Coastal Program, then the request shall also be found to be consistent with the Coastal Land Use Plan.

As discussed in Section 6.2 of the staff report dated December 2, 2011, herein incorporated by reference, the project is inconsistent with the Comprehensive Plan, including the Orcutt Community Plan. The project site is outside of the coastal zone and therefore does not involve a request to amend the Local Coastal Program.

2.1.3 The request is consistent with good zoning and planning practices.

The proposed project would develop residential units within the area identified in the OCP for open space resulting in the dispersal of residential development throughout the site thereby creating a series of small open-space areas rather than one large contiguous open-space area envisioned in the OCP. The small, fragmented areas of open space are: 1) inconsistent with OCP policies that pertain to the protection of biological resources and visual resources; and, 2) less desirable because they do not offer the same opportunities at preserving the semi-rural character of the Orcutt area as would be achieved with one large-contiguous open space. Therefore, the finding that the request is consistent with good zoning and planning practices cannot be made.

2.2 GENERAL PLAN AMENDMENT FINDINGS

Government Code Section 65358(a) requires a general plan amendment to be in the public interest.

Refer to the discussion provided under Section 2.1.1 above.

2.3 SUBDIVISION MAP ACT FINDINGS

Findings for all Tentative Maps. In compliance with the Subdivision Map Act, the review authority shall deny the Orcutt Key Site 3 Map, Case No. 06TRM-00000-00004/TM 14,714 if any of the following Subdivision Map Act Findings cannot be made:

2.3.1 *State Government Code §66473.5. No local agency shall approve a tentative map, or a parcel map for which a tentative map was not required, unless the legislative body finds that the proposed subdivision, together with the provisions for its design and improvement is consistent with the general plan required by Article 5 (commencing with §65300) of Chapter 3 of Division 1 or any specific plan adopted pursuant to Article 8 (commencing with §65450) of Chapter 3 of Division 1.*

As proposed, development of Key Site 3 would result in direct loss of wetland, coastal scrub, oak woodland, oak riparian, and non-native grassland. The proposed project would also result in the disruption of wildlife corridors as well as permanently alter the area identified for open space in the OCP. Mitigation Measures described in the Subsequent Final EIR, would reduce impacts to the extent feasible. However, several impacts to the biological and visual resources would remain significant and unavoidable. Moreover, the proposed project would develop residential units within the area identified in the OCP for open space resulting in the creation of small, fragmented open-space areas. The fragmented areas of open space are inconsistent with the policies that pertain to the protection of biological and visual resources as well as preserving the semi-rural character of the Orcutt area. Therefore, the finding that the project is consistent with general plan cannot be made.

2.3.2 State Government Code §66474. The following findings shall be cause for disapproval of a Tentative Parcel Map/Tract Map:

- a. The proposed map is not consistent with applicable general and specific plans as specified in §66451.*

Refer to the discussion provided under Section 2.1 above.

- b. The design or improvement of the proposed subdivision is not consistent with applicable general and specific plans.*

Refer to the discussion provided under Section 2.1 above.

2.4 CHAPTER 21, COUNTY SUBDIVISION REGULATIONS

The following, among others, shall be cause for disapproval of a tentative map including tentative parcel maps, but the tentative map may nevertheless be approved in spite of the existence of such conditions where circumstances warrant:

- 2.4.1 Nonconformance with the County's Comprehensive Plan or with any alignment of a state highway officially approved or adopted by the state department of transportation.**

Refer to the discussion provided under Section 2.1 above.

2.5 DEVELOPMENT PLAN FINDINGS

Findings required for all Preliminary or Final Development Plans. In compliance with Subsection 35.82.080.E.1 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for a Preliminary or Final Development Plan the review authority shall first make all of the following findings.

2.5.1 *The proposed project will comply with all applicable requirements of this Development Code and the Comprehensive Plan.*

Refer to the discussion provided under Section 2.1 above.

2.6 PLANNED RESIDENTIAL DEVELOPMENT FINDINGS

Additional findings required for sites zoned Planned Residential Development (PRD). In compliance with Subsection 35.82.080.E.5 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for a Preliminary or Final Development Plan for sites zoned PRD the review authority shall first make all of the following findings:

2.6.1 *The density and type of the proposed development will comply with the PRD zone and applicable policies of the Comprehensive Plan including any applicable community or area plan policies.*

Refer to the discussion provided under Section 2.1 above.

2.6.2 *The structures are clustered to the maximum extent feasible to provide the maximum amount of contiguous open space.*

The proposed project would develop residential units within the area identified in the OCP for open space resulting in the dispersal of residential development throughout the site thereby creating a series of small open-space areas rather than one large contiguous open-space area envisioned in the OCP. The small, fragmented areas of open space are: 1) inconsistent with OCP policies that pertain to the protection of biological resources and visual resources; and, 2) less desirable because they do not offer the same opportunities at preserving the semi-rural character of the Orcutt area as would be achieved with one large contiguous open space. Therefore, the finding that structures are clustered to the maximum extent feasible cannot be made.

2.7 CONDITIONAL USE PERMIT FINDINGS

Pursuant to Section 35.82.060.E, a Conditional Use Permit application shall only be approved or conditionally approved if all of the following findings are made:

2.7.1 *That the project is in conformance with the applicable provisions and policies of the Development Code and the Comprehensive Plan.*

Refer to the discussion provided under Section 2.1 above.

ATTACHMENT B REVISION LETTER

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*

Prepared by:

County of Santa Barbara
Planning & Development Department
624 West Foster Road
Santa Maria, California 93455-3623

With the assistance of:

Rincon Consultants, Inc.
1530 Monterey Street, Suite D
San Luis Obispo, CA 93401

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

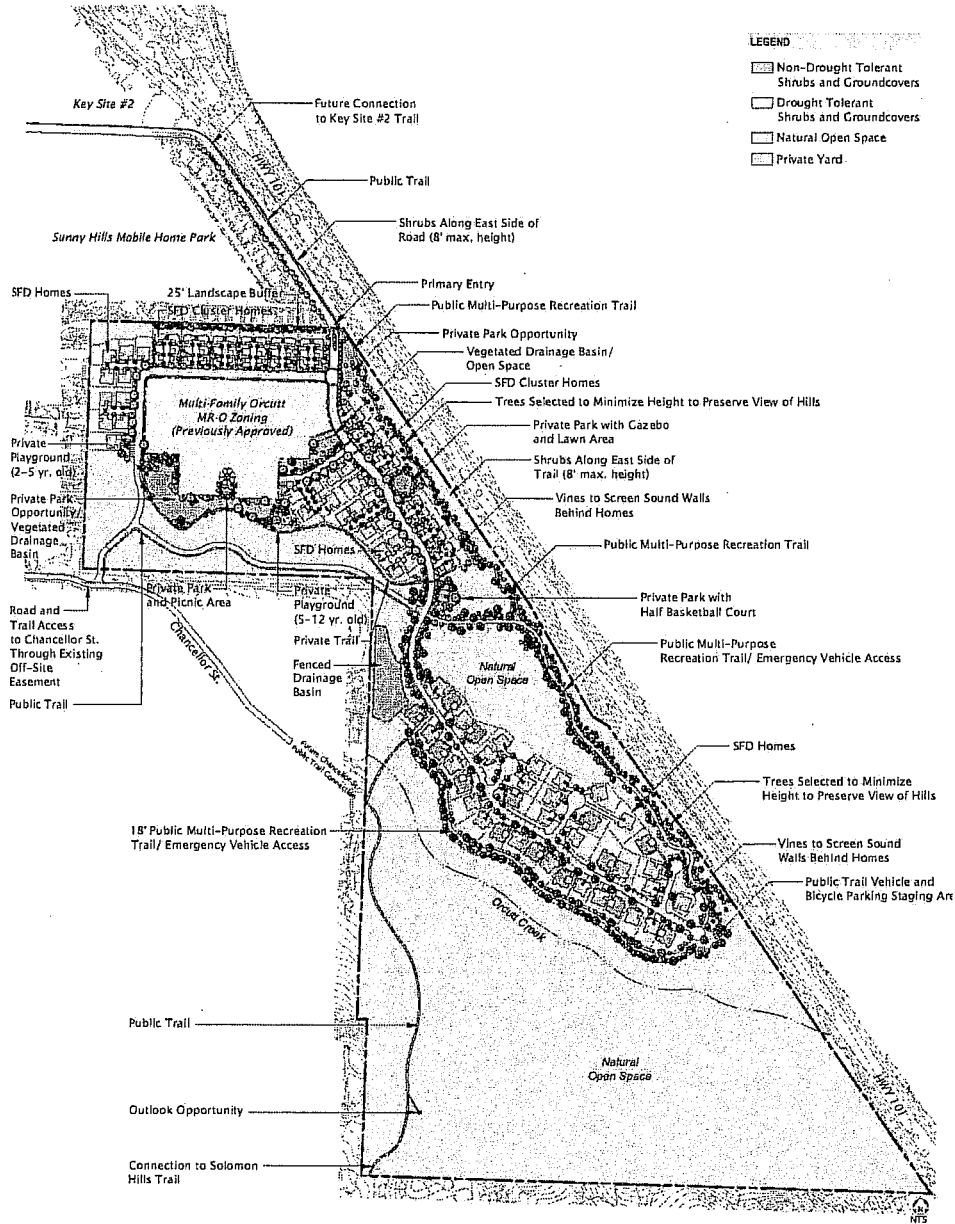
The proposed modifications to the Key Site 3 Project include a reduction in total units, an increase in setback from Highway 101, an increased buffer from the project boundary for residences along the northern and western portion of the Northern Mesa area, and elimination of the 11 estate lots previously 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-way (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 plan 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 plant 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 CO₂e /yr, which would still exceed the significance criteria of 1,100 MT CO₂e/yr. Similar to the proposed project, the per service population (SP) annual GHG emissions rate would be 5.08 MT CO₂e/SP/yr, which exceeds the significance criteria of 4.6 MT CO₂e/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. 101 Southbound 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

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
Vegetation Removal for Fire Mgt.	II	II
Sensitive Habitat Loss	I	II
Wetlands	II	II
Impacts to Wildlife	I	I
Construction Impacts	II	II
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		

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
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
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

**ATTACHMENT C
NOTICE OF EXEMPTION**

TO: Santa Barbara County Clerk of the Board of Supervisors

FROM: Santa Barbara County Planning and Development Department

The project or activity identified below is determined to be exempt from further environmental review requirements of the California Environmental Quality Act (CEQA) of 1970, as defined in the State and County Guidelines for the implementation of CEQA.

APN: 129-151-026

Case No.: 06GPA-00000-00016, 06RZN-00000-00007, 06DVP-00000-00015, TTM 14,714,
10CUP-00000-00001

Location: Project site is located approximately 0.5 miles south of the Clark Avenue/US Highway 101 intersection, in the Orcutt area. The project site is referred to as Key Site 3 in the Orcutt Community Plan.

Project Title: Key Site 3

Project Description: Disapproval of the detailed reconfigured Key Site 3 project.

Name of Public Agency Approving Project: County of Santa Barbara Board of Supervisors

Name of Person or Agency Carrying Out Project: John Franklin; Franklin Real Estate
Development, LLC

Exempt Status: (Check one)

- Ministerial
 Statutory Exemption
 Categorical Exemption
 Emergency Project
 Declared Emergency

Cite specific CEQA and/or CEQA Guideline Section Section 15270 of the CEQA Guidelines (Projects which are Disapproved).

Reasons to support exemption findings: CEQA Section 15270 states that "CEQA does not apply to projects which a public agency rejects or disapproves."

The proposed project would develop residential units within the area identified in the OCP for open space resulting in the dispersal of residential development throughout the site thereby

creating a series of small open-space areas rather than one large contiguous open-space area envisioned in the OCP. The small, fragmented areas of open space are: 1) inconsistent with OCP policies that pertain to the protection of biological resources and visual resources; and, 2) less desirable because they do not offer the same opportunities at preserving the semi-rural character of the Orcutt area as would be achieved with one large-contiguous open space. Therefore, staff recommends denial of the detailed reconfigured project and OCP amendments because: 1) the finding that the proposed project provides a public benefit, and is in the interest of the general community welfare, cannot be made; and, 2) the project is inconsistent with the OCP policies state above.

Lead Agency Contact Person: John Zorovich, Senior Planner, (805) 934-6297

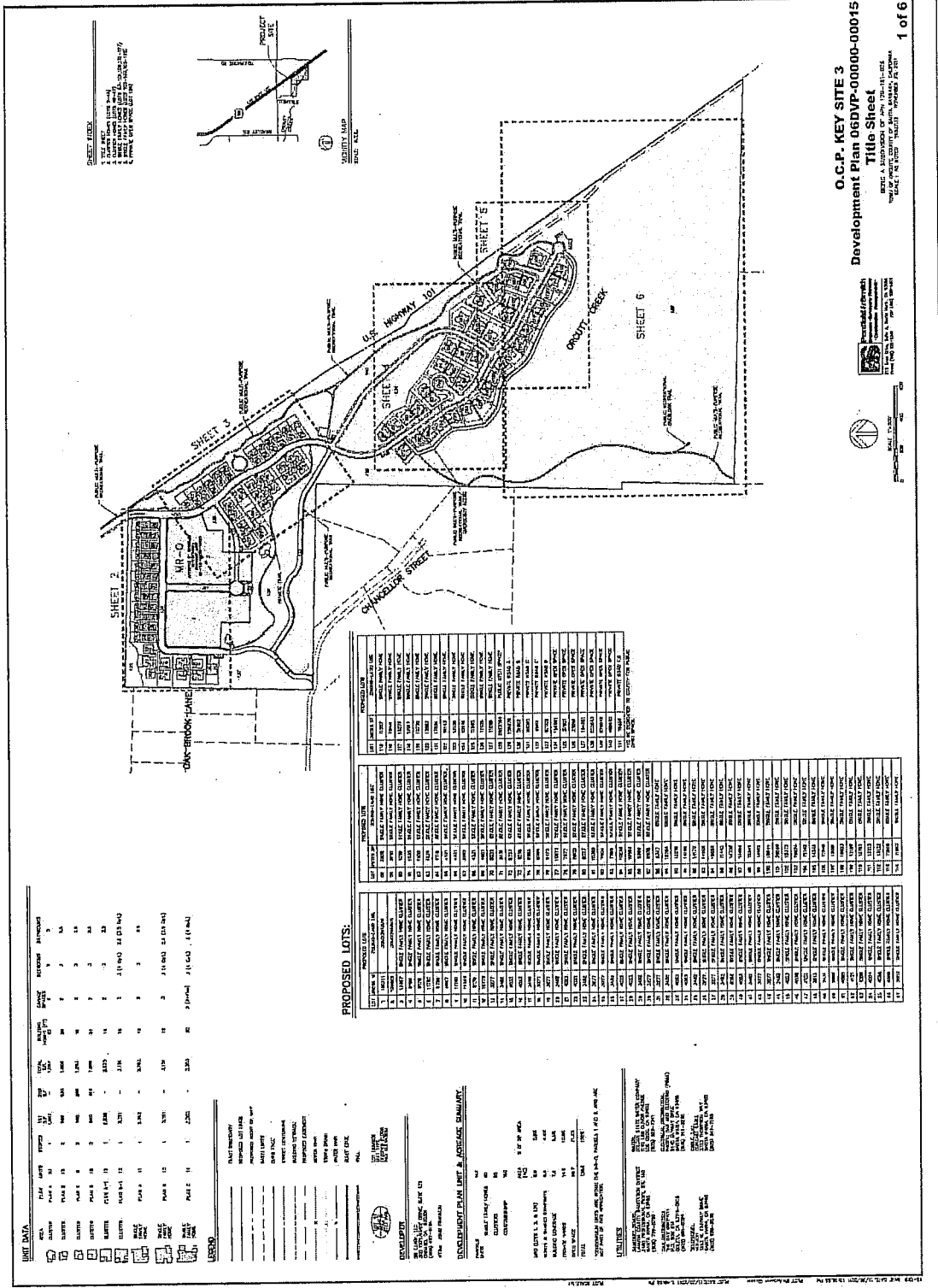
Department/Division Representative: _____ **Date:** _____

Acceptance Date: _____

Date Filed by County Clerk: _____.

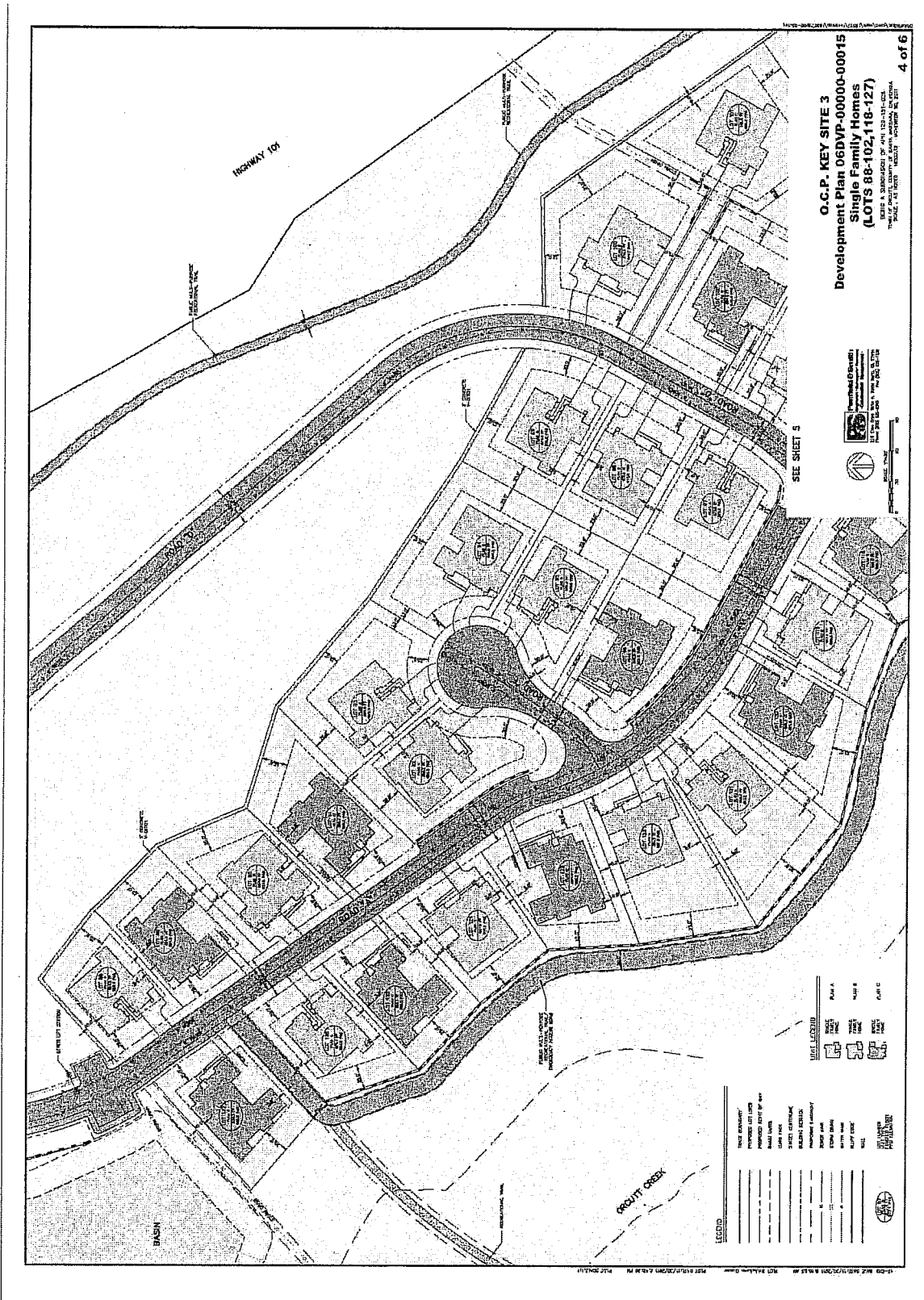


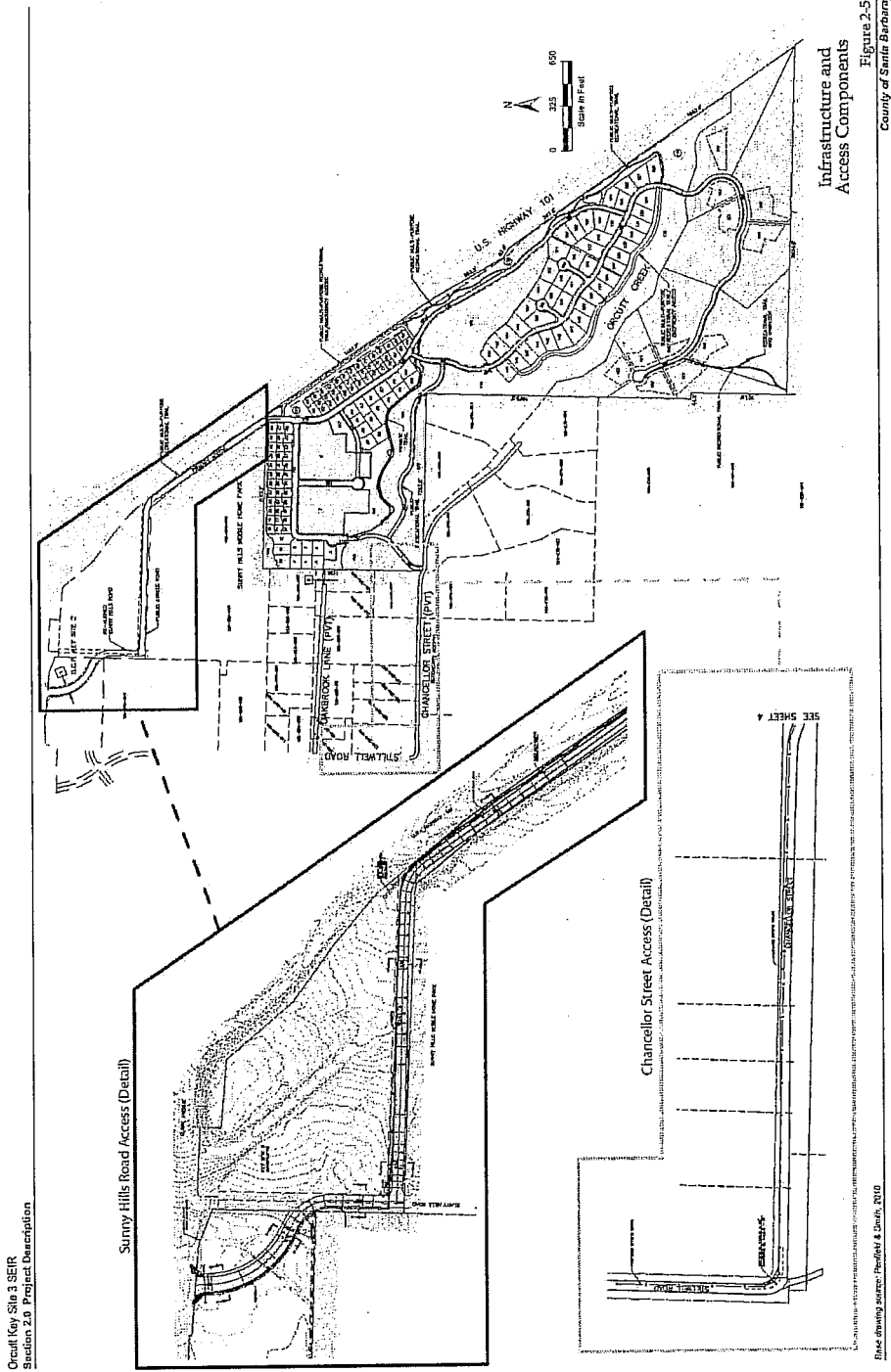
ATTACHMENT D Site Plans



O.C.P. KEY SITE 3
 Development Plan 06DVP-00000-00015
 Title Sheet
 BEING A SUBDIVISION OF PART OF THE
 TRACT OF 100 ACRES MORE OR LESS
 IN THE COUNTY OF HAWAII







Infrastructure and
 Access Components
 Figure 2-5
 County of Santa Barbara

Orcutt Key Site 3 SEIR
 Section 2.8 Project Description

Base drawing source: Parkley & Smith, RUC

*Orcutt Key Site 3; Case Nos. 06GPA-00000-00016, 06RZN-00000-00007, 06DVP-00000-00015, TTM 14,714,
10CUP-00000-00001*

Attachment D: Site Plans

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