CONFIRMING ANALYSIS FOR ALTERNATIVE 1B

PRELIMINARY DRAFT SANTA BARBARA COUNTY

SANTA BARBARA RANCH PROJECT

ALTERNATIVE 1B Environmental Analysis and Findings

1.0 Introduction

Alternative 1B proposes to revise the Alternative 1 (referred to here as Alternative 1A) lot configuration on the north side of Highway 101. Alternative 1B relocates fourteen lots located north of Highway 101 into areas that had been proposed for development on Dos Pueblos Ranch DP Lots 1 through 10 as part of Alternative 1A. Under Alternative 1B, twelve of the relocated lots would be located within areas that had been proposed for the development of residences in Alternative 1A. Two lots would be located immediately adjacent to those lots on the eastern boundary of Dos Pueblos Ranch.

Alternative 1B reduces the potential view impacts that would be associated with Alternative 1A, by moving lots that would be visible from Highway 101 into less visible locations. Further, Alternative 1B would result in a larger Agricultural Conservation Easement (ACE) and the implementation of design guidelines revised to reflect more rural-sensitive architecture. Finally, Alternative 1B proposes slight refinements to development envelopes on the south side of Highway 101 within Lots DP-15, DP-16 and DP-20, in order to account for current information regarding cultural resources, see 2.4 Historic Resources below.

2.0 Resources

The County has reviewed Alternative 1B and determined that the Final EIR's analysis of the potential environmental impacts of Alternative 1A takes into account the full extent of the potential environmental impacts of Alternative 1B. As detailed below, Alternative 1B, which encompasses the same areas of Santa Barbara and Dos Pueblos Ranches as proposed under Alternative 1A, will not result in any new, or substantially more severe, significant impacts than those disclosed in the Final EIR for Alternative 1A, nor will it require any new mitigation measures in addition to those recommended in the Final EIR for Alternative 1A.

2.1 Biological Resources

The development envelopes on 12 of the 14 lots that would be located on Dos Pueblos Ranch under Alternative 1B would occur within the areas that were to be subdivided as Lots DP 1-10 under Alternative 1A. Two lots would be located immediately east of the area that Alternative 1A had proposed to locate DP Lots 1-5. The new development envelopes within Lots DP-1-5 will be located in areas of dying avocado orchards, non-native grassland and dry-farmed hay. The two new development envelopes that would be located immediately east of Lots DP 1-5 consist of the same types non-native grasses and dry-farmed hay that is found on the land previously proposed for development under Alternative 1A. The new development envelopes within Lots DP-6-10 will be located in areas of non-native grassland.

Accordingly, while Chapter 9.4 Biological Resources discloses that Lots DP-1 - 10 contain some areas of coastal scrub vegetation that would be impacted under Alternative 1A, the new lots proposed to be relocated within the existing lot footprints of Lots DP-1 - 10 will not result in any new, or substantially more severe, significant impacts to coastal scrub vegetation, nor will they require any new mitigation measures in addition to those recommended for Alternative 1A. (Final EIR at pp. 9.4-17, 9.4-60 - 9.4-61.) Implementation of Mitigation Measure Bio 2a and 2b, as described in the Final EIR, will continue to mitigate appropriately for the loss of any coastal scrub vegetation by requiring protection and revegetation of coastal scrub habitat. (Final EIR at pp. 9.4-88 - 9.4-90.)

Finally, though Table 9.4-5 of the Final EIR's analysis of potential Biological Resource impacts also notes that Lots DP-1, 4 and 5 contain potentially affected federal and state jurisdiction waters, under Alternative 1B these waters will continue to be avoided through the realignment of the ranch road and the installation of a culvert for stream crossing pursuant to a California Fish and Game Code Section 1600 – 1616 Streambed and Bank Alteration Permit. (Final EIR at p. 9.4-68.)

Table 1 Vegetation Types Found in the Alternative 1B Area

SAIC Report Vegetation Types and Features Classifications (SBR Property only)	Corresponding Vegetation Types and Features Classifications and Codes for this RDEIR	Total Acres within Alternative 1 Area	Acres Affected by Alternative 1B
	Coastal Bluffs (not mapped)	3 acres (The area between vegetation mapping and property boundary is approx. 9.95 acres, most of which is beach.)	0.00 acre (beach access stairway deleted)
Open Water	Aquatic Habitat (AQ)	8.2 acres (Dos Pueblos Ranch Reservoir)	0
	AQ/Disturbed/Developed (AQ/DD)	1.2 acres (concrete reservoir along Dos Pueblos Creek and adjacent land)	_
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SAIC Report Vegetation Types and Features Classifications (SBR Property only)	Corresponding Vegetation Types and Features Classifications and Codes for this RDEIR	Total Acres within Alternative 1 Area	Acres Affected by Alternative 1B	
Not mapped by SAIC	Chaparral/Coast Live Oak Woodland/Coastal Scrub (CHAP/COW/CS)	62.8 ac (most in Lot DP-11)	0.0 (Building footprint for Lot DP-03A shifted to avoid any	
	CHAP/CS/Non-native Grassland/Ruderal (CHAP/CS/NNG/R)	5.3 ac (all in Lot DP-11)	Chaparral impacts))	
Coast-live Oak Riparian Woodland	Coast-Live Oak Riparian Woodland (CORW)	6.5 ac	1.15 (most is disturbance on existing	
	CORW/Planted Trees and Horticulture (CORW/PTH)	0.1 ac	roads, with some indirect effect in Lot 48	
	Coast Live Oak and Sycamore Riparian Woodland (COSRW)	32.5 ac (along Dos Pueblos Creek)	 subject to erosion/ sedimentation from road construction) 	
Not mapped by SAIC	COW	15.2 ac (most in designated remainder)	0.89 (Lots DP-02A and DP-03A, fill into	
	COW/CS	5.3 ac (most in designated remainder)	understory, no matur trees will be removed	
	COW/CS/NNG/R	33 ac (most in designated remainder)		
	COW/NNG/R	10.2 ac (all in designated remainder)	_	
Coastal Scrub	CS	43.8 ac (Generally steeper slopes)	9.24 (0.126 in CS,	
	CS/NNG/R	68.4 ac along margins of NNG 10.6 ac north of Hwy 101)	remainder in areas with NNG)	
	CS/PTH	1.3 ac	_	
	CS/PTH/R/NNG	38.2 ac	_	
	CS/R/NNG	1.3 ac	_	
	CS/R/NNG/Willow Riparian woodland and scrub (WR)	1.5 ac (Lot DP-11)	_	
	CS/WR		_	
Disturbed/Develope	Disturbed/Developed (DD)	12.9 ac	8.64	
d	DD/R/NNG	0.02 ac		

SAIC Report Vegetation Types and Features Classifications (SBR Property only)	Corresponding Vegetation Types and Features Classifications and Codes for this RDEIR	Total Acres within Alternative 1 Area	Acres Affected by Alternative 1B	
	DD/PTH	49.0 ac	_	
	DD/PTH/R	0.9 ac		
Native Grassland (meets Santa Barbara County criteria and thresholds)	Native Grassland (native grasses predominant; meets Santa Barbara County criteria and thresholds)	12.5 ac (2.9 ac on Lot 57 and margins along coastal terrace drainages)	Approx. 0.10 (beach access trails, temporary disturbance for drain lines)	
Native grasses present but with less than 10 percent cover (does not meet Santa Barbara County criteria or threshold)	Native grasses present, but not predominant (not mapped-see text)	Not mapped. Small isolated patches in non-native grassland; margins of coastal scrub.		
Non-native Grassland	AG/NNG	21.7 ac	17.16	
	Non-native Grassland and Ruderal (NNG/R)	330 ac	171.23	
	NNG/R/Orchard 165 ac (NNG/R/OR)		-	
	NNG/R/PTH	2.7	-	
	NNG/R/WR	0.25 ac (along Canada Tomate, Lots 202 and 209)	-	
Non-native Grassland/Weed Dominated	Ruderal-dominated and Non-native Grassland (R/NNG)	58 ac	40.93	
	R/NNG/WR	3.1 ac	-	
Orchard	Orchard (OR)	341.7 ac	10.8	
Planted Trees	Planted Trees and Horticulture (PTH)	37.83 ac	4.89	
	PTH/R/NNG		-	
Willow Riparian Woodland	Willow Riparian Scrub and Woodland (WR)	12.2 ac (most [9.9 ac] on design. remainder)	0.54(DP-04 0.53 ac culvert crossing)	
Wetlands	Prevalent Hydrophytic Vegetation (PHV)	4.6 ac (margin of Dos Pueblos Ranch reservoir, isolated seeps)	0.0 (No direct effects. Seeps along stream	
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SAIC Report Vegetation Types and Features Classifications (SBR Property only)	Corresponding Vegetation Types and Features Classifications and Codes for this RDEIR	Total Acres within Alternative 1 Area	Acres Affected by Alternative 1B	
(3BK Property Only)	IOI IIIIS RDEIR	For seasonal waterbodies, see Figure	margins, within 100	
		3.4-3 and Table 3.4-2. Total is approx. 2,500 sq. ft.	feet of structures.)	

2.2 Agriculture Resources

As discussed in Chapter 9.7, Agriculture, Lots DP-1 - 10 are subject to existing Williamson Act contracts. (Final EIR at p.9.7-5.) The numbers cited in the Final EIR, and addressed in this Confirming Analysis, are derived from GIS analysis of shape files containing lots and development envelopes provided by the applicant. As a result, these acreages may not agree precisely with the areas for properties shown on record maps or other legal surveys. The differences, however, are not significant and do not affect the analysis or policy implications of the proposal.

Within the Alternative 1B proposal, the creation of two additional lots outside of the areas proposed for Lots DP-1 – 10 under Alternative 1A, and lot boundary adjustments to create two large agricultural lots (DP-10C and Lot 185), leads to an increase in the amount of Williamson Act land proposed to be extinguished for development from 271 acres (Alternative 1A) to 576 acres (Alternative 1B) – or an additional 305 acres. The amount of total acreage that will be exchanged into a new Department of Conservation (DOC) Agricultural Conservation Easement (ACE) under Alternative 1B has been increased from 2,634 acres (Alternative 1A) to 2,653 acres (Alternative 1B). As with Alternative 1A, the total protected land in the ACE will be greater than the currently protected land in the existing Williamson Act Contract (an increase from 2,566 acres to 2,653).

The amount of prime agricultural land (including land mapped as such in the Statewide farmland mapping system plus Class IIe soils) protected by contract or easement will increase from the current 517 acres in the existing Williamson Act, to 616 acres in the proposed Alternative 1B ACE. Thus, the proposed ACE will be preserving 99 acres more prime agricultural land than is currently protected in the Williamson Act contract. The amount of existing orchards that will be physically removed will increase from 53 acres under Alternative 1A to 59 acres under Alternative 1B. This area of prime agricultural land that would be lost to development is more than offset by the excess of 99 acres of prime agricultural land that will be protected under the ACE. As such, no new mitigation with respect to agricultural resources would be required under Alternative 1B.

Table 2
Summary of Agricultural Lands

	Total Area (gross acres)		Prime Agricultural Land (gross acres)		
	In Wms. Act	In ACE	In Wms. Act	In ACE	
Existing Condition	2,566	0	517	0	
Proposed Alt. 1B Project	1,990	2,653	412	616	
Net Change	-576	+2,653	-105	+616	

Table 3
Change in Total Agricultural Land and Prime Agricultural Land

		Р	Prime Agricultural Land (gross ac)			
	•		Марре			
	Protected Agricultural Land (gross ac)	Class Ile Soils only	With Class Ile Soils	Without Class Ile Soils	Total Acres	
Current Williamson Act	2,556	30	68	419	517	
Proposed ACE	2,652	80.2	92.5	443	616	
Net Change	+96	+50.2	+24.5	+24	+99	

As well, under Alternative 1B the amount of Prime Soils (Class IIe) that will be taken out of existing contracted lands remains zero (0) acres. (Final EIR. at p. 9.7.-6.) Further, the amount of Prime Soils (Class IIe) that will be included in a new DOC ACE remains the same, approximately 80 acres. (Final EIR at p.9.7.-6.) Accordingly, there are no new, or substantially more severe, significant agricultural impacts of Alternative 1B, nor are any new mitigation measures required in addition to those recommended for Alternative 1A.

2.3 Visual Resources

Under Alternative 1B there are 14 Alternative 1A residences (Lots 48, 52A, 107B, 109, 133, 136, 137, 160, 164, 186, 187, 188, 193, and 195) that would be relocated to areas associated with proposed DP Lots 1 – 10 under Alternative 1A and that were previously evaluated in the Final EIR. Under Alternative 1A, those residences were located within the potential Highway 101 viewsheds considered in the Final EIR as Key Observation Point (KOP) 2 (the view from Highway 101 Northbound), KOP 6a (the foreground view of north of Highway 101 from Highway 101), and KOP 6b (the midground view north of Highway 101 from Highway 101 southbound) All potential visual impacts of those 14 residences on KOP 2, 6a and 6b are eliminated or reduced under Alternative 1B.

Further, the relocation and reconfiguration of lots on Dos Pueblos Ranch on and in the vicinity of Lots DP 1 – 10 will not result in a new, or substantially more severe, significant visual impact. Lots DP-1 – 10 lie closest to KOP 4 (views to site from inland residences and trails) and 5 (midground view north of Highway 101 from Highway 101 southbound) viewsheds. However, no development on Lots DP-6 –10, under either Alternative 1A or 1B, would be visible from KOP 5 (see Final EIR Figure 9.9-15) and no development on Lots DP-1 – 5, under either Alternative 1A or 1B, would be visible from KOP 4 (see Final EIR Figure 9.9-14). Accordingly, there are no new, or substantially more severe, significant visual impacts of Alternative 1B, nor are any new mitigation measures required in addition to those recommended for Alternative 1A.

In the coastal terrace lots of the Santa Barbara Ranch property, the lot location and general building configuration under Alternative 1B will be very similar to that in the original Alternative 1A. Nine residential lots will be developed in this area. In the original Alternative 1A, the building sizes on these lots would have ranged from 6,300 to 13,000 square feet; under Alternative 1B these will be limited to a maximum of 10,000 square feet. In the original Alternative 1A design, all of these residences would be single story, but the structures would have architectural features such as vaulted ceilings and entrances with heights up to 25 feet. In the visual modeling performed for the views from the open ocean (discussed in Impact Vis-9) it was assumed that the structures had a uniform height of 25 feet around their entire perimeters. Under Alternative 1B, provision is made for limited use of two-story designs if the upper floors are set back from the building perimeter and the design is approved by the Central Board of Architectural Review. The 25 foot height limit would remain. Thus, Alternative 1B would have similar or less effects on views from the open ocean.

Thus, in overall scale and bulk--as determined by building placement, area, and height—the project design and appearance in the coastal terrace lots of Alternative 1B would be similar in nature to that originally proposed in Alternative 1A. None of these residences would be visible from Highway 101, but some of them (the most southeasterly in Lots 122, 119, and 93) would be visible from portion of the Coastal Trail (De Anza Trail) just south of the UPRR tracks (KOP 1A in the Final EIR) and from portions of the bluff access trail leading to the bluff overlook and information station. This recreational trail segment would be constructed by the project itself, and the overall effect of the Alternative 1B visibility from this trail segment would be very similar to that of the original Alternative 1A. The analysis in the Final EIR concluded that the visual impact from KOP 1A would be potentially significant, but mitigated (Class II). This conclusion remains applicable to the design in Alternative 1B.

The lighting standards and restrictions specified in the Revised Design Guidelines applicable to Alternative 1B are somewhat more explicit and restrictive than those proposed in the original design guidelines under Alternative 1A. Impacts related to nighttime visibility of light and glare from the project (Impact Vis-10) would remain potentially significant but mitigated (Class II) for Alternative 1B.

In summary, the visual impacts of Alternative 1B would be somewhat less than those expected under the original Alternative 1A, due to the relocation of 14 residences from the sloping land visible north of Highway 101 to less visible inland portions of the project. The single Class I significant and not mitigable impact related to the overall change in character of the project would remain with Alternative 1B, although the greater variety in architectural style and the

increased emphasis on ranch or rural designs may provide some positive influence in this regard. The remaining impacts, all of which were determined to be either significant and mitigable (Class II) or less than significant (Class III), would be unchanged under Alternative 1B.

2.4 Historic Resources

The Final EIR already contemplates the slight refinements to development envelopes on the south side of Highway 101 within Lots DP-15, DP-16 and DP-20 that are proposed under Alternative 1B. As discussed and analyzed in the Final EIR, the development envelope proposed on Lot DP-15 has been reduced to 2.0 acres and moved to the east. (Final EIR at p. 9.11-28.) The development envelope proposed on Lot DP-16 has been reduced to encompass the existing development footprint of the existing house (approximately <1.0 acre). (*Id.*) The new residence will be located in the same general footprint of an existing home which will be demolished. (*Id.*) The proposed development envelope for Lot DP-20 has been reduced to 2.0 acres and moved to the west. (*Id.*) As concluded in the Final EIR, these refinements "will avoid and reduce direct impacts to archeological resources." (*Id.*) Accordingly, there are no new, or substantially more severe, significant cultural resource impacts of Alternative 1B, nor are any new mitigation measures required in addition to those recommended for Alternative 1A.

2.5 Traffic and Circulation; Noise; Air Quality; Public Services:

The Final EIR's analysis of Alternative 1A in Chapter 9.12 Traffic and Circulation, Chapter 9.13 Noise, Chapter 9.14 Air Quality, and Chapter 9.15 Public Services is based on an assessment of the potential traffic, noise, air quality and public service impacts of the 72 single family residences proposed under Alternative 1A. Alternative 1B proposes only 71 single residences. Accordingly, Alternative 1B will not result in new, or substantially more severe, significant impacts as to those categories of environmental analysis, nor will it require any new mitigation measures in addition to those recommended for Alternative 1A. For example, the Final EIR's analysis of potential impacts to water supply concludes that there is sufficient water to meet Alternative 1's water demands. (Final EIR at p. 3.15-24.) The conclusion remains the same for Alternative 1B. Accordingly, Alternative 1B will not result in new, or substantially more severe, significant impacts related to water use, nor will it require any new mitigation measures beyond those recommended for Alternative 1A.

2.6 Geology, Geologic Hazards and Soils; Hydrology and Water Quality; Hazards and Hazardous Materials, Land Use; Mineral Resources; Recreation; Climate Change:

Similarly, the proposed development under Alternative 1B is located within areas that were evaluated in the Final EIR in connection with Alternative 1A. Accordingly, the same mitigation measures, such as Geo 4 and 5 proposed in Chapter 9.2 for Geology, Geologic Hazards and Soils, to ensure mitigation of any potential impacts of construction related to landsliding or soil conditions, or mitigation measures WQ-1a and WQ-1b proposed in Chapter 9.3 for Hydrology and Water Quality to avoid storm water pollution and to ensure storm water quality management, will serve to mitigate the potential water quality impacts of Alternative 1B, just as they serve to mitigate the potential water quality impacts of Alternative 1A. (Final EIR at pp. 9.2-24 – 9.2-25; 9.3-34 – 9.3-39.)

Further, the new development envelopes under Alternative 1B are located in areas in which the Final EIR found no potential hazards or mineral resources. As a result, no new, or substantially more severe, significant impacts would occur under Alternative 1B and no new mitigation would be required to reduce potential impacts relating to hazards, and hazardous materials or minerals. (Final EIR at pp. 9.5-8; 9.8-2.) As well, Alternative 1B will have the same projected use of existing and neighborhood parks as Alternative 1A, and Alternative 1B does not alter Alternative 1A's proposals for the Coast Trail or De Anza Trail. (Final EIR at pp. 9.10-13 – 9.10-15.) Therefore, Alternative 1B will not result in new, or substantially more severe, significant impact or require new mitigation measures with regard to recreation. Finally, as Alternative 1B does not propose more residences than Alterative 1A and does not propose additional development on coastal bluffs, it would not result in new, or substantially more severe, significant impacts or require the imposition of new mitigation measures with regard to Land Use or Climate Change.