COUNTY OF SANTA BARBARA

Planning and Development

Draft Mitigated Negative Declaration

Rose Comprehensive Plan Amendment and Zoning Map Amendment

Case Nos. 23GPA-00006, 23RZN-00006, & 25NGD-00006

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1.0 REQUEST/PROJECT DESCRIPTION

The project is a request for a Comprehensive Plan Amendment and Zoning Map Amendment to change the land use designation of the subject parcel from A-I-10 (Agriculture I, Minimum parcel size 10 acres) to RES-1.8 (Single Family, Minimum parcel size 20,000 square feet) and to rezone the parcel from AG-I-10 (Agriculture I, Minimum parcel size 10 acres) to 20-R-1 (Single Family, Minimum parcel size 20,000 square feet).

The parcel will be served by the Goleta Water District, the Goleta Sanitary District, and the Santa Barbara County Fire Department. Access will continue to be provided from Orchid Drive. The property is a 2.33-acre parcel shown as Assessor's Parcel Number 065-290-026, located at 1251 Orchid Drive in the Eastern Goleta Valley Community Plan area, Second Supervisorial District.

2.0 PROJECT LOCATION

The 2.33-acre proposed project site is shown as APN 065-290-026 and is located at 1251 Orchid Drive in the Eastern Goleta Valley Community Plan area, Second Supervisorial District.



Figure 1. Zoning Vicinity Map

2.1 Site Information	
Comprehensive Plan Designation	A-I-10 (Agriculture I, Minimum Lot Size 10 Acres), Urban Area, Eastern Goleta Valley Community Plan
Zoning District, Ordinance	AG-I-10 (Agriculture I, Minimum Lot Size 10 Acres Gross), Article II

Site Size	2.33 acres gross and net
Present Use & Development	Orchid Nursery
Surrounding Uses/Zoning	North: Single-Family Residence, 20-R-1 (Single Family Residential, Minimum Lot Size 20,000 sq. ft. net) South: Single-Family Residence, 20-R-1 East: Single-Family Residence, 20-R-1 West: Residential Development and Agricultural Nursery Operations, AG-I-10
Access	Orchid Drive
Public Services	Water Supply: Goleta Water District Sewage: Goleta Sanitary District Fire: Santa Barbara County Fire Department Battallion 1, Station #12 Other: Goleta Union School District

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

Slope/Topography: The property is located on a marine terrace that is flat to gently sloping. The property sits at an elevation of roughly 90 feet above sea level, according to the USGS topographic map quadrangle.

Fauna/Flora: Vegetation on site consists of mature cypress, pine, and palm trees. An avocado orchard stands at the property's southern end. A thick row of succulents runs along the western boundary. The northern boundary contains a row of tall hedges. Bamboo grows within the southeastern corner. The project area contains numerous species of ornamental hedges, bushes, succulents, and flowering plants, as well as non-native grasses, weeds, and forbs (herbaceous flowering plants). The proposed project site does not contain any documented observations of special status animal species according to the California Natural Diversity Database (CNDDB).

Archaeological Sites: No previously recorded archaeological sites exist in the project area. Three previously recorded sites lie within 0.25-miles of the project area (SBA-1698, SBA-1699, and SBA-1700), and one previously unrecorded site (SBA-4296) lies within the project area. SBA-1698 is a prehistoric site, perhaps a temporary camp, containing a low-to-medium density of marine shell, stone tools, fire affected rock, chipped stone, animal bone, and groundstone. SBA-1698 lies over 1,100 feet northwest of the current project area. SBA-1699 is a small prehistoric camp site characterized as a high-density marine shell midden with a low count of observed lithic materials. The site also contains the burnt faunal remains of deer. SBA-1699 lies over 1,000 feet northeast of the current project area. SBA-1700 is another small prehistoric camp characterized by a high-density marine shell midden with a lower percentage of lithic materials. SBA-1700 lies approximately 750 feet northeast of the project area. SBA-4296, the unrecorded site, does not represent an intact archaeological deposit, and cultural materials have been mixed with abundant modern trash and debris and redeposited on the project parcel. As the site is the result of secondary deposition from an unknown source, the site lacks integrity and context.

Soils: Soils on the subject property are classified as Baywood loamy sand, with slopes ranging from two to nine percent. Baywood soils are classified as deep, somewhat excessively drained soils that formed in old sand dunes near the coast.

Surface Water Bodies (including wetlands, riparian areas, ponds, springs, creeks, rivers, lakes, and estuaries): No surface water bodies are located on the subject parcel. The nearest blue line stream is

Atascadero Creek located approximately 1,500 feet north of the site. The site generally drains to the north toward Atascadero Creek.

Surrounding Land Uses: The property is adjacent to an agricultural parcel to the west that is developed with a small-scale garden nursery use, and residentially-zoned parcels to the north, east, and south that are developed with single-family residences.

Existing Development: The existing 2.33-acre parcel currently supports an orchid nursery that operates within three existing greenhouses and four shade house structures. The site is developed with approximately 49,879 square feet of greenhouses/shade structures, a 405-square-foot gazebo, a 1,240 square foot office/caretaker residence, and 617 square feet of storage structures. Additionally, a small portion of the property is planted with avocado trees. The site also has historically been used as an orchid nursery.

3.2 ENVIRONMENTAL BASELINE

The environmental baseline from which the project's impacts are measured consists of the physical environmental conditions in the vicinity of the project, as described above.

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

The following checklist indicates the potential level of impact and is defined as follows:

Potentially Significant and Unavoidable Impact: A fair argument can be made, based on the substantial evidence in the file, that an effect may be significant.

Significant but Mitigable: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to an Insignificant Impact.

Insignificant Impact: An impact is considered adverse but does not trigger a significance threshold.

No Impact: There is adequate support that the referenced information sources show that the impact simply does not apply to the subject project.

Beneficial Impact: There is a beneficial effect on the environment resulting from the project.

Reviewed Under Previous Document: The analysis contained in a previously adopted/certified environmental document addresses this issue adequately for use in the current case and is summarized in the discussion below. The discussion should include reference to the previous documents, a citation of the page(s) where the information is found, and identification of mitigation measures incorporated from the previous documents.

4.1 AESTHETICS/VISUAL RESOURCES

Will the proposal result in:	Potent. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view?			X		
b. Change to the visual character of an area?			X		
c. Glare or night lighting which may affect adjoining areas?			X		
d. Visually incompatible structures?			X		

Existing Setting. The project site is located approximately 1,400 feet south of Atascadero Creek, 1,000 feet west of More Mesa, and 900 feet north of the coast, in an urban area bounded by residential and agricultural development. Public views in this area are dominated by the Santa Ynez mountains to the north and the Pacific Ocean to the south. The project site is located on a marine terrace that is flat to gently sloping, and sits at an elevation of roughly 90 feet above sea level, according to the USGS topographic map quadrangle. There are no public views of the project site as it is located at the end of a private roadway easement off Orchid Drive and there is significant vegetation screening the project site.

Environmental Thresholds. The County's Visual Aesthetics Impact Guidelines classify coastal and mountainous areas, the urban fringe, and travel corridors as "especially important" visual resources. A project may have the potential to create a significantly adverse aesthetic impact if (among other potential effects) it would impact important visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The guidelines address public, not private, views.

Impact Discussion.
(a – d) The project will not result in an obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view as the site is not visible from public view. The project site is located at the end of a private roadway easement off Orchid Drive and there is significant vegetation screening the project site, as shown in Figure 2 below. The project site is not located in a View Corridor Overlay, and is located over a mile from the nearest highway (Highway 101). No development is proposed as part of the project, and future development will not obstruct or degrade any public view or scenic vista.

The implementation of the project is not anticipated to result in any substantial change in the aesthetic character of the area since the project site is currently developed with agricultural development and the project will result in potential residential development in the future. The project site is in a residential neighborhood and is surrounded on three sides by residential development and one side by agricultural development. Future residential development will be visually compatible with its surroundings.

Future residential development will be subject to requirements of Article II and the Eastern Goleta Valley Community Plan, including, but not limited to, height limit, setbacks, and lighting standards. Exterior lighting regulations specify that lighting shall be hooded and no unobstructed beam of exterior lighting shall be directed toward any area zoned or developed residential, or toward any environmentally sensitive habitat area. No lighting shall be so designed as to interfere with vehicular traffic at any portion of a street. With the inclusion of standard County lighting conditions, impacts would be insignificant.

The project site is located entirely within the Eastern Goleta Valley Community Plan boundary and will be subject to the applicable Eastern Goleta Valley Community Plan policies and development standards regarding visual resources. In addition, the site is in the Design Control Overlay and future development will require review and approval by the South Board of Architectural Review (SBAR). SBAR review of future development on these parcels will ensure that structures and uses are visually compatible with the character of the area.



Figure 2. View of Project Site from Orchid Drive

Cumulative Impacts. There are no direct project impacts to visual resources and therefore, the project will not have a cumulatively considerable effect on aesthetics/visual resources within the County.

Mitigation and Residual Impact. No mitigation is required. Residual impacts would be insignificant.

4.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime) or conflict with agricultural preserve programs?			X		
b. An effect upon any unique or other farmland of State or Local Importance?			X		

Setting

Background

Agricultural lands play a critical economic and environmental role in Santa Barbara County. Agriculture continues to be Santa Barbara County's major producing industry with a gross production value of over $1.6 billion (Santa Barbara County Agricultural Production Report, 2019). In addition to the creation of food, jobs, and economic value, farmland provides valuable open space and maintains the County's rural character.

Physical

The existing 2.33-acre parcel currently supports an orchid nursery that operates within three existing greenhouses and four shade house structures. Additionally, a small portion of the property is planted with avocado trees. The site has historically been used as an orchid nursery. The property is adjacent to an agricultural parcel to the west that is 32.27 acres in size; the neighboring property to the west is developed with a small-scale garden nursery use. Soils onsite are classified as Baywood loamy sand, with slopes ranging from two to nine percent. Baywood soils are classified as deep, somewhat excessively drained soils that formed in old sand dunes near the coast. Soils on site are considered prime soils.

Regulatory – County Thresholds Manual

The County's Agricultural Resources Guidelines (approved by the Board of Supervisors, August 1993) provide a methodology for evaluating agricultural resources. These guidelines utilize a weighted point system to serve as a preliminary screening tool for determining significance. The tool assists planners in identifying the value of a site's agricultural suitability and productivity, to determine whether the project's impact on loss or impairment of agricultural resources would be a potentially significant impact. The Point System is intended to measure the productive ability of a parcel. The tool accounts for availability of resources and prevalent uses that benefit agricultural potential but does not quantifiably measure a parcel's actual agricultural production.

Initial Studies are to use this Point System in conjunction with any additional information regarding agricultural resources. The Initial Study assigns values to nine particular characteristics of agricultural productivity of a site. These factors include parcel size, soil classification, water availability, agricultural suitability, existing and historic land use, comprehensive plan designation, adjacent land uses, agricultural preserve potential, and combined farming operations. If the tabulated points total 60 or more, that parcel is considered viable for the purposes of analysis. The project would be considered to have a potentially significant impact if the project would result in the conversion from agricultural use of a parcel qualifying as viable using the weighting system. Any loss or impairment of agricultural resources identified using the Point System could constitute a potentially significant impact and warrants additional site specific analysis.

Impact Discussion.

(a, b) The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Application of the Agricultural Suitability and Productivity Point System contained in the County's Environmental Thresholds and Guidelines Manual indicates that the existing parcel is rated at 47.5 points.

A screening of the agricultural land value of the parcel is shown in the points assessment below (Table 1). According to the points analysis, the project is not considered viable agricultural land. Since the existing parcel does not reach the required threshold value of 60 or more points, it is not considered viable for an independently productive agricultural operation onsite. Adverse agricultural resources impacts would be insignificant.

Table 1 – Agricultural Suitability and Productivity Analysis

Agricultural Suitability and Productivity	Current	Point Justification
Parcel size • Less than 5 acres 0-3 • 5-10 acres 4-6 • 10-40 acres 7-8	1.5	The parcel is 2.33 acres, half the size of a 5-acre parcel, and therefore was given 1.5 points as it is in the middle of the range for parcels under 5 acres.
Soil classification • Class I 14-15 • Class II 11-13 • Class VII 1-5	12	The soils on site are classified as Class II when irrigated, and so 12 points were assigned.
Water availability • Adequate supply from on/offsite sources suitable for crops or grazing 12-14 • Has water, may be marginal in quantity or quality suitable for crops or grazing 8-11	11	The property has an existing water supply provided by the Goleta Water District of 7.2-acre feet/year. The parcel has not been used for crop irrigation and it is uncertain if the existing water allocation is adequate for crops. Grazing is not feasible, and therefore 11 points were assigned.
Agricultural Suitability (crops) • Highly suitable for irrig. crops 8-10 • Highly suitable for irrig. ornamentals, pasture, dry farming 6-8 • Mod. suitable for irrig. crops 4-5 • Low suitability for any crops 1-3	8	The project site is currently developed with an ornamental orchid propagation nursery, and is therefore suitable for irrigated ornamentals. Eight points were awarded in this category.
Existing and Historic Land Use • Active ag. Production 5 • Maintained range 5 • Unmaintained, productive w/in last 10 years 3-5 • Vacant 1-3	5	The property is in active agricultural production as it is developed with an orchid nursery.
Comprehensive Plan Designation • A-II 5 • A-I 4	4	The parcel is designated A-I (Agriculture I) and therefore was awarded 4 points in this category.
Adjacent Land Uses • Surrounded by ag. Operations w/ adequate support uses 9-10 • Surrounded by ag. Operations w/o adequate support uses 7-8 • Partially surrounded by ag. Operations w/o adequate support uses 3-6	6	The property is surrounded by residential uses on three sides and agricultural uses on one side. The project site is located at the end of a cul-de-sac and can only be accessed by driving through the residential neighborhood. The adjacent land uses create potential conflicts for agricultural development such as traffic and noise impacts from truck trips, spraying of crops, etc. The project site is not well buffered from the adjacent residential land uses. Six points were assigned in this category as the property is partially surrounded

Agricultural Suitability and Productivity	Current	Point Justification
		by agricultural operations but there is not adequate support uses.
Agricultural Preserve Potential • Can qualify for prime agricultural preserve by itself, or is in a preserve 5-7 • Can qualify for non-prime agricultural preserve by itself 2-4 • Can qualify for prime agricultural preserve with adjacent parcels 3-4 • Can qualify for non-prime agricultural preserve with adjacent parcels 1-3 • Cannot qualify 0	0	The property does not meet the requirements to be considered for Agricultural Preserve Potential, and therefore no points were assigned in this category.
Combined Farming Operations • Provides a significant component of a combined farming operation 5 • Provides an important component of a combined farming operation 3 • Provides a small component of a combined farming operation 3 • No combined operation 0	0	The parcel is not part of a combined farming operation, and therefore no points were assigned in this category.
TOTAL	47.5	

Cumulative Impacts. The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant issue constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for agricultural resources. Therefore, the project's contribution to the regionally significant loss of agricultural resources is not considerable, and its cumulative effect on regional agriculture is insignificant.

Mitigation and Residual Impact. No mitigation is required. Residual impacts would be insignificant.

4.3a AIR QUALITY

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. The violation of any ambient air quality standard, a substantial contribution to an existing or projected air quality violation, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)?			X		
b. The creation of objectionable smoke, ash or odors?			X		
c. Extensive dust generation?			X		

Existing Setting. As the local air quality management agency, the Santa Barbara County APCD is responsible for monitoring air pollutant levels to ensure National Ambient Air Quality Standards and California Ambient Air Quality Standards are met, and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, Santa Barbara County is classified as being in "attainment" or "nonattainment". Currently, Santa Barbara County is in nonattainment for the State standards for ozone and Particulate Matter with a diameter of 10 microns or less (PM_{10}) (Santa Barbara APCD 2022a).

Environmental Threshold. Chapter 5 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (as revised in August 2024) addresses the subject of air quality. The thresholds provide that a proposed project will not have a significant impact on air quality if operation of the project will:

- emit (from all project sources, mobile and stationary), less than the daily trigger for offsets for any pollutant (currently 240 pounds per day for NO_x and ROC, and 80 pounds per day for PM_{10});
- emit less than 25 pounds per day of oxides of nitrogen (NO_x) or reactive organic compounds (ROC) from motor vehicle trips only;
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; and
- be consistent with the adopted federal and state Air Quality Plans.

No thresholds have been established for short-term impacts associated with construction activities. However, the County's Grading Ordinance requires standard dust control conditions for all projects involving grading activities. Long-term/operational emissions thresholds have been established to address mobile emissions (i.e., motor vehicle emissions) and stationary source emissions (i.e., stationary boilers, engines, and chemical or industrial processing operations that release pollutants).

Impact Discussion.

(a – c) Short-Term Construction Impacts. No development is proposed as part of the project. The project site is relatively gently sloped, and future development would be subject to Eastern Goleta Valley Community Plan policies which require grading to be minimized to the extent feasible. Earth moving operations at the project site would not have the potential to result in significant project-specific short-term emissions of fugitive dust and $PM_{10,}$ with the implementation of standard dust control measures that are required for all new development in the County.

Emissions of ozone precursors (NO_x and ROC) during future construction would result primarily from the on-site use of heavy earthmoving equipment. Due to the limited period of time that grading activities would occur on the project site, construction-related emissions of NO_x and ROC would not be significant on a project-specific or cumulative basis. However, due to the non-attainment status of the air basin for ozone, future development must implement measures recommended by the APCD to reduce construction-related emissions of ozone precursors to the extent feasible. Compliance with these measures is routinely required for all new development in the County.

The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. Long-term emissions are typically estimated using the California Emissions Estimator Model (CalEEMod) computer model program. However, the proposed project [up to five residential units] is below threshold levels for significant air quality impacts, pursuant to the screening table maintained by the Santa Barbara County APCD. Pursuant to the screening table, single family housing projects with less than 290 units will likely not exceed the air quality threshold. Therefore, the proposed project would not have a potentially significant long-term impact on air quality.

Cumulative Impacts. The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the significance criteria for air quality. Therefore, the project's contribution to regionally significant air pollutant emissions is not cumulatively considerable, and its cumulative effect is insignificant.

Mitigation and Residual Impact. No mitigation is required. Residual impacts would be insignificant.

4.3b AIR QUALITY - GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions - Will the project:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X			
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		X			

Existing Setting. Greenhouse gases (GHG) include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) (California Health and Safety Code, § 38505(g)). These gases create a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as "the greenhouse effect," human activities have accelerated the generation of GHG emissions above pre-industrial levels (U.S. Global Change Research Program 2018). The global mean surface temperature increased by approximately 1.8°F (1°C) in the past 80 years, and is likely to reach a 2.7°F (1.5°C) increase between 2030 and 2050 at current global emission rates (IPCC 2023).

The largest source of GHG emissions from human activities in the United States is from fossil fuel combustion for electricity, heat, and transportation. Specifically, the *Inventory of U.S. Greenhouse Gasses and Sinks: 1990-2022* (U.S. Environmental Protection Agency 2024) states that the primary sources of GHG emissions from fossil fuel combustion in 2022 included electricity production (25%), transportation (29%), industry (30%), agriculture (10%), and commercial and residential end users (31%, combined).

The County of Santa Barbara's 2030 Climate Action Plan (2030 CAP) and the accompanying Programmatic Environmental Impact Report (PEIR) contain a detailed description of the proposed project's existing regional setting as it pertains to GHG emissions. Regarding non-stationary sources of GHG emissions within Santa Barbara County specifically, the transportation sector produces 48% of the total emissions, followed by natural gas used in buildings and facilities (21%), agriculture (14%), electricity used in buildings and facilities (7%), off-road equipment (5%), and solid waste (4%) sectors (2030 CAP).

The overabundance of GHG in the atmosphere has led to a warming of the earth and has the potential to substantially change the earth's climate system. More frequent and intense weather and climate-related events are expected to damage infrastructure, ecosystems, and social systems across the United States (U.S. Global Change Research Program 2018). California's Central Coast, including Santa Barbara County, will be affected by changes in precipitation patterns, reduced foggy days, increased extreme heat days, exacerbated drought and wildfire conditions, and acceleration of sea level rise leading to increased coastal flooding and erosion (Langridge, Ruth 2018).

Global mean surface warming results from GHG emissions generated from many sources over time, rather than emissions generated by any one project (IPCC 2014). As defined in CEQA Guidelines Section 15355, and discussed in Section 15130, "'Cumulative impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Therefore, by definition, climate change under CEQA is a cumulative impact.

CEQA Guidelines Section 15064.4(b) states that a lead agency "should focus its analysis on the reasonably foreseeable incremental contribution of the project's [GHG] emissions to the effects of climate change." A project's individual contribution may appear small but may still be cumulatively considerable. Therefore, it is not appropriate to determine the significance of an individual project's GHG emissions by comparing against state, local, or global emission rates. Instead, the Governor's Office of Planning and Research recommends using an established or recommended threshold as one method of determining significance during CEQA analysis (OPR 2008, 2018). A lead agency may determine that a project's incremental contribution to an existing cumulatively significant issue, such as climate change, is not significant based on supporting facts and analysis [CEQA Guidelines Section 15130(a)(2)].

Environmental Threshold. In 2024, Santa Barbara County adopted its 2030 Climate Action Plan (2030 CAP), with an emission reduction goal of 50 percent below 2018 levels by 2030 and achieving carbon neutrality by 2045 or sooner, which are in line with the State's GHG emission reduction goals. The 2030 CAP is a qualified greenhouse gas emissions reduction plan pursuant to CEQA Guidelines Section 15183.5, which allows discretionary non-industrial projects to tier their GHG emissions analysis off the 2030 CAP Programmatic Environmental Impact Report (PEIR) if the project is found consistent with the 2030 CAP. To aid in determining a project's consistency with the 2030 CAP, the County has developed the Climate Action Plan Consistency Checklist (Checklist). A project found to be consistent with the 2030 CAP that tiers GHG emissions analysis off the 2030 CAP PEIR will have an insignificant environmental impact in regards to GHG emissions.

Concurrent with adoption of the 2030 CAP, Santa Barbara County adopted new GHG emissions thresholds of significance (Thresholds) for non-industrial stationary source projects based on the County's 2030 GHG

target (i.e., 50 percent below 2018 levels by 2030). The thresholds were developed and adopted consistent with CEQA Guidelines Section 15064.7, Thresholds of Significance. The thresholds are designed to identify (1) a cumulatively considerable contribution to an existing adverse condition, and (2) a cumulatively significant impact in combination with other projects causing related impacts. A CEQA lead agency may determine that a project's incremental contribution to an existing cumulatively significant issue, such as climate change, is not significant based on supporting facts and analysis (CEQA Guidelines Section 15130, Discussion of Cumulative Impacts, Subsection (a)(2)). The CEQA Guidelines direct that a project's contribution to a significant cumulative impact will be rendered insignificant if the project is required to implement or fund its fair share of a mitigation measure designed to alleviate the cumulative impact (CEQA Guidelines Section 15130(a)(3)). Any non-industrial stationary source project that does not demonstrate consistency with the 2030 CAP shall be subject to the following applicable threshold based on project type: 2.68 metric tons CO_2 equivalent (MT CO_2e) per year per resident for residential projects; 2.63 MT CO_2e/year per employee for non-residential projects; and 2.67 MT CO_2e/year per service person for mixed-use projects. If the estimated GHG emissions are less than the applicable threshold, staff can conclude that the project will have an insignificant environmental impact, and the project would require no further analysis. For projects that exceed the threshold, mitigation measures are needed.

Impact Discussion.

(a – b) The proposed project has been found inconsistent with one measure in the Climate Action Plan Consistency Checklist. Measure 1b requires the Comprehensive Plan, Zoning Map, or Ordinance Amendment to result in an equivalent or less GHG-intensive project when compared to the existing designation. Due to the increase in density, this measure is not met. Thus, the proposed project does not demonstrate consistency with the 2030 CAP measures and cannot be tiered from the 2030 CAP PEIR.

Therefore, the proposed project was reviewed subject to the quantitative threshold of 2.68 MT CO_2e per resident for the residential project.

The County used CalEEMod to estimate potential GHG emissions resulting from construction and operation of the project. CalEEMod calculates annual GHG emissions and criteria pollutants (e.g., carbon monoxide, ozone, and particulate matter) for a given project for CEQA analysis. With regard to GHG emissions, CalEEMod estimates CO_2, CH_4, and N_2O because they are the most common GHGs associated with land use developments. The model reports the annual metric tons (MT) of each pollutant as well as the total annual metric tons in carbon dioxide equivalent (CO_2e).

Analysis of the proposed project concludes that total annual greenhouse gas emissions for the proposed project would be 3.25 MTCO_2e /year, based on a project life of 75 years. Attachment 2 shows the complete greenhouse gas calculations for the proposed project.

The proposed project's total greenhouse gas emissions would exceed the applicable significance threshold of 2.68 MTCO_2e/year, and therefore, the project's incremental contribution to a cumulative effect is cumulatively considerable. However, mitigation measures will be implemented that will reduce the impact to below the threshold. With the incorporation of MM Air-01 below, requiring all appliances to be electric, the total annual greenhouse gas emissions for the proposed project would be 2.49 MTCO_2e /year. The proposed project's cumulative effect is therefore significant but mitigable to an insignificant level.

Mitigation and Residual Impact. The following mitigation measure would reduce the proposed project's greenhouse gas impacts to an insignificant level:

1. **MM Air-01 GHG Emissions Reduction - Building Electrification.** The Owner/Applicant shall install and utilize all electric appliances with no natural gas hookups.
   PLAN REQUIREMENTS: This condition shall be printed on all building plans.
   TIMING: P&D permit processing planner shall review and approve plans prior to issuance of Building permits.
   MONITORING: The Owner/Applicant shall demonstrate compliance with this condition to Building and Safety Staff prior to Final Building Inspection Clearance.

With the incorporation of this measure, residual impacts would be insignificant.

References:

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4.4 BIOLOGICAL RESOURCES

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
Flora					
a. A loss or disturbance to a unique, rare or threatened plant community?				X	
b. A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants?				X	
c. A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)?				X	
d. An impact on non-native vegetation whether naturalized or horticultural if of habitat value?				X	
e. The loss of healthy native specimen trees?				X	
f. Introduction of herbicides, pesticides, animal life, human habitation, non-native plants or other factors that would change or hamper the existing habitat?				X	
Fauna					
g. A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any unique, rare, threatened or endangered species of animals?				X	
h. A reduction in the diversity or numbers of animals onsite (including mammals, birds, reptiles, amphibians, fish or invertebrates)?				X	
i. A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)?				X	
j. Introduction of barriers to movement of any resident or migratory fish or wildlife species?				X	
k. Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) which could hinder the normal activities of wildlife?				X	

Impact Discussion.

(a – k) There are no unique, rare, or threatened plants or plant communities on the subject parcel. Existing vegetation primarily consists of mature avocado trees and non-native landscaping and hedges. There is no vegetation on site that provides habitat value. The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. There are currently pesticides, fertilizers, and other agricultural chemicals used in the orchid operation, and the conversion to residential uses would reduce these uses. No sensitive wildlife inhabit the site or use it for breeding or foraging. The proposed project would not impact wildlife species or their habitat. There is currently limited open space on the site as it is currently developed with approximately 49,879 square feet of greenhouses/shade structures, a 405-square-foot gazebo, a 1,240 square foot office/caretaker residence, and 617 square feet of storage structures. Future residential uses on site would not provide a barrier against wildlife movement nor would it hinder the normal activities of wildlife. The project site contains several dozen avocado trees along the

southern portion of the parcel that would provide foraging opportunities for common urban wildlife species. The applicant is not proposing to remove any trees. The project would not introduce factors that could hinder the normal activities of wildlife as there is already light, fencing, noise, and human presence on the project site associated with the orchid operation.

Mitigation and Residual Impact. No impacts are identified. No mitigation is necessary.

4.5 CULTURAL RESOURCES

Will the proposal:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Cause a substantial adverse change in the significance of any object, building, structure, area, place, record, or manuscript that qualifies as a historical resource as defined in CEQA Section 15064.5?			X		
b. Cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource pursuant to CEQA Section 15064.5?		X			
c. Disturb any human remains, including those located outside of formal cemeteries?		X			
d. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X			

County Environmental Thresholds. Chapter 8 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (2008, revised February 27, 2018) contains guidelines for the identification, significance evaluation, and mitigation of impacts to cultural resources, including archaeological, historic, and tribal cultural resources. In accordance with the requirements of CEQA, these guidelines specify that

if a resource cannot be avoided, it must be evaluated for importance under specific CEQA criteria. CEQA Section 15064.5(a)(3)A-D contains the criteria for evaluating the importance of archaeological and historic resources. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the significance criteria for listing in the California Register of Historical Resources: (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (B) Is associated with the lives of persons important in our past; (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (D) Has yielded, or may be likely to yield, information important in prehistory or history. The resource also must possess integrity of at least some of the following: location, design, setting, materials, workmanship, feeling, and association. For archaeological resources, the criterion usually applied is (D).

CEQA calls cultural resources that meet these criteria "historical resources". Specifically, a "historical resource" is a cultural resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources, or included in or eligible for inclusion in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1. As such, any cultural resource that is evaluated as significant under CEQA criteria, whether it is an archaeological resource of historic or prehistoric age, a historic built environment resource, or a tribal cultural resource, is termed a "historical resource".

CEQA Guidelines Section 15064.5(b) states that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment." As defined in CEQA Guidelines Section 15064.5(b), substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project: (1) demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; (2) demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources; or (3) demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

For the built environment, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995), is generally considered as mitigated to an insignificant impact level on the historical resource.

Existing Setting.
For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. Based on a Phase 1 and Extended Phase 1 Archaeological Assessment prepared by Brent Leftwich in July 2024, records on file at the CCIC (Central Coast Information Center of the University of California, Santa Barbara), the Native American Heritage Commission (NAHC) review of the Sacred Lands File (SLF), and a field survey conducted on May 10, 2024, there are no previously recorded archaeological sites within the project area. Three previously recorded sites lie within 0.25-miles of the project area (SBA-1698, SBA-1699, and SBA-1700), and one previously unrecorded site (SBA-4296) lies within the project area. SBA-1698 is a prehistoric site, perhaps a temporary camp, containing a low-

to-medium density of marine shell, stone tools, fire affected rock, chipped stone, animal bone, and groundstone. SBA-1698 lies over 1,100 feet northwest of the current project area. SBA-1699 is a small prehistoric camp site characterized as a high density marine shell midden with a low count of observed lithic materials. The site also contains the burnt faunal remains of deer. SBA-1699 lies over 1,000 feet to the northeast of the current project area. SBA-1700 is another small prehistoric camp characterized by a high density marine shell midden with a lower percentage of lithic materials. SBA-1700 lies approximately 750 feet northeast of the project area. SBA-4296, the unrecorded site, does not represent an intact archaeological deposit, and cultural materials have been mixed with abundant modern trash and debris and redeposited on the project parcel. As the site is the result of secondary deposition from an unknown source, the site lacks integrity and context.

The subject property consists of 2.33 acres containing an office/residence, greenhouses, storage structures, and shade structures constructed between 1962 and 1990. There are no significant historical structures located on the subject property.

To date, Santa Barbara County has received one request from tribal groups to participate in government-to-government consultation, pursuant to Public Resources Code (PRC) Sections 21080.3.1 and 65352.3, and in accordance with the provisions of Assembly Bill (AB) 52 and Senate Bill (SB) 18. On May 6, 2025, and July 7, 2025, formal notices for the proposed project were sent to the following tribal contacts:

- *Sam Cohen, Government and Legal Affairs Director of the Santa Ynez Band of Chumash Indians*
- *Kenneth Kahn. Tribal Chairman of the Santa Ynez Band of Chumash Indians*
- *Gabe Frausto, Chairman of the Coastal Band of the Chumash Nation*
- *Matthew Vestuto, Chair of the Barbareño/Ventureño Band of Mission Indians*
- *Eleanor Fishburn, Chairwoman of the Barbareño Band of Chumash Indians*
- *Barbara Lopez, Cultural Resource Chair of the Barbareño Band of Chumash Indians*
- *Julio Quair, Chairperson of the Chumash Council of Bakersfield*
- *Wendy Teeter, Cultural Resources Archaeologist for the Santa Ynez Band of Chumash Indians*
- *Violet Walker, Chairperson of the Northern Chumash Tribal Council*
- *Nakia Zavalla, Tribal Historic Preservation Officer for the Santa Ynez Band of Chumash Indians*

The notices provided opportunity for consultation under SB 18 and AB 52, and included a description of the proposed project. The consultation period under SB 18 ended on August 7, 2025, and the consultation period under AB 52 ended on August 6, 2025. One request to consult was received from Eleanor Fishburn, Chairwoman, Barbareño Band of Chumash Indians, and a consultation meeting was held on Tuesday, May 13th. No concerns for the project were expressed and the consultation process was closed following the May 13th meeting.

Impact Discussion.

(a) No historic resources are known to occur within the project site; therefore, future demolition of the existing structures and hardscapes would have no effect on historic resources. Impacts to historic resources from the proposed project would be less than significant.

(b – d) There is no development proposed as part of the project, but the project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned

and designated for residential uses with a 20,000-square-foot minimum parcel size. There is the potential for future residential development, paving, and grading from the project. As discussed above, three previously recorded sites lie within 0.25-miles of the project area (SBA-1698, SBA-1699, and SBA-1700), and one previously unrecorded site (SBA-4296) lies within the project area. SBA-4296, the unrecorded site, does not represent an intact archaeological deposit, and cultural materials have been mixed with abundant modern trash and debris and redeposited on the project parcel. As the site is the result of secondary deposition from an unknown source, the site lacks integrity and context. However, given the overall cultural sensitivity of the site, as demonstrated by the recorded sites in proximity to the project site, there is the potential that unknown cultural resources could be encountered during grading and ground disturbance. Impacts are considered significant but mitigable with cultural resource monitoring (MM CulRes-01), and the standard condition requiring that work be stopped in the event that cultural materials are uncovered during grading. These measures would ensure that any previously unidentified cultural resources discovered during site development, are treated in accordance with the requirements of CEQA and Chapter 8 of the County's Environmental Thresholds and Guidelines. Impacts would be significant but mitigable.

No evidence of human remains has been encountered on the project site and in the areas of proposed disturbance. Except for the resources discussed above, no other cultural resources have been identified in the other areas of the site proposed for development. However, prehistoric sites in the wider vicinity of the project area are known to contain human burials. While it is highly unlikely human remains exist in the project area, there is a possibility that SBA-4296 contains imported, disarticulated human remains from redeposited cultural soils. Impacts are considered significant but mitigable with MM CulRes-02, which requires that work stop if human remains are encountered and the Santa Barbara County Coroner to be contacted to determine the origin of the remains. In the event the remains are Native American in origin, the California Native Heritage Commission (NAHC) will be contacted to determine the appropriate procedures for the remains.

Cumulative Impacts. Since the project would not significantly impact cultural resources, it would not have a cumulatively considerable effect on the County's cultural resources with implementation of the mitigation measures described below.

Mitigation and Residual Impact. The following mitigation measures would reduce the project's cultural resource impacts to an insignificant level:

1. **MM CulRes-01 Cultural Resource Monitor**. The Owner/Applicant shall have all earth disturbances including scarification and placement of fill within the site area monitored by a P&D approved archaeologist and a Native American consultant in compliance with the provisions of the County Archaeological Guidelines.
   TIMING: Prior to Coastal Development Permit issuance, the Owner/Applicant shall submit for P&D review and approval, a contract or Letter of Commitment between the Owner/Applicant and the archaeologist, consisting of a project description and scope of work, and once approved, shall execute the contract.
   MONITORING: The Owner/Applicant shall provide P&D compliance monitoring staff with the name and contact information for the assigned onsite monitor(s) prior to grading/building permit issuance and pre-construction meeting. P&D compliance monitoring staff shall confirm monitoring by archaeologist and Native American consultant and P&D grading inspectors shall spot check field work.

2. **MM CulRes-02 Encountering Human Remains.** The Owner/Applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately in the event human

remains are encountered during earthwork, grading, construction or other construction-related activity. If human remains are discovered, the County Coroner must be notified within 48 hours, and no further disturbance to the site shall take place where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the California Native Heritage Commission (NAHC) within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.
PLAN REQUIREMENTS: This condition shall be printed on all building and grading plans.
TIMING: P&D permit processing planner shall check plans prior to issuance of Building permits.
MONITORING: P&D Compliance Monitoring and/or Building and Safety staff shall spot check in the field throughout grading and construction.

With the incorporation of these measures, residual impacts would be insignificant.

4.6 ENERGY

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Substantial increase in demand, especially during peak periods, upon existing sources of energy?			X		
b. Requirement for the development or extension of new sources of energy?			X		

Impact Discussion. The County has not identified significance thresholds for electrical and/or natural gas service impacts (Thresholds and Guidelines Manual). Private electrical and natural gas utility companies provide service to customers in Central and Southern California, including the unincorporated areas of Santa Barbara County. The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. Based on an estimated occupancy rate of 3.01 people per household (single-family residence), energy use is estimated as follows:

Energy Use

Multiplier	Project Demand
Natural Gas (13.7 million BTU per capita[1])	206.19 million BTU per year (5 single-family residences * 3.01/household = 15.05 residents, * 13.7 m BTU/capita)
Electricity (7.4MWh/yr/home PG&E; 6.9 MWh/yr/home SCE)[2]	34.5 megawatt hours per year (5 single-family residences * 6.9 MWh/yr)

[1] http://apps1.eere.energy.gov/states/residential.cfm/state=CA#ng
[2] http://enduse.lbl.gov/info/LBNL-47992.pdf

Based on these figures, the natural gas use for a project of this size is estimated to be 206.19 million BTU per year and the electricity use is estimated to be 34.5 MWh per year. The proposed project will not result in a substantial increase in energy demand or require the development of extension of new sources of energy. In summary, the project would have minimal long term energy requirements and a negligible effect on regional energy needs. No adverse impacts would result.

Cumulative Impacts. The project's contribution to the regionally significant demand for energy is not considerable, and is therefore insignificant.

Mitigation and Residual Impact. No mitigation is required. Residual impacts would be insignificant.

4.7 FIRE PROTECTION

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Introduction of development into an existing high fire hazard area or exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X		
b. Project-caused high fire hazard?			X		
c. Introduction of development into an area without adequate water pressure, fire hydrants or adequate access for fire fighting?			X		
d. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X		
e. Introduction of development that will substantially impair an adopted emergency response plan, emergency evacuation plan, or fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?			X		
f. Development of structures beyond safe Fire Dept. response time?			X		

Existing Setting. The project site is not located within a designated High Fire Hazard Severity Zone. The site is currently developed with agricultural structures including approximately 49,879 square feet of greenhouses/shade structures, a 405-square-foot gazebo, a 1,240 square foot office/caretaker residence, and 617 square feet of storage structures. The project site falls within the jurisdiction of the Santa Barbara County Fire Protection District and is served by Station #12, located at 5330 Calle Real, approximately two miles north of the project site.

County Standards. The following County Fire Department standards are applied in evaluating impacts associated with the proposed development:

- The emergency response thresholds include Fire Department staff standards of one on-duty firefighter per 4,000 persons (generally 1 engine company per 12,000 people, assuming three firefighters/station). The emergency response time standard is approximately 5-6 minutes.

- Water supply thresholds include a requirement for 750 gpm at 20 psi for urban single family dwellings in urban and rural developed neighborhoods, and 500 gpm at 20 psi for dwellings in rural areas (lots larger than five acres).
- The ability of the County's engine companies to extinguish fires (based on maximum flow rates through hand held line) meets state and national standards assuming a 5,000 square foot structure. Therefore, in any portion of the Fire Department's response area, all structures over 5,000 square feet are an unprotected risk (a significant impact) and therefore should have internal fire sprinklers.
- Access road standards include a minimum width (depending on number of units served and whether parking would be allowed on either side of the road), with some narrowing allowed for driveways. Cul-de-sac diameters, turning radii and road grade must meet minimum Fire Department standards based on project type.
- Two means of egress may be needed and access must not be impeded by fire, flood, or earthquake. A potentially significant impact could occur in the event any of these standards is not adequately met.

Impact Discussion.
(a – f) The project is not located within a High Fire Hazard Area and does not involve new fire hazards. No development is proposed as part of the project. Future development will be subject to review and conditions by the County Fire Department. Pursuant to standard County Fire Department requirements, future homes constructed will be required to have sprinklers. There is adequate water pressure and fire hydrants to serve the project site. The project site is served by the Goleta Water District. The Goleta Water District issued a Preliminary Water Service Determination, dated March 28, 2024, stating that the District has sufficient water supply available to serve the project, and the project site has adequate historic water credit for the forecasted demand associated with the proposed project. There is no infrastructure proposed as part of the project, and future infrastructure such as access roads and utilities for residential development would be reviewed for compliance with County Fire Department standards. The project site is not located in an area that would require controlled burns or other fire prevention techniques. The project is located approximately 2.2 miles away from the nearest Santa Barbara County Fire Department Station and is therefore located in an area with an adequate response time from fire protection services.

Cumulative Impacts. No mitigation is required. Residual impacts would be insignificant.

4.8 GEOLOGIC PROCESSES

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils), or similar hazards?			X		
b. Disruption, displacement, compaction or overcovering of the soil by cuts, fills or extensive grading?			X		
c. Exposure to or production of permanent changes in topography, such as bluff retreat or sea level rise?				X	

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
d. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X	
e. Any increase in wind or water erosion of soils, either on or off the site?			X		
f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake?			X		
g. The placement of septic disposal systems in impermeable soils with severe constraints to disposal of liquid effluent?				X	
h. Extraction of mineral or ore?				X	
i. Excessive grading on slopes of over 20%?					
j. Sand or gravel removal or loss of topsoil?				X	
k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?				X	
l. Excessive spoils, tailings or over-burden?				X	

County Environmental Threshold. Pursuant to the County's Adopted Thresholds and Guidelines Manual, impacts related to geological resources may have the potential to be significant if the proposed project involves any of the following characteristics:

1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by P&D or PWD. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. "Special Problems" areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards and other physical limitations to development.
2. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical.
3. The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade.
4. The project is located on slopes exceeding 20% grade.

Impact Discussion.

(a, e, f) The project site is not underlain by any known fault or landslide area and is not in a designated "Special Problems" area. The More Ranch Fault (an active fault) is located between 500 and 600 feet from the subject property. However, compliance with existing building regulations would reduce potential ground shaking impacts caused by movement along the fault to an insignificant level. The project is not located in an area with high liquefaction potential. Soils on the project site are classified as Baywood loamy sand, with slopes ranging from two to nine percent. Baywood soils are classified as deep, somewhat excessively drained soils that formed in old sand dunes near the coast. Any potential for expansive soils would be mitigated by the use of non-expansive engineered fill. All soils-related hazards would be reduced to an insignificant level through the normal building permit review and inspection process. There is no development currently proposed, and future development would be subject to Eastern Goleta Valley Community Plan policies

which require grading that has been minimized to the extent possible. Future grading operations that would occur on the project site may remove vegetative cover and disturb the ground surface, thereby increasing the potential for erosion and sedimentation impacts. However, the potential for the project to cause substantial erosion and sediment transport would be adequately mitigated by the County's standard erosion control and drainage requirements. Thus, impacts would be insignificant.

(c, d, g, h, j – l) The project is not located adjacent to the beach or on a coastal bluff. There are no unique geological features located on the project site, and the project would not result in the use of septic systems. The project would not involve mining, the loss of topsoil, or construction-related vibrations.

Cumulative Impacts. Since the project would not result in significant geologic impacts after mitigation, and geologic impacts are typically localized in nature, it would not have a cumulatively considerable effect on geologic processes within the County.

Mitigation and Residual Impact. No impacts are identified. No mitigations are necessary.

4.9 HAZARDOUS MATERIALS/RISK OF UPSET

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. In the known history of this property, have there been any past uses, storage or discharge of hazardous materials (e.g., fuel or oil stored in underground tanks, pesticides, solvents or other chemicals)?		X			
b. The use, storage or distribution of hazardous or toxic materials?				X	
c. A risk of an explosion or the release of hazardous substances (e.g., oil, gas, biocides, bacteria, pesticides, chemicals or radiation) in the event of an accident or upset conditions?				X	
d. Possible interference with an emergency response plan or an emergency evacuation plan?				X	
e. The creation of a potential public health hazard?		X			
f. Public safety hazards (e.g., due to development near chemical or industrial activity, producing oil wells, toxic disposal sites, etc.)?				X	
g. Exposure to hazards from oil or gas pipelines or oil well facilities?				X	
h. The contamination of a public water supply?				X	

Existing Setting. This area of Santa Barbara County contains agricultural operations and low-density residential land uses. The property adjoins an agricultural parcel to the west that is developed with a small-scale garden nursery use, and residentially-zoned parcels to the north, east, and south that are developed with single-family residences. A Phase I Environmental Site Assessment by Campbell-Geo, Inc., dated May 13, 2024, was submitted which documented any potentially hazardous materials on the project site. Most of the project site is currently covered by greenhouse and shade house structures, which contain orchids and specialty ornamental plants in various sized containers. An avocado orchard is located in the southern area of the site. A small shed contains fertilizer chemicals, which are not present in large quantities.

Another small shed was reported to previously exist near the northern property line that contained agricultural chemicals. Pesticides were observed in small quantities in a cabinet in the indoor work area, adjacent to the office.

Environmental Threshold. The County's safety threshold addresses involuntary public exposure from projects involving significant quantities of hazardous materials. The threshold addresses the likelihood and severity of potential accidents to determine whether the safety risks of a project exceed significant levels.

Impact Discussion:
(a, e) A Phase I Environmental Site Assessment by Campbell-Geo, Inc., dated May 13, 2024, was submitted for the project site. The report concluded that there is a "Recognized Environmental Condition" (REC) on the subject site, as defined by ASTM E1527-21, and due to the potential for soil impacted with chemicals from the potential pesticides associated with agricultural use on the subject property, a Phase II Environmental Site Assessment was submitted. The Phase II Environmental Site Assessment was reviewed by Santa Barbara County Environmental Health Services (EHS). The review concluded that, based on the soil sampling done, the site is suitable for residential development and further site assessment is not warranted. However, five of the soil samples contained detectable Chlordane. The concentrations were less than the Chlordane Residential Environmental Screening Level (ESL), but three of the samples were above its Tier 1 ESL. Some soil would not be acceptable for unrestricted use if the soil were exported offsite. MM HazMat-01 requires soil sampling for soils exported off-site. With the incorporation of this mitigation measure, impacts would be insignificant.

(b – d, f – h) The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. There will be no use, storage or distribution of hazardous or toxic materials associated with potential residential development on the project site, and no risk of explosion or release of hazardous substances. The use of common household materials (cleaners, garden and automotive products, etc.) on the project site would not result in significant hazardous materials/waste impacts. The project site is located at the end of a cul-de-sac at the end of a private roadway easement off Orchid Drive. Future access improvements would be required to be consistent with County Fire Department and Department of Public Works design standards. Traffic that would be generated by the project would not substantially interfere with emergency response capabilities to the project site or to other properties in the project area. The project would not interfere with an emergency response plan or an emergency evacuation plan. No public safety hazards will result from future residential development on the project site. No oil pipelines exist on or near the site and residential gas service will be constructed in accordance with building code standards. Future residential development will not cause contamination of a public water supply.

Cumulative Impacts. Since the project would not create significant impacts with respect to hazardous materials and/or risk of upset, it would not have a cumulatively considerable effect on safety within the County.

Mitigation and Residual Impact. The following mitigation measures would reduce the project's effects regarding hazardous materials and/or risk of upset to an insignificant level:

1. **MM HazMat-01 Sampling of Exported Soils.** Based on the results of soil sampling done on the project site, the site soil is sufficient for residential and agricultural activities onsite. However, due to the detections of OCPs in the site soil, it may not be suitable for unrestricted landuse if exported offsite. Therefore, should the soil be exported for off-site use, it will need to be tested per the

Department of Toxic Substances Control's October 2001 *Advisory – Clean Imported Fill Material* fact sheet. The testing frequency for sites with known impacts is one sample per truckload.
PLAN REQUIREMENTS: This condition shall be printed on all building and grading plans.
TIMING: P&D permit processing planner shall check plans prior to issuance of Building permits.
MONITORING: P&D Compliance Monitoring staff shall ensure sampling is done for any soils exported offsite, subject to review by EHS.

With the incorporation of this measure, residual impacts would be insignificant.

4.10 LAND USE

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Structures and/or land use incompatible with existing land use?			X		
b. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		
c. The induction of substantial unplanned population growth or concentration of population?			X		
d. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed project?				X	
e. Loss of existing affordable dwellings through demolition, conversion or removal?				X	
f. Displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X		
g. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere?			X		
h. The loss of a substantial amount of open space?				X	
i. An economic or social effect that would result in a physical change? (i.e. Closure of a freeway ramp results in isolation of an area, businesses located in the vicinity close, neighborhood degenerates, and buildings deteriorate. Or, if construction of new freeway divides an existing community, the construction would be the physical change, but the economic/social effect on the community would be the basis for determining that the physical change would be significant.)				X	
j. Conflicts with adopted airport safety zones?			X		

Existing Setting. The project site is located within the urban area in the Eastern Goleta Valley Community Plan. The property is surrounded by residential uses on three sides and agricultural uses on one side. The project site is located at the end of a cul-de-sac and can only be accessed by driving through the residential

neighborhood. Existing development on site consists of approximately 49,879 square feet of greenhouses/shade structures, a 405-square-foot gazebo, a 1,240 square foot office/caretaker residence, and 617 square feet of storage structures.

Environmental Threshold. The Thresholds and Guidelines Manual contains no specific thresholds for land use. Generally, a potentially significant impact can occur if a project would result in substantial growth inducing effects or result in a physical change in conflict with County policies adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Discussion.

(a – c, f, g, j) The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. The site is not viable for continued agricultural use under the current AG-I-10 zoning. The cost of running a full-scale orchid operation has become cost-prohibitive at the subject site, and the property is limited in what agricultural development can be located on the site as it is surrounded on three sides by residential development. Future residential development will be compatible with the existing surrounding land uses. There is no development proposed as part of the project, but future development will be subject to the requirements of Article II, and the Comprehensive Plan, including the Eastern Goleta Valley Community Plan and the Coastal Land Use Plan. The project would be consistent with the residential development density designations surrounding the project site. The project would not result in an extension of urban services that would promote growth on properties that are not planned for urban development. Potential growth inducing impacts would be insignificant. There is an office/caretaker's residence on the project site that may be demolished when future residential development is proposed. However, the project will not cause displacement of substantial numbers of existing people or housing. The site is currently primarily used for orchid production. The project will result in the potential for residential development on up to five new lots. The project is located within the outer edge of Airport Safety Zone 4 (Outer Approach/Departure Zone). Residential uses up to four units per acre are considered compatible uses in Airport Safety Zone 4. The project would result in a zone density of approximately two units per acre, and therefore would not conflict with the adopted airport safety zone.

(d, e, h, i) The project does not involve the extension of a sewer trunk line, or an access road with capacity to serve new development beyond this proposed project. There is no affordable housing on the project site. The project site is currently developed with approximately 49,879 square feet of greenhouses/shade structures, a 405-square-foot gazebo, a 1,240 square foot office/caretaker residence, and 617 square feet of storage structures. There is not a significant amount of open space on the project site, and future demolition of the agricultural development and construction of residential development would likely result in more open space. No physical changes are proposed that will result in an economic or social effect.

Cumulative Impacts. The implementation of the project is not anticipated to result in any substantial change to the site's conformance with environmentally protective policies and standards or have significant growth inducing effects. Thus, the project would not cause a cumulatively considerable effect on land use.

Mitigation and Residual Impact. No significant impacts are identified. No mitigation is necessary.

4.11 NOISE

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Long-term exposure of people to noise levels exceeding County thresholds (e.g. locating noise sensitive uses next to an airport)?			X		
b. Short-term exposure of people to noise levels exceeding County thresholds?			X		
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?			X		

Environmental Setting/Threshold. Noise is generally defined as unwanted or objectionable sound which is measured on a logarithmic scale and expressed in decibels (dB(A)). The duration of noise and the time period at which it occurs are important values in determining impacts on noise-sensitive land uses. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (L_{dn}) are noise indices which account for differences in intrusiveness between day- and night-time uses. County noise thresholds are: 1) 65 dB(A) CNEL maximum for exterior exposure, 2) 45 dB(A) CNEL maximum for interior exposure of noise-sensitive uses, and 3) an increase in noise levels by 3 db(A) – either individually or cumulatively when combined with other noise-generating sources when the existing (ambient) noise levels already exceed 65 db(A) at outdoor living areas or 45db(A) at interior living areas. Noise-sensitive land uses include: residential dwellings; transient lodging; hospitals and other long-term care facilities; public or private educational facilities; libraries, churches; and places of public assembly.

The proposed project site is located in a residential neighborhood in Eastern Goleta Valley in the outer edge of Airport Safety Zone 4 (Outer Approach/Departure Zone). The project would result in the potential for future residential development. Surrounding noise-sensitive uses consist of residential dwellings.

Impact Discussion:
(a – c) The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. There is no development proposed as part of the project. The project will not result in long-term exposure of people to noise levels exceeding County thresholds. The property adjoins an agricultural parcel to the west that is developed with a small-scale garden nursery use, and residentially-zoned parcels to the north, east, and south that are developed with single-family residences. The project site is located at the end of a cul-de-sac at the end of a private roadway easement off Orchid Drive. The project site is located in Airport Safety Zone 4, however, residential uses up to four units per acre are considered compatible uses in Airport Safety Zone 4. The project would result in a zone density of approximately two units per acre, and therefore residential uses at this density would be an allowable use in this Airport Safety Zone. Additionally, standard building requirements will reduce the interior noise level to below 45 db(A). The proposed project would not result in construction activities generating short-term noise impacts exceeding County thresholds. Standard noise conditions will be applied to all future land use entitlements and would be enforced during construction activities. Therefore, future short-term construction-related noise impacts would have an insignificant impact on the neighborhood. Long-term noise generated onsite from future residential uses would not: 1) exceed County thresholds, or 2) substantially increase ambient noise levels in adjoining areas. Impacts would be insignificant.

Cumulative Impacts. The implementation of the project is not anticipated to result in any substantial noise effects. Therefore, the project would not contribute in a cumulatively considerable manner to noise impacts.

Mitigation and Residual Impact. No significant impacts are identified. No mitigation is necessary.

4.12 PUBLIC FACILITIES

Will the proposal require or result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. A need for new or altered police protection and/or health care services?			X		
b. Student generation exceeding school capacity?			X		
c. Significant amounts of solid waste or breach any federal, state, or local standards or thresholds relating to solid waste disposal and generation (including recycling facilities and existing landfill capacity)?		X			
d. The relocation or construction of new or expanded wastewater treatment facilities (sewer lines, lift-stations, etc.) the construction or relocation of which could cause significant environmental effects?			X		
e. The relocation or construction of new or expanded storm water drainage or water quality control facilities, the construction of which could cause significant environmental effects?			X		

Environmental Thresholds.
(Schools) A significant level of school impacts is generally considered to occur when a project would generate sufficient students to require an additional classroom.

(Solid Waste) A project is considered to result in significant impacts to landfill capacity if it would generate 196 tons per year of solid waste (operational). This volume represents 5% of the expected average annual increase in waste generation, and is therefore considered a significant portion of the remaining landfill capacity. In addition, construction and demolition waste from new construction, remodels and demolition/rebuilds is considered significant if it exceeds 350 tons. A project which generates between 40 and 196 tons per year of solid waste is considered to have an adverse **cumulative** effect on solid waste generation, and mitigation via a Solid Waste Management Plan is recommended.

Table 4.12.A: Typical Waste Generation During Construction

Commercial Development	Amounts in Pounds per Square foot
Remodel	40
Demolition	100
New construction	25
Residential Development	Amounts in Pounds per Square foot
Remodel	100
Demolition	60
New construction	15

Note: These estimates are based on the US Environmental Protection Agency's 1998 C&D study (Document: EPA530-R-98-010; June 1998) and data gathered by the San Luis Obispo Integrated Waste Management Authority in 2005 and 2006.

Impact Discussion.

(a, b, d, e) The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. This level of new development would not have a significant impact on existing police protection or health care services. The average residents per household rates are 3.01 people per household for a single family residence in Santa Barbara County. The project would not generate the number of students (approximately 20) that would require an additional classroom. School fees for future residential development would be paid at the time the development is constructed, as required by State Law. The project would not cause the need for new or altered sewer system facilities as it is already in the service district, and the District has adequate capacity to serve the project (Goleta Sanitary District letter, dated April 4, 2024). Future development would be required to be reviewed and approved by the Goleta Sanitary District. The proposed project will not result in significant drainage impacts or require the construction of stormwater facilities that would have the potential to result in significant environmental impacts. The project would result in the potential development of impervious surfaces, including driveways and residential development. New impermeable surfaces would increase the storm water runoff, however, the increase would be accommodated via on-site infiltration. Potentially significant drainage-related impacts would be reduced to an insignificant level by complying with Public Works, Flood Control Division standard conditions of approval.

(c) Operational solid waste. During occupancy, the annual residential per capita waste generation rate is 0.95 tons. Based on the average residents per household and the potential for five single-family residences, operational waste would be approximately 14.3 tons per year (3.01 people/unit x # of units x 0.95 tons/year).

Construction-related solid waste. Construction that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on public services. The project site is developed with approximately 49,879 square feet of greenhouses/shade structures, a 405-square-foot gazebo, a 1,240 square foot office/caretaker residence, and 617 square feet of storage structures. The amount of demolition waste is estimated to be 100 pounds per square foot for commercial development and 60 pounds per square foot for residential development. Demolition of the existing structures on site would result in approximately 2,500 tons of solid waste. The average single family residence in the neighborhood on lots of similar size as the lots that could result from a potential subdivision of the subject lot is approximately 3,000 square feet. Generation of construction waste for residential development is approximately 15 pounds per square foot. This would result in approximately 112.5 tons of solid waste for the development of five single family residences. As the total construction-related solid waste is above the threshold of 350 tons, a Solid Waste Management Plan is required to reduce the amount of waste generated during construction. MM Solid Waste-SRSWMP requires a Source Reduction and Solid Waste Management Plan describing

proposals to reduce the amount of waste generated during construction and throughout the life of the project and enumerating the estimated reduction in solid waste disposed at each phase of project development and operation. Impacts would be significant but mitigable.

Cumulative Impacts. The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In accordance with the County's threshold, a project which generates 350 tons of solid waste from construction is considered to result in a significant impact, and mitigation via a solid waste management plan is required (MM-Solid Waste-SRSWMP). In this instance, the project has been found not to exceed the threshold of significance for public services with the implementation of the project-specific mitigation identified below. Therefore, the project's contribution to the regionally significant demand for public services is not considerable, and is insignificant.

Mitigation and Residual Impact. The following mitigation measures will reduce the project's public service impacts to an insignificant level:

1. **MM Solid Waste-SRSWMP.** At the time of demolition the Owner/Applicant shall develop and implement a Source Reduction and Solid Waste Management Plan (SRSWMP) describing proposals to reduce the amount of waste generated during demolition and construction of the project and enumerating the estimated reduction in solid waste disposed at each phase of project development.
   PLAN REQUIREMENTS: The plan shall include but is not limited to:
   1. Construction Source Reduction:
      a. A description of how fill will be used on the construction site, instead of landfilling,
      b. A program to purchase materials that have recycled content for project construction.
   2. Construction Solid Waste Reduction:
      a. Recycling and composting programs including separating excess construction materials onsite for reuse/recycling or proper disposal (e.g., concrete, asphalt, wood, brush). Provide separate onsite bins as needed for recycling.

   TIMING: The Owner/Applicant shall (1) submit a SRSWMP to P&D permit processing staff for review and approval prior to issuance of Coastal Development Permits and (2) include the construction recycling area on building plans. Program components shall be implemented prior to construction activities.
   MONITORING: During construction, the Owner/Applicant shall demonstrate to P&D compliance staff as required that solid waste management components are established and implemented. The Owner/Applicant shall demonstrate to P&D compliance staff that all required components of the approved SRSWMP are in place as required prior to Final Building Clearance.

With the incorporation of this measure, residual impacts will be insignificant.

4.13 RECREATION

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Conflict with established recreational uses of the area?				X	
b. Conflict with biking, equestrian and hiking trails?				X	

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
c. Substantial impact on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on numbers of people, vehicles, animals, etc. which might safely use the area)?			X		

Environmental Setting/Threshold. The Thresholds and Guidelines Manual contains no threshold for park and recreation impacts. However, the Board of Supervisors has established a minimum standard ratio of 4.7 acres of recreation/open space per 1,000 people to meet the needs of a community. The Santa Barbara County Parks Department maintains more than 900 acres of parks and open spaces, as well as 84 miles of trails and coastal access easements.

The proposed project site is located in an agricultural and residential area of Eastern Goleta Valley. No established recreational uses (including parks, biking, equestrian or hiking trails) are located on or adjacent to the proposed project site.

More Mesa is located approximately 1,000 feet east of the subject property, with several developed residential lots in between.

Impact Discussion.
(a, b) The proposed project site is not located on or adjacent to any established recreational uses, including biking, equestrian or hiking trails. No adverse impacts would result.

(c) The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. The population increase associated with project implementation would result in insignificant adverse impacts on the quality and quantity of existing recreational opportunities, both in the project vicinity and County-wide. The surrounding lots to the north, east, and south are zoned 20-R-1, and the average lot size is approximately 0.5 acres, or 21,780 square feet. The new zoning and land use designation would be consistent with the neighborhood, and if the lot were subdivided in the future the resulting lots would be consistent with the lot sizes in the vicinity.

Cumulative Impacts. Since the project would not affect recreational resources, it would not have a cumulatively considerable effect on recreational resources within the County.

Mitigation and Residual Impact. No mitigation is required. Residual impacts would be insignificant.

4.14 TRANSPORTATION

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?			X		

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?			X		
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X		
d. Result in inadequate emergency access?			X		

Existing Setting.
The proposed project site is located in the Eastern Goleta Valley area, approximately a mile south of Hollister Avenue and 1.4 miles south of Highway 101. The site is accessed off of a private road easement off Orchid Drive, a public road, which connects to Shoreline Drive. The project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it would have the potential to be subdivided into at most five residential lots.

County Environmental Thresholds.
According to the County's Environmental Thresholds and Guidelines Manual, a significant transportation impact would occur when:

a. **Potential Conflict with a Program, Plan, Ordinance, or Policy.** A transportation impact occurs if a project conflicts with the overall purpose of an applicable transportation and circulation program, plan, ordinance, or policy, including impacts to existing transit systems and bicycle and pedestrian networks pursuant to Public Resources Code Section 21099(b)(1).

b. **Potential Impact to VMT.** According to the OPR Technical Advisory, the County considers transportation projects that will (1) reduce VMT, or (2) not likely lead to a substantial or measurable increase in vehicle travel, to have insignificant VMT impacts. The County's VMT Calculator incorporates screening criteria, thresholds of significance, mitigation measures, and data from the Santa Barbara County Association of Governments' (SBCAG) Regional Travel Demand Model (RTDM). The County estimates VMT for transportation projects using total roadway VMT, or the VMT generated by the number of vehicles on each roadway segment and length of each roadway segment in the defined area. Total Roadway VMT reflects all vehicles (passenger and commercial vehicles) assigned on the roadway network.

The OPR Technical Advisory contains screening criteria for land use and transportation projects. Land use or transportation projects meeting any of the screening criteria, absent substantial evidence to the contrary, will have insignificant VMT impacts and will not require further analysis. A multiple-component project must have each component meet at least one applicable screening criteria related to each specific land use. The screening criteria for small projects is included in the table below.

Screening Criteria for Land Use Projects

Screening Category	
Small Projects	A project that generates 110 or fewer average daily trips

Transportation projects that would (1) reduce VMT, or (2) are not likely to lead to a substantial or measurable increase in vehicle travel would have insignificant VMT impacts. Additionally, the County threshold of significance for residential projects that do not meet the screening criteria are included in the table below.

Project Type	**Threshold for Determination of Significant VMT Impacts**
Residential	Project VMT exceeds a level of 15 percent below existing County VMT for home-based VMT per resident

c. **Design Features and Hazards.** A transportation impact occurs if a project would result in potential roadway hazards, such as a driveway that would not meet site distance requirements, a new traffic signal, or a new use and substantial traffic that would create potential safety problems.

d. **Emergency Access.** A significant impact occurs if a project will potentially impede emergency access vehicles.

Impact Discussion:

(a – d) The project will not conflict with any program, plan, ordinance, or policy or have an impact to VMT. The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. Pursuant to the Santa Barbara County VMT tool, the proposed project has the potential to generate 47 Average Daily Trips (ADT). The project was analyzed using the Santa Barbara County VMT tool, and it was determined that the small increase in ADT is consistent with County transportation policies related to roadway and intersection operations. The net increase in ADT is less than the 110 ADT that is used as a screening criteria for small projects. The project can be screened from analyzing potential impacts to VMT, and a VMT transportation study is not required. There is no requirement for bicycle parking or pedestrian facilities for potential future single-family residential uses. The project would not result in potential roadway hazards or impedance to emergency access to the proposed parcels. The project site is located at the end of a cul-de-sac at the end of a private roadway easement off Orchid Drive, and takes access off an existing driveway. No development is proposed as part of the project. Future access improvements would be required to be consistent with County Fire Department and Department of Public Works design standards. There would be no traffic signal or substantial increase in traffic. Impacts would be insignificant.

Cumulative Impacts.
The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for transportation.

Therefore, the project's contribution to the regionally significant transportation impacts is not considerable, and is insignificant.

Mitigation and Residual Impact. With the incorporation of standard County conditions, residual impacts would be insignificant.

4.15 WATER RESOURCES/FLOODING

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?				X	
b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?			X		
c. Change in the amount of surface water in any water body?			X		
d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution?			X		
e. Alterations to the course or flow of flood water or need for private or public flood control projects?				X	
f. Exposure of people or property to water related hazards such as flooding (placement of project in 100 year flood plain), accelerated runoff or tsunamis, sea level rise, or seawater intrusion?			X		
g. Alteration of the direction or rate of flow of groundwater?			X		
h. Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or recharge interference?			X		
i. Overdraft or over-commitment of any groundwater basin? Or, a significant increase in the existing overdraft or over-commitment of any groundwater basin?			X		
j. The substantial degradation of groundwater quality including saltwater intrusion?			X		
k. Substantial reduction in the amount of water otherwise available for public water supplies?			X		
l. Introduction of storm water pollutants (e.g., oil, grease, pesticides, nutrients, sediments, pathogens, etc.) into groundwater or surface water?			X		

Existing Setting.
The subject parcel is located within the Goleta Groundwater Basin area. This basin is within the Goleta Slough Watershed. There are no water bodies located on the subject parcel or within the project site area.

Water Resources Thresholds. A project is determined to have a significant effect on water resources if it would exceed established threshold values which have been set for each overdrafted groundwater basin. These values were determined based on an estimation of a basin's remaining life of available water storage. If the project's net new consumptive water use [total consumptive demand adjusted for recharge less discontinued historic use] exceeds the threshold adopted for the basin, the project's impacts on water resources are considered significant.

A project is also deemed to have a significant effect on water resources if a net increase in pumpage from a well would substantially affect production or quality from a nearby well.

Water Quality Thresholds. A significant water quality impact is presumed to occur if the project:

- Is located within an urbanized area of the county and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- Increases the amount of impervious surfaces on a site by 25% or more;
- Results in channelization or relocation of a natural drainage channel;
- Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks or wetlands;
- Is an industrial facility that falls under one or more of categories of industrial activity regulated under the NPDES Phase I industrial storm water regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
- Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses[3] of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

Impact Discussion
(a, e) The project would not result in changes in currents, or the course or direction of water movements, in either marine or fresh waters. The project would also not alter the course or flow of flood water or require private or public flood control projects. The project site is located approximately 900 feet north from the coast and 1,400 feet south of Atascadero Creek, and there is significant residential development surrounding the project site. The project is not located within a mapped floodway or floodplain.

[3] Beneficial uses for Santa Barbara County are identified by the Regional Water Quality Control Board in the Water Quality Control Plan for the Central Coastal Basin, or Basin Plan, and include (among others) recreation, agricultural supply, groundwater recharge, fresh water habitat, estuarine habitat, support for rare, threatened or endangered species, preservation of biological habitats of special significance.

(b – d, f – l) The proposed project would result in the subject lot changing from being zoned and designated for agriculture with a 10-acre minimum lot size, to being zoned and designated for residential uses with a 20,000-square-foot minimum parcel size. Based on the subject lot's area of 2.33 acres, it could at most be subdivided into five residential lots. Future residential development would create minor amounts of additional storm water runoff as a result of newly constructed impermeable surfaces (i.e. structures, driveways, patios, etc.). Construction activities such as grading could also potentially create temporary runoff and erosion problems. Application of standard County grading, erosion, and drainage-control measures would ensure that no significant increase of erosion or storm water runoff would occur.

Predictions about the long-term effects of global climate change include rising sea levels due to melting of glaciers and thermal expansion. Rising sea levels could increase the incidence of flooding in coastal areas with altitudes at or near sea-level. Although the exact rate of future sea level rise is unknown, the Intergovernmental Panel on Climate Change has estimated that sea levels may rise between 50 and 90 centimeters (approximately 1.6-to-3 feet) by the year 2100.[4] Although the project does involve lands in a coastal area, the site is located approximately 900 feet from the coast and surface elevations are roughly 90 feet above sea level. Therefore, even if these rates of sea level rise are realized, the project site would remain well above sea level within that planning horizon. The project is not located within a mapped floodway or floodplain.

The project would be supplied water from the Goleta Water District, which receives its water from the Goleta groundwater basin. Since the volume of water extracted annually does not exceed its safe yield, this basin is not overdrafted. The Goleta Water District issued a Preliminary Water Service Determination, dated March 28, 2024, stating that the District has sufficient water supply available to serve the project, and the project site has adequate historic water credit for the forecasted demand associated with the proposed project. The proposed project would not use septic systems and therefore groundwater quality would not be impacted by effluent associated with septic systems.

Future residential development could adversely affect surface water quality by increasing the volume and decreasing the quality of stormwater runoff. Development would involve the use of household cleaners and chemicals. Runoff from driveways and/or parking lots could introduce oil and other hydrocarbons into drainage facilities. However, the project would be expected to generate only minor amounts of storm water pollutants. Minor amounts of such household hazardous material would not present a significant potential for release of waterborne pollutants and would be highly unlikely to create a public health hazard.

Cumulative Impacts. The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for water resources. Therefore, the project's contribution to the regionally significant issues of water supplies and water quality is not considerable, and is insignificant.

Mitigation and Residual Impact. No significant impacts are identified. No mitigation is necessary.

5.0 INFORMATION SOURCES

5.1 Comprehensive Plan

X	Seismic Safety/Safety Element		Conservation Element
	Open Space Element	X	Noise Element

[4] The Intergovernmental Panel on Climate Change is a scientific intergovernmental body set up by the World Meteorological Organization (WMO) and by the United Nations Environment Programme (UNEP).

X	Coastal Plan and Maps	X	Circulation Element
	ERME		

5.2 Other Sources

	Field work		Ag Preserve maps
	Calculations		Flood Control maps
	Project plans	X	Other technical references
	Traffic studies		(reports, survey, etc.)
X	Records	X	Planning files, maps, reports
	Grading plans	X	Zoning maps
	Elevation, architectural renderings	X	Soils maps/reports
X	Published geological map/reports		Plant maps
X	Topographical maps	X	Archaeological maps and reports
	Environmental Thresholds and Guidelines Manual		Other

6.0 PROJECT SPECIFIC *(short- and long-term)* AND CUMULATIVE IMPACT SUMMARY

The proposed project does not have potential impacts that cannot be feasibly mitigated to less than significant levels.

I. Project specific impacts which are of unavoidable significance levels: **None**

II. Project specific impacts which are potentially significant but can be reduced to less than significant levels with incorporation of mitigation measures: **Greenhouse Gas Emissions, Cultural Resources, Hazardous Materials, and Public Facilities**

III. Potentially significant adverse cumulative impacts: **None**

7.0 MANDATORY FINDINGS OF SIGNIFICANCE

Will the proposal result in:	**Poten. Signif. and Unavoid.**	**Signif. But Mitigable**	**Insignif.**	**No Impact / Beneficial Impact**	**Reviewed Under Previous Document**
1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, contribute significantly to greenhouse gas emissions or significantly increase energy consumption, or eliminate important examples of the major periods of California history or prehistory?		X			

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
2. Does the project have the potential to achieve short-term to the disadvantage of long-term environmental goals?			X		
3. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects and the effects of probable future projects.)			X		
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X			
5. Is there disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR ?			X		

1. As discussed in this document, the project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The project has the potential to contribute significantly to greenhouse gas emissions, however, mitigation measures proposed in Section 4.3b would reduce project impacts to levels of insignificance.

2. There are no short-term environmental goals that would be achieved by the proposed project to the disadvantage of long-term environmental goals.

3. As discussed throughout this document, the project does not have any impacts that are individually limited, but cumulatively considerable. Any contribution of the project to significant cumulative impacts would be adequately reduced by mitigation measures identified to address project-specific impacts.

4. The project would allow for potential future residential development. As discussed in this document, with implementation of identified required mitigation measures, all impacts to human beings, either directly or indirectly, would be adequately reduced to insignificant levels.

5. There is no known disagreement supported by facts, reasonable assumptions predicted upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR.

9.0 INITIAL REVIEW OF PROJECT CONSISTENCY WITH APPLICABLE SUBDIVISION, ZONING AND COMPREHENSIVE PLAN REQUIREMENTS

The project will be subject to all applicable requirements and policies under Article II and the County of Santa Barbara Comprehensive Plan (including the Eastern Goleta Valley Community Plan and Coastal Land Use Plan). Specific relevant policies include those listed below:

Agricultural Element

Goal I. *Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.*

Policy I.A. *The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.*

Policy I.F. *The quality and availability of water, air, and soil resources shall be protected through provisions including, but not limited to, the stability of Urban/Rural boundary lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.*

Goal II. *Agricultural lands shall be protected from adverse urban influence.*

Policy II.D. *Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.*

Goal III. *Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.*

Policy III.B. *It is a County priority to retain blocks of productive agriculture within Urban Areas where reasonable, to continue to explore programs to support that use, and to recognize the importance of the objectives of the County's Right to Farm Ordinance.*

Coastal Land Use Plan

Section 1.2 Goals, Priorities, and Policies. *…The Coastal Act places as its highest priority the preservation and protection of natural resources including environmentally sensitive habitat areas (i.e., wetlands, dunes), and prime agricultural lands… For agricultural land, the intent of the Act is to keep the maximum amount of prime land in production. On lands not suited for agricultural use, coastal dependent development (i.e., development that requires a site on or adjacent to the sea to be able to function at all) has the highest priority. Public recreational uses have priority on coastal sites which are not habitat areas and not needed for coastal dependent uses. For sites that are not reserved for habitat preservation, agriculture, coastal dependent uses, or public recreation, private development is permitted. However, visitor-serving commercial recreation has priority over private residential, general industrial and general commercial development…*

Policy 30241. *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*

a. By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban uses.
b. By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.
c. By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.
d. By developing available lands not suited for agriculture prior to the conversion of agricultural lands.
e. By assuring that public service and facility expansions and non-agricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.
f. By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

Coastal Act Policy 30242. *All other lands suitable for agricultural use shall not be converted to non-agricultural uses unless:*
(1) continued or renewed agricultural use is not feasible, or
(2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.

Section 30250.
(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases, for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.
(b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.

Eastern Goleta Valley Community Plan

Policy LUA-EGV-1.1*. Agricultural resources, agricultural land uses and operations, and distinctive urban and rural characteristics shall be preserved to the greatest extent feasible.*

Policy LUA-EGV-1.2*. Non-agricultural development adjacent to agriculturally-designated property shall include buffers to protect agricultural land, operations, and characteristics.*

Policy LUA-EGV-1.5*. Urban Agricultural Land Uses: Agricultural land within the Urban Area shall be preserved for urban agricultural uses to the greatest extent feasible.*

Policy LUA-EGV-1.6*. Urban Agricultural Land Use Conversion: to the greatest extent feasible, any general plan amendment and/or rezone proposal in the Urban Area which results in a change of land use designation from agricultural to non-agricultural shall:*

1. Require a factual and substantive finding by the County that (a) the land is no longer appropriate for urban agricultural land uses following due consideration consistent with all policies of the Plan, or (b) there is an overriding public need for conversion to other uses. As part of the finding the County will:

a. Evaluate and document factually and substantively the quality and extent of agricultural resources onsite and adjacent to the property, including, but not limited to, prime agricultural land, land in existing agricultural use, lands with prime soils, grazing land, land with agricultural potential, and lands under Williamson Act contracts.

2. Require proposed land uses that:

a. Are consistent with all policies of this Plan.

b. Are compatible with each other and with neighboring land uses—whether agricultural or non-agricultural.

c. Avoid partitioning or interrupting contiguous blocks of agriculturally-designated lands.

d. Preserve and enhance environmental resources, including, but not limited to coastal bluff geology, habitat areas, visual resources, and watershed resources, and community characteristics, particularly with regard to agricultural heritage and natural environmental resources, and/or minimize environmental impacts.

e. Include provisions for the community's social, economic and cultural well-being, and health and safety, such as public parks, open spaces, trails, habitat protection or restoration, and/or community gardens.

f. Dedicate public open space for habitat preservation and/or public recreation and indicate the amount and extent

g. Provide public coastal access, parking, recreational trails, bike paths, and/or pedestrian routes.

h. Confine and cluster non-agricultural development adjacent to existing developed areas and transportation facilities to maximize preservation of open space, with the exception of passive public recreation improvements such as trails, signs and park facilities.

***Policy LUA-EGV-2.4**. Allowable Urban Agriculture Uses: In the interest of sustaining and enhancing urban agricultural operations in the Urban Area of Eastern Goleta Valley, the County shall allow for a range of sustainable agricultural and agriculture related uses on agriculturally-designated land in the Urban Area only to retain agricultural and farmland in the Urban Area of Eastern Goleta Valley and support agriculture-related businesses without impairing the function or character of onsite and adjacent land uses.*

***Policy PRT-EGV-5.1**. In compliance with applicable requirements, all opportunities for public recreational trails within the general corridors adopted by the Board of Supervisors as part of the Parks, Recreation and Trails (PRT) maps of the County Comprehensive Plan (and this Community Plan) shall be protected, preserved and provided for upon approval of any development, subdivision and/or permit requiring any discretionary review or approval, except as referenced in Agricultural Element Policy IA.*

***Policy PRT-EGV-5.9**. When applications for general plan amendments and/or zoning changes, or subdivisions are processed, County staff shall review the PRT maps and Goleta Trails Implementation Study to determine if a trail corridor can be established for the general area/watershed in which the project is located. If so, coordination with property owners shall be required to implement trails to the greatest extent feasible. The trail alignment shall be consistent with applicable Agricultural Element and resource protection policies.*

***Policy WAT-EGV-1.7**. (COASTAL) Subdivisions or projects that result in increased residential density shall be analyzed to ensure that sufficient supply of water exists to serve existing commitments and the proposed project.*

10.0 RECOMMENDATION BY P&D STAFF

On the basis of the Initial Study, the staff of Planning and Development:

___ Finds that the proposed project WILL NOT have a significant effect on the environment and, therefore, recommends that a Negative Declaration (ND) be prepared.

_X_ Finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures incorporated into the REVISED PROJECT DESCRIPTION would successfully mitigate the potentially significant impacts. Staff recommends the preparation of an ND. The ND finding is based on the assumption that mitigation measures will be acceptable to the applicant; if not acceptable a revised Initial Study finding for the preparation of an EIR may result.

___ Finds that the proposed project MAY have a significant effect on the environment, and recommends that an EIR be prepared.

__ Finds that from existing documents (previous EIRs, etc.) that a subsequent document (containing updated and site-specific information, etc.) pursuant to CEQA Sections 15162/15163/15164 should be prepared.

Potentially significant unavoidable adverse impact areas:

___ With Public Hearing __X__ Without Public Hearing

PROJECT EVALUATOR: **Willow Brown** **DATE:** 10/8/2025

11.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

_X_ I agree with staff conclusions. Preparation of the appropriate document may proceed.
___ I DO NOT agree with staff conclusions. The following actions will be taken:
___ I require consultation and further information prior to making my determination.

SIGNATURE: Joseph Durgal **INITIAL STUDY DATE**: 10/8/2025

SIGNATURE: Joseph Durgal **NEGATIVE DECLARATION DATE**: 10/10/2025

SIGNATURE: _____ **REVISION DATE:** _____

SIGNATURE: _____ **FINAL NEGATIVE DECLARATION DATE:** _____

12.0 ATTACHMENTS

1. Vicinity Map
2. CalEEMod Report