

**CITY OF SANTA BARBARA
COMMUNITY DEVELOPMENT DEPARTMENT, PLANNING DIVISION**

INITIAL STUDY/ ENVIRONMENTAL CHECKLIST MST2005-00742

PROJECT: 900 Calle de los Amigos – Valle Verde Retirement Community

May 22, 2009

This Initial Study has been completed for the project described below because the project is subject to review under the California Environmental Quality Act (CEQA) and was determined not to be exempt from the requirement for the preparation of an environmental document. The information, analysis and conclusions contained in this Initial Study are the basis for deciding whether a Negative Declaration (ND) is to be prepared or if preparation of an Environmental Impact Report (EIR) is required to further analyze impacts. Additionally, if preparation of an EIR is required, the Initial Study is used to focus the EIR on the effects determined to be potentially significant.

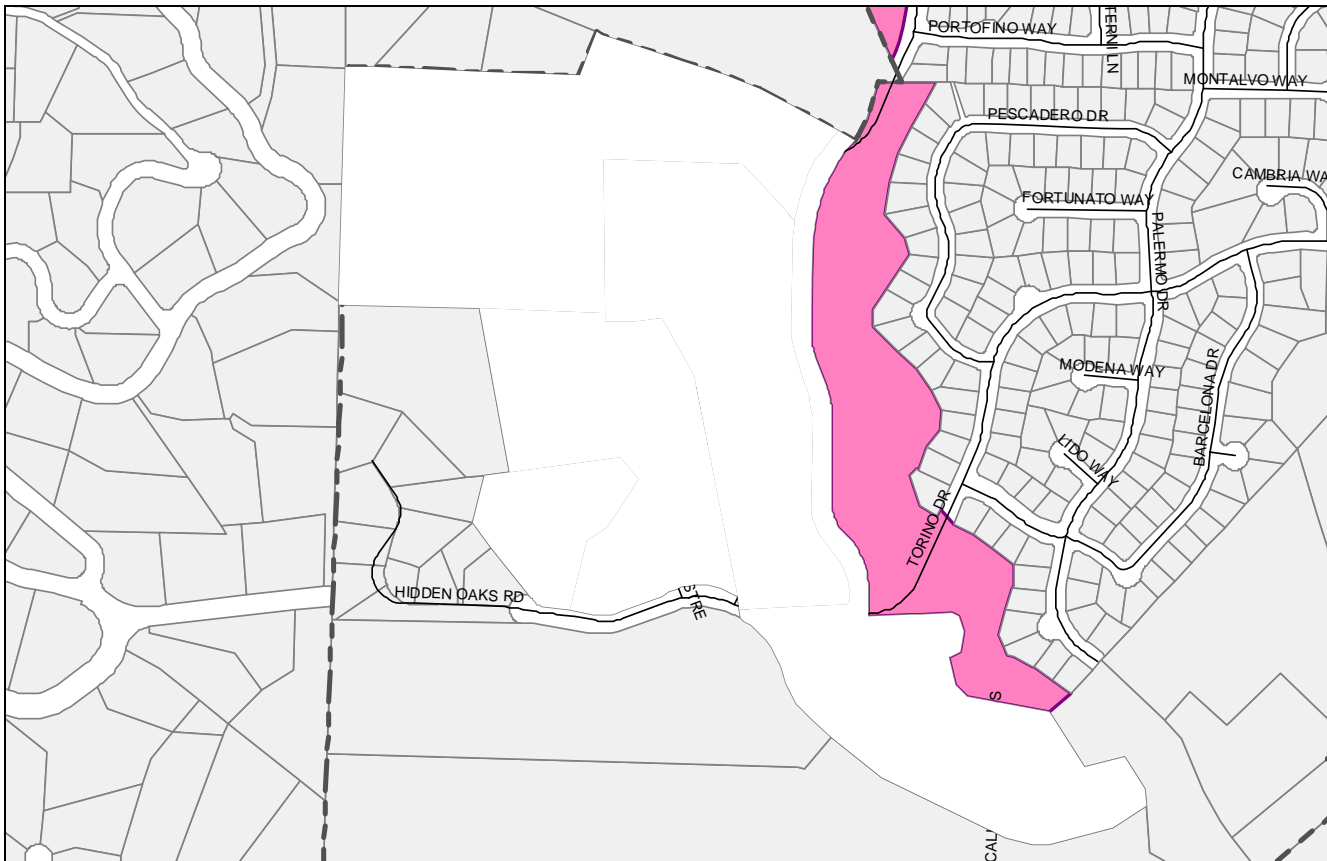
APPLICANT/ PROPERTY OWNER

Owner/Applicant: American Baptist Homes of the West
Ron Schaefer, Executive Director

Applicant Representatives: Cameron Carey, Tynan Group (Agent)
Keith Nolan, On Design, LLC (Architect)

PROJECT ADDRESS/LOCATION

The project site is located at 900 Calle de los Amigos in the Hidden Valley neighborhood and is comprised of five separate legal parcels totaling approximately 59.75 acres. Cross streets include Calle de los Amigos and Torino Drive.



PROJECT BACKGROUND

Development History for the Valle Verde Retirement Community

A Conditional Use Permit (CUP) was originally approved for the Valle Verde Retirement Community on April 20, 1960 (Resolution 36). The approval included the development of 182 independent care units and a 15-bed convalescent hospital (also referred to as nursing care facility or “Skilled Nursing,” in various documents), and was contingent upon the annexation of 45 acres into the City. The CUP allowed for a maximum density of 350 residents (including resident staff), building height limitation of two-stories, and adequate parking to meet the requirements of the residents, staff and visitors; with a provision that, in no case, should the parking be less than 90 spaces. The facility was constructed between 1965 and 1966.

In 1971, a Variance was granted to allow an addition of 16 resident rooms, a lounge, dining room, and a day room to the existing nursing care facility, and to construct a 49 bed Personal Care Facility (also referred to as “Assisted Living”). This project was never built, as it was contingent upon a rezoning, which never took place.

In 1976, the 1971 project was re-approved, without the 49-bed Personal Care Facility (Assisted Living). This approval brought the total number of units to 182 units with a total of 47 beds in the Skilled Nursing facility.

In 1981, the Planning Commission approved an addition of 44 additional independent living dwelling units on the Valle Verde campus, bringing the total to 226 units and 47 beds in the Skilled Nursing facility, to accommodate 320 residents.

In 1984, approximately 11.77 acres were annexed for expansion of the facility. A Condition Use Permit approved at the same time included the construction of a 28-unit apartment complex, a 45-unit Assisted Living building with 48 beds, a 14-room Skilled Nursing building with 28 beds, a recreation building, a laundry/kiosk and five two-car carports, and additions to the existing central kitchen and dining area. At that time, the total existing and proposed development on site consisted of 254 units, 48 beds in 45 rooms in Assisted Living, 75 beds in 37 rooms in Skilled Nursing, and associated facilities. An Environmental Impact Report was prepared by Interface Corporation and certified for this project.

In 1986, a 3.50 acre parcel, referred to as the Rutherford Property, was annexed to the Valle Verde Retirement Community as part of the Hidden Oaks Development. The Hidden Oaks project included 11 new single family residences and annexation to the City. However, since this development was not contiguous to the City, staff recommended that the Rutherford parcel, located on the north-western border of Hidden Oaks, also be included in the annexation since it was immediately adjacent to the City. Thus Hidden Oaks would not be a city "island" surrounded by the County of Santa Barbara jurisdiction. Additionally, Torino Road was extended to its present location across the Rutherford lot and dedicated to the City.

In 1993, the Planning Commission approved the conversion of a residential building containing four studio units, to a six-bed residential hospice that would serve up to six individuals.

Since 1993, a number of changes have been approved at Valle Verde through the use of Substantial Conformance Determinations, which compared the proposals with the 1984 approval. The changes have included adding bathrooms to existing units converting existing units to other uses such as Hospice, Wellness clinic and archives, and converting two one-bedroom independent living units into one larger two-bedroom unit. These incremental changes over time have not increased the density of the existing residential development, but have decreased the number of units from 254 to 213. These Substantial Conformance Determinations were exempt from CEQA review.

Current Development and Use

The Valle Verde Retirement Community (VVRC) is a Continuing Care Retirement Community owned and operated by American Baptist Homes of the West. The facility provides seniors with the following living options; independent living, assisted living, and skilled nursing and all of the services associated with these living options, such as meal service, physical therapy, recreation, transportation, housekeeping and maintenance. VVRC is licensed by the Department of Social Services as a Community Care Facility. Presently, the Valle Verde Retirement Community consists of 214-independent living units (one-bedroom and two-bedroom apartments), 11 studios (which are not considered residential units because they lack private kitchens), a 36 room, 80 bed Skilled Nursing facility, a 45 room, 48 bed Assisted Living facility, a central dining room/kitchen, a campus dayroom, a recreation building, a laundry kiosk, a maintenance building and an administration building. In addition to the 213 independent living unit and 11 studios described above, the property contains a single family residence on parcel 049440-015, which is known as the “Rutherford Property.” This house was never counted towards the 254 units allowed, because it was acquired when Valle Verde purchased the Rutherford property.

The residential component of the project site is mainly developed with multi-family units in duplex or triplex configuration. A small number of units are single family residential and the remaining residential units are studios, which have no kitchens. One lot has a single family residence known as the Rutherford residence.

Commercial structures that currently exist on site include a Skilled Nursing facility, a hospice (operated by a separate organization), an Assisted Living facility, a two unit/four room bed and breakfast for visitors, a central dining room/kitchen, laundry kiosks, a maintenance building, and an administration building. Common areas include a campus dayroom, a recreation building, and gazebos. All included, the commercial floor area of the site currently totals approximately 90,000 net square feet. Demolition of the hospice, the bed & breakfast, the maintenance building, and four gazebos is proposed.

Existing services to residents include housekeeping, linen service, unit maintenance, grounds keeping, common washers/dryers, residential kitchens, common dining, a pool, fitness room, art studio, chapel, putting green, shuffleboard, Wellness clinic, salon, thrift shop, country store, theatre/meeting space, woodshop, bed & breakfast for guests of residents, continuing health care (assisted living & skilled nursing), resident shuttle service, voting, plays, lectures, concerts and adult education.

There are currently 331 uncovered and covered parking spaces existing onsite. Six existing common parking lot areas, which park approximately 10 to 12 cars each, will be removed for the new development, and either reconfigured for efficiency in the same location, or relocated throughout the campus.

PROJECT DESCRIPTION (See *Exhibit A-Project Plans*)

The overall project would include 40 new residential units, additions to the existing common buildings and maintenance buildings, reconfiguring the existing parking areas and a minor lot line adjustment between lots owned by the project applicant. A new access driveway from Torino Road will be provided and grading for the project will be approximately 11,000 cubic yards of cut and 13,000 cubic yards of fill. Below, under Project Components, is an itemized list of the existing and proposed development, with a chart under each component with details on the development.

Project Components:

Proposed Residential

The proposed residential portion of the project involves the demolition of the house located on the Rutherford Property, the demolition of two independent living units, the demolition of four studio units and the construction of 40 new two-bedroom independent living units on multiple parcels of the Valle Verde Retirement Community Campus. The Rutherford house existing prior to the development of Valle Verde and was never considered a part of their Conditional Use Permit, thus its demolition will not affect total net new number of units. The project would result in a total number of 252 (214 existing – 2 existing + 40 proposed) units and seven studios (without kitchens) on the campus. All proposed units are single story, consistent with the existing campus development pattern. Unit sizes range from 1,084 square feet to 1,425 net square feet excluding garages. Twenty seven of the proposed units will have attached one-car garages, and of the remaining 13 units, 10 will have covered parking provided by carports and 3 will have uncovered parking. Ten of the units (five duplexes) are proposed on parcel 049-440-015, which is the Rutherford Property. Eight of the units located on the Rutherford Property would be accessed directly from Torino Road via a new driveway, or by VVRC staff via a cart path through campus. The remaining units would be accessed via the existing street network throughout the campus (See figure A Project Plans).

RESIDENTIAL DEVELOPMENT				
Development & Use	Existing Square Footage & Units	Demolished Square Footage & # Units	New Square Footage & # of Units	Total Net Square Footage & # of Units
Single Family	26,410s.f. @ 19 units	1,300 s.f. @ 1 units (Rutherford House)	12,402 s.f. @ 9 units	37,512 s.f. @ 28 units
Multi-Family (duplex & triplex)	137,211 s.f. @ 195 units	1,629 s.f. @ 2 units	38,276 s.f. @ 31 units	173,858 s.f. @ 234 units
Studio rooms	6,122 s.f. @ 11	2,019 s.f. @ 4 studios	0	4,103 s.f. @ 7 studios

(no kitchens)	studios			
TOTAL	169,743 s.f. @ 214 units (does not include studios)	4,948 s.f. @ 3 units	50,678 s.f. @ 40 units	215,473 s.f. @ 252 units

Proposed Commercial & Common Areas

The facility's Central Core (Common Area) and commercial facilities would be upgraded as part of the proposed project, including renovations to the existing gazebos. Other commercial facilities would be expanded, including a redeveloped Theater Multipurpose Room, expanded outside dining, a new fine dining component, a café, expanded spa services, resident's business center, fitness center, and administration and maintenance buildings. Three gazebos with attached covered patios would be re-constructed in various locations throughout the development. Each gazebo would have a half bath and a janitor's area with a laundry facility that can also be used by the residents (as some smaller units do not have laundry facilities). The Central Core component of the proposed project consists of 10,461 net square feet of remodeled space and 14,902 net square feet of new construction.

COMMON BUILDINGS					
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Development & Use	Existing Square Footage	Demolished Square Footage	New Square Footage	Additional Use	Total Net Square Footage
Gazebos (6) common lavatory ½ bath each	1,802 s.f.	354 s.f. total	1,644 s.f.	Activity Room	3,092 s.f.
Maintenance	4,348 s.f.	4,348 s.f.	5,642 s.f.	None	5,642 s.f.
Bed/Breakfast & Wellness	2,015 s.f.	2,015 s.f.	None	None	None
Admin Building & Bed/Breakfast	1,817 s.f.	None	4,600 s.f.	Conference room & resident bank office	6,417 s.f.
Dining/Multi-purpose/Wellness	11,647 s.f.	0	1,592 s.f.	None	13,239 s.f.
Salon/Staff Lounge	1,982 s.f.	0	503 s.f.	Conference room	2,485 s.f.
Recreation bldg.	1,203 s.f.	0	56 s.f.	Change art room & fitness to lounge & common area & storage	1,259 s.f.
TOTAL	24,814 s.f	6,717 s.f.	14,037 s.f.		32,134 s.f.

ASSISTED LIVING					
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Development & Use	Existing Square Footage	Demolished Square Footage	New Square Footage	Additional Use	Total Net Square Footage
45-unit 48 bed Assisted living units, dining room & common	24,225 s.f.	0	865 s.f.	Art room, & fitness facility & 4 new assisted living rooms	25,090 s.f.

room				
TOTAL	24,225 s.f.	0	865 s.f.	25,090 s.f.

SKILLED NURSING

Development & Use	Existing Square Footage	Demolished Square Footage	New Square Footage	Additional Use	Total Net Square Footage
36 room, 80 bed Skilled Nursing	27,244 s.f.	0	0	None	27,244 s.f.
TOTAL	27,244 s.f.	0	0		27,244 s.f.

HOSPICE

Development & Use	Existing Square Footage	Demolished Square Footage	New Square Footage	Additional Use	Total Net Square Footage
Hospice	2,280	2,280	0	N/A	0
	2,280	2,280	0		0

Proposed Residential Services

Proposed services to residents include poolside lounge, business center, outdoor gathering space, small café, future onsite banking and an ADA compliant Administration building.

Proposed Parking Facilities

Approximately 83 new parking spaces are proposed, including new staff parking lots totaling 43 spaces, 27 new single car garages and 10 covered parking spaces and 3 additional surface parking lot spaces. With these improvements, there would be a total of 414 parking spaces onsite. The post project parking supply would be 246 residential spaces, 104 shared employee/guest spaces and 64 employee only spaces. Some of the existing parking areas will be relocated and most of these lots will park approximately the same number of cars. The parking stalls would be located either perpendicular to the private roads or within small parking lots.

UNCOVERED PARKING AREA

Existing Parking Spaces	289 Spaces	Existing Surface Coverage	46,819 s.f.
Removed Parking Spaces	126 Spaces	Demolished Surface	20,412 s.f.
Proposed Parking Spaces	172 Spaces	Proposed Surface Coverage	27,864 s.f.
Total	335 Spaces (56 net new)		54,270 s.f.

COVERED PARKING

Existing Garages/Carports	42 @ 1 car - garage or carport	Existing Surface Coverage	8,400 s.f.
Removed Parking Spaces	0	Demolished Surface	0
Proposed Garages/Carports	37 @ 1 car - garage or carport	Proposed Surface Coverage	7,400 s.f.
Total	79 @ 1 car - garage or carport		15,800 s.f.

Total	Residential - 246 spaces, Employee/Guest – 104 spaces, Employee Only – 64 spaces
TOTAL	Covered and Uncovered – 414 spaces

Proposed Lot Line Adjustment

The applicants are proposing a lot line adjustment to transfer approximately 9,000 s.f. from APN 49-440-015 to APN 49-440-016, in order to prevent Units 16 and 17 from crossing property lines. The lot line adjustment provides opportunity for infill development and better use of the existing topography.

Parcel	Existing Area	Proposed Area	Proposed Change
049-440-015	3.50 acres	3.30 acres	-0.20 acres
049-440-016	10.77 acres	10.97 acres	+0.20 acres
049-040-050	20.00 acres	20.00 acres	No Change
049-040-053	14.08 acres	14.08 acres	No Change
049-040-054	11.40 acres	11.40 acres	No Change

Proposed Oak Woodland Dedication

A condition of the 1984 Planning Commission approval was the dedication of four acres of oak woodland. This was never done. The applicant is currently proposing to dedicate or otherwise restrict development rights of the 4 acres, plus 5.8 additional acres, for a total of 9.8 acres.

Proposed Grading, Tree Removal and Construction

Grading for the project would involve 11,520 cubic yards of cut, 13,300 cubic yards of fill and 1,780 cubic yards of import. One hundred eighty one (181) trees have been inventoried adjacent to or within the area of the proposed development, including 79 native oaks, 2 California sycamore, and 100 non-native trees. Approximately 15 oak trees would be removed and six oaks may be impacted. Forty-six (46) non-native trees are proposed for removal, and 30 non-native trees may be impacted by the construction. One large California sycamore may be impacted by the project. Fifteen oak trees are proposed to be removed, 13 of which are 8” dbh or less and 2 which are greater than 8” dbh. Six oak trees potentially may be impacted by the construction. The applicant is proposing to plant 150 oak trees to replace those removed (10:1 replacement ratio) in conjunction with Tree Protection Measures which will be implemented to protect trees that could be potentially impacted. Grading would last approximately three months, and construction would last approximately 18 months.

Required Permits:

1. Modifications to allow less than the required distance between main buildings on the project site (SBMC § 28.15.070);
2. Modifications to allow less than the required front yard setback for some of the proposed residential units and parking spaces (SBMC § 28.15.060);
3. Modifications to allow less than the required interior yard setback for some of the proposed residential units (SBMC § 28.15.060);
4. Lot Line Adjustment to allow adjustment of the property line between two adjoining parcels (SBMC § 27.40 and Government Code § 66412); and
5. Conditional Use Permit Amendment to allow expansion of the Valle Verde Retirement Community (SBMC § 28.94.030).

ENVIRONMENTAL SETTING

Existing Site Characteristics

Topography: Topography of the five existing parcels ranges from 3% and 32% average slope as shown on the “Property Characteristics” table below:

Seismic/Geologic Conditions: The project site is underlain with artificial fill, colluvium, and Santa Barbara Formation material. Groundwater at the project site was encountered on the Rutherford property at depths of 28 and 33 feet below existing grade, and in the maintenance building area at approximately 28 feet below the existing ground surface. Soils on the project site are predominately silty sand associated with Santa Barbara Formation. Silty sand can be considered loose to medium density and, therefore, the site has the potential to experience liquefaction-related impacts. The City’s Master Environmental Assessment (MEA) indicates that the project area has a “conditional or questionable liquefaction potential.”

Either the potentially active Lavigia Fault or one of its branches has been mapped south of the Rutherford property. Exploratory trenching found no evidence of faulting on the Rutherford property.

Flooding/Fire Hazard: The project site lies north of the City’s designated high fire hazard area. However, the oak woodland area adjacent to the proposed development poses a wildland fire hazard to the Valle Verde Retirement Community. The Fire Department has required that a defensible space area continues to be provided in order to protect the Valle Verde structures from wildland fires.

Creeks/Drainage: Valle Verde is situated on the western edge of the Arroyo Burro Creek floodplain, one of the larger drainages in the urban area. A portion of Arroyo Burro Creek runs along the eastern property line of parcel 049-040-045. The entire Valle Verde campus drains to Arroyo Burro Creek.

Biological Resources: The project site is located within an urban area and is identified on the City’s MEA map as containing southern oak woodland, riparian woodland & creek, coastal sage scrub, and orchard. The Conservation Element identifies the Southern Oak Woodland west of Calle de los Amigos as one of two pristine stands in the City. Over 500 oak trees are located on the Valle Verde property.

Archaeological Resources: A portion of APN 049-040-053 and -054 are within a Prehistoric Sites and Water Courses Sensitivity Zone. Development proposed in these areas involves the construction of residential units, parking areas and various common area facilities, including an addition to the Administration Building. An intensive field survey of the entire property, including shovel scrapes in areas of less ground surface visibility, was performed by Stone Archaeological Consulting. No prehistoric or historic cultural materials were identified.

Noise: According to the City’s MEA, the project site is subject to noise levels of less than 60 Ldn dBA, which is acceptable for residential uses.

Access and Parking:

Primary access is provided to the Valle Verde by Calle de los Amigos and Torino Drive. Additionally, there is a network of private streets that provide access to different areas within the Valle Verde campus. There are 331 parking spaces existing at Valle Verde, with 193 spaces reserved for residents and 138 unmarked spaces for visitors and staff.

PROPERTY CHARACTERISTICS

Assessor's Parcel Numbers:	049-040-050, 049-040-053, 049-040-054, 049-440-015, and 049-440-016	General Plan Designation:	Residential 5 units/acre, 1 unit/acre
Zoning:	049-040-050 = A-1/E-3 049-040-053 = E-3 049-040-054 = E-3 049-440-015 = A-1 049-440-016 = A-1/E-3	Parcel Size:	049-040-050 = 20.0 ac. 049-040-053 = 14.08 ac. 049-040-054 = 11.40 ac. 049-440-015 = 3.50 ac. (after LLA = 3.30 ac. 049-440-016 = 10.77 ac. (after LLA = 10.97 ac.
Existing Land Use:	Valle Verde Retirement Community (Community Care Facility)	Proposed Land Use:	Valle Verde Retirement Community (Community Care Facility)
Slope:	049-040-050 = 32% (Average Slope) 049-040-053 = 3% (Average Slope) 049-040-054 = 10% (Average Slope) 049-440-015 = 20% (Average Slope) 049-440-016 = 19% (Average Slope)		
SURROUNDING LAND USES:			
North:	La Cumbre Country Club		
South:	Residential		
East:	Hidden Valley Park, Arroyo Burro Creek, Residential		
West:	Vacant, Residential		

PLANS AND POLICY DISCUSSION

Land Use and Zoning Designations:

The project site is located in the Hidden Valley Neighborhood, which is bordered on the north by Highway 101; on the south by Hope Ranch and Arroyo Burro Creek; on the east by Veronica Springs Road; and on the west by Hope Ranch and Arroyo Burro Creek. The neighborhood is described by the Land Use Element as an area “almost entirely developed” with single family and duplex uses. It also identifies Valle Verde as a “retirement home” in the neighborhood. The Valle Verde facility has existed in this neighborhood for approximately 40 years.

The project site is comprised of five separate parcels totaling 59.75 acres. The table below reflects the general plan and zoning designations for the various parcels, as well as the minimum lot size requirements.

Assessor Parcel Number	General Plan Designation	Zoning Designation
049-040-050	Residential, 5 Units/Acre	A-1/E-3, Single Residential Unit – Min. Lot Size: 43,500 SF (A-1), 7,500 SF (E-3)
049-040-053	Residential, 5 Units/Acre	E-3, Single Residential Unit – Min. Lot Size: 7,500 SF
049-040-054	Residential, 5 Units/Acre	E-3, Single Residential Unit – Min. Lot Size: 7,500 SF
049-440-015	Residential, 1 Unit/Acre	A-1, Single Residential Unit – Min. Lot Size: 43,000 SF
049-440-016	Residential, 1 Unit/Acre	A-1/E-3, Single Residential Unit (Min. Lot Size: 43,500 SF (A-1), 7,500 SF (E-3))

As previously indicated the original CUP for the Valle Verde Retirement Community was approved in 1960 and included the development of 182 independent living units and a 15-bed convalescent hospital, with an overall maximum density of 350 people. Subsequent amendments to the CUP have allowed for additional independent living units on the campus up to 254 units in 1984. Subsequent substantial conformance determinations have decreased the number of units to the current number of 213.

Parcel	Area	Zone	Slope	Maximum Allowed Units
049-440-015	03.50 acres	A-1	20%	2
049-440-016	10.77 acres	A-1/E-1	19%	15
049-040-050	20.00 acres	A-1/E-3	32%	25
049-040-053	14.08 acres	E-3	3%	81
049-040-054	11.40 acres	E-3	10%	66

Based on the City’s slope density provisions, a maximum of 189 total units could be allowed on the 59.75-acre property. The Land Use Element, however, acknowledges that densities for senior housing can be greater because the number of people per unit is lower for such housing than for non-restricted housing. Previous CUP amendments have allowed up to 254 units on the property. The current proposal would result in 251 units on the property, which is consistent with the density previously intended for the facility.

General Plan Policies:

Various resource sections of this Initial Study make reference to and analyze consistency with applicable General Plan policies and ordinance provisions. The following is a discussion of the project’s potential consistency with the various elements of the General Plan. Additional discussion of policy consistency issues will subsequently be provided in the Planning Commission Staff Report. Final determinations of project consistency of applicable plans and policies will be made by the decision-makers as part of their action to approve or deny the proposed project. The following information consists of some background information of the Conservation, Housing, Seismic Safety/Safety, Noise and Circulation Elements of the General Plan.

1. Conservation Element

City Conservation Element policies provide that significant environmental resources of the City be preserved and protected. The Conservation Element requires implementation of resource protection measures for archaeological, cultural and historic resources; protection and enhancement of visual, biological and open space resources; protection of specimen and street trees; maintenance of air and water quality; and minimizing potential drainage, erosion and flooding hazards. The Conservation Element recognizes that while full implementation of the policies would be the most desirable, there are often competing demands for preservation, enhancement, development and conservation.

With respect to the subject development, there are five policies under the Conservation Element that directly apply to the project site, which are discussed below:

Visual Resources Policy 2.0 – “Development on hillsides shall not significantly modify the natural topography and vegetation.”

Visual Resources Policy 2.1 – “Development which necessitates grading on hillsides with slopes greater than 30% should not be permitted.”

Visual Resources Policy 4.0 – “Trees enhance the general appearance of the City’s landscape and should be preserved and protected.”

Visual Resources Policy 4.1 – “Mature trees should be integrated into project design rather than removed.”

Visual Resources Policy 4.2 – “All feasible options should be exhausted prior to the removal of trees.”

Biological Resources Policy 4.0 – “Remaining Coastal Perennial Grasslands and Southern Oak Woodlands shall be preserved, where feasible.”

Future construction of the 40 independent living units is not anticipated to obstruct important public scenic views to the ocean or lower elevations of the City nor obstruct upper foothill or mountain views from the beach or lower elevations of the City. The project site is surrounded by existing residential development, parkland and heavy vegetation, some of which is proposed for removal, but replacement is also proposed. Further, the units have been designed to be one story to maintain a low profile.

As discussed in Section 1. Aesthetics, visual impacts related to views from the adjacent Hidden Valley Park were determined to be less than significant. Additionally, the project proposes to place some of the residential units and a staff/visitor parking lot in areas that contain slopes of 30% or greater. However, the Geotechnical Report prepared for the project describes a portion of these areas as having shallow artificial fill materials related to the grading and construction of the existing residence and roadway on the Rutherford parcel and in the location of the existing maintenance building where the employee/visitor parking lot is proposed. The project has been designed to place development on the more level parts of the hillsides and therefore avoid, to the extent possible, slopes of 30% or greater. Such construction will not substantially disturb the hillsides or modify the natural topography; therefore, the project can be found potentially consistent with the visual resources aspects of the Conservation Element.

Biological and open space resources could also be affected by the proposed development. The site contains an oak woodland, identified by the Conservation Element as an important environmentally sensitive biotic community. This woodland is one of two remaining pristine oak tree stands in the City. The Conservation Element acknowledges the conflict between urban uses and ecosystem preservation as two major concerns. It states that as important habitats are lost, the general quality of the city is reduced, therefore making Santa Barbara a less attractive place to live and visit. The original project proposed the removal or potential impact to approximately 30 oak trees, however through several refinements of the project design, 15 of the 30 oaks are now being preserved and integrated into the project. The majority of these trees are small in size and not contiguous to one another. The project applicant is also proposing a revegetation plan for areas disturbed by construction activities, and oak tree replacement at a 10:1 ratio. The oak tree replacement will occur along project buffer areas and areas where the intensity of fuel management is being greatly reduced. As discussed below in Section 3. Biological Resources, with the proposed removal of 15 oak trees and the planting of 150 oak saplings, the project could be found potentially consistent with biological resources policies of the Conservation Element.

2. Housing Element

The Housing Element encourages construction of a wide range of housing types to meet the needs of various sectors of the community. The proposed project would result in the provision of 40 new independent living residential units for seniors. Therefore, the proposed project is potentially consistent with this goal of the Housing Element.

Housing Element Policy 3.3 requires new development to be compatible with the prevailing character of the neighborhood. The neighborhood surrounding the proposed project site is comprised of single-family and multi-family residential development, including both one- and two-story structures. The proposed Valle Verde central core development is intended to be consistent with the existing retirement facility, and the proposed residential units are designed as single-story structures consistent with the existing Valle Verde development pattern. Size and design of these residences would be subject to review by the City’s Architectural Board of Review. Therefore, the proposed new development would be potentially consistent with this policy of the Housing Element.

3. Seismic Safety/Safety Element

The City's Seismic Safety/Safety Element requires that development be sited, designed and maintained to protect life, property, and public well-being from seismic and other geologic hazards, and to reduce or avoid adverse economic, social, and environmental impacts caused by hazardous geologic conditions. The Seismic Safety/Safety Element addresses a number of potential hazards including, geology, seismicity, flooding, liquefaction, tsunamis, high groundwater, and erosion. The project site is subject to a number of geologic and environmental constraints. As discussed in this Initial Study analysis, potential impacts associated with these hazards would be adequately addressed by adhering to the California Building Code and implementation of recommendations for grading and development, which are outlined in the geotechnical report provided for the project. Therefore, the proposed project may be found *potentially consistent* with the Seismic Safety/Safety Element policies relative to potential hazards.

4. Noise Element

The City's Noise Element includes policies intended to achieve and maintain a noise environment that is compatible with the variety of human activities and land uses in the City. The proposed residential development would not generate a substantial increase in existing ambient noise levels in the area and would not locate new residential use in an area where existing noise levels would impact future residents. Short-term construction noise is minimized through implementation of standard mitigation measures. Therefore, the proposed project may be found *potentially consistent* with the applicable policies and guidelines of the Noise Element.

5. Circulation Element

The Circulation Element of the General Plan contains goals and implementing measures to reduce adverse impacts to the City's street system and parking by reducing reliance on the automobile, encouraging alternative forms of transportation, reviewing traffic impact standards, and applying land use and planning strategies that support the City's mobility goals. Traffic and circulation impacts resulting from the proposed project are very minor, and thus the project could be found *potentially consistent* with the Circulation Element.

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

A Mitigation Monitoring and Reporting Program will be prepared with the Environmental Impact Report (EIR).

ENVIRONMENTAL CHECKLIST

The following checklist contains questions concerning potential changes to the environment that may result if this project is implemented. If no impact would occur, **NO** should be checked. If the project might result in an impact, check **YES** indicating the potential level of significance as follows:

Significant: Known substantial environmental impacts. Further review needed to determine if there are feasible mitigation measures and/or alternatives to reduce the impact.

Potentially Significant: Unknown, potentially significant impacts that need further review to determine significance level and whether mitigable.

Potentially Significant, Mitigable: Potentially significant impacts that can be avoided or reduced to less than significant levels with identified mitigation measures agreed-to by the applicant.

Less Than Significant: Impacts that are not substantial or significant.

1. AESTHETICS Could the project:	NO	YES <i>Level of Significance</i>
a) Affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway?		Potentially Significant, Mitigable
b) Have a demonstrable negative aesthetic effect in that it is inconsistent with Architectural Board of Review or Historic Landmarks Guidelines or guidelines/criteria adopted as part of the Local Coastal Program?		Less than Significant
c) Create light or glare?		Less than Significant

Visual Aesthetics - Discussion

Issues: Issues associated with visual aesthetics include the potential blockage of important public scenic views, project on-site visual aesthetics and compatibility with the surrounding area, and changes in exterior lighting.

Impact Evaluation Guidelines: Aesthetic quality, whether a project is visually pleasing or unpleasing, may be perceived and valued differently from one person to the next, and depends in part on the context of the environment in which a project is proposed. The significance of visual changes is assessed qualitatively based on consideration of the proposed physical change and project design within the context of the surrounding visual setting. First, the existing visual setting is reviewed to determine whether important existing visual aesthetics are involved, based on consideration of existing views, existing visual aesthetics on and around the site, and existing lighting conditions. Under CEQA, the evaluation of a project’s potential impacts to scenic views is focused on views from public (as opposed to private) viewpoints. The importance of existing views is assessed qualitatively based on whether important visual resources such as mountains, skyline trees, or the coastline, can be seen, the extent and scenic quality of the views, and whether the views are experienced from public viewpoints. The visual changes associated with the project are then assessed qualitatively to determine whether the project would result in substantial effects associated with important public scenic views, on-site visual aesthetics, and lighting.

Significant visual aesthetics impacts may potentially result from:

- Substantial obstruction or degradation of important public scenic views, including important views from scenic highways; extensive grading and/or removal of substantial amounts of vegetation and trees visible from public areas without adequate landscaping; or substantial loss of important public open space.
- Substantial negative aesthetic effect or incompatibility with surrounding land uses or structures due to project size, massing, scale, density, architecture, signage, or other design features.
- Substantial light and/or glare that poses a hazard or substantial annoyance to adjacent land uses and sensitive receptors.

Visual Aesthetics – Existing Conditions and Project Impacts

1. a) Scenic Views

The project is located in an urban environment in the Hidden Valley Neighborhood, an area described by the Land Use Element as “almost entirely developed” with single family and duplex uses. It also identifies Valle Verde as a “retirement home” in the neighborhood. The project site is developed with a full care retirement community providing services to both independent seniors and those needing nursing care. The Valle Verde facility has existed in this neighborhood for approximately 40 years. The project site is surrounded by the La Cumbre County Club to the north, residential development on the south, Hidden Valley Park and Arroyo Burro Creek to the east, and by a residential development and a steep, vacant hillside with a pristine Oak Woodland habitat to the west.

The City’s Master Environmental Assessment (MEA) maps do not identify any specific important scenic resources in the vicinity of the project. The City carefully scrutinizes project sites proposed on parcels with an average slope of 30% or greater, where visual impacts are a general concern. The proposed residential units would be one-story and as such are intended to have a low profile. Although, half of the new residential units, a driveway, and a portion of a new staff parking lot are proposed on slopes ranging from 20% to over 30%, they would not be substantially visible from

Calle de los Amigos, one of the public streets surrounding the project site. A portion of the slopes that are between 20% and 30% were created from previous development of a parking area, a driveway serving a single family residence and a maintenance building. The proposed development would re-use these areas. Eight residential units proposed on the Rutherford parcel would take access from Torino Drive and development in this area would be visible from this public street. The project site is also visible from Hidden Valley Park located to the east of Calle de los Amigos, however development proposed on this portion of the property would be infill development that would not substantially alter views from the park or create a significant impact to an important public scenic resource.

Currently, the existing development is landscaped with mostly non-native ornamental trees, shrubs, and ground cover, A few mature western sycamores are scattered throughout the campus, either remnants of the original oak-sycamore riparian woodland found in this area or planted as landscape trees. Outside of the existing development are over 500 mature coast live oaks. A total of 61 trees are proposed for removal, including 46 non-native trees (11 skyline or specimen trees) and 15 coast live oak trees (6 skyline or specimen trees), to make way for the residential development. The proposed project includes planting of 150 coast live oak trees and the planting of additional, native landscaping on the interior of the main campus.

The visual change caused by the proposed project as a result of building of new structures and roads, from public view vantage points and surrounding neighborhoods, would be minimal. The proposal would incorporate development compatible with the surrounding neighborhood, and the single story buildings would not substantially change mountain views for the neighbors to the west. No designated open spaces would be impacted by this proposal.

Removal of this vegetation will be analyzed in terms of its biological impact in Section 3, "Biological Impacts," below. From an aesthetic point of view, although these trees do not provide for screening of the site from major public viewpoints, some of the trees are skyline trees, and they provide visual relief from surrounding urban development. Additionally, the project would result in a minor visual change as viewed from Torino Drive, a public road, due to the removal of the trees, however, this is a lightly traveled road. Mitigation Measure BIO-3 in the Biological Resources section requires replacement of all removed oak trees at a 10:1 ratio. Mitigation Measure AES-1 requires a landscape plan for the development site that replaces all skyline and specimen trees proposed for removal or impacted during construction at a minimum ratio of 1:1. Given the large number of trees and vegetation proposed to remain, the number of trees proposed for replacement, and the mitigation measure to replace skyline and specimen trees, the removal of the trees would be potentially *significant, but mitigable* to less than significant levels.

1. b) On-Site Aesthetics

The removal of 15 oak trees is discussed in the Biological section of this document, and it should be noted that, as proposed, 9.8 acres of oak woodland would be preserved and restricted from further development (BIO-3). The proposal to add 40 new independent living units and improve existing facilities is intended to be compatible with the Valle Verde Retirement Community and the overall residential character of the neighborhood. The proposed residential units will have the same one story scale as the existing units, and it is expected that the project landscaping will blend with the existing development. Five duplexes are proposed on the Rutherford site, where the slopes are the greatest. One unit will be placed within the current footprint of the existing single family residence, and that footprint will be lowered in an effort to blend into the hillside. Access to the units from Torino Drive will be on slopes of less than 10%. Access from Calle Sastre will be via driveway that is on a slope of between 20-30%; however this driveway already exists, and provides access to the existing house on the Rutherford site. As discussed in the Geological Section, the majority of the grading for the Rutherford Parcel, the employee parking lot, and other duplexes will occur on slopes less than 30%, and in some areas that have been previously graded.

Improvements, additions and new structures are also proposed for the commercial buildings on the project site. For example, a second floor addition is proposed above the administration building, three enclosed gazebos are proposed to replace four existing gazebos, and a new maintenance building would be constructed. Most of the commercial buildings that are being remodeled are located within the center of the existing development, closer to Calle de los Amigos and away from the existing suburban development to the north. Aesthetics and architectural design of the project and units, including the parking areas will require review and approval by the Architectural Board of Review.

The project is subject to the Visual Resource Policies of the Conservation Element that encourage minimization of grading on slopes, preservation and incorporation of existing trees into a project, landscaping downslope of a project to reduce visual impacts and protection of important open space. The proposed development will be reviewed and approved by the Architectural Board of Review (ABR) in accordance with ABR Design Guidelines. The ABR has conceptually reviewed the project on three occasions (**See Exhibit C**) with regard to these guidelines and found the project design, architecture and landscaping to be generally acceptable with suggestions for some improvements relating to architectural massing and landscape details. Therefore, based on the current project design, as well as required final review and

approval by the ABR, the proposed project's on-site aesthetics impacts are considered *less than significant*.

1. c) Lighting

Although the project is located in a residential neighborhood, the Valle Verde facility contains both residential and commercial uses. The proposed development would therefore provide outdoor lighting typical of commercial and residential uses. Additionally, the Rutherford parcel, which is currently developed with a single family residence, would be redeveloped with ten residences and a small parking area for the residences. By grading the parking area into the hillside, lighting from the parking lot would be shielded from the uphill neighbors. Other light sources would be generated from cars traveling west, uphill, on Torino Drive toward the Hidden Oaks Estates during the evening and the street lights on Torino Road above Calle de los Amigos. The project's exterior lighting would be subject to compliance with the requirements of SBMC §22.75, the City's Outdoor Lighting and Design Ordinance. The ordinance provides that exterior lighting be shielded and directed to the site such that no undue lighting or glare would affect surrounding residents, roads, or habitat areas. Conformance with this ordinance will be confirmed by the Architectural Board of Review in their final review of the project. Project impacts on lighting and glare would be *less than significant*.

Visual Aesthetics – Required Mitigation

AES-1 Landscape Plans. Prior to issuance of grading or building permits, final landscaping plans for the development shall be submitted for review and approval of the Environmental Analyst and Architecture Board of Review (ABR), and shall include the following:

- A. Planting of only native species in development areas adjacent to native riparian, oak woodland, and coastal sage scrub areas. Drought tolerant, water wise landscaping shall be used throughout the site. No highly invasive non-native species listed by the California Native Plant Society are to be used onsite.
- B. Replacement of all skyline and specimen trees proposed for removal or significantly impacted onsite at a minimum of a 1:1 ratio, with native species. Should any of the large sycamore trees onsite be impacted by the project, they shall be replaced at a 3:1 ratio per the specifications of the Tree Assessment and Protection Plan.

Visual Aesthetics - Residual Impacts

Impacts with regard to site aesthetics would be less than significant. Impacts related to scenic views would be mitigated with Measure AES-1 to a less than significant level.

2. AIR QUALITY Could the project:	NO	YES Level of Significance
a) Conflict with or obstruct implementation of the applicable air quality plan?		Less Than Significant
b) Exceed any air quality emission threshold? Long-term		Less Than Significant
Short-term		Less than significant
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard?		Less Than Significant
d) Expose sensitive receptors to substantial pollutants?		Less than significant
e) Create objectionable odors affecting a substantial number of people?		Less Than Significant

Air Quality - Discussion

Issues. Air quality issues involve pollutant emissions from vehicle exhaust and industrial or other stationary sources that contribute to smog, particulates and nuisance dust associated with grading and construction processes, and nuisance odors.

Smog, or ozone, is formed in the atmosphere through a series of photochemical reactions involving interaction of oxides of nitrogen [NO_x] and reactive organic compounds [ROC] (referred to as ozone precursors) with sunlight over a period of several hours. Primary sources of ozone precursors in the South Coast area are vehicle emissions. Sources of particulate matter (PM₁₀) include demolition, grading, road dust, agricultural tilling and mineral quarries and vehicle exhaust (PM_{2.5}).

The City of Santa Barbara is part of the South Central Coast Air Basin. The City is subject to the National Ambient Air Quality Standards and the California Ambient Air Quality Standards (CAAQS), which are more stringent than the national standards. The CAAQS apply to six pollutants: photochemical ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, particulate matter, and lead. The Santa Barbara County Air Pollution Control District (SBCAPCD) provides oversight on compliance with air quality standards and preparation of the County Clean Air Plan.

Presently, Santa Barbara County is in attainment for all federal ambient air quality standards but does not meet the 8-hour ozone and PM₁₀ California ambient air quality standards.

Impact Evaluation Guidelines: A project may create a significant air quality impact from the following:

- Exceeding an APCD pollutant threshold; inconsistency with District regulations; or exceeding population forecasts in the adopted County Clean Air Plan.
- Exposing sensitive receptors, such as children, the elderly or sick people to substantial pollutant exposure.
- Substantial unmitigated nuisance dust during earthwork or construction operations.
- Creation of nuisance odors inconsistent with APCD regulations.

Long-Term (Operational) Impact Guidelines: The City of Santa Barbara uses the SBCAPCD thresholds of significance for evaluating air quality impacts. The APCD has determined that a proposed project will not have a significant air quality impact on the environment if operation of the project will:

- Emit (from all project sources, both stationary and mobile) less than 240 pounds per day for ROC and NO_x, and 80 pounds per day for PM₁₀;
- Emit less than 25 pounds per day of ROC or NO_x from motor vehicle trips only;
- Not cause a violation of any California or National Ambient Air Quality Standard (except ozone);
- Not exceed the APCD health risks public notification thresholds adopted by the APCD Board; and
- Be consistent with the adopted federal and state air quality plans for Santa Barbara.

Short-Term (Construction) Impacts Guidelines: Projects involving grading, paving, construction, and landscaping activities may cause localized nuisance dust impacts and increased particulate matter (PM₁₀). Substantial dust-related impacts may be potentially significant, but are generally considered mitigable with the application of standard dust control mitigation measures. Standard dust mitigation measures are applied to projects with either significant or less than significant effects.

Exhaust from construction equipment also contributes to air pollution. Quantitative thresholds of significance are not currently in place for short-term or construction emissions. However, SBCAPCD uses combined emissions from all construction equipment that exceed 25 tons of any pollutant except carbon monoxide within a 12-month period as a guideline threshold for determining significance of construction emission impacts.

Cumulative Impacts and Consistency with Clean Air Plan: If the project-specific impact exceeds the ozone precursor significance threshold, it is also considered to have a considerable contribution to cumulative impacts. When a project is not accounted for in the most recent Clean Air Plan growth projections, then the project's impact may also be considered to have a considerable contribution to cumulative air quality impacts. The Santa Barbara County Association of Governments and Air Resources Board on-road emissions forecasts are used as a basis for vehicle emission forecasting. If a project provides for increased population growth beyond that forecasted in the most recently adopted CAP, or if the project does not incorporate appropriate air quality mitigation and control measures, or is inconsistent with APCD rules and regulations, then the project may be found inconsistent with the CAP and may have a significant impact on air quality.

Air Quality – Existing Conditions and Project Impacts

2. a) Clean Air Plan

Direct and indirect emissions associated with the project are accounted for in the 2007 CAP emissions growth assumptions. Appropriate air quality mitigation measures, including construction dust suppression, would be applied to the project, consistent with CAP and City policies. The project could be found consistent with the 2007 Clean Air Plan; therefore, impacts would be *less than significant*.

2. b) Air Pollutant Emissions

Long-Term (Operational) Emissions:

Long-term project emissions could potentially stem from motor vehicles associated with the project, and from stationary sources, which may require permits from the APCD. Examples of stationary sources include gas stations, auto body shops, diesel generators, dry cleaners, oil and gas production and processing facilities, and water treatment facilities. Other stationary sources such as small wineries, residential heating and cooling equipment, wood burning stoves and fireplaces, or other individual appliances do not require permits from the APCD and are known as "area sources". The proposed project does not contain any stationary sources that require permits from APCD.

Using the URBEMIS 9.2.4 computer model (**Exhibit D**), it is estimated that the long-term vehicle emissions resulting from the proposed project would be 5.4 pounds per day of ROC and 1.8 pounds per day of NO_x which is substantially below significance thresholds adopted by the APCD and the City of Santa Barbara. Therefore, the proposed project would have a *less than significant* impact on the environment related to long-term air quality.

Short-Term (Construction) Emissions:

The project would involve grading (11,520 cubic yards of cut, 13,300 cubic yards of fill, 1,780 cubic yards of import), paving, and landscaping activities which could cause localized dust related impacts resulting in increases in particulate matter (PM₁₀ and PM_{2.5}). Utilizing the URBEMIS 9.2.4 computer model, it is estimated that the proposed project would result in emissions of 1.08 tons per year of PM₁₀ and 0.19 tons per year of PM_{2.5}. Dust control measures (which are repeated in the mitigation measures below) are required for the project as standard conditions of approval; therefore, dust-related impacts are considered *less than significant*.

Construction equipment would also emit NO_x and ROC. However, in order for NO_x and ROC emissions from construction equipment to be considered a significant environmental impact, combined emissions from all construction equipment would need to exceed 25 tons of any pollutant (except carbon monoxide) within a 12-month period. Using the URBEMIS 9.2.4 computer model, it is estimated that the proposed project will generate 2.52 tons per year of NO_x and 0.48 tons per year of ROG during construction. Construction emission control measures (which are repeated in the mitigation measures below) are required as standard conditions of approval for the project. Therefore, project impacts related to short-term emissions impacts would be *less than significant*.

2. c) Cumulative Emissions

Global Climate Change (GCC) is a change in the average weather of the earth that can be measured by changes in wind patterns, storms, precipitation and temperature. GCC is generally thought to be caused by increased emission of greenhouse gases (GHG) because these gases trap heat in the atmosphere. Common GHG include water vapor, carbon dioxide, methane, nitrous oxides, chlorofluorocarbons, hydrofluorocarbons, ozone and aerosols. Natural processes and human activities emit GHG and help to regulate the earth's temperature; however, it is believed that substantial emissions from human activities, such as electricity production and vehicle use, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations. California is a substantial contributor of GHG (2nd largest contributor in the U.S. and the 16th largest contributor in the world), with transportation and electricity generation representing the two largest contributing factors (41 and 22 percent, respectively).

The carbon dioxide (CO₂) equivalent is a consistent methodology for comparing GHG emissions. Using the URBEMIS 9.2.4 computer model, the net increase in CO₂ emissions is anticipated to be 553.82 tons per year.

As the project will result in a small increase of vehicle trips, it will contribute, on a cumulative level, to the generation of GHG emissions. Because no significance thresholds or regulatory guidance have been adopted yet for the generation of GHG emissions, an impact determination would be overly speculative at this time. The City has adopted ordinances and guidelines in an effort to reduce the energy consumption of new construction. These measures to require more "green" construction serve to reduce GHG emissions from new and some refurbished development. In addition, the City is in the process of preparing revisions to its General Plan. During the analysis of the impacts of the new plan, additional guidance on how to deal with GHG emissions is anticipated.

Since project impacts do not exceed any adopted significance thresholds and the project is consistent with the CAP, cumulative project emissions impacts would be *less than significant*.

2. d) Sensitive Receptors

Sensitive receptors are defined as children, elderly, or ill people that can be more adversely affected by air quality problems. Land uses typically associated with sensitive receptors include schools, parks, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and clinics. The proposed development would generate approximately 11 new peak hour trips, which is substantially less than the 800 new peak hour vehicle trip threshold and therefore would be unlikely to generate dangerous concentrations of carbon monoxide at any location. Stationary sources are of particular concern to sensitive receptors, as is construction dust and particulate matter. The project would not include stationary sources, but sensitive receptors could be affected by fugitive dust and diesel particulate matter (diesel PM) from construction equipment and vehicle exhaust during project site grading. Particulate emissions from diesel exhaust are classified as carcinogenic by the State of California. Standard nuisance dust and diesel PM measures are required for the project as conditions of approval (repeated below as mitigations measures); therefore, nuisance dust and diesel PM impacts are considered *less than significant*.

2. e) Odors

The Valle Verde facilities includes an existing full service dining facility that contain features with the potential to emit odorous emissions, from sources such as commercial cooking equipment including grills, fryers, ovens, burners, hoods/fire suppression systems and food warming racks. The Santa Barbara County Health Department inspects the facility annually. Due to the nature of the proposed land use, project impacts related to odors would be considered *less than significant*.

Air Quality – Recommended Mitigation

AQ-1 Construction Dust Control – Minimize Disturbed Area/Speed. Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.

AQ-2 Construction Dust Control - Watering. During site grading and transportation of fill materials, regular water sprinkling shall occur using reclaimed water whenever the Public Works Director determines that it is reasonably available. During clearing, grading, earth moving or excavation, sufficient quantities of water, through use of either water trucks or sprinkler systems, shall be applied to achieve minimum soil moisture of 12% to prevent dust from leaving the site. Each day, after construction activities cease, the entire area of disturbed soil shall be sufficiently moistened to create a crust.

Throughout construction, water trucks or sprinkler systems shall also be used to keep all areas of vehicle movement damp enough to prevent dust raised from leaving the site. At a minimum, this will include wetting down such areas every three hours. Increased watering frequency will be required whenever the wind speed exceeds 15 mph.

AQ-3 Construction Dust Control – Tarping. Trucks transporting fill material to and from the site shall be covered from the point of origin and maintain a freeboard height of 12 inches.

AQ-4 Construction Dust Control – Gravel Pads. Gravel pads, 3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes or a pipe-grid track out control device shall be installed to reduce mud/dirt track out from unpaved truck exit routes.

AQ-5 Construction Dust Control – Disturbed Area Treatment. After clearing, grading, earth moving or excavation is completed, the entire area of disturbed soil shall be treated to prevent wind erosion. This may be accomplished by:

- A. Seeding and watering until grass cover is grown;
- B. Spreading soil binders;
- C. Sufficiently wetting the area down to form a crust on the surface with repeated soakings as necessary to maintain the crust and prevent dust pickup by the wind;
- D. Other methods approved in advance by the Air Pollution Control District.

AQ-6 Construction Dust Control – Paving. All roadways, driveways, sidewalks, etc., shall be paved as soon as possible. Additionally, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- AQ-7 Stockpiling.** If importation, exportation and stockpiling of fill material are involved, soil stockpiled for more than two days shall be covered, kept moist by applying water at a rate of 1.4 gallons per hour per square yard, or treated with soil binders to prevent dust generation. Apply cover when wind events are declared.
- AQ-8 Construction Dust Control – Project Environmental Coordinator (PEC).** The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when construction work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading for the structure.
- AQ-9 Exhaust Emissions – Engines.** Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) shall be used.
- AQ-10 Engine Size.** The engine size of construction equipment shall be the minimum practical size.
- AQ-11 Equipment Numbers.** The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- AQ-12 Equipment Maintenance.** Construction equipment shall be maintained to meet the manufacturer's specifications.
- AQ-13 Engine timing.** Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines.
- AQ-14 Catalytic Converters.** Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- AQ-15 Diesel Catalytic Converters.** Diesel catalytic converters, diesel oxidation catalysts and diesel particulate filters are certified and/or verified by EPA or California shall be installed, if available.
- AQ-16 Diesel Replacements.** Diesel powered equipment shall be replaced by electric equipment whenever feasible.
- AQ-17 Idling Limitation.** Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units shall be used whenever possible.
- AQ-18 Worker Trips.** Construction worker trips shall be minimized by requiring carpooling and by providing for lunch onsite.
- AQ-19 Biodiesel.** Biodiesel shall be used to the maximum extent feasible.
- AQ-20 Energy Use.** Minimize the use of energy by designing and constructing structures using sustainable development principles including green building designs and materials.
- AQ-21 Carpool Parking.** Provide preferential parking for carpools and vanpools.
- AQ-22 Demolition and Debris Removal.** Apply water every 4 hours to the area within 100 feet of a structure being demolished, to reduce vehicle trackout. Apply water to disturbed soils after demolition is completed or at the end of each day of cleanup.
- AQ-23 Post Demolition.** Apply dust suppressants (e.g., polymer emulsion) to disturbed areas upon completion of demolition.
- AQ-24 Demolition Activities.** Prohibit demolition activities when wind speeds exceed 25 mph.

Air Quality - Residual Impacts

Implementation of Mitigation Measures related to dust generation and implementation of Mitigation Measures related to diesel equipment emissions would further reduce to less than significant impacts.

3. BIOLOGICAL RESOURCES Could the project result in impacts to:	NO	YES <i>Level of Significance</i>
a) Endangered, threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?		Potentially Significant
b) Locally designated historic, Landmark or specimen trees?		Potentially Significant
c) Natural communities (e.g. oak woodland, coastal habitat, etc.).		Potentially Significant
d) Wetland habitat (e.g. marsh, riparian, and vernal pool)?	X	
e) Wildlife dispersal or migration corridors?		Potentially Significant

Biological Resources - Discussion

Issues: Biological resources issues involve the potential for a project to substantially affect biologically-important natural vegetation and wildlife, particularly species that are protected as rare, threatened, or endangered by federal or state wildlife agencies and their habitat, native specimen trees, and designated landmark or historic trees.

Impact Evaluation Guidelines: Existing native wildlife and vegetation on a project site are qualitatively assessed to identify whether they constitute important biological resources, based on the types, amounts, and quality of the resources within the context of the larger ecological community. If important biological resources exist, project effects to the resources are qualitatively evaluated to determine whether the project would substantially affect these important biological resources. Significant biological resource impacts may potentially result from substantial disturbance to important wildlife and vegetation in the following ways:

- Elimination or substantial reduction or disruption of important natural vegetative communities and wildlife habitat or migration corridors, such as oak woodland, coastal strand, riparian, and wetlands.
- Substantial effect on protected plant or animal species listed or otherwise identified or protected as endangered, threatened or rare.
- Substantial loss or damage to important native specimen trees or designated landmark or historic trees.

Biological Resources – Existing Conditions and Project Impacts

3. a-e) Native Wildlife and Habitat

Existing Habitats

The City Master Environmental Assessment identifies the project site as having several biotic communities, including southern oak woodland, riparian woodland and creek, coastal sage scrub and orchard. A Biological Assessment has been prepared by Hunt and Associates Biological Consulting Services for all five properties of the campus (**Exhibit E**). Additionally a Tree Assessment and Protection Plan has been prepared by Bill Spiewak for those areas potentially impacted by the project (**Exhibit F**). Both of these documents are hereby incorporated by reference and relevant portions are summarized below. The west side of the site (APN 049-440-015; -016; and -050) contains a pristine oak woodland that is identified by the Conservation Element as one of two pristine stands of Southern Oak Woodlands in the City. This habitat is designated as highly sensitive in the City’s Conservation Element, and is considered sensitive habitat by the California Department of Fish and Game (CDFG) and the County of Santa Barbara, as described in the Biological Assessment. Coastal sage scrub and grassland habitats are intermixed amongst and adjacent to the oak woodland stand. The City’s Conservation Element considers coastal sage scrub and grassland habitats to have medium and low sensitivity respectively. Coastal sage scrub is also considered a sensitive habitat by CDFG and the County of Santa Barbara. According to the Biological Assessment, past farming practices and more recent fuel management activities have disturbed the oak woodland and coastal sage scrub areas immediately west of the existing structures on the campus. The report characterizes these border areas as being mostly devoid of woody vegetation, with a scattering of coast live oaks, ornamental trees and shrubs.

The main portion of the existing Valle Verde campus is landscaped with mostly non-native ornamental trees, shrubs, and ground cover, with a number of mature coast live oaks and a few mature western sycamores scattered throughout the

facility. Also found on the campus grounds are coast redwood, Monterey pine and Monterey cypress. A portion of the Arroyo Burro Creek and associated riparian area runs along the eastern property line of APN 049-040-054 and just south of Calle de Los Amigos east of the Valle Verde Campus. These riparian areas are considered sensitive by the City, County, and CDFG, but would not be impacted by the project because no development is proposed in this area. There is no wetland habitat identified in or directly adjacent to the project impact area. The biological report identifies four special-status annual plants species that have some potential of being present on the project site, including Catalina mariposa lily (CNPS List 4), Nuttall's snapdragon (Locally Sensitive); Santa Barbara bedstraw (CNPS List 4), and Suffrutescent wallflower (CNPS List 4). However, no special-status plants were observed within or adjacent to the project area during site visits by the consulting biologist.

In 1984, as part of their project approval, Valle Verde was required by the Planning Commission to dedicate four acres of oak woodland to be preserved as open space in perpetuity to mitigate for the loss of 13 oak trees. However, this dedication was never recorded. The current proposal would place development restrictions on the original four acres of oak woodland, as well as an additional five acres, bringing the total restricted oak woodland acreage to 9.8 acres.

Tree Removal

A Tree Assessment and Protection Plan was prepared by Bill Spiewak (**Exhibit F**) that inventoried all trees within and adjacent to all proposed impact areas, and assessed the project's impacts on these trees. Impacts were classified in one of four categories **1**) Removal; **2**) Significant Impact (over 20% of the root zone impacted and the tree likely to be impacted); **3**) Borderline Impact (approximately 20% of root zone impacted; however, the impact area already disturbed and tree protection measures likely to save trees); and **4**) No Impact (less than 20% of root zone impacted or no encroachment). According to the report, 15 oaks would be removed, and impacts to six additional oak trees are considered borderline depending on the limits of construction for the project. The twenty-one oak trees to be removed and/or considered in the Borderline Impact category range in diameter from 4" to 20," with six having a diameter of 16" or more. Construction of the employee and staff parking lot located on APN 049-040-053 and the four residential units proposed on APN 049-040-050 would result in the removal of 10 oak trees with trunk diameter ranging from 4" to 8". On APN 049-440-015 (Rutherford Property) and APN 049-440-016, construction of the residential units, roadway and parking area would also result in the removal of five oaks, with trunk diameters ranging in size from 7" to 16". The potentially impacted oaks are all located in the existing fuel modification clearance area adjacent to existing structures that has undergone repeated disturbance, but is adjacent to extensive closed-canopy coast live oak woodland.

As described above, the Biological Assessment concludes that the existing coastal live oak woodland and coastal sage scrub, which border the proposed expansion areas, are considered sensitive by the California Department of Fish and Game and the County of Santa Barbara. Additionally, the oak woodland stand existing on site is identified as a highly sensitive habitat in the City's Conservation Element. As noted above, the Southern Oak Woodland located on the project site is considered pristine, and viable as an undisturbed habitat. The oak trees serve to control the micro-environment around them by producing shade to lower temperatures. These trees also provide shelter, food, and space for many animals. Policies in the Conservation Element support the protection and preservation of the Southern Oak Woodland habitat as well as individual oak trees. The Conservation Element also calls for the integration of mature trees into project design rather than their removal. Biological Resources Policy 4.0 of the Conservation Element directs that, where feasible, the City's remaining stands of Southern Oak Woodlands be preserved. Policy 4.2 directs that all feasible options be exhausted prior to the removal of trees, and Policy 4.3 requires that major trees removed be replaced on a minimum of one-for-one basis.

The applicant has worked diligently to consider numerous options that would minimize the removal of oak trees. The original project proposal identified the loss of as many as 30 oak trees. Revisions made by the applicant to the proposed development areas allowed for the preservation of 15 oak trees. Additionally, the majority of trees potentially impacted are small. In total, the number of trees to be removed or impacted (including borderline impact) constitutes approximately 4% of the total number of oaks on the Valle Verde properties. The Tree Assessment and Protection Plan and Biological Assessment recommend numerous tree protection measures during construction and require monitoring of the site during and following construction. Any oaks to be removed or impacted would be replaced at a minimum 10:1 ratio to ensure that an adequate number of trees survive. These measures are outlined below in the required Mitigation Measures BIO-1 and BIO-3.

The tree assessment provided by Bill Spiewak concluded that the impacts to southern oak woodland could be considered less than significant; however, an additional assessment by Brian Trautwein stated there could be substantial impacts to the oak woodland, which has led to a disagreement between experts. Therefore, the impact to the oak woodland is *potentially significant* and will be assessed as part of an EIR. Preliminary Biological Mitigations are included in this initial study and, depending on the conclusion of the EIR, additional mitigations could be required.

In addition to oaks, the project may cause a minor impact to one large native sycamore tree. The Tree Assessment and Protection Plan recommends replacement of this sycamore tree at a minimum of a 3:1 ratio should impacts occur. This mitigation could reduce any potential impacts and will be further analyzed in an EIR. Additionally, 11 large non-native trees and 69 small to medium sized non-native trees would be potentially impacted. While not considered to have significant habitat impacts, removal of these trees does affect the aesthetics and views in the area. These issues and required landscaping plans are discussed further in Section 1. Aesthetics.

Fuel Modification

Routine fuel modification practices have encroached into the oak woodland and coastal sage scrub existing on the Valle Verde property. Currently, a 100-foot buffer zone is maintained around structures along the western edge of the project area, through either vegetation modification (clearance of shrubs, mowing, and trimming of trees) or planting of fire resistant landscape vegetation. All proposed structures would be placed in previously disturbed oak woodland, chaparral, or non-native areas. However, development would place structures within portions of the currently maintained fuel modification buffer, therefore extending the fuel modification zone upslope into the undisturbed coastal sage scrub and oak woodland habitat. Although, the project site is not designated as a high fire hazard area, the City Fire Department has indicated that the oak woodland area adjacent to the proposed development poses a wildland fire hazard.

As discussed in the Section 6. Hazards below, a 75-foot defensible space would be required from each structure proposed for development adjacent to, or in close proximity to the oak woodland or coastal sage scrub areas. Reducing the fuel management zone from 100 feet to 75 feet would result in fewer and less intense impacts to native vegetation. Approximately 1.5 acres of oak woodland and coastal sage scrub habitats would be relieved of fuel management activities due to existing structures and replanted with native vegetation. However, approximately 0.3 acres of undisturbed oak woodland and coastal sage scrub habitat would be impacted as a result of the proposed fuel modification for new structures. As described in Section 6. Hazards, the fuel modification in this area includes thinning of shrub habitat and trimming of low limbs on oak trees. While the entire habitat is not proposed for complete removal, these fuel modification activities reduce the functional capacity and diversity of the habitat and promote invasion by non-native plants. This impact to coastal sage scrub and oak woodland habitat could be reduced with the implementation of Required Mitigation Measures BIO-3. However, as stated above a habitat assessment was provided during the comment period for the original initial study comment period, stating that the modified fuel management program would cause impacts to the coastal sage and oak woodland. Therefore, the fuel modification will be studied further under in an EIR, thus the impacts *are potentially significant*. In addition, Mitigation Measure AES-1 requires the City's Environmental Analyst to review and modify (if necessary) landscaping plans prior to building permit approval to ensure that only native plant material is used adjacent to existing riparian, oak woodland, and coastal sage scrub habitats and any specimen sycamore trees impacted are replaced at a 3:1 ratio as further described in Section 1., Aesthetics.

The timing of vegetation modification could also affect nesting birds if it is not timed properly to avoid the breeding season. These potential impacts are discussed below.

Wildlife

On September 18, 2006 and again on September 26, 2006, Lawrence E. Hunt (Exhibit E) surveyed all parts of the Valle Verde campus and the proposed expansion areas on foot. The surveys served to characterize the existing biological conditions in the proposed development areas, as well as identify special-status plants, animals, and habitats. Wildlife species inhabiting the property include a wide variety of species typical of coast live oak and coastal sage plant communities. The report identifies many of the landscape within the Valle Verde campus as providing suitable roosting, foraging and/or nesting habitat for special-status birds, such as raptors, resident and migratory passerines, and bats. The report identifies 40 special-status wildlife species that have the potential to exist within or adjacent to the project area based on either known occurrence in the immediate area or known occurrence in the region and the presence of suitable habitat in the project area. Silvery legless lizards have a high potential of existing on the project site because of the sandy soils found on-site. As well, coast horned lizards may also be found because of the presence of favorable vegetation and soil types. Allen's hummingbird, California thrasher, Cooper's hawk, and loggerhead shrike have been observed in and directly adjacent to the project area during surveys conducted by the consulting biologist. No nests were found during surveys. All of the species potentially present or found during surveys in the affected project area are designated California Species of Special Concern, Federal Sensitive Species, Migratory Non-game Bird Species of Management Concern, or Species of Local Concern. The Biological Assessment does not identify any Federal or State threatened or endangered species as potentially located in or directly adjacent to the area of project affect.

Development of the property would include the removal of 15 oak trees and disturbance to approximately 0.3 acres of undisturbed oak woodland and coastal sage scrub habitat, as a result of fuel modification needed to protect new structures from fire hazard. Additionally, approximately 7 large non-native trees and 69 small to medium sized non-native trees

would be potentially removed or severely impacted. This development of the property would reduce the available habitat of some wildlife species from the project vicinity. Wildlife which could nest onsite may be unable to tolerate the level of disturbance from occupation of the new homes. Mammal species could be restricted from some areas of the site if the property is developed. Required Mitigation Measure BIO-3 ensures the restoration of approximately 1.5 acres of oak woodland and coastal sage scrub habitat as proposed by the applicant. Additionally, the applicant is required through Mitigation BIO-3 and AES-1 to replace lost oaks at a 10:1 basis, replace any lost sycamore trees at a 3:1 basis, and replace large skyline/specimen non-native trees at a 1:1 basis. Given these restoration requirements, the proximity of disturbance areas to existing structures, the large amount of habitat retained as part of the project, and the lack of potential for endangered or threatened species, permanent impacts to sensitive wildlife habitats due to habitat removal could be less than significant. However, the impacts to wildlife will be reviewed in an EIR and therefore the impacts are potentially significant.

A variety of wildlife species could be adversely affected by the presence of lights from the proposed development. Nocturnal species which rely on darkness to hunt or evade predators would be especially affected, including owls, nighthawks, and small mammals. On the other hand, certain species of aerial-foraging bats may be aided by night-lighting as these light sources are foci of activity for many flying insects. Impacts relating to lighting could be considered potentially significant and will be examined further in an EIR. Mitigation Measure BIO-4, which requires the applicant to use minimal lighting and direct all lighting downward, will be considered in the mitigations for the EIR.

Construction activities could disturb nesting birds or sensitive species potentially present on the property through direct removal, noise, traffic, erosion, and increased human activity at the site. As described in the following Noise, Traffic, and Water Quality sections, all potentially significant impacts related to construction noise, traffic, and water quality can be mitigated with the implementation of mitigation measures. Mitigation Measure BIO-2 also requires a qualified biologist to survey the project area prior to construction for nesting birds and sensitive species. Surveys shall be conducted not more than 3 days prior to commencement of construction activities. Should nesting birds or sensitive species be found, the biologist is required to implement a plan to avoid impacts to these species. Additionally, a biologist would be required to monitor during initial grading activities in order to prevent impacts to any silvery legless lizards potentially on the property. Construction related impacts to wildlife species would be considered potentially significant and will be reviewed as part of the EIR.

Biological Resources – Mitigation

The following Mitigations have been preliminarily identified based upon the Tree Assessment and Protection Plan and the Biological Assessment prepared to date. As part of the EIR, these Mitigations may be revised as appropriate and additional Mitigations may be identified.

BIO-1 Oak Tree Protection (Short-Term). Tree protection measures recommended in the Tree Assessment and Protection Plan dated November 12, 2008, are listed below and shall be followed, as specified, for the duration of all grading and construction activities associated with the project. Additionally, all recommended mitigation measures identified in the Biological Assessment prepared by Hunt & Associates Biological Consulting Services dated September 28, 2006 amended April 25, 2008 and December 18, 2008 are also listed below and shall be implemented, as:

1. **Pre-Construction Conference.** A pre-conference meeting with all contractors shall be held to discuss tree protection mitigation measures prior to any construction activity.
2. **Arborist Monitoring.** A qualified arborist shall monitor activities within the CRZs during demolition and grading and construction phases to ensure that tree protection zones are maintained as designated on the plan. Prior to issuance of any grading permits, the applicant shall submit a draft contract with a qualified arborist for the review and approval of the Environmental Analyst.
3. **Tree Protection Measures.** All trees not indicated for removal on the site plan shall be preserved, protected, and maintained, in substantial accordance with the Tree Assessment and Protection Plan dated November 12, 2008. The following measures shall be noted on the grading plan submitted to the building department prior to issuance of grading permit and implemented prior and during construction-related activities to ensure the protection of trees:
 - a. Tree protection fencing and barriers shall be installed as indicated on the fencing plan.
 - b. Fences shall be chain link or orange plastic, four to six feet high and positioned at the Critical Root Zone (CRZ) as specified in the tree inventory table and illustrated on the site maps of the Tree Assessment and Protection Plan.

- c. CRZs shall have a radius measured from the center of the trunk to the outside edge of the CRZ, wherever possible. If work is approved within the CRZ, the fence shall be placed at the outside edge of the work zone.
- d. Fencing shall remain upright and intact throughout the duration of the project.
- e. Construction related activities shall be prohibited within the Tree Protection Zones (TPZ), including the use of heavy equipment, storage of materials, or accumulation of soil for later use.
- f. Demolition and excavation within TPZs of all native and non-native trees shall be done by hand where reasonable. Reasonableness shall be determined by the Project Environmental Coordinator, Supervising General Contractor and the Project Arborist.
- g. Special attention shall be given to construction related activity around sycamore #104 and all oak trees to minimize impacts. Three 24-inch boxed sycamores shall be planted to mitigate impacts to sycamore #104.
- h. Any roots encountered within the CRZs of trees, even if outside the TPZs shall be cleanly cut back to an undisturbed section of the root zone. In areas where roots are cut, the soil profile shall be irrigated to reduce drying of newly exposed soil and subsequent damage to remaining roots in that profile. The Project Arborist shall determine the quantity, area and frequency of irrigation to the disturbed area.
- i. A permethrin-based pesticide (Astro) shall be applied to the lower six feet of oak tree trunks stressed from root cutting in the early Spring and late Summer (through September), to reduce the risk of attack by fatal oak bark beetles. It may need to be repeated for several years at the discretion of the City Arborist.
- j. Tree removal should, to the extent feasible, be scheduled between August 1 and November 1 to avoid bird nesting season.

BIO-2 Biological Monitoring. Prior to issuance of any grading or building permits, the applicant shall submit a draft contract with a qualified biologist for the review and approval of the Environmental Analyst. The following monitoring activities, as outlined in the Biological Assessment dated December 18, 2008, shall be implemented:

- 1. A qualified biologist shall supervise the installation of the construction fencing around all work areas and access roads. Fencing shall be maintained through the duration of project construction.
- 2. A qualified biologist shall be retained to survey trees and shrubs in the project area for nesting birds or any special status animals prior to commencement of any grading or vegetation removal activities. Surveys should be conducted no more than three (3) days prior to initial grading or vegetation removal. Any vegetation found to contain active nests of any raptors or sensitive bird species shall be left alone until fledging has been completed. If any special-status species are found, the biologist shall submit for the review and approval of the environmental analyst a plan for either the relocation or avoidance of these species, whichever is appropriate. This plan should be prepared in consultation with CDFG and/or USFWS depending on the species. Work shall not commence until the plan has been approved and implemented.
- 3. A qualified biologist shall be present during initial grading of parking lot area to direct equipment operator(s) to make first pass removing only vegetation and top three inches of topsoil. The biologist shall salvage any legless lizards or other animals uncovered during this activity and determine if second or third "lifts" of soil are necessary to salvage additional animals.

BIO-3 Biological Restoration Plan. Prior to issuance of grading or building permits, restoration plans prepared by a qualified biologist shall be submitted for review and approval by the City's Environmental Analyst that include the following:

- 1. The plan shall include all recommendations relating to restoration and tree replacement contained in the Biological Assessment and Tree Assessment and Protection Plan prepared for the project.
- 2. The plan shall include a planting palette, planting design, source of plant material, and plant installation.
- 3. Monitoring of the restoration area shall occur for a minimum of five (5) years. Monitoring reports shall be submitted annually and at the completion of the five year period. If the final report indicates that the restoration project has in part or in whole been unsuccessful based on the performance standards specified in the restoration plan, the applicant shall submit within 90 days a revised or supplemental restoration program.
- 4. All plantings should be maintained for the life of the project.

5. All cleared, graded, or disturbed areas on the subject site shall be planted and maintained for erosion control purposes as soon as feasible following initial disturbance.
6. A minimum oak tree replacement ratio of 10:1 shall be required to mitigate the loss of the 15 coast live oaks. A minimum survivorship ratio of 8:1 after three years post-planting shall be achieved. Acorns collected from on-site oak trees shall be used. One hundred fifty oak saplings, one gallon in size shall be planted in areas between the new structures on the west side of the property (project north) and the oak woodland. Additional trees shall be planted if damage occurs to existing trees during construction related activities.
7. All disturbed soils around the margins of the development proposed on the western side of the campus adjacent to the existing oak woodland shall be hydroseeded with a native coastal sage scrub seed mix using native species found in adjacent habitats. Seed shall be collected from locally-occurring plants (either on-site or within the south coast of Santa Barbara County).
8. Existing areas currently undergoing fuel modification but proposed to no longer be disturbed (approximately 1.5 acres) adjacent to the oak woodland on the western side of the property shall be cleared of existing invasive, non-native species (oleander, ice plant, ivy, etc.) and replanted with native, locally-occurring ground over, brush and trees found in the oak woodland and coastal sage scrub habitats.
9. Trees may be grown from acorn collected on-site or purchased from a local nursery that grows trees from local seed.
10. Planting shall be undertaken immediately after completion of construction.
11. Cages around the saplings shall be installed during planting to prevent wildlife from damaging the young trees. Weeds shall be controlled and a 2-3 inch layer of mulch shall be placed around the trees, but not against the stems. Newly planted saplings shall be irrigated with drip or other water source for the first two years, until the saplings are established.
12. All trees removed during construction shall have their trunks and large limbs cut into three to four-foot long sections and scattered around adjacent natural habitat to function as microhabitat for small animals.

BIO-4 Night Lighting. In addition to compliance with the Lighting Ordinance, all night-lighting shall be of the minimum wattage necessary for public safety and shall be shielded and down-directed to prevent stray light from illuminating the adjacent oak woodland, consistent with the City's Lighting Ordinance.

Biological Resources - Residual Impacts

Implementation of the required mitigation measures could lessen potential biological resources impacts; however a final determination of residual impacts shall occur in an EIR.

4. CULTURAL RESOURCES	NO	YES
Could the project:		<i>Level of Significance</i>
a) Disturb archaeological resources?		Less than Significant
b) Affect a historic structure or site designated or eligible for designation as a National, State or City landmark?	X	
c) Have the potential to cause a physical change which would affect ethnic cultural values or restrict religious uses in the project area?	X	

Cultural Resources - Discussion

Issues: Archaeological resources are subsurface deposits dating from Prehistoric or Historical time periods. Native American culture appeared along the channel coast over 10,000 years ago, and numerous villages of the Barbareno Chumash flourished in coastal plains now encompassed by the City. Spanish explorers and eventual settlements in Santa Barbara occurred in the 1500's through 1700's. In the mid-1800's, the City began its transition from Mexican village to American city, and in the late 1800's through early 1900's experienced intensive urbanization. Historic resources are above-ground structures and sites from historical time periods with historic, architectural, or other cultural importance.

The City's built environment has a rich cultural heritage with a variety of architectural styles, including the Spanish Colonial Revival style emphasized in the rebuilding of Santa Barbara's downtown following a destructive 1925 earthquake.

Impact Evaluation Guidelines: Archaeological and historical impacts are evaluated qualitatively by archeologists and historians. First, existing conditions on a site are assessed to identify whether important or unique archaeological or historical resources exist, based on criteria specified in the State CEQA *Guidelines* and City Master Environmental Assessment *Guidelines for Archaeological Resources and Historical Structures and Sites*, summarized as follows:

- Contains information needed to answer important scientific research questions and there exists a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with an important prehistoric or historic event or person.

If important archaeological or historic resources exist on the site, project changes are evaluated to determine whether they would substantially affect these important resources.

Cultural Resources – Existing Conditions and Project Impacts

4. a) Archaeological Resources

The City Master Environmental Assessment (MEA) *Cultural Resources Sensitivity Map* identifies a portion of APN 049-040-053 and -054 within a Prehistoric Sites and Water Course Sensitivity Zone. Development proposed in these areas involves the construction of residential units, parking areas and upgrades to Common Area facilities, including the Administration Building. On December 20, 2008, an intensive field survey of the entire property was conducted by David Stone, M.A., Stone Archaeological Consulting, which is incorporated in this section by reference and summarized below. Soils in the proposed development area were closely inspected in parallel transects spaced no greater than two meters (six feet) apart. Shovel scrapes were performed in areas of less ground surface visibility. Good ground surface visibility was observed within the proposed development. Therefore, the overall reliability of the survey in the areas of potential impacts is considered good. No prehistoric or historic cultural materials were identified.

Based on absence of prehistoric cultural remains, as well as the overall good to excellent reliability of the surface survey, the report concludes that the proposed project is not considered to have the potential to impact intact significant or important historic or prehistoric cultural remains. Project impacts to archaeological resources are therefore, *less than significant*. However, as with any ground disturbing activity, there is the remote possibility of encountering unknown buried deposits. For this reason contractors and construction personnel should be alerted to the possibility of encountering archaeological resources within the project parcel. If archaeological resources are encountered, work in the area of the find should be halted and a professional archaeologist consulted.

4. b) Historic Resources

The existing residential unit on the Rutherford property is proposed to be demolished as part of the project. Preservation Planning Associates prepared a Historic Structures/Sites Report (**Exhibit G**) for the project, which identifies the structure as a “vernacular house of the 1950’s, which does not have historic significance.” It is not known when the house was constructed. There is no building permit; however it is believed that the house may have been constructed in 1955 for Stephen and Verde Rutherford. In 1986 after Verde Rutherford’s death, the property was annexed to the City and subsequently sold to the American Baptist Homes of the West by Mrs. Rutherford’s heirs. Presently, a Valle Verde employee is occupying the house.

The house is set within mature trees at the top of a knoll accessed by a paved driveway from Calle Sastre within the Valle Verde campus. The residence is primarily surrounded by dirt, with no landscaping, except for mature trees. The subject house is a one-story wood-framed L-shaped house, clad in a rough-finished stucco siding. The structure has been altered with a front entrance door, concrete steps and a porch. The report states it is unusual that the no patios or exterior terraces exist, which are normally associated with the indoor/outdoor design of 1950’s houses. The condition of the house is deteriorating, with stucco spalling from the base of the walls and rust evident on the metal sash windows.

The report concluded that the dwelling unit is not eligible for the California Register of Historic Resources or for designation as a City Structure of Merit or a Landmark. Because the house is not considered an historic resource pursuant to CEQA standards, demolition of the structure will not result in a potentially significant impact. Therefore, no mitigation was required. The Historic Landmarks Commission reviewed and accepted the Historic Structures Report and its

conclusions on March 7, 2007. No impacts to historical resources would occur as a result of the proposed demolition of the existing residence.

4. c) Ethnic/Religious Resources

There is no evidence that the site involves any ethnic or religious use or importance. The project would have no impact on historic, ethnic or religious resources.

Cultural Resources – Recommended Mitigation

CR-1 Unanticipated Archaeological Resources Contractor Notification. The following information should be printed on the grading plans submitted to the building department prior to issuance of a grading permit:

Prior to the start of any vegetation or paving removal, demolition, trenching or grading, contractors and construction personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts associated with past human occupation of the parcel. If such archaeological resources are encountered or suspected, work shall be halted immediately, the City Environmental Analyst shall be notified and an archaeologist from the most current City Qualified Archaeologists List shall be retained by the applicant. The latter shall be employed to assess the nature, extent and significance of any discoveries and to develop appropriate management recommendations for archaeological resource treatment, which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a Barbareño Chumash representative from the most current City qualified Barbareño Chumash Site Monitors List, etc.

If the discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the Coroner determines that the remains are Native American, the Coroner shall contact the California Native American Heritage Commission. A Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

If the discovery consists of possible prehistoric or Native American artifacts or materials, a Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

Cultural Resources – Residual Impacts

Project specific impacts would be less than significant and further reduced by the recommended mitigation measure.

5. GEOPHYSICAL CONDITIONS Could the project result in or expose people to:	<i>NO</i>	<i>YES</i> <i>Level of Significance</i>
a) Seismicity: fault rupture?		Less than Significant
b) Seismicity: ground shaking or liquefaction?		Less than Significant
c) Seismicity: seiche or tsunami?	X	
d) Landslides or mudslides?		Potentially Significant, Mitigable
e) Subsidence of the land?		Less than Significant
f) Expansive soils?		Less than Significant
g) Excessive grading or permanent changes in the topography?		Less than Significant

Geophysical Conditions - Discussion

Issues: Geophysical impacts involve geologic and soil conditions and their potential to create physical hazards affecting persons or property; or substantial changes to the physical condition of the site. Included are earthquake-related conditions such as fault rupture, groundshaking, liquefaction (a condition in which saturated soil loses shear strength during earthquake shaking); or seismic sea waves; unstable soil or slope conditions, such as landslides, subsidence, expansive or compressible/collapsible soils; or erosion; and extensive grading or topographic changes.

Impact Evaluation Guidelines: Potentially significant geophysical impacts may result from:

- Exposure to or creation of unstable earth conditions due to seismic conditions, such as earthquake faulting, groundshaking, liquefaction, or seismic waves.
- Exposure to or creation of unstable earth conditions due to geologic or soil conditions, such as landslides, settlement, or expansive, collapsible/compressible, or expansive soils.
- Extensive grading on slopes exceeding 20%, substantial topographic change, destruction of unique physical features; substantial erosion of soils, overburden, or sedimentation of a water course.

Geophysical Conditions – Existing Conditions and Project Impacts

5. a-c) Seismic Hazards

Fault Rupture: The Valle Verde facility is located in a seismically active region typical of southern California, and within the general vicinity of mapped active and potentially active faults. The site is not within a State of California Fault Hazards Zone. The closest known active or potentially active fault is the Lavigia fault. The Lavigia fault is mapped trending southeasterly from the west side of Hope Ranch towards the La Mesa Hill area of Santa Barbara. The Lavigia fault has been mapped south of the site within the mid-slope area of Campanil Hill by Dibblee (1987), Olson (1982) and Gurrola (2002). It was also mapped by Hoover (1978) trending toward the site from the east. A Geotechnical Report (**Exhibit H**) was prepared for the project site by Fugro West, Inc., in October 2006 and updated in February 2008. As part of these studies, a 245-foot trench in a north-south direction was excavated to depths of up to 14 feet on the Rutherford property. The report documents that no evidence of faulting was encountered and suggests that the Lavigia fault is likely south of the Rutherford property as mapped by most investigators. Based on this, the report concludes that the project site has a “low” potential to experience surface fault rupture resulting from an earthquake on one of the mapped faults. Therefore, fault rupture impacts are considered *less than significant*.

Ground Shaking and Liquefaction: Evidence of faulting was not discovered in the trench on the Rutherford property, however, the project site is located in a seismically active area of Southern California. Significant ground shaking as a result of a local or regional earthquake is likely to occur during the life of the project. The potential for ground shaking is considered a *less than significant* impact because of the distance to the nearest know fault. Future development would be required to comply with building code requirements that would minimize potential hazards associated with ground shaking.

The MEA identifies the project site as having a “conditional or questionable” potential for liquefaction. The geotechnical reports prepared for the project (**Exhibit H**) states that, in the event of a strong earthquake, surface effects of liquefaction are expected to be slight due to the depth of the groundwater table. Because groundwater was found at 27 to 33 feet below the surface in four test drilling areas, the report concludes that there is not a particularly high potential for liquefaction. However, the report cautioned that if there is a rise in the mean water table at the site, it may result in increased post-liquefaction settlement of the ground surface in liquefiable areas and the report recommends that a determination of the groundwater depth shall occur prior to construction shall occur to ensure the water table has not risen. Based upon the level of the water table, the geotechnical analysis will include a recommendation of the appropriate foundation consistent with the current building code. Conformance with building code would mitigate any potential impacts to a *less than significant level*.

Seiche or Tsunami: The City’s Master Environmental Assessment (MEA) Geophysical maps identify the project site as not subject to seismic waves that could be induced in lakes (seiche) or the ocean (tsunami) or associated run-up areas. There are no open bodies of water that could result in an increase in tsunami-related risk. Impacts associated with these hazards are not expected to occur. Therefore, there would be *no impact* related to seismic hazards such as seiche or tsunami.

5. d-f) Geologic or Soil Instability

Landslides and Surficial Stability: The project site has some areas with relatively steep slopes, and portions of the project site are identified by the MEA as being potentially subject to heavy damage to structures from problems associated with slope stability. The Geotechnical Reports prepared by Fugro West, Inc. for the project in 2006 and 2008 (**Exhibit H**), state that the project site is located in an area of high landslide potential due to weak, erodible bedrock materials of the Santa Barbara Formation and the moderately to steep sloping terrain on the site.

Data reviewed by Fugro, Inc. does not show known mapped landslides on the ascending slopes above the Rutherford property, maintenance building area, or West campus development. According to the reports, observed subsurface conditions also do not support large-scale landsliding onsite. It should be noted that there are numerous older and recent

landslides mapped in the Rincon Formation along the north flank of Campanil Hill south of the project site. The areas of active landsliding on the Campanil Hill slope are believed to be substantially southeast of the Rutherford property so that it would be highly unlikely that there are landslide hazards above Torino Drive that would directly impact the proposed residential development on the Rutherford property including access from Torino Drive. Impacts from deep seated landslides are, therefore, considered *less than significant*.

However, shallow slope instabilities, earthflows, and erosional features consistent with moderate to steep slopes within the Santa Barbara Formation are likely to be present within the ascending slopes of the hillside areas above the proposed development areas. The geotechnical reports determine that these surficial stability hazards could significantly impact the proposed development areas if design recommendations outlined in the report are not implemented. Mitigation Measure GEO-1 requires the applicant to submit final plans in substantial conformance to the recommendations of the geotechnical reports. Therefore, impacts from shallow slope instabilities, earthflows, and erosional features are considered *significant, but mitigable*.

5. e-f) Subsidence & Expansive Soils

Subsidence: The geotechnical study stated that the potential for subsidence on the site is considered low due to the current level of the water table. The study included a recommendation to re-examine the water table level prior to construction to determine if there is any rise in the water table. Therefore, based upon current water table conditions, impacts related to subsidence under normal conditions would be *less than significant*.

Expansive Soils: Soils on the project site are considered to be minimally expansive, and foundation recommendations by the project geotechnical report (mitigation measure GEO-1) would further ensure expansive soil-related impacts are *less than significant*. No additional mitigation measures are required.

5. g) Topography; Grading; Erosion

Topographic Changes/Grading: The proposed project would result in approximately 11,520 cubic yards of cut and 13,300 cubic yards of fill, with 1,780 cubic yards of import. The majority of the excavation (6,800 cubic yards) would occur on the Rutherford parcel (APN 049-440-015) to accommodate grading for 10 residential units, an access road, parking area, and retaining walls. Overall grading and development proposed for the Rutherford property, employee/visitor parking lot and residential units on APN 049-040-050 would alter the existing landform of these areas.

The project is designed to avoid the majority of the project site's steep slopes on the west side of the development, consistent with Policies 2.0 and 2.1 of the City's Conservation Element that require minimization of development of slopes exceeding 30%. However, the proposed access driveway from Calle Sastre to the new units on the Rutherford property, as well as the employee/visitor parking lot, would be located in small areas of slopes greater than 30%. According to the Geotechnical Report prepared for the project, the proposed access driveway from Calle Sastre is sited in an area that has previously been disturbed because of the existing dirt driveway that serves the single family residence on the property. Likewise, previous grading likely occurred in the area of the proposed employee parking lot and clearly in the area of the maintenance building. The majority of steep slopes that will be graded, therefore, were created from piling and cutting artificial fill from previous construction projects. Because these 30% or greater sloped areas appear to have been created during previous development on the property and impacts to these areas are minimized and avoided to a large extent, impacts associated with project grading would be considered *less than significant*.

Geophysical Conditions – Required Mitigation

GEO-1. The final project plans reviewed and approved by the City building Division prior to issuance of any grading or building permits shall show that the project is constructed in accordance with California Building Code requirements and the recommendations contained in the Geotechnical Report prepared by Fugro West, Inc., dated October 2006, updated on February 18, 2008 regarding site preparation, grading, paving, foundation design, retaining walls, and construction plans.

Geophysical Conditions – Residual Impacts

Implementation of the required site preparation and structural design measures would mitigate potential geologic hazards to less than significant levels.

6. HAZARDS Could the project involve:	NO	YES <i>Level of Significance</i>
a) A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation)?		Less than Significant
b) The creation of any health hazard or potential health hazards?		Less than Significant
c) Exposure of people to existing sources of potential health hazards?		Less than Significant
d) Increased fire hazard in areas with flammable brush, grass, or trees?		Potentially Significant, Mitigable

Hazards - Discussion

Issues: Hazardous materials issues involve the potential for public health or safety impacts from exposure of persons or the environment to hazardous materials or risk of accidents involving combustible or toxic substances.

Impact Evaluation Guidelines: Significant impacts may result from the following:

- Siting of incompatible projects in close proximity to existing sources of safety risk, such as pipelines, industrial processes, railroads, airports, etc.
- Exposure of project occupants or construction workers to unremediated soil or groundwater contamination.
- Exposure of persons or the environment to hazardous substances due to improper use, storage, or disposal of hazardous materials.
- Siting of development in a high fire hazard areas or beyond adequate emergency response time, with inadequate access or water pressure, or otherwise in a manner that creates a fire hazard

Hazards – Existing Conditions and Project Impacts

6. a-c) Public Health and Safety

Health Hazards

Staff has reviewed the Cortese List, a compilation of the following:

- (1) All hazardous materials release.
- (2) All public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis.
- (3) All underground storage tanks for which an unauthorized release report is filed.
- (4) All solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the Department of Toxic Substances Control.
- (5) All cease and desist orders that concern the discharge of wastes that are hazardous materials.
- (6) All solid waste disposal facilities from which there is a known migration of hazardous waste.

The project site is not located on or adjacent to land subject to the Cortese List. A Leaking Underground Fuel Tank (LUFT) clean-up site at the La Cumbre Country Club (4014 Via Laguna) is located approximately 2,500 linear feet to the north of the project site. Land uses near the facility are predominately residential uses, which would not result in a substantial use of hazardous materials or result in significant hazardous material/waste impacts to residents of the proposed project.

Residential and commercial uses associated with the retirement community would not be a substantial source of hazardous materials or waste that would have the potential to result in significant environmental impacts. Additionally, current local regulations, which require permits and regular inspections, would be applicable to the handling of any hazardous being generated by the project. Hazardous materials use and storage associated with the residential uses on the

property would be limited to small amounts of common household, automotive, and gardening supplies, such as cleansers, paint, motor oil, and pesticides. Biohazard waste (blood, infectious material, sharps, etc.) is stored on-site in approved containers and is removed by a contract service. The storage, handling and disposal of hazardous materials/waste generated by the skilled nursing and hospice facilities occupying the project site is required to adhere to applicable local, state and federal regulations. Electronic waste, typical of what is used in either homes or offices, such as computers, appliances and other items would also be disposed of consistent with current regulations.

While the construction and operation of the project may use hazardous materials, the amount associated with construction and operation would be minor and subject to all applicable federal, state, and local laws, regulations, and policies pertaining to hazardous materials. The risk to the public would be minimal. Other hazards, including air toxics, flooding and geologic processes are discussed in other sections of this Initial Study. Compliance with existing regulations would be adequate to ensure that hazardous material/waste impacts are *less than significant*.

6. d) Fire Hazard

The proposed new buildings are located on the western boundary of the Valle Verde property. The property lies just north of the City's designated high fire hazard area (Coastal Zone). The property is not part of this high fire hazard area; however, the dense oak woodland and chaparral area adjacent to the proposed development poses a wildland fire hazard to the Valle Verde community. The Fire Department was asked to review plans for the proposed development on the Valle Verde property and has determined that the area is subject to a relatively high fire risk resulting in a *potentially significant, mitigable* impact to public safety from fire.

The 2007 California Fire Code, Chapter 3, Section 304.1.2 Vegetation., states "weeds, grass, vines or other growth that is capable of being ignited and endangering property, shall be cut down and removed by the owner or occupant of the premises". The standard used for removal of this vegetation shall be the high fire hazard defensible space requirements as outlined below.

The City's Wildland Fire Specialist has evaluated the property and identified the appropriate defensible space clearance for the project. Valle Verde has maintained a defensible space area along the western property boundary for the past 10 years. This area varies from 100 to 150 feet from structures. The maintenance of this defensible space has removed all ground covers and shrub material and resulted in limbing up of oak trees to 7 feet from the ground. The City's Wildland Fire Specialist has determined that this amount of clearance is not necessary to protect the proposed structures. Based on existing vegetation and topography, it was determined that a 75 foot defensible space area would be adequate to provide wildland fire protection to the structures and the Valle Verde community. The 75-foot defensible space area would be broken up into three zones. Each zone has specific requirements for plantings, vegetation removal, irrigation, and maintenance (outlined below).

The Fire Department has identified a number of areas where clearance can be reduced (approximately 1.5 acres) and re-vegetated as part of the oak woodland restoration plan (see Section 3. Biological Resources). There is one area where additional vegetation clearance would be required and would encroach into the oak woodland area (approximately 0.3 acres). Table 1 delineates the standards that will be applied to the project. The Fire Department shall review final landscape plans to ensure they meet the requirements identified in Table 1.

A 75-foot defensible space would be required from each structure proposed for development adjacent to, or in close proximity to the oak woodland or vegetation. The 75 feet will be broken up into three zones as outlined in Table 1 below. Because of the location of the residential development on the north slope, impacts to public safety from fire is *potentially significant, mitigable*. Compliance with these Fire Department standards for brush maintenance and landscape design would reduce project related fire hazard impacts.

Table 1: Fire Department Standards

<p>ZONE 1 0 – 30 feet</p>	<p>This area is closest to a structure. It provides the best protection against the high radiant heat that results during a wildfire. Plants should be low growing, irrigated plants. Focus should be on ground covers not more than 12 inches in height or succulents. Use non-flammable materials for paths, patios, and mulch. Trees should not be planted closer than 15 feet to a structure. Trees must be spaced at least 40 feet apart. Annual maintenance to meet high fire hazard defensible space requirements shall be met by June 15th of each year. Annual maintenance shall include maintaining the irrigation system.</p>
<p>ZONE 2 30 – 50 feet</p>	<p>This area is considered a mix of landscaped and native vegetation. A reasonably open character should be maintained in this area. Plant low growing ground covers and succulents resistant to fire. Shrubs up to 3 feet can be planted but should have at least 18 feet spacing between other shrubs or other trees. Shrubs can be planted in clusters not more than 10 feet in diameter, but should have at least 18 feet between clusters. Do not plant shrubs underneath existing oak tree canopies or proposed new oak plantings. Trees should be spaced at least 30 feet apart to prevent crowns from touching once fully grown. Annual maintenance to meet high fire hazard defensible space requirements shall be met by June 15 of each year. Annual maintenance shall include maintaining the irrigation system.</p>
<p>ZONE 3 50 – 75 feet</p>	<p>This area is the furthest from the structure. Plantings will consist of native plants. Plantings may require initial irrigation, but should be removed once established. Shrubs should be spaced at least 15 feet from each other or planted in clusters with at least 18 feet between clusters. Shrubs should not be planted underneath existing oak canopies or proposed new oak plantings. Trees should be spaced at least 30 feet apart to prevent crowns from touching once fully grown. New areas that require defensible space shall have vegetation meeting the defensible space requirements as outlined in the Valle Verde Defensible Space Requirements. Annual maintenance to meet high fire hazard defensible space requirements shall be met by June 15th of each year.</p>
<p>Vegetation Road Clearance Requirements</p>	<p>Vegetation along proposed new roads shall be planted to provide a vertical clearance of 13 feet, 6 inches and 5 feet of horizontal clearance of flammable vegetation.</p>

Hazards – Required Mitigation

HAZ 1. Landscape Plans – The project shall adhere to the Fire Department Landscape Guidelines and Fuel Management Standards identified for properties within the project area. The Landscape plan shall be reviewed and approved by the Fire Department prior to submittal to the Environmental Analyst or ABR for review.

Hazards – Residual Impacts

Compliance with requirements for vegetation clearance within the 75-foot defensible space identified by the Fire Department would ensure wildfire hazard impacts of the proposed project would be less than significant.

<p>7. NOISE Could the project result in:</p>	<p>NO</p>	<p>YES <i>Level of Significance</i></p>
<p>a) Increases in existing noise levels (short-term)?</p>		<p>Potentially Significant, Mitigable</p>
<p>Increases in existing noise levels (long-term)?</p>		<p>Less than Significant</p>
<p>b) Exposure of people to severe noise levels (short-term)?</p>		<p>Potentially Significant, Mitigable</p>
<p>Exposure of people to severe noise levels (long-term)?</p>		<p>Less than Significant</p>

Noise - Discussion

Issues: Noise issues are associated with siting of a new noise-sensitive land use in an area subject to high ambient background noise levels, siting of a noise-generating land use next to existing noise-sensitive land uses, and/or short-term construction-related noise.

The primary source of ambient noise in the City is vehicle traffic noise. The City Master Environmental Assessment (MEA) *Noise Contour Map* identifies average ambient noise levels within the City.

Ambient noise levels are determined as averaged 24-hour weighted levels, using the Day-Night Noise Level (L_{dn}) or Community Noise Equivalence Level (CNEL) measurement scales. The L_{dn} averages the varying sound levels occurring over the 24-hour day and gives a 10 decibel penalty to noises occurring between the hours of 10:00 p.m. and 7:00 a.m. to take into account the greater annoyance of intrusive noise levels during nighttime hours. Since L_{dn} is a 24-hour average noise level, an area could have sporadic loud noise levels above 60 dBA which average out over the 24-hour period. CNEL is similar to L_{dn} but includes a separate 5 dBA penalty for noise occurring between the hours of 7:00 p.m. and 10:00 p.m. CNEL and L_{dn} values usually agree with one another within 1 dBA. The Equivalent Noise Level (L_{eq}) is a single noise level, which, if held constant during the measurement time period, would represent the same total energy as a fluctuating noise. L_{eq} values are commonly expressed for periods of one hour, but longer or shorter time periods may be specified. In general, a change in noise level of less than three decibels is not audible. A doubling of the distance from a noise source will generally equate to a change in decibel level of six decibels.

Guidance for appropriate long-term background noise levels for various land uses are established in the City General Plan Noise Element Land Use Compatibility Guidelines. Building codes also establish maximum average ambient noise levels for the interiors of structures.

High construction noise levels occur with the use of heavy equipment such as scrapers, rollers, graders, trenchers and large trucks for demolition, grading, and construction. Equipment noise levels can vary substantially through a construction period, and depend on the type of equipment, number of pieces operating, and equipment maintenance. Construction equipment generates noise levels of more than 80 or 90 dBA at a distance of 50 feet, and the shorter impulsive noises from other construction equipment (such as pile drivers and drills) can be even higher, up to and exceeding 100 dBA. Noise during construction is generally intermittent and sporadic, and after completion of the initial demolition, grading and site preparation activities, tends to be quieter.

The Noise Ordinance (Chapter 9.16 of the Santa Barbara Municipal Code) governs short-term or periodic noise, such as construction noise, operation of motorized equipment or amplified sound, or other sources of nuisance noise. The ordinance establishes limitations on hours of construction and motorized equipment operations, and provides criteria for defining nuisance noise in general.

Impact Evaluation Guidelines: A significant noise impact may result from:

- Siting of a project such that persons would be subject to long-term ambient noise levels in excess of Noise Element land use compatibility guidelines as follows:
 - Residential: Normally acceptable maximum exterior ambient noise level of 60 dBA, maximum interior noise level of 45 dBA.
 - Commercial: Normally acceptable maximum exterior ambient noise level of 80 dBA, maximum interior noise level of 50 dBA
- Substantial noise from grading and construction activity in close proximity to noise-sensitive receptors for an extensive duration.

Noise – Existing Conditions and Project Impacts

7. a) Increased Noise Level;

Long-Term Operational Noise: The proposed project is not anticipated to have significant long-term noise impacts because of the proposed residential and commercial uses. The indoor and outdoor recreational facilities will remain in the same general location, and there are no additional intensive outdoor uses being proposed that would increase the noise levels being generated from the project site. The proposed residential use is not in an area where residents would be exposed to high noise levels (ambient noise levels for the site are less than 60 dBA L_{dn} per the City's Master Environmental Assessment Map). The Noise Element establishes 60 dBA and 80 dBA as the acceptable exterior noise levels for residential and commercial uses respectively. As standard construction practices are considered to reduce noise levels by 15 dBA, it is anticipated that interior areas of the residential units would meet the 45 dBA L_{dn} standard. No substantial noise generation is anticipated to occur as a result of the proposed project. Therefore, the project site would not be subject to high noise levels, nor would the project cause high operational noise levels. Long-term operational noise impacts would be *less than significant*.

Temporary Construction Noise: Noise during construction is generally intermittent and sporadic, and after completion of initial grading and site clearing activities, tends to be quieter. Noise generated during project grading activities would result in a short-term adverse construction impact to residential receptors in the area. Demolition of the existing house and construction of the 40 residential units and associated driveways, roadway, and parking areas as well as the common area components of the project are anticipated to result in use of heavy equipment.

Demolition and grading operations have the potential to result in noise levels of 80-90 dBA measured at a distance of 50 feet from the noise source. Noise from construction of the proposed project components would result in noise levels that are generally lower than demolition and grading operations, but noise impacts to surrounding uses would still have the potential to occur. Therefore, noise from demolition, grading and construction operations would result in elevated noise levels that would result in short-term *potentially significant, but mitigable* noise impacts to surrounding noise-sensitive uses. The implementation of routine construction site noise controls would be capable of reducing temporary peak construction noise impacts to sensitive receptors located on-site and adjacent to the project site.

7. b) Exposure to High Noise Levels

Proposed construction activities would also generate short-term traffic as workers, equipment and materials are brought to the project site. The increase in traffic on roadways near the project site would result in an incremental increase in existing traffic noise conditions, however construction-related traffic would not result in a substantial increase in daily traffic volumes and would not result in a significant increase in traffic noise levels. Therefore, construction-related traffic would be *less than significant*.

Noise – Required Mitigation

- N-1 Construction Notice.** At least 20 days prior to commencement of construction, the contractor shall provide written notice to all property owners and residents within 450 feet of the project area. The notice shall contain a description of the proposed project, a construction schedule including days and hours of construction, the name and phone number of the Project Environmental Coordinator (PEC) who can answer questions, and provide additional information or address problems that may arise during construction. A 24-hour construction hot line shall be provided. Informational signs with the PEC's name and telephone number shall also be posted at the site.
- N-2 Construction Hours.** Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between the hours of 8:00 a.m. and 5:00 p.m., excluding holidays observed by the City as legal holidays: New Year's Day (January 1st); Martin Luther King Jr.'s Birthday (3rd Monday in January); President's Day (3rd Monday in February); Cesar Chavez Day (March 31st); Memorial Day (Last Monday in May); Independence Day (July 4th); Labor Day (1st Monday in September); Thanksgiving Day (4th Thursday in November); Day Following Thanksgiving Day (Friday following Thanksgiving); Christmas Day (December 25th). *When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday respectively shall be observed as a legal holiday.
- Occasional night work may be approved for the hours between 5 p.m. and 8 a.m. by the Chief of Building and Zoning per Section 9.13.015 of the Municipal Code) between the hours of 5 p.m. and 8 a.m. weekdays. In the event of such night work approval, the applicant shall provide written notice to all property owners and residents within 450 feet of the project property boundary and the City Planning and Building Divisions at least 48 hours prior to commencement of any. Night work shall not be permitted on weekends and holidays.
- N-3: Construction Equipment Sound Control.** All construction equipment, including trucks, shall be professionally maintained and fitted with standard manufacturers' muffler and silencing devices.
- N-4 Sound Barriers.** As determined necessary by the Project Environmental Coordinator, the project shall employ sound control devices and techniques such as noise shields and blankets during the construction period to reduce the level of noise to surrounding residents.

Noise – Residual Impact

Impacts associated with long term noise sources would be considered *less than significant*. Recommended mitigation measures would minimize the nuisance associated with construction noise to *less than significant*.

8. POPULATION AND HOUSING Could the project:	NO	YES Level of Significance
a) Induce substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)?		Less than Significant
b) Displace existing housing, especially affordable housing?	X	

Population and Housing - Discussion

Impact Evaluation Guidelines: Issues of potentially significant population and housing impacts may involve:

- Growth inducement, such as provision of substantial population or employment growth or creation of substantial housing demand; development in an undeveloped area, or extension/ expansion of major infrastructure that could support additional future growth.
- Loss of a substantial number of housing units, especially loss of more affordable housing.

Population and Housing – Existing Conditions and Project Impacts

8. a) Growth-Inducing Impacts. The project would not involve a substantial increase in major public facilities such as extension of water or sewer lines or roads that would facilitate other growth in the area. The project would not involve substantial employment growth that would increase population and housing demand. Growth-inducing impacts would be *less than significant*.

8. b) Housing Displacement

The project would involve the removal of three existing dwelling units (two at Valle Verde, and one on the Rutherford property). The proposed project would provide 40 new dwelling units; therefore, there would be a net gain of 37 new dwelling units in the City. *No impact* would result from the project.

Population and Housing – Mitigation No mitigation is required.

Population and Housing – Residual Impact Impacts would be *less than significant*.

9. PUBLIC SERVICES	NO	YES
Could the project have an effect upon, or result in a need for new or altered services in any of the following areas:		<i>Level of Significance</i>
a) Fire protection?		Less than Significant
b) Police protection?		Less than Significant
c) Schools?		Less than Significant
d) Maintenance of public facilities, including roads?		Less than Significant
e) Other governmental services?		Less than Significant
f) Electrical power or natural gas?		Less than Significant
g) Water treatment or distribution facilities?		Less than Significant
h) Sewer or septic tanks?		Less than Significant
i) Water distribution/demand?		Less than Significant
j) Solid waste disposal?		Potentially Significant, Mitigable

Public Services – Discussion

Issues: This section evaluates project effects on fire and police protection services, schools, road maintenance and other governmental services, utilities, including electric and natural gas, water and sewer service, and solid waste disposal.

Impact Evaluation Guidelines: The following may be identified as a potentially significant public services and facilities impacts:

- It does not have sufficient water supplies, treatment facilities, water pressure for fire hydrants and where water line size would be insufficient to meet City water supply standards
- Creation of a substantial need for increased police department, fire department, road maintenance, or government services staff or equipment.
- Generation of substantial numbers of students exceeding public school capacity where schools have been designated as overcrowded.
- Inadequate water, sewage disposal, or utility facilities.
- Substantial increase in solid waste disposal to area sanitary landfills by generating more than 350 tons of construction waste and more than 196 tons per year of operational solid waste without recycling.

Public Services – Existing Conditions and Project Impacts

9. a, b, d-g. Facilities and Services

The project site is located in an urban area where all public services are available. In 2005, the City prepared a General Plan Update: 2030 Condition, Trends, and Issues Report (CTI - September 2005) that examined existing conditions associated with fire protection, police protection, library services, public facilities, governmental facilities, electrical power, and natural gas. The CTI Report specifically analyzed whether there were deficiencies existing or anticipated for each of the public services. The CTI report determined that police and fire protection services, and library services are being provided at acceptable levels to the City. In addition, the CTI Report determined that electricity, natural gas, telephone, and cable telecommunication services are being provided at acceptable service levels and utility companies did not identify any deficiencies in providing service in the future. Finally, the CTI Report determined that demand for City buildings and facilities will continue to be affected by growth, although no appropriate/acceptable levels of service have been established.

The project would be served with connections to existing public services for gas, electricity, cable, and telephone traversing the site, as well as access to existing roads. The project is not anticipated to create a substantially different demand on fire or police protection services, library services, or City buildings and facilities than that anticipated in the CTI Report or previously approved in prior conditional use permits for the site. Therefore, impacts to fire protection,

police protection, library services, City buildings and facilities, electrical power, natural gas, telephone, and cable telecommunication services are anticipated to be *less than significant*.

9. c) Schools

The project site is served by the Santa Barbara Elementary and High School Districts for elementary and high school. The project would provide a net increase of 37 residential units; however, additional students to these districts are not anticipated since Valle Verde is a retirement community and would not generate school age children.

The project would result in a minor increase in area employees. It would be expected that some of the added employees would already reside in the area. Some portion of new employees may in-migrate or utilize local schools. None of the school districts in the South Coast have been designated "overcrowded" as defined by California State law. School impact fees would be applied to the project in accordance with State law. The project would not generate sufficient students to substantially impact school enrollment. In addition, School District Fees are already required for new residential and commercial development to offset the cost to the school district of providing additional infrastructure to accommodate new students generated by the development. Therefore, project impacts to schools would be *less than significant*.

9. g-i) Water and Sewer

Water: The City of Santa Barbara's water supply comes from the following sources, with the actual share of each determined by availability and level of customer demand: Cachuma Reservoir and Tecolote Tunnel, Gibraltar Reservoir and Mission Tunnel, 300 Acre Feet per Year (AFY) of contractual transfer from Montecito Water district, groundwater, State Water Project entitlement, desalination, and recycled water. Conservation and efficiency improvements are projected to contribute to the supply by displacing demand that would otherwise have to be supplied by additional sources. In 1994, based on the comprehensive review of the City's water supply in the Long Term Water Supply Alternatives Analysis (LTWSAA), the City Council approved the Long Term Water Supply Program (LTWSP). The LTWSP outlines a strategy to use the above sources to meet the projected demand of 17,900 AFY (including 1,500 AFY of demand projected to be met with conservation) plus a 10 percent safety margin for a total of 19,700 AFY. Therefore, the target for the amount of water the system will actually have to supply, including the safety margin, is 18,200 AFY. The 2003 Water Supply Management Report documents an actual system demand of 13,460 AFY and a theoretical commitment of 16,170 AFY. Of the total system production, 95% was potable water and 5% was reclaimed water.

In 2005, the City prepared a General Plan Update: 2030 Condition, Trends, and Issues Report (September 2005) that examined existing conditions associated with water supply, treatment, and distribution system, and specifically analyzed and determined that there were no existing or anticipated deficiencies for the next 20-year planning period based on a growth rate of 0.7% per year.

The existing development on the site demands 70.23 AFY of water, which is based upon a two year average of usage between 2006 and 2008. The proposed project is estimated to increase demand 7.57 AFY for a total new site demand of 77.80 AFY (based on the City's Water Demand Factor and Conservation Study "User's Guide" Document No. 2) (see *Exhibit I-Water Calculation*). The Water Demand and Conservation study was prepared in 1989 and since that time, plumbing fixtures have been manufactured to stricter water conservation requirements under the plumbing code, which results in lower flow fixtures. Thus the actual demand will be less and this is reflected in the in the most recent water bills for Valle Verde. The factor used in estimating the water consumption for multi-family residences based upon the Water Demand and Conservation study is 0.19AFY/unit, but the actual usage is 0.09AFY/unit. Valle Verde also has agreements with the City's Water Department to serve approximately 254 residential units and all commercial development originally approved in 1984. The proposed project would result in a total of 251 units and seven studios on the property and would add 14,902 sq. ft. of new common areas. The proposed project is within the anticipated growth rate for the City and therefore, the City's long-term water supply and existing water treatment and distribution facilities would adequately serve the proposed project.

The potential increase in demand from the proposed project would constitute a *less than significant* impact to the City water supply, treatment, and distribution facilities.

Sewer: The maximum capacity of the El Estero Treatment Plant is 11 million gallons per day, with current average daily flow 8.5 MGD. The Treatment Plant is designed to treat the wastewater from a population of 104,000. The proposed project's estimated net new sewer demand is 5,876 gallons per day or 6.57 AFY (see *Exhibit I-Sewer Calculation*). The sewer demand is based upon the Water Demand and Conservation study and, as stated above, the actual water use would be lower, which translates into a lower actual sewer demand. The project would not increase the total number of residential units above that approved in previous CUP documents and the current water allotment for the project (see above section). Any increased sewage treatment associated by the project can be accommodated by the existing City sewer system and sewage treatment plant, and would represent a *less than significant* impact.

9. j) Solid Waste Generation/ Disposal

Most of the waste generated in the City is transported on a daily basis to seven landfills located around the County. The County of Santa Barbara, which operates the landfills, has developed impact significance thresholds related to the impacts of development on remaining landfill capacity. The County thresholds are based on the projected average solid waste generation for Santa Barbara County from 1990-2005. The County assumes a 1.2% annual increase (approximately 4000 tons per year) in solid waste generation over the 15-year period.

The County's threshold for project specific operational impacts to the solid waste system is 196 tons per year (this figure represents 5% of the expected average annual increase in solid waste generation [4000 tons/year]). Source reduction, recycling, and composting can reduce a project's waste stream by as much as 50%. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable.

Proposed projects with a project specific impact as identified above (196 tons/year or more) would also be considered cumulatively significant, as the project specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase in solid waste of 1% or more of the expected average annual increase in solid waste generation [4000 tons/year], which equates to 40 tons per year, is considered an adverse but not significant cumulative impact.

Any construction, demolition or remodeling project that would create more than 350 tons of construction and demolition debris would have a significant impact on landfill capacity.

Long-Term (Operational). The additional development of residential use, assisted living units, common area additions and common areas would generate a grand total of approximately 99.2 tons per year of solid waste as follows:

Residential development - 38 net new multi-family units x 2.0 persons per unit x 0.95 tons per year = 72.2 tons/year

Four new assisted living facility rooms - 4 rooms x 1.9 tons/room = 7.6 tons/yr.

New commercial common areas - 14,902 s.f. of new floor area x 0.0013 tons/s.f. for health facilities = 19.4 tons/year

Because the operational solid waste of the project falls between 40 and 196 tons per year, the County Thresholds and Guidelines recommend that mitigations are imposed to reduce the impacts. With application of source reduction, reuse and recycling, landfill disposal of solid waste could be reduced by 50%, to 47.6 tons per year, which is greater than the County recommendation of 40 tons per year. Therefore, with the recommended mitigations below, the project's cumulative impacts to solid waste would be considered adverse, *but less than significant*.

Short-Term (Demolition and Construction). Project demolition and excavation will require export of non-structural fill. The solid waste generation/disposal thresholds adopted by the City do not apply to short-term construction projects. However, new construction, especially remodeling and demolition, represents the greatest challenge to maintaining existing diversion rates. The County of Santa Barbara has developed solid waste generation guidelines. Based on these guidelines, it is anticipated that the project would generate 1,221 tons of waste for demolition and construction (see Table 2).

Under the County's significance thresholds, any project that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. Therefore, under these thresholds of significance, the subject project would be considered to have a potentially significant impact based on its construction-related solid waste generation. However, with the implementation of the City's standard condition of approval requiring that a minimum of 90% of demolition and construction material be recycled or reused, which exceeds the County's recommendation of a 50% reduction short-term waste disposal impacts would be *potentially significant, mitigable*.

Table 2 – Short Term Solid Waste Generation

Type use	Amount SF	Factor/SF	Waste Generated (lbs)	Waste (Tons)
Commercial Development				
Remodel	11110	40	444,400	
Demolition	4348	100	434,800	
New Construction	14902	25	372,550	
Residential development				
Demolition	5302	60	318,120	
New Construction	58078	15	871,170	
TOTAL			2,441,040	1220.52

Public Services – Mitigation

PS-1 Demolition/Construction Materials Recycling. Recycling and/or reuse of demolition/construction materials shall be carried out to the extent feasible, and containers shall be provided on site for that purpose, in order to minimize construction-generated waste conveyed to the landfill. Indicate on the plans the location of a container of sufficient size to handle the materials, subject to review and approval by the City Solid Waste Specialist, for collection of demolition/construction materials. A minimum of 90% of demolition and construction materials shall be recycled or reused. Evidence shall be submitted at each inspection to show that recycling and/or reuse goals are being met.

Public Services – Residual Impacts Impacts would be less than significant.

10. RECREATION	NO	YES
Could the project:		<i>Level of Significance</i>
a) Increase the demand for neighborhood or regional parks or other recreational facilities?		Less than Significant
b) Affect existing parks or other public recreational facilities?		Less than Significant

Recreation - Discussion

Issues: Recreational issues are associated with increased demand for recreational facilities, or loss or impacts to existing recreational facilities.

Impact Evaluation Guidelines: Recreation impacts may be significant if they result in:

- Substantial increase in demand for park and recreation facilities in an area under-served by existing public park and recreation facilities.
- Substantial loss or interference with existing park space or other public recreational facilities such as hiking, cycling, or horse trails.

Recreation – Existing Conditions and Project Impacts

10. a) Recreational Demand

Currently within the City, there are more than 1,800 acres of natural open space, park land and other recreational facilities. In addition, there are 28 tennis courts, 2 public outdoor swimming pools, beach volleyball courts, sport fields, lawn bowling greens, a golf course, 13 community buildings and a major skateboard facility. The City also offers a wide variety of recreational programs for people of all ages and abilities in sports, various classes, tennis, aquatics and cultural arts.

In 2005, the City prepared a General Plan Update: 2030 Condition, Trends, and Issues (CTI) Report (September 2005) that examined existing conditions associated with recreation and parks. Population characteristics including income, age, population growth, education and ethnicity affect recreation interests and participation levels.

The CTI Report determined that there is an uneven distribution of parkland in the City, such that some areas of the City may currently be underserved with neighborhood parks, but overall the City has adequate passive, community, beach, regional, open space, and sports facility parks.

The National Recreation and Park Association has established park service area standards for various types of parks. The NRPA standards have not been adopted by the City; however, the standards do provide a useful tool for assessing park space needs. The CTI Report determined that, based on NRPA standards, there is an uneven distribution of parkland in the City, such that some areas of the City may currently be underserved with neighborhood and community parks, but overall the City has adequate passive, community, beach, regional, open space, and sports facility parks.

The future development of the net 37 additional residences could result in an increased demand for park and recreational opportunities. As indicated above, the City of Santa Barbara has ample parkland, albeit unevenly distributed throughout the City and adequate recreation facilities. The proposed project would introduce additional residents into the Hidden Valley neighborhood where existing nearby parks include Hidden Valley Park. In addition, residents would have access to other community, beach, regional, open space, sports facility parks, and all City recreation programs.

Valle Verde is a unique residential development since there are a number of onsite passive and active recreational opportunities for the residents. There are extensive walkways through out the campus, gazebos that will be used for informal gatherings, a theater, a gymnasium, an outdoor pool, gardens, and a number of outdoor seating areas. Therefore, with the numerous onsite recreational facilities and public facilities nearby, the increase in park and recreational demands associated with the residences would be a *less than significant* impact.

10. b) Existing Recreational Facilities

As described above, the proposed project is located within close proximity of Hidden Valley Park and there are several onsite recreational opportunities. The proposed residential use would not result in population increases that would have the potential to result in substantial increase on the use of existing recreational facilities. Short-term construction and long-term operation of the project would not result in impacts that have the potential to interfere with the use and enjoyment of existing parks or recreational facilities by means of obnoxious or offensive emission of odors, dust, gas, fumes, smoke, liquids, wastes, noise, vibrations, or disturbances. Therefore, the project would have *less than significant* impacts on recreational facilities.

Recreation – Mitigation No mitigation required.

Recreation – Residual Impacts Impacts would be less than significant.

11. TRANSPORTATION/CIRCULATION Could the project result in:	NO	YES <i>Level of Significance</i>
a) Increased vehicle trips? Long-term		Potentially Significant
		Less than Significant
b) Hazards to safety from design features (e.g. sharp curves, inadequate sight distance or dangerous intersections)?		Less than Significant
c) Inadequate emergency access or access to nearby uses?		Less than Significant
d) Insufficient parking capacity on-site or off-site?		Less than Significant
e) Hazards or barriers for pedestrians or bicyclists?		Less than Significant

Transportation - Discussion

Issues: Transportation issues include traffic, access, circulation, safety, and parking. Vehicle, bicycle and pedestrian, and transit modes of transportation are all considered, as well as emergency vehicle access. The City General Plan Circulation Element contains policies addressing circulation, traffic, and parking in the City.

Impact Evaluation Guidelines: A proposed project may have a significant impact on traffic/ circulation/ parking if it would:

Vehicle Traffic

- Cause an increase in traffic that is substantial in relation to the existing traffic load and street system capacity (see traffic thresholds below).
- Cause insufficiency in transit system.
- Conflict with the Congestion Management Plan (CMP) or Circulation Element or other adopted plan or policy pertaining to vehicle or transit systems.

Circulation and Traffic Safety

- Create potential hazards due to addition of traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, and inadequate pavement structure) or that supports uses that would be incompatible with substantial increases in traffic.
- Diminish or reduce safe pedestrian and/or bicycle circulation.
- Result in inadequate emergency access on-site or to nearby uses.

Parking: Result in insufficient parking capacity for the projected amount of automobiles and bicycles.

Traffic Thresholds of Significance: The City uses Levels of Service (LOS) “A” through “F” to describe operating conditions at signalized intersections in terms of volume-to-capacity (V/C) ratios, with LOS A (0.50-0.60 V/C) representing free flowing conditions and LOS F (0.90+ V/C) describing conditions of substantial delay. The City General Plan Circulation Element establishes the goal for City intersections to not exceed LOS C (0.70-0.80 V/C).

For purposes of environmental assessment, LOS C at 0.77 V/C is the threshold Level of Service against which impacts are measured. An intersection is considered “impacted” if the volume to capacity ratio is .77 V/C or greater.

Project-Specific Significant Impact: A project-specific significant impact results when:

- Project peak-hour traffic would cause a signalized intersection to exceed 0.77 V/C, or
- The V/C of an intersection already exceeding 0.77 V/C would be increased by 0.01 (1%) or more as a result of project peak-hour traffic.

For non-signalized intersections, delay-time methodology is utilized in evaluating impacts.

Significant Cumulative Contribution: A project would result in a significant contribution to cumulative traffic impacts when:

- Project peak-hour traffic together with other cumulative traffic from existing and reasonably foreseeable pending projects would cause an intersection to exceed 0.77 V/C, or
- Project would contribute traffic to an intersection already exceeding 0.77 V/C.

Transportation – Existing Conditions and Project Impacts

11. a) Traffic

Long-Term Traffic: Valle Verde requires that at least one person per residential unit is 63 years old or older, which indicates that most of the residents will be retired or semi-retired. For purposes of traffic analysis, the majority of the trips would be generated by employees arriving in the morning and leaving in the afternoon. In a typical residential neighborhood that does not have an age restriction for occupying a residence, the majority of the traffic would be outbound in the morning and inbound in the afternoon. Residential development is on three sides of Valle Verde. A golf course that is accessed from Modoc Road is on the fourth side. Additionally, the residents of Valle Verde have access to an onsite private bus service or the City bus service, which has a route along Calle de los Amigos. The project site currently includes a hospice, which is operated by the Visiting Nurses Association. As part of the master plan for Valle Verde, this facility will be relocated offsite, thus reducing trips to the site.

According to City Transportation Planning Staff, the Las Positas Road at Calle Real intersection in the surrounding area has a level of service of 0.79 volume to capacity (v/c) ratio during the highest evening peak hour between 4-6 p.m. Based on the Institute of Traffic Engineers (ITE) trip generation rate for this use, the proposed development is expected to generate approximately 141 additional daily trips, with 5 new a.m. peak hour trips and 6 new p.m. peak hour trips. When

staff distributed these trips to the surrounding street network using the City's standard trip distribution analysis, the results suggest that the project will not cause a project-specific impact or contribute to an existing cumulatively significant impacted intersections. However, the limited circulation pattern in the vicinity of the project may reduce the reliability of the standard distribution analysis. This concern was expressed by members of the public and the Planning Commission at the comment hearing for the environmental document. Because of this uncertainty, and following the guidance of CEQA Guideline 15064(f)(1), staff has concluded the long term project specific and cumulative traffic impacts are *potentially significant*. Therefore, a traffic study will be prepared as part of an EIR.

Short-Term Construction Traffic: The overall project construction process is estimated to last approximately 18 months. This would include grading for site preparation over approximately 3 months, and construction duration of estimated 18 months. Grading processes would involve 15 workers, and construction of the community building would require up to 30 workers on site on occasion. Working hours during the construction process are proposed to be 7:00 a.m. – 5:00 p.m. weekdays excluding holidays. Staging, equipment, materials storage, and temporary construction worker parking would occur on-site or on a designated off-site location.

The project would generate construction-related traffic that would occur over the 18-month construction period and would vary depending on the stage of construction. Temporary construction traffic is generally considered an adverse but not significant impact. Short-term construction-related traffic would result in a *less than significant impact*. Standard mitigation measures outlined below, including restrictions on the hours permitted for construction trips and approval of routes for construction traffic are recommended to further to reduce the short-term traffic impacts.

11. b, c, e) Access/ Circulation/ Safety

Primary access to the project site is provided by two public streets, Calle de los Amigos and Torino Drive. West of Calle de los Amigos, Torino Road serves the eleven residences in the Hidden Oaks Estates and the Valle Verde Campus only. The Valle Verde facility contains an extensive sidewalk and roadway network to facilitate vehicular and pedestrian mobility throughout the site. As part of the proposal, a new 20-foot wide roadway would be installed off Torino Road to provide access to eight of the ten new units on the Rutherford parcel (APN 049-440-015). The remaining two units would have access from an existing private driveway currently serving the property, which is proposed to be upgraded, and would provide access for small cart vehicles to the other 8 Rutherford units. Pedestrian walkways, consistent with those contained throughout the campus, are proposed on the Rutherford parcel to provide internal access and circulation. In addition, the residential units proposed on the northwest portion of the project site would be accessed from a new private driveway off of Senda Verde, an existing internal private roadway. Pedestrian walkways are also proposed in this area to facilitate pedestrian circulation. Additional new, relocated or improved pedestrian pathways are proposed throughout the site as part of the development proposal and will meet Building Code for accessibility requirements.

Adjacent Hidden Oaks Estates neighbors have expressed concerns regarding potential traffic conflicts resulting from the proposed installation of the roadway near their entrance gate on Torino Road. Additionally, concerns were raised about emergency ingress and egress. The Fire Department and Transportation Planning Staff reviewed the proposed road on the Rutherford Parcel and determined that the location of the road would not result in access, limited sight distance, circulation or safety impacts related to vehicular conflicts. The traffic volumes on Torino Road, above Calle de los Amigos are low, as this segment of the road serves exclusively the 11 residences of Hidden Oaks Estates and Valle Verde. Torino Road terminates at the Hidden Oaks Estates subdivision and will not be extended in the future due to the topography and layout of the existing and proposed residences. Line of sight from the new access road to the Rutherford Parcel will be consistent with the Transportation Division requirements and this road will provide access to 8 of the 40 additional units. Access to the remaining proposed units will be from Calle de los Amigos.

State law requires elderly care facilities to conduct fire drills and Valle Verde has an emergency evacuation plan which includes drills that are performed at least twice a year to practice implementation of the plan. All residents are included in the evacuation plan, as will the proposed project units. Additionally, Valle Verde has several small buses on site which would be used to evacuate residents. Therefore, access, circulation and safety impacts are considered *less than significant*.

11. d) Parking

Existing Parking Supply and Parking Demand: The Valle Verde Retirement facility currently provides 331 parking spaces throughout its campus for staff, residents and visitors. Approximately 193 spaces are assigned and reserved for residents, including 12 spaces provided in garages. An additional 138 unmarked spaces are provided for visitors and staff. The Zoning Ordinance parking requirement for the existing facility is 259 spaces, based on the current number of senior residential units and beds associated with the use.

In September 2006, Associated Transportation Engineers (ATE) conducted parking surveys at Valle Verde to determine peak hour demand for the campus (**Exhibit J**). The surveys were undertaken on Wednesday, September 13 and Thursday,

September 14 from 8:00 a.m. through 5 p.m. Peak parking demand was observed at 4:00 p.m. on September 13, 2006, during which time 67% of the assigned parking spaces were occupied, and 62% of the unmarked spaces were occupied. Overall, 65% (207 spaces) of the total parking supply on campus was occupied at this time. In addition, the parking surveys found that a peak demand of 60 employee cars were parked along the adjacent streets throughout the day.

The Hidden Valley Residence Association is concerned about the inadequate parking facilities for Valle Verde employees. They state that Calle de los Amigos is completely parked on both sides during business hours. The Association has requested that this situation be corrected before any additional units are approved. The applicant has responded to this concern by proposing a parking lot on campus designated for employees and visitors. Additionally, Valle Verde has an Alternative Transportation program for the employees that includes, but is not limited to, bus passes, carpool incentives and on site bicycle parking. The project site is located on the Mesa-La Cumbre bus route.

Project Parking Supply and Parking Demand: Future development of the 40 residential units and upgraded common areas will require compliance with the City's Zoning Ordinance requirements for parking of a senior facility, which is one space per senior unit and 0.5 spaces per bed. Therefore, the parking requirement for the proposed project would be 42 spaces (40 spaces for the senior residential units + 2 spaces for the beds).

The parking demand analysis performed by ATE concluded that the parking demand for the project would be 40 spaces for residents and 75 spaces for employees and visitors for a total of 115 spaces. The parking demand analysis for the 75 spaces included one visitor space per four new residential units for a total of 10 spaces, five additional employees (as a result of the project) each assigned a space and 60 spaces for the employees currently parking on the street. The Zoning Ordinance parking requirement for the existing development and the proposed project is 301 spaces. However, the report prepared by ATE states that the peak demand for the existing and proposed project would be 322 spaces. As proposed, a total of 93 net new parking spaces (56 uncovered + 37 covered) will be provided, which would increase the total number of parking spaces to 414, both the zoning standard and the anticipated parking demand would be satisfied. Therefore, project impacts related to Valle Verde's parking supply and demand would be considered *less than significant*.

Transportation – Recommended Mitigation

Once the EIR is completed, additional Mitigations maybe required.

- T-1 Construction Traffic.** The haul routes for all construction-related trucks, three tons or more, entering or exiting the site, shall be approved by the Transportation Engineer. Construction-related truck trips for all trucks three tons or more shall not be scheduled during peak hours (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.) to help reduce truck traffic and noise on adjacent streets and roadways. The route of construction-related traffic shall be established to minimize trips through surrounding residential neighborhoods.
- T-2 Construction Parking.** Construction parking and vehicle/equipment/materials storage shall be provided as follows:
 - a. During construction, free parking spaces for construction workers shall be provided on-site or off-site in a location subject to the approval of the Transportation and Parking Manager.
 - b. On-site or off-site storage shall be provided for construction materials, equipment, and vehicles. Storage of construction materials within the public right-of-way is prohibited.
- T-3 Disabled Accessibility.** Project circulation shall be maintained for disabled accessibility or equivalent facilitation in accordance with American Disabilities Act requirements.

Transportation – Residual Impact

Impacts due to increased automobile traffic trips will be analyzed in the EIR. Internal pedestrian and traffic circulation, access, and parking would be less than significant. Mitigation measures T-1 through T-3 would further reduce to less than significant short-term construction impacts.

12. WATER ENVIRONMENT	NO	YES
Could the project result in:		<i>Level of Significance</i>
a) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?		Less than Significant
b) Exposure of people or property to water related hazards such as flooding?		Less than Significant
c) Discharge into surface waters?		Less than Significant
d) Change in the quantity, quality, direction or rate of flow of ground waters?		Less than Significant
e) Increased storm water drainage?		Less than Significant

Water – Discussion

Issues: Water resources issues include changes in offsite drainage and infiltration/groundwater recharge; storm water runoff and flooding; and water quality.

Impact Evaluation Guidelines: A significant impact would result from:

Water Resources and Drainage:

- Substantially changing the amount of surface water in any water body or the quantity of groundwater recharge.
- Substantially changing the drainage pattern or creating a substantially increased amount or rate of surface water runoff that would exceed the capacity of existing or planned drainage and storm water systems.

Flooding: Locating development within 100-year flood hazard areas; substantially altering the course or flow of flood waters or otherwise exposing people or property to substantial flood hazard

Water Quality: Substantial discharge of sediment or pollutants into surface water or groundwater, or otherwise degrading water quality, including temperature, dissolved oxygen, or turbidity.

Water Resources – Existing Conditions and Project Impacts

12. a, c, d, e) Drainage and Water Quality

The entire Valle Verde Retirement campus drains to Arroyo Burro Creek. A Preliminary Hydraulic Report prepared by MAC Design Associates, dated November 20, 2008, incorporated by reference and summarized below, (**Exhibit K**) calculated the pre- and post-development storm runoff for the 10, 25, 50 and 100 year return period storm events. The table below indicates that the post-development runoff for all storm events would result in an increase of storm water runoff due to an increase from 4.43 acres of impervious areas to approximately 5.16 acres

Return Period Year	Pre-Development Runoff cfs	Post-Development Runoff cfs	Net Increase
10	16.11	17.22	1.11
25	20.53	21.68	1.15
50	23.83	25.01	1.18
100	27.07	28.24	1.17

Construction of a detention basin is proposed on APN 049-440-015 (Rutherford Parcel) to maintain pre-development runoff levels. According to the report, the location for the detention basin was selected because it lies at the upstream end of the tributary areas, and therefore detaining runoff from this site will benefit the existing storm drain system. It was also selected because development on this parcel will occur in the early phase of the project and therefore all storm water impacts will be mitigated prior to development of the remaining zones. The detention basin is proposed to be

approximately 16' x 104' and would be located under the proposed guest parking area on the Rutherford property. Outflow from the detention basin would be via an outlet pipe, which would carry storm water to the existing storm drain system on Torino Road.

The City and State require that onsite capture, retention, and treatment of storm water be incorporated into the design of the project. Pursuant to the City's Storm Water Management Plan (SWMP) and the NPDES General Permit for Storm Water Discharges, the City requires that any increase in stormwater runoff (based on a 25-year storm event) be retained on-site and that projects be designed to capture and treat the calculated amount of runoff from the project site for a 1 inch storm event, over a 24-hour period.

The hydraulic report indicates that routing runoff from the Rutherford parcel tributary area through a detention facility would reduce peak runoff for the various storm events to below pre-development levels.

Return Period Year	Peak Inflow cfs	Peak Outflow cfs	Decrease csf
10	1.72	0.59	1.13
25	2.99	1.66	1.33
50	4.04	2.65	1.39
100	5.12	3.51	1.61

Following project approval, grading and construction drawings and public improvement plans for the proposed project would be reviewed and subject to approval by City Building and Public Works staff to assure compliance with applicable codes and standards. Sufficient engineered design and adequate mitigation measures shall be employed to ensure that no significant construction-related or long-term effects from increased runoff, erosion and sedimentation, urban water quality pollutants, or groundwater pollutants would result from the project. These measures are standard conditions and approval and are repeated in the recommended mitigation measures below. Therefore, long-term project impacts related to drainage are considered to be less than significant.

As described above, the net increase in stormwater runoff from impervious surfaces based on a 25-year storm event is proposed to be retained on-site. The residential units proposed by the project would not be a substantial source of pollutant runoff. However, pollutant runoff from parking areas has the potential to degrade water quality. The project proposes to use infiltration trenches and the detention basin as Best Management Practices (BMP) for treatment of storm water runoff. The base of the proposed detention basin would have clean rock, which would act as an infiltration trench to treat the storm water runoff. Additionally, regular sweeping of all roadway and parking lot surfaces would be instituted as a BMP to further reduce potential impacts to water quality.

Additionally, compliance with standard City storm water management requirements would reduce the proposed parking area's long-term water quality impacts to a less than significant level. These standard requirements include the preparation of an operation and maintenance plan for the use of storm drain surface water pollutant interceptors, stenciling of storm drain warnings of the direct connection of the drainage system to creeks and the ocean, and implementation of water quality protection best management practices (BMPs).

The City of Santa Barbara recommends more natural, passive treatment approaches (such as bioswales and infiltration basins), especially for the smaller, more frequent storm events that impact water quality in Santa Barbara. These types of passive/natural capture and filtration design options pose fewer maintenance problems than mechanical/underground options, and often times, treat runoff more efficiently. The project proposes to utilize a myriad of BMPs to treat storm water runoff. These include, infiltration basins, infiltration trenches, permeable pavement and biofilters. Mitigation measures have been recommended to further improve the design of the subdivision relative to water quality.

Short-Term: Project grading activities create the potential for erosion and sedimentation affecting water quality. The City requires the implementation of erosion control measures as standard conditions of approval and these erosion control measures are repeated below as recommended mitigation measures. Numerous federal, state and local regulatory programs have been established to minimize impacts to water quality resulting from construction operations. Compliance with applicable regulations and the mitigation requirements provided below will reduce the potential for the proposed project to result in short-term construction-related water quality impact to a less than significant level.

12. b) Flooding

The project site is not located in a flood hazard zone or in an area prone to flooding. The flooding potential would not change following project construction, nor would the project substantially alter the course or flow of flood waters. Therefore, project impacts related to flooding are considered *less than significant*.

Water Resources – Recommended Mitigation

- W-1 Preliminary Hydraulic Report.** A detention basin, to reduce runoff to pre-construction levels, as recommended in the Preliminary Hydraulic Report prepared by MAC Design Associates, dated November 20, 2008, shall be provided and shown on final project plans.
- W-2 Drainage and Water Quality.** Project plans for grading, drainage, stormwater facilities, and project development shall be subject to review and approval by City Building Division and Public Works Department per City regulations, (*and Regional Water Quality Control Board*). Sufficient engineered design and adequate mitigation measures shall be employed to ensure that no significant construction-related or long-term effects from increased runoff, erosion and sedimentation, urban water quality pollutants, or groundwater pollutants would result from the project.
- W-3 Erosion Control/Water Quality Protection Plan.** Prior to the issuance of a demolition permit for the proposed project, the applicant or project developer shall prepare an erosion control plan that is consistent with the requirements outlined in the *Procedures for the Control of Runoff into Storm Drains and Watercourses* and the Building and Safety Division *Erosion/Sedimentation Control Policy* (2003). The erosion control/water quality protection plan shall specify how the required water quality protection procedures are to be designed, implemented and maintained over the duration of the development project. A copy of the plan shall be submitted to the Community Development and Public Works Departments for review and approval, and a copy of the approved plan shall be kept at the project site.

At minimum, the erosion control/water quality protection plan prepared for the proposed project shall address the implementation, installation and/or maintenance of each of the following water resource protection strategies:

- Paving and Grinding
- Sandbag Barriers
- Spill Prevention/Control
- Solid Waste Management
- Storm Drain Inlet Protection
- Stabilize Site Entrances and Exits
- Illicit Connections and Illegal Discharges
- Water Conservation
- Stockpile Management
- Liquid Wastes
- Street Sweeping and Vacuuming
- Concrete Waste Management
- Sanitary/Septic Waste Management
- Vehicle and Equipment Maintenance
- Vehicle and Equipment Cleaning
- Vehicle and Equipment Fueling

- W-4 Minimization of Storm Water Pollutants of Concern.** The applicant shall submit project plans incorporating long-term BMPs to minimize storm water pollutants of concern to the extent feasible, and obtain approval from Public Works Engineering. The approved facilities shall be maintained in working order for the life of the project and should incorporate passive design (bioswales, buffers, etc) to the extent feasible.

- W-5 Storm Drain System Stenciling and Signage.** Within the project area, the applicant shall implement stenciling of all storm drain inlets and catch basins, and posting of signs at all public access points along channels and creeks, with language in English and Spanish and graphic icons prohibiting dumping, per approved plans. The applicant shall submit project plans to the satisfaction of Public Works Engineering that identify storm drain inlet locations throughout the project area, and specified wording and design treatment for stenciling of storm drain inlets and signage for public access points that prohibit dumping. The owners association shall maintain ongoing

legibility of the stenciling and signage for the life of the project, and shall inspect at least annually and submit report to City annually.

Water Resources – Residual Impact

Implementation of mitigation measures W-1 through W-5 would further reduce less than significant long- and short-term water resources impacts of the project to less than significant levels.

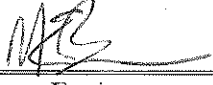
	<i>YES</i>	<i>NO</i>
MANDATORY FINDINGS OF SIGNIFICANCE.		
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	X	
b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		X
c) Does the project have potential 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
d) Does the project have potential environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	X	

As discussed in Section 3. Biological resources, additional information was provided during the original initial study circulation period, stating that the proposed development could impact the oak woodland found on the project site. Since that information was prepared by a qualified biologist and it is in conflict with the biological assessment originally prepared for the project, a fair argument is raised that the project could threaten a plant or animal community. The impact to the oak woodland, as well as to the native species will be reviewed as part of an EIR. Also being reviewed in an EIR are impacts from increased vehicle trips, which is discussed further in Section 11, Transportation.

INITIAL STUDY CONCLUSION

On the basis of this initial evaluation it has been determined that the proposed project may have a significant effect on the environment, and further study in a focused Environmental Impact Report is required.


 Peter Lawson Initial Study Preparer 5/21/2009
Date


 Michael Berman Environmental Analyst 5/21/2009
Date

EXHIBITS:

- A. Project Plans**
- B. Mitigation Monitoring and Reporting Program**
- C. Architectural Board of Review Minutes, dated July 10, 2006, April 9, 2007, and January 26, 2009**
- D. URBEMIS 2007 Version 9.2.4 Results**
- E. Revised Biological Assessment, prepared by Larry Hunt & Associates, dated December 18, 2008**
- F. Revised Tree Assessment & Protection Plan, prepared by Bill Spiewak, dated November 12, 2008**
- G. Historic Structures Report, prepared by Preservation Planning Associates, dated February 2008**
- H. Geotechnical Report, prepared by Fugro West, Inc., dated October 2006 and revised February 18, 2008**
- I. Water and Sewer Calculations**
- J. Parking Study, prepared by Associated Transportation Engineers (ATE), dated April 25, 2008**
- K. Preliminary Hydraulic Report, prepared by MAC Design Associates, dated November 20, 2008**

LIST OF SOURCES USED IN PREPARATION OF THIS INITIAL STUDY

The following sources used in the preparation of this Initial Study are located at the Community Development Department, Planning Division, 630 Garden Street, Santa Barbara and are available for review upon request.

(Add references to each technical study used - with date, author, and report title - such as for visual study, lighting study, biologist report, arborist report, archaeological report, historic structures report, geologist report, fault location study, hazardous materials contamination site assessment, noise study, traffic and parking study, drainage or floodplain study)

California Environmental Quality Act (CEQA) & CEQA Guidelines

General Plan Circulation Element

General Plan Conservation Element

2004 Housing Element

General Plan Land Use Element

General Plan Noise Element w/appendices

General Plan Map

General Plan Seismic Safety/Safety Element

Geology Assessment for the City of Santa Barbara

Institute of Traffic Engineers Parking Generation Manual

Institute of Traffic Engineers Trip Generation Manual

Master Environmental Assessment

Parking Design Standards

Santa Barbara County Draft Updated Solid Waste Thresholds

Santa Barbara Municipal Code & City Charter

Uniform Building Code as adopted by City

Zoning Ordinance & Zoning Map

Santa Barbara County Thresholds and Guidelines Manual (Updated September 16, 2008)