

CHAPTER 1 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This ~~Draft~~ Final Environmental Impact Report (EIR) was prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000, *et seq.*) and the CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000, *et seq.*). An EIR is a public informational document designed to provide decision makers and the public with an analysis of the environmental effects of a proposed project, to indicate possible ways to reduce or avoid significant effects, and to describe reasonable alternatives to a project that may reduce or avoid significant effects. An EIR must also disclose significant environmental impacts that cannot be avoided; growth-inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The Rancho ~~Goleta Estates~~ Mobile Home Park Fire Improvements Project (Project) is intended to improve fire safety within the neighborhood commonly known as Rancho ~~Goleta~~ Estates and consists of the following elements:

Note: After the Draft EIR was released, the applicant chose to remove the car wash facilities from the Project site, and use of the car wash area is no longer part of the proposal. All references to future use of the car wash area have been removed from the project description and the impact analysis.

- Replace two existing fire hydrants at the mobile home park (one between Units #428 and #429 and another between Units #439 and #440), served by a fire line stub off of Sea Gull Drive.
- Install a new fire hydrant near the pool, and another new fire hydrant near the hammerhead turnaround area for the Santa Barbara County Fire Protection District (Fire Department) at the south end of the mobile home park.
- Install a new 8-inch fire line between the two replacement hydrants and the new hydrant near the pool.
- Repave an area in the southeast corner of the mobile home park to function as a hammerhead turnaround for the Fire Department; this was completed in late 2014, but is analyzed as part of this EIR because the environmental impacts from repaving ~~and use of the car wash area located in~~ this turnaround were not previously analyzed, and no permits were issued for ~~these activities~~ this activity.
- ~~Bring the existing unpermitted resident car wash into compliance with applicable local regulations.~~
- Install a 575-foot-long, 8-inch-diameter fire line along the north side of Devereux Creek to the new fire hydrant at the hammerhead turnaround area on the south end of the mobile home park site.
- Construct a 20-foot-wide all-weather emergency access road along the north side of Devereux Creek from the south terminus of Coronado Drive to the hammerhead turnaround.

- Construct a 270-foot-long, 3-foot-high retaining wall north of the emergency access road, 10 feet from the property line of the private residences. The wall would be constructed of Allan Block and backfilled with soil, sloping upward toward the residences.
- Retain the pipe gates on the west end of the emergency access road, near Coronado Drive, and on the east end near the hammerhead turnaround, so that vehicular access would be limited to use by the Fire Department during emergencies. Access also would continue to be available to the Goleta West Sanitary District and Santa Barbara County Flood Control District in accordance with the terms of their existing easements for ingress and egress and for maintenance and flood control and drainage purposes, respectively. Additionally, the area would continue to be accessible to pedestrians and bicyclists.

This EIR is prepared by the City of Goleta (City) in accordance with CEQA and the CEQA Guidelines to evaluate potential environmental impacts resulting from the proposed fire improvements approvals being requested by the applicant. Under CEQA Guidelines § 15367, the City is the lead agency for this EIR. The City will use this EIR when considering the requests that would allow implementation of the Project.

A Notice of Preparation (NOP) was circulated for review and comment by the public, agencies, and organizations as required under CEQA. The NOP and comments received on the NOP are provided in Appendix A. The NOP was sent to the State Clearinghouse at the Governor's Office of Planning and Research to officially solicit statewide agency input on the Project. A public notice for the NOP was published in the *Santa Barbara News Press* on May 18, 2016, to solicit comments. The public review period for the NOP began on May 18, 2016, and ended on June 16, 2016. A total of nine comment letters were received in response to the NOP for the Draft EIR. This EIR has considered all comments received in response to the NOP, including those received during a public scoping meeting on June 1, 2016.

Pursuant to CEQA and the CEQA Guidelines, ~~this the Draft EIR is was being~~ circulated for public review ~~for a period of at least 45 days~~ from October 7, 2016 through November 21, 2016. The Draft EIR ~~is was~~ available for general public review at the Goleta Public Library and at the City of Goleta Planning and Environmental Review office. The Draft EIR also ~~has been was~~ posted online at the City of Goleta's website (www.cityofgoleta.org). An environmental hearing to receive comments on the Draft EIR was held at the Goleta City Council Chambers on November 9, 2016. Interested agencies and members of the public ~~are also were~~ invited to provide written comments on the Draft EIR during the 45-day comment period to the City at the following address:

Mr. Joe Pearson, Associate Planner
City of Goleta
Planning and Environmental Review Department
130 Cremona Drive, Suite B
Goleta, CA 93117
jpearson@cityofgoleta.org

After completing the 45-day review period, the City ~~will reviewed~~ and prepared written responses to each comment as required by CEQA and the CEQA Guidelines. A Final EIR ~~will was~~ then ~~be~~ prepared, incorporating all of the comments received, responses to the comments, and any changes to the Draft EIR that result from the comments received, which are indicated by revision marks. Comments on the Draft EIR were numbered and included in Appendix H; responses to these comments were given corresponding numbers and included in Appendix I. The Final EIR

is available for general public review at the Goleta Public Library and at the City of Goleta Planning and Environmental Review office. The Final EIR also is posted online at the City of Goleta's website (www.cityofgoleta.org). All responses to comments submitted on the Draft EIR by public agencies will be provided to those agencies at least 10 days before final action on the Project. In addition, all persons who commented on the Draft EIR will be notified of the availability of the Final EIR and of the date of the Planning Commission and City Council public hearings concerning certification of the Final EIR. If the City Council certifies the Final EIR, the City Council will make the necessary findings required by CEQA and the CEQA Guidelines regarding the extent and nature of the impacts as presented in the Final EIR.

Public input is encouraged at all public hearings before the City concerning the Project.

1.2 PROJECT BACKGROUND

The applicant agreed to provide the proposed fire improvements (the Project) as requested by the Fire Department as a public benefit for the City processing a condominium conversion of Rancho ~~Estates~~Goleta; the condominium conversion received local approval in 2009. The applicant began the condominium conversion process in 2005 upon filing for a Tentative Map application to convert the Rancho ~~Estates~~Goleta-Mobile Home Park from a rental space facility to a resident-owned facility. The Project was deemed complete on June 29, 2006. Subsequent to that determination, staff prepared an Initial Study per CEQA. The Initial Study was released for public review on August 21, 2006. The Initial Study found that the project posed the potential for significant environmental impacts to occur and that staff was unaware of feasible mitigation measures to reduce such impacts to less than significant levels. Pursuant to CEQA Guidelines § 15065, an EIR is required.

The mobile home park owner challenged that determination in Superior Court and prevailed. The trial court ruled that potential economic displacement of current park residents was not an environmental impact subject to CEQA. The court also found that the determination that such displacement could result in the need for replacement housing to be constructed somewhere else in the City, resulting in unknown, but potentially significant environmental impacts, was too speculative.

Subsequent to the trial court's ruling on the Initial Study determination, the City Council initiated consideration of a Development Agreement (DA) between the City and the mobile home park owner, intended in part to avoid and/or mitigate the potential for such economic displacement to occur as a result of the proposed condominium conversion. In addition, through discussion with the Fire Department, the DA also included an obligation that, subject to City approval, the applicant apply and obtain approvals for various fire safety-related public improvements to Rancho ~~Estates~~Goleta.

On January 12, 2009, the City Planning Commission, acting in an advisory capacity to the City Council, recommended that the Council grant the various approvals for the proposed condominium conversion subject to the findings and conditions. On February 17, 2009, the Goleta City Council introduced an ordinance (No. 09-02) approving the DA. On March 3, 2009, the City Council approved the Tentative Map, approved a Final Development Plan, conducted local review in concept of a Coastal Development Permit, and adopted the ordinance approving the DA. The Council action was unsuccessfully challenged on grounds that it failed to comply with the conversion provisions of Government Code § 66427.5. No timely challenge was made based on environmental review of the DA. In accordance with the approved DA, on November 17, 2014,

the applicant filed an application for approval of the Rancho Estates Goleta Fire Improvements Project.

Because the site is located in the Coastal Zone, the California Coastal Commission (CCC) is the final approval body for the condominium conversion, as well as the Project. Following the local approvals, the applicant began the initial review process with CCC. To date, the CCC has not acted on any component of the applicant's proposals, and is awaiting the City's review and determination on the Project before continuing its processing.

1.3 STRUCTURE OF ENVIRONMENTAL IMPACT REPORT

This executive summary summarizes the project description and conclusions of the impact analyses provided in the Draft EIR. Chapter 2, Project Description, provides a detailed description of the Project evaluated in the Draft EIR. Chapter 3, Related Projects, includes a list of pending and approved projects in the Project vicinity; this list was used, where applicable, in the environmental issue area evaluations of cumulative impacts.

Chapter 4, Environmental Impact Analysis, addresses each of the issue areas that were identified for further discussion during or after the scoping period. Issue areas addressed include:

- Section 4.1 Aesthetics and Visual Resources
- Section 4.2 Biological Resources
- Section 4.3 Cultural Resources
- Section 4.4 Geology and Soils
- Section 4.5 Hydrology and Water Quality
- Section 4.6 Land Use and Planning
- Section 4.7 Noise
- Section 4.8 Public Services
- Section 4.9 Utilities and Service Systems

Each section (4.1 through 4.9) addresses the environmental resource areas listed above and contains the following information:

- **Existing Conditions.** This section describes the physical environmental conditions in the Project area as they relate to the resource being evaluated. CEQA Guidelines establish that existing conditions normally constitute the baseline physical conditions by which the lead agency (in this case, the City) determines whether or not an impact is significant.
- **Regulatory Framework.** This section summarizes the regulations, plans, and standards that apply to the Project and relate to the specific resource area being evaluated.
- **Thresholds of Significance.** This section identifies the thresholds of significance that are used to evaluate the Project's impacts. Significance thresholds can be quantitative or qualitative and are based on Appendix G of the CEQA Guidelines and the City of Goleta's Environmental Thresholds and Guidelines Manual (Thresholds Manual) (City of Goleta 2008). Where a threshold of significance is not relevant to the Project, this is noted, and it is not discussed further.

- **Project Impacts.** The environmental analysis considers the Project's potential impacts resulting from short-term construction and long-term operation of the Project. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:
 - A **significant impact** would cause a substantial adverse effect on the environment. An impact can be **significant and unavoidable (Class I)** when no feasible mitigation measures are available to reduce the impact to a less-than-significant level. An impact also can be **significant but mitigable to less than significant (Class II)** when feasible mitigation measures have been identified.
 - A **less-than-significant impact (Class III)** would cause an adverse effect on the environment, but it would not be substantial and would not exceed the significance criteria established for each resource.
 - A **beneficial impact (Class IV)** also could occur under some circumstances.
 - Additionally, it may be determined that **no impact** would result from the Project.
- **Cumulative Impacts.** This subsection identifies the potential for significant effects to occur as a result of the Project in combination with other development anticipated in the vicinity of the Project site. Where this potential exists, a determination is made as to whether or not the project's contribution to this impact would be cumulatively considerable and therefore significant.
- **Mitigation Measures.** Mitigation measures are identified for each significant Project-specific and cumulative impact that would result from the Project.
- **Residual Impacts.** This subsection identifies the level of significance for Project and cumulative impacts following the implementation of mitigation measures. Residual impacts either would be less than significant (mitigation measures are available that would reduce an impact below the established thresholds of significance) or significant (no feasible mitigation measures have been identified that would reduce an impact below the thresholds of significance; thus, the impact would remain significant and unavoidable). This section also identifies less-than-significant (Class III) impacts that do not require mitigation.

1.4 PROJECT OBJECTIVES

The applicant's objectives for the Project are to:

1. Construct a new emergency access road and Fire Department hammerhead turnaround.
2. Construct fire infrastructure improvements, including upgrade of existing fire hydrants, extension of fire water lines, and construction of new fire hydrants.
3. Provide for improved emergency access to the existing mobile home park development.
4. Improve fire protection infrastructure to and on the existing mobile home park development, thereby improving the safety for the residents and the area.
5. Promote City planning goals by improving fire safety through the provision of additional emergency access and improved fire infrastructure.
6. Minimize impacts on biological resources while providing the necessary fire improvements to improve safety of the mobile home park residents.

7. Protect and preserve public trail access through public park property.
8. ~~Provide a car washing area for the mobile home park residents that complies with applicable regulations.~~

Chapter 5 describes the rationale for resource areas dismissed from further discussion. Chapter 6 describes alternatives to the Project and the extent to which each alternative would reduce and/or avoid the environmental impacts associated with implementation of the Project. Chapter 7 identifies growth-inducing impacts and significant irreversible environmental changes resulting from Project implementation. Chapter 8 lists the EIR preparers, and Chapter 9 includes references used in preparation of the EIR.

1.5 REQUESTED APPROVALS

All permits and required approvals for the Project are included in Table 1-1. A Coastal Development Permit provided by the California Coastal Commission would regulate all aspects of the Project.

Table 1-1 Required Permits and Approvals

Agency	Permit/Approval
California Coastal Commission	Coastal Development Permit
Regional Water Quality Control Board	Waste Discharge Requirements
California Department of Fish and Wildlife	Streambed Alteration Agreement
<u>California Department of Housing and Community Development</u>	<u>Construction Permit</u>
City of Goleta	Development Plan, building permits, approval of haul routes and times required
Goleta Water District	Approval required
Goleta West Sanitary District	Connection permit, approval required
Santa Barbara County Fire Protection District	Approval required

1.6 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table 1-2 summarizes the Project's environmental impacts and the measures identified to mitigate these impacts, using the highest impact classification (i.e., if a resource would have Class I, II, and III impacts, only the Class I [significant and unavoidable] impact is shown). The residual impact remaining after the mitigation measure is applied also is identified.

Table 1-2 Impact Summary Table

Impact	Impact Classification	Mitigation Measure	Residual Impact
Aesthetics			
Impact AES-1. Scenic Resources	Class II	MM BIO-4. Protect/ Replace/ Enhance Riparian Habitat	Less than Significant
Impact AES-2. Visual Character and Quality	Class II	MM BIO-4. Protect/ Replace/ Enhance Riparian Habitat	Less than Significant

Table 1-2 Impact Summary Table

Impact	Impact Classification	Mitigation Measure	Residual Impact
Biological Resources			
Impact BIO-1. Special-Status Plant/Animal Species	Class II	MM BIO-1 General Biological Resource Protection during Construction MM BIO-2. Protection of Special-status Plant Species MM BIO-3. Protection of Special-Status Wildlife	Less than Significant
Impact BIO-2. Riparian/Other Sensitive Natural Communities	Class II	MM BIO-4. Protect/ Replace/ Enhance Riparian Habitat	Less than Significant
Impact BIO-3. Wetlands	Class III	No mitigation is required	Less than Significant
Impact BIO-4. Wildlife Movement	Class III	No mitigation is required	Less than Significant
Impact BIO-5. Conflicts with Policies	Class I ¹	MM BIO-5. Protection of SPA Buffer from Non-local Genotypes of Native Species MM BIO-6. Protection of SPA Buffer from Human Encroachment	Significant
Impact BIO-6. Loss of Wildlife Habitat	Class II	MM BIO-7. Protection of Wildlife Habitat	Less than Significant
Cultural Resources			
Impact CUL-1. Historic and Prehistoric Resources	Class II	MM CUL-1. Construction Monitoring	Less than Significant
Impact CUL-2. Paleontological Resources/Geologic Features	Class II	MM CUL-2. Discovery of Paleontological Resources	Less than Significant
Geology and Soils			
Impact GEO-1. Fault Rupture, Seismic Ground-shaking, Seismically Induced Landslides, or Liquefaction	Class III	No mitigation is required	Less than Significant
Impact Geo-2. Soil Erosion/Loss of Topsoil	Class III	No mitigation is required	Less than Significant
Impact Geo-3. Expansive Soils	Class III	No mitigation is required	Less than Significant
Hydrology and Water Quality			
Impact HYD-1. Surface Water and Groundwater Quality (Construction Impacts)	Class III	No mitigation is required	Less than Significant
Impact HYD-2. Surface Water and Groundwater Quality (Operational Impacts)	Class III	No mitigation is required MM HYD-1. Discharge Car Wash Runoff to Sewer System	Less than Significant
Impact HYD-3. Stormwater Flows and Drainage	Class III	No mitigation is required	Less than Significant

Table 1-2 Impact Summary Table

Impact	Impact Classification	Mitigation Measure	Residual Impact
Land Use			
Impact LU-1. Conflict with Applicable Land Use Plan, Policy, or Regulation	Class I	MM BIO-5. Protection of SPA Buffer from Non-local Genotypes of Native Species MM BIO-6. Protection of SPA Buffer from Human Encroachment	Significant
Noise			
Impact NOI-1. Construction Noise	Class II	MM NOI-1: Limit Hours of Operation MM NOI-2: Shield Stationary Equipment MM NOI-3: Other Construction Measures	Less than Significant
Impact NOI-2. Vibration	Class III	No mitigation is required	Less than Significant
Public Services			
Impact PS-1. Provision of Fire Protection Services	Class IV	No mitigation is required	Beneficial
Utilities and Service Systems			
Impact USS-1. Water Supply Availability	Class III	No mitigation is required	Less than Significant
Impact USS-2. Solid Waste Disposal	Class III	No mitigation is required	Less than Significant
Cumulative Impacts			
Aesthetics	Class III	No mitigation is required	Less than Significant
Biological Resources	Class I	No feasible mitigation was identified ¹	Significant
Cultural Resources	Class II	MM CUL-1. Construction Monitoring MM CUL-2. Discovery of Paleontological Resources	Less than Significant
Geology and Soils	No Impact	No mitigation is required	Less than Significant
Hydrology and Water Quality	No Impact	No mitigation is required	Less than Significant
Land Use and Planning	Class I	MM BIO-5. Protection of SPA Buffer from Non-local Genotypes of Native Species MM BIO-6. Protection of SPA Buffer from Human Encroachment	Significant
Noise	No Impact	No mitigation is required	Less than Significant
Public Services	No Impact	No mitigation is required	Less than Significant

Table 1-2 Impact Summary Table

Impact	Impact Classification	Mitigation Measure	Residual Impact
Utilities and Service Systems	Class III	No mitigation is required	Less than Significant

Notes:

Class I = significant impact

Class II = significant but mitigable to less than significant

Class III = less than significant

1. Potential policy inconsistencies exist due to construction within the Streamside Protection Area (SPA) buffer. As proposed, a 100-foot SPA buffer is not feasible at the emergency access road site because the parcel is too narrow, and a 100-foot buffer would encroach on the adjacent residential neighborhood located along Daytona Drive. These homes were constructed prior to the City's incorporation and adoption of the SPA buffer policy. If the City Council approves the Project as proposed and there is a feasible alternative Project siting that would maintain the 100-foot SPA buffer, this determination would result in a significant (Class I) impact because the access road and fire line would conflict with a local policy protecting biological resources. If the City Council determines that alternative Project siting within the property that would maintain the 100-foot SPA buffer is not feasible, the emergency access road and fire line as proposed would result in a less than significant (Class III) impact because they would not conflict with a local policy protecting biological resources. However, other Class I impacts on biological resources from policy inconsistencies also have been identified; thus, the overall impact would remain Class I even if the impact associated with the SPA buffer was determined to be Class III.

1.7 ALTERNATIVES TO THE PROPOSED PROJECT

1.7.1 Alternative 1: No Project Alternative

The No Project Alternative is defined in CEQA Guidelines § 15126.6(e) as:

“...the existing conditions at the time of the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

Existing conditions at the Project site are described in each of the impact analyses in Chapter 4, Environmental Impact Analysis.

Under the No Project Alternative, none of the proposed fire protection improvements would be implemented, and the hammerhead turnaround would remain paved, ~~and the car wash facilities would be removed and the area could no longer be used for this purpose.~~

1.7.2 Alternative 2a: Alternative Access Road

Under this alternative, gated emergency access would be taken from Sea Gull Drive instead of north of Devereux Creek and the fire hydrant at the hammerhead would be connected to the fire line off of Sea Gull Drive in place of a new fire line adjacent to Devereux Creek. To create space for this road, two mobile homes that are immediately adjacent to Sea Gull Drive, would need to be removed. Approximately 60 feet of new paved roadway would be constructed, and the trees that border the mobile home park in this area would be removed. About 460 feet of additional trenching through the paved area of the site would also be required. The hammerhead turnaround would remain in its current location, and other proposed fire protection improvements would remain as they are under the Project, with the exception of the retaining wall north of Devereux Creek, which would not be required nor would hydroseeding of adjacent slopes.

1.7.3 Alternative 2b: No Emergency Access Road and Alternative Fire Line Location

Under this alternative, no emergency access would be constructed, and the fire hydrant at the hammerhead would be connected to the fire line off Sea Gull Drive in place of a new fire line adjacent to Devereux Creek. About 460 feet of additional trenching through the paved area of the site would be required. Because the emergency access road would be removed from the Project, no new grading or road surfacing would be needed, no trees would be removed, vegetation near Devereux Creek would not need to remain trimmed to meet Fire Department requirements, and no mobile homes would be removed. The hammerhead turnaround would remain in its current location, and other proposed fire protection improvements would remain as they are under the Project, except for the retaining wall north of Devereux Creek, which would not be required, nor would hydroseeding of adjacent slopes.

1.7.31.7.4 Alternative 3: Alternative Car Wash Location

Under this alternative, the car wash area would be relocated from the hammerhead turnaround to a site the near the pool. All other proposed fire protection improvements would remain the same.

1.8 COMPARISON OF ALTERNATIVES

The alternatives assessed in this EIR include various approaches to reducing or avoiding one or more of the Project's impacts. Table 1-3 provides a comparison of environmental impacts associated with the Project and the various alternatives, using the highest impact classification (i.e., if a resource would have Class I, II, ~~and III~~, and IV impacts, only the Class I [significant and unavoidable] impact is shown). Both the impact classifications and the relative degree of impact of the alternatives compared to the Project are shown. Alternative 2a is considered the environmentally superior alternative because it is the only alternative that would reduce significant impacts of the Project while meeting Project objectives.

1.9 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

No areas of controversy or issues to be resolved have been identified.

1.10 REFERENCE MATERIALS

Reference materials used in preparing this EIR are included in Chapter 9 and cited in each section where they are used. Reports, documents, and maps are available for public review at the City of Goleta Planning and Environmental Review Department (130 Cremona Drive, Suite B, Goleta, phone number 805-961-7500) or contact Mr. Joe Pearson (805-961-7573) or via email: jpearson@cityofgoleta.org).

Table 1-3 Comparison of Environmental Impacts for Project Alternatives

Environmental Impacts	Proposed Project	Impacts of Alternatives Compared to the Proposed Project							
		Alternative 1 No Project		Alternative 2a Alternative Access Road and Fire Line Location		Alternative 2b No Emergency Access Road and Alternative Fire Line Location		Alternative 3 Alternative Car-Wash Location	
Aesthetics	Class II	<u>No Impact</u> Class IV	-	Class III	-	<u>No impact</u>	=	Class II	=
Biological Resources	Class I ¹	<u>No Impact</u> Class IV	-	Class II	-	Class II	=	Class I ⁺	=
Cultural Resources	Class II	No Impact	-	Class II	=	Class II	=	Class II	=
Geology and Soils	Class III	No Impact	-	Class III	=	Class III	=	Class III	=
Hydrology and Water Quality	Class III	<u>No Impact</u> Class IV	-	Class III	=	Class III	=	Class II	=
Land Use and Planning	Class I	No Impact	-	No Impact	-	<u>No Impact</u>	=	Class I	=
Noise	Class II	No Impact	-	Class II	=	Class III	=	Class II	=
Public Services	Class IV	Class I	+	Class IV	=	Class IV	=	Class IV	=
Utilities and Service Systems	Class III	No Impact	-	Class III	=	Class III	=	Class III	=

Notes:

Class I = significant impact

Class II = significant but mitigable to less than significant

Class III = less than significant

Class IV = beneficial

1. Potential policy inconsistencies exist due to construction within the Streamside Protection Area (SPA) buffer. As proposed, a 100-foot SPA buffer is not feasible at the emergency access road site because the parcel is too narrow, and a 100-foot buffer would encroach on the adjacent residential neighborhood located along Daytona Drive. These homes were constructed prior to the City's incorporation and adoption of the SPA buffer policy. If the City Council approves the Project as proposed and there is a feasible alternative Project siting that would maintain the 100-foot SPA buffer, this determination would result in a significant (Class I) impact because the access road and fire line would conflict with a local policy protecting biological resources. If the City Council determines that alternative Project siting within the property that would maintain the 100-foot SPA buffer is not feasible, the emergency access road and fire line as proposed would result in a less than significant (Class III) impact because they would not conflict with a local policy protecting biological resources. However, other Class I impacts on biological resources from policy inconsistencies also have been identified; thus, the overall impact would remain Class I even if the impact associated with the SPA buffer was determined to be Class III.

"+" Impacts from this alternative would be greater than the proposed Project.

"-" Impacts from this alternative would be less than the proposed Project.

"=" Impacts from this alternative would be similar to the proposed Project.

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