

Chapter 5

Policy Consistency Analysis

5.1 Policy Consistency Analysis

The following is a preliminary analysis of the proposed Project’s consistency with applicable County policies, focusing on those policies that may require conditions or mitigation measures to ensure Project consistency. This analysis is preliminary and subject to change prior to taking final action on the Project. The decision maker will make the final decision regarding consistency. Policies applicable to the Project are those found in the County’s Comprehensive (General) Plan, including the various Plan Elements and the Coastal Land Use Plan (CLUP).

Table 5-1. Policy Consistency Analysis

POLICY REQUIREMENT	DISCUSSION
Fire Protection	
<p>CLUP Policy 2-6: <i>Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e. water, sewer, roads, etc.) are available to serve the proposed development.</i></p>	<p>Consistent: Access to Cate School would continue to be provided by a private driveway at Lillingston Canyon Road. The Carpinteria Summerland Fire District (CSFD) has reviewed preliminary plans and provided input during development of the Project. New development has been designed to meet approved fire protection design criteria and adhere to CSFD standards, which would be confirmed through the established permit review process, including standards for access, water supply for fire suppression, and fuel management. Therefore, the proposed Project would be consistent with this policy.</p>
<p><i>Coastal Act Policy 30253: New development shall:</i></p> <ol style="list-style-type: none"> <i>1. Minimize risks to life and property in areas of high geologic, flood, and fire hazard.</i> <i>2. Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.</i> 	<p>Consistent: The Project is not located in an area of high geologic or flood hazards. However, the Project is located within a Very High Fire Severity Hazard Zone. The Project includes creation of fuel modification zones surrounding the structures of each development envelope. Cate School would continue to be adequately served by the Carpinteria-Summerland Fire District (CFSD) Fire Station 1. As discussed in Section 3.2, MM FP-1a, <i>Fire Protection Measures</i>, requires specific measures to reduce the potential for brush or grass fires to be caused by construction activities and equipment. MM FP-3a, <i>Fuel Management Plan</i>, requires submittal and approval by Planning and Development and the CFSD of a Fuel Modification Plan, and requires that only fire-resistant species from the CSFD High Fire Hazard Area Desirable Plant List be used for landscaping. MM FP-3b, <i>Tree Clearance and Maintenance</i>, requires tree</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
	<p>clearance and maintenance of existing trees to be retained that are within 100 feet of structures, and a report by a certified arborist. MM FP-5a, <i>Fire Resistant Construction</i>, requires that all structures be constructed with specific fire prevention features (e.g. sprinkler systems, fire resistant building materials, etc.), consistent with Uniform Building Code and CSFD standards. Compliance with this measure would also be confirmed through the standard building permit approval and inspection process, which includes issuance of a Fire Protection Certificate by the CSFD prior to issuance of any Building Permit. Finally, MM FP-7a, <i>Emergency Evacuation Plan Update</i>, requires the preparation and submittal of an emergency evacuation plan for review and approval by the CSFD and County prior to each phase of construction, with annual reporting to confirm compliance with the training requirements therein. Therefore, fire hazards are reduced to less than significant levels and risks to life and property would be minimized as part of the Project, consistent with this policy.</p>
Noise	
<p>Noise Element Policy 1: <i>In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.</i></p> <p>Noise Element Policy 2: <i>Noise-sensitive land uses should be considered to include:</i></p> <ul style="list-style-type: none"> a) <i>Residential, including single and multifamily dwellings, mobile home parks, dormitories, and similar uses.</i> b) <i>Transient lodging, including hotels, motels, and similar uses.</i> c) <i>Hospitals, nursing homes, convalescent hospitals, and other facilities for long-term medical care.</i> d) <i>Public or private educational facilities, libraries, churches, and places of public assembly.</i> 	<p>Consistent: The existing and proposed uses on the site (a private school, faculty residences, and dormitories) are considered noise-sensitive. The property is also surrounded by other noise-sensitive uses (i.e. residential development). The Project has been designed and would be conditioned to protect these uses from significant noise impacts, both during construction and during continued operation of the campus.</p> <p>Several noise studies were conducted for the Project (Appendix E). Based on these studies and the analysis provided in Section 3.3 (Impact NOI-1), implementation of MM NOI-1a through NOI-1d would ensure that noise from construction activities with the potential of exceeding 65dBA at the property lines would be properly regulated and controlled to minimize disturbance to noise-sensitive uses in the vicinity. MM NOI-1a, <i>Construction Hours</i>, requires that construction equipment arrive no earlier than 7:30 A.M., and limits noise generating construction activity to 8:00 A.M. to 5:00 P.M., with no work allowed on weekends and holidays. MM NOI-1b, <i>Noise Equipment Shielding-Construction</i>, requires that construction equipment be muffled according to manufacturer’s or County’s specifications, whichever is more stringent; that noise generating equipment be staged away from noise sensitive activities, as feasible; and that</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
	<p>supplemental noise attenuation barriers or blankets be employed to the satisfaction of the County. MM NOI-1c, <i>Staging Area</i>, requires that construction staging areas, worker parking, and operation of earth moving equipment within the Project site be located as far away from vibration and noise sensitive uses as possible. MM NOI-1d, <i>Construction Noise</i>, requires submittal of a Haul Truck Plan prior to the Zoning Clearance for each phase of development, to ensure that haul trucks are routed away from residential streets and sensitive receptors to the maximum extent feasible.</p> <p>In addition to noise from construction, some elements of the proposed Project would also generate increased operational noise compared to the previously approved Project, from increased use of the water treatment system, HVAC systems, landscaping maintenance, traffic, and use of the outdoor public address system. However, based on the analysis contained in Section 3.3, the increase in operational noise from the Project would be negligible, and no operational element of the proposed Project would cause it to exceed adopted noise thresholds. In particular, the results of the Noise Analysis performed for the Project (Appendix E) indicate that noise generated during special events that use an amplified sound system would not exceed 61.5 dBA at the closest (northern) property line. The Project would also be required to comply with the requirements of the County’s Noise Ordinance (42-2 Co. Ord., <i>Nighttime Noise Restrictions</i>), which restricts noise generated from special events during late night and early morning hours.</p> <p>With implementation of the measures described above, the proposed Project would be consistent with these policies and standards.</p>
Aesthetic / Visual Resources	
<p>Coastal Act Policy 30251: <i>The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.</i></p>	<p>Consistent: Cate School is located on a mesa in the Santa Ynez Mountain foothills above Carpinteria, surrounded by private ranch and agricultural properties. All but one of the faculty residences would be set into an existing hillside. The new dormitories and student facilities, and the remaining faculty residence, would be located on the northwest area of the mesa adjacent to the existing freshman dormitory complex. Both of these locations are largely screened from public view, and the closest neighboring residence is approximately 1,600 feet to the north. The proposed development is either clustered with existing campus development, or clustered in the</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p>CLUP Policy 4-3: <i>In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.</i></p>	<p>southwest part of the property, even further away from neighboring residential development. As a result, the Project would not block any public views of the ocean or public or private views of the mountains or other scenic coastal areas.</p> <p>The new faculty residences in the southwest portion of the site would be located on a vegetated slope that is between 20 and 30 percent in some areas of the proposed development. These homes are designed to be single story and set into the hillside, following the natural contours of the landscape. None of the proposed new or remodeled structures would intrude into the skyline as seen from public viewing places. However, without careful consideration of the design of these new buildings, including color and materials, the new structures could be visually incompatible with the rural character of the area. In addition, construction of new buildings on campus and modifications to the landscaping could introduce more night lighting into the area. The South Board of Architectural Review (SBAR) conceptually reviewed the proposed Project on two occasions (on February 2, 2013 and June 5, 2015), gave favorable comments, and requested that the Project return for preliminary approval. MM AEST-1, <i>SBAR Required</i>, would ensure that SBAR has final review and approval authority over the designs, colors and materials selected for the new structures to ensure their compatibility with the rural character of the area, and final approval authority over the lighting to ensure that it is low in intensity and fully hooded and shielded to prevent glare and spillover onto adjacent properties. MM AEST-2, <i>Building Materials</i>, requires the use of natural colors and materials to further blend the new development into the rural landscape. MM AEST-4, <i>Lighting</i>, requires the Project’s exterior lighting to be low intensity, low glare, minimum height, and hooded; the Project would also be conditioned to ensure that the exterior lighting is dark-sky compliant. Implementation of these measures would ensure that the Project would be consistent with these policies.</p>
Agricultural Resources	
<p>Coastal Act Policy 30241: <i>The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas’ agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:</i></p> <p><i>(a) By establishing stable boundaries separating urban and rural areas, including, where necessary,</i></p>	<p>Consistent: The Project site is zoned for agriculture, but it has an Educational Facility Comprehensive Plan land use designation and has functioned as a high school since 1913. The first CUP for operation of the school was issued in 1959. Vedder Ranch, a 105-acre agricultural operation, is located immediately north of the Cate campus and contains lemon and avocado orchards in active production. The new faculty</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p><i>clearly defined buffer areas to minimize conflicts between agricultural and urban uses.</i></p> <p><i>(e) By assuring that public service and facility expansions and non-agricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.</i></p> <p>CLUP Policy 8-2: <i>If a parcel is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to non-agricultural use shall not be permitted unless the conversion of the entire parcel would allow for another priority use under the Coastal Act, e.g., coastal dependent industry, recreation and access, or protection of an environmentally sensitive habitat. Such conversion shall not be in conflict with contiguous agricultural operations in the area, and shall be consistent with Section 30241 and 30242 of the Coastal Act.</i></p>	<p>residence west of the existing tennis courts in the northwest area of campus would be the closest new structure to the Vedder Ranch, at more than 200 feet from the adjacent property line and over 300 feet from the nearest orchard. The new residence would be separated from the adjoining property by low, vegetated hills and a road. As a result, the introduction of new habitable structures closer to the agricultural operation on Vedder Ranch (specifically the introduction of the new dormitories and the single faculty residence), would not significantly increase the potential for land use conflicts between agricultural operations and the educational land uses at Cate (e.g., pesticide drift complaints, noise complaints etc.).</p> <p>None of the on-site soils are designated as prime soils. In order to accommodate the new development, the Project would include improvements to the existing drainage system, some of which would occur within existing avocado orchards. Drainage from the northern area of development would be conveyed through a closed pipe to a detention basin and above- and below-ground storage tanks on a Cate-owned agricultural parcel west of Lillingston Canyon Road, adjacent to Carpinteria Creek. A portion of the western detention system would be located within an existing avocado orchard on this 5.3-acre agricultural parcel and would impact approximately 0.57 acre of orchard, requiring the loss of approximately 43 avocado trees. Most of these trees were planted within the last 5 years, and, as such, their removal would not significantly impact production yields, and the majority of these orchards would remain in production. Additionally, approximately 60 to 70 percent of the disturbed area could be re-planted with orchard trees after completion of the underground elements of the drainage system. Drainage from the southern system, located within the southwestern corner of the main campus parcel, would impact approximately 0.13 acre of avocado orchard and require the removal of approximately 9 to 10 mature trees, which represents a small fraction of the overall orchard acreage. Loss of these trees is also not expected to significantly impact production yields. Overall, the majority of the existing agricultural use would remain, and agricultural productivity would not be significantly affected by the Project. Therefore, the proposed Project would be consistent with this policy.</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
Biological Resources	
<p>CLUP Policy 9-1: <i>Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat area shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc., shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an environmentally sensitive habitat area may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.</i></p>	<p>Consistent: Although no environmentally sensitive habitat (ESH) is mapped on or within 250 feet of the Project area, Carpinteria Creek meets the CLUP’s definition of ESH. The Project area was surveyed and habitat areas were mapped by a qualified biologist, and all habitats potentially affected by the Project have been mapped and would be required to be depicted on all plans. Standard monitoring conditions would ensure that the site be inspected by a biologist as needed during construction potentially affecting ESH. Therefore, the Project would be consistent with this policy.</p>
<p>CLUP Policy 9-35: <i>Oak trees, because they are particularly sensitive to environmental conditions, shall be protected. All land use activities, including cultivated agriculture and grazing, should be carried out in such a manner as to avoid damage to native oak trees. Regeneration of oak trees on grazing lands should be encouraged.</i></p> <p>CLUP Policy 9-36: <i>When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees</i></p>	<p>Consistent: The Project has been sited and designed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation, impact the fewest number of oak trees possible, and to preserve areas containing significant amounts of native vegetation. Nonetheless, the Project would result in the loss of approximately 0.4 acre of coast live oak woodland habitat. In addition, reduction of oak woodland understory vegetation within the proposed 100-foot fuel management zone around new development may occur. A total of 0.7 acre of mapped coast live oak woodland/forest is located within the 100-foot fuel management zones. The Project would also result in direct impacts to lemonade berry scrub habitat totaling approximately 1.6 acres and an additional 0.3 acre of lemonade berry - California sagebrush - mountain mahogany scrub associated with the 100-foot fuel management zone. Direct impacts to ashy-leaf buckwheat dominated plant communities would also occur, and approximately 0.4 acre of this sensitive habitat occurs within the 100-foot fuel management area of new development. The Project would not result in any direct impacts to rare or sensitive plant species. The Project would result in the loss of approximately 2.5 acres of other non-sensitive plant communities containing both native and non-native vegetation, including other coastal sage scrub associations, chaparral habitat, native and non-native trees and shrubs, and eucalyptus. Approximately 16 coast live oak trees and three sycamores would be removed and an additional five oak trees would be significantly impacted by encroachment into the critical root zone. There are no other viable locations on the campus to site new</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
	<p>development in order to avoid the oak tree removal and disturbance to native vegetation. Native trees removed or significantly impacted would be mitigated through replacement planting to ensure consistency with County policies preserving native trees to the extent feasible. MM BIO-1a, <i>Habitat Restoration</i>, requires implementation of a Planning and Development-approved Restoration Plan designed to replace, restore, and/or enhance impacted sensitive vegetation communities within the Project site, with mitigation restoration planting acreage based on actual impacts during Project phases. MM FP-3a, <i>Fuel Management Plan</i>, requires preparation of a Fuel Management Plan that details methods for achieving fire safety around new buildings while preserving the integrity and function of affected native plant communities to the maximum extent feasible. MM BIO-1c, <i>Distribution Limits</i>, requires fencing of all sensitive vegetation types within 25 feet of construction activities. MM BIO-1d, <i>Preconstruction Surveys</i>, requires pre-construction surveys by a qualified biologist to ensure that sensitive resources within the disturbance areas are identified, flagged and/or fenced, and avoided. Incorporation of these mitigation measures into conditions of approval for the Project would ensure that the Project would be consistent with these policies.</p>
<p>CLUP Policy 9-37: <i>The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams: 1) soil type and stability of stream corridors; Coastal Land Use Plan Republished May 2014 143; 2) how surface water filters into the ground; 3) slope of the land on either side of the stream; and 4) location of the 100-year flood plain boundary. Riparian vegetation shall be protected and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible.</i></p> <p>CLUP Policy 9-38: <i>No structures shall be located within the stream corridor except: public trails, dams</i></p>	<p>Consistent: The Project includes improvements to an existing drainage system to accommodate site runoff. A portion of the northern system – a drainage basin and underground and above-ground storage tanks - would be located within the 100-foot buffer area of Carpinteria Creek which currently contains an active avocado orchard. This part of the northern drainage system would not be located within the stream corridor, and no riparian habitat would be removed or otherwise affected by the Project. MM GEO-2, <i>Erosion and Sediment Control Plan</i>, MM WAT-1, <i>Storm Water Control Plan Approval</i> and MM WAT-3a to MM WAT-3c require best management practices during construction to ensure that pollutants and sediments are not conveyed into any water bodies. The Project would not affect biological productivity, water quality, or the hydrologic characteristics of the site. Therefore, the Project would be consistent with these policies.</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p><i>for necessary water supply projects, flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development; and other development where the primary function is for the improvement of fish and wildlife habitat. Culverts, fences, pipelines, and bridges (when support structures are located outside the critical habitat) may be permitted when no alternative route/location is feasible. All development shall incorporate the best mitigation measures feasible.</i></p> <p>CLUP Policy 9-40: All development, including dredging, filling, and grading within stream corridors, shall be limited to activities necessary for the construction of uses specified in Policy 9- 38. When such activities require removal of riparian plant species, revegetation with local native plants shall be required except where undesirable for flood control purposes. Minor clearing of vegetation for hiking, biking, and equestrian trails shall be permitted.</p>	
Cultural Resources	
<p>Coastal Act Policy 30244: Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.</p> <p>CLUP Policy 10-1: All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.</p> <p>CLUP Policy 10-2: When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.</p> <p>CLUP Policy 10-3: When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.</p>	<p>Consistent: The Phase 1 archaeological resources report conducted for the proposed Project (Stone 2012) did not identify any potentially significant prehistoric resources in the Project area. However, it is possible that cultural resources not presently known to exist on the Project site could be encountered during grading and construction of the proposed Project. MM CULT-1, <i>Stop Work at Encounter</i>, requires that, if archaeological remains are discovered during construction, work would be stopped or redirected, and procedures outlined in the County Cultural Resource Guidelines are followed.</p> <p>As discussed in Section 4.8, onsite development would involve alterations to and demolition of structures and landscaping over 50 years old. Based on the historic resources report prepared for the Project (Post/Hazeltine Associates 2012), a number of buildings that were designed by Reginald Johnson, considered together, are historically significant. These are the Mesa House, School House building, High House, Raymond Commons, Hooker Infirmary, Fleischmann Gymnasium, Parsonage Dormitory, House at 1788 Cate Mesa Road, and the former stable building. The landscape designed by Lockwood de Forest is also considered historically significant. All of these are eligible for listing as a County Historic Landmark. The Katherine Thayer Cate Memorial</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
	<p>Chapel is also eligible for listing as a County Historic Landmark. Additionally, these structures and landscapes are eligible for listing in the California Register of Historical Resources and National Register of Historic Places.</p> <p>In addition to evaluating the significance of on-site resources, the Post/Hazeltine report analyzed the effects of the Project on resources determined to be significant. Post/Hazeltine concluded that implementation of the Project would not alter the complex of buildings designed by Reginald Johnson and the landscape designed by Lockwood de Forest Jr. such that their eligibility for listing as a County of Santa Barbara Historic Landmark would be impaired. The report also concludes that the new development would not significantly impact the integrity of the nearby historic buildings or impact the remaining elements of the historic landscape. In order to lessen the impact of the alterations to the complex of historic structures and associated historic landscape, MM HIST-1a, <i>Photo-documentation</i>, requires photo documentation of the High House Dormitory, Parsonage House Dormitory, and Infirmary Building prior to their alteration/demolition, and archiving of the documentation at the Santa Barbara Historical Society’s Gledhill Library and the Carpinteria Valley Historical Museum. MM HIST-1b, <i>Historian Review</i>, requires that the final building and landscaping plans be reviewed by an approved historian to ensure that they meet the Secretary of the Interior’s Standards and the County’s preservation guidelines.</p> <p>With implementation of these measures, the Project would be consistent with these policies.</p>
Energy	
<p>Coastal Act Policy 30253(4). <i>New development shall minimize energy consumption and vehicle miles traveled.</i></p>	<p>Consistent: Compliance with the requirements of the most current Uniform Building Code, which requires energy-efficient design, would ensure compliance with this policy. In addition, construction of new faculty housing onsite would eliminate the commute made by faculty currently living offsite. Therefore, the proposed Project would be consistent with this policy.</p>
Geologic Processes	
<p>Coastal Act Policy 30253: Refer to description in the <i>Fire Protection</i> section above.</p>	<p>Consistent: Refer to discussion in the <i>Fire Protection</i> section above.</p>
<p>CLUP Policy 3-8: <i>Applications for grading and building permits, and applications for subdivision shall be reviewed for adjacency to, threats from, and impacts on geologic hazards arising from seismic</i></p>	<p>Consistent: The Project site is in an area that is subject to certain geologic hazards, including landslides, slope instability, expansive soils, earthquakes, etc. The new faculty houses proposed</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p><i>events, tsunami runup, landslides, beach erosion, or other geologic hazards such as expansive soils and subsidence areas. In areas of known geologic hazards, a geologic report shall be required. Mitigation measures shall be required where necessary.</i></p>	<p>west of Cate Mesa Road would be located on a slope that in some areas exceeds 20 percent. Other development, including dormitories, is proposed near the edges of steep slopes and is thus susceptible to damage from slope instability. Geologic reports have been prepared as part of the proposed Project and mitigation measures are required, as identified in the reports and in Section 4.6 of the EIR, in order to ensure the proposed Project does not exacerbate existing geologic hazards or result in exposing structures, residents, or members of the public to geologic hazards. Compliance with these measures and adherence to the most current Uniform Building Code requirements would be ensured through the normal building permit review and inspection process. Therefore, the Project would be consistent with this policy.</p>
<p>CLUP Policy 3-13: <i>Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</i></p> <p>CLUP Policy 3-14: <i>All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</i></p>	<p>Consistent: The new development proposed by the Project is designed to minimize cut and fill operations. The development is designed to fit the site topography, soils, hydrology, and geology, and is oriented so that grading and other site preparation is minimized to the extent feasible. Most of the area where construction would occur is relatively flat. The Project would require net grading amounts of approximately 14,990 cubic yards (cy) of cut and 15,500 cy of fill. Some of this grading would be associated with structural foundations in the relatively level areas of the site, placement of utilities, and installation of the below ground elements of the drainage system. Much of the grading, however, would be associated with construction of the cluster of faculty residences in the southwest portion of the site. These single-story homes would be stepped into an undeveloped, vegetated slope that in some areas is between 20 and 30 percent. The residences and their associated access drive are designed and oriented to fit the site topography and avoid native trees to the maximum extent feasible. There are no areas of the site with known hazards that would be developed as part of the Project. Two geotechnical studies were conducted for the Project, and their results would guide the construction of safe structural foundations in this area as well as for the remainder of site development.</p> <p>While the Project is designed to minimize impervious areas and facilitate retention of water on site, the proposed development would increase the amount of impervious area by approximately 129,641 square feet (2.98 acres), with a concomitant increase in the amount of surface runoff. The Project would include</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
	<p>improvements to and expansion of the existing drainage system to serve the new development. The drainage system is designed to accommodate increased runoff and ensure that runoff exiting the site is properly conveyed and does not exceed pre-Project levels. Bioswales and a detention basin are proposed to allow opportunities for groundwater recharge, consistent with Coastal Plan Policy 3-18. The drainage system would be required to comply with Flood Control Division design standards and receive Flood Control’s approval prior to issuance of the first Zoning Clearance for the Project.</p> <p>In order to prevent the discharge of sediments and pollutants that might degrade water quality during construction, mitigation measures have been applied to the Project. MM GEO-2, <i>Erosion and Sediment Control Plan</i>, requires preparation of a Storm Water Pollution Prevention Plan (SWPPP), Storm Water Management Plan (SWMP) and/or an Erosion and Sediment Control Plan (ESCP), as required by the latest edition of the California Green Code and/or Chapter 14 of the Santa Barbara County Code. The potential for discharge of pollutants during construction is also addressed in MM WAT-1, <i>Storm Water Control Plan Approval</i>, which outlines specific construction site measures to prevent water contamination. MM WAT-3a, <i>SWPPP</i>, also requires the applicant to provide Planning and Development with a SWPPP prior to issuance of the Zoning Clearance. In order to address the potential for water pollution after the completion of construction, MM WAT-2, <i>Stormwater Control Plan – Project Objective</i>, requires approval of an Operational Stormwater Plan designed to prevent the entry of pollutants into the stormwater system after development. Planning and Development and Project Clean Water review and approval, as appropriate, is required for all plans mandated by these measures.</p> <p>Additionally, MM BIO-2b, <i>Construction Near Creeks</i>, prohibits construction activities that might affect creeks from occurring during the rainy season, or, if construction cannot be deferred to beyond the rainy season, requires implementation of appropriate stormwater best management practices. MM BIO-2c, <i>Raptor, Special Status Species, and Nesting Bird Protection</i>, requires a designated construction equipment washout area located at least 100 feet from any storm drain or water body in order to contain polluted water, and requires that this washout water be removed from the site as often as necessary to avoid spills. MM BIO-2d, <i>Equipment Storage-</i></p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
	<p><i>Construction</i>, requires the designation of a construction equipment storage and filling area located within the site and more than 100 feet from any water body, to contain spills and prevent contamination from discharging to storm drains or surrounding creeks.</p> <p>Together, these measures would ensure that pollutants would not be discharged into or alongside coastal streams or wetlands either during or after construction. Therefore, the Project would be consistent with these policies</p>
<p>CLUP Policy 3-15: <i>For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.</i></p> <p>CLUP Policy 3-16: <i>Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained throughout the development process to remove sediment from runoff waters. All sediment shall be retained onsite unless removed to an appropriate dumping location.</i></p> <p>CLUP Policy 3-17: <i>Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.</i></p>	<p>Consistent: The Project would require net grading amounts of approximately 11,770 cy of cut and 13,580 cy of fill. With the exception of the proposed faculty housing cluster, most of the grading would occur on relatively level areas of the site. As described above, mitigation measures applied to the Project require preparation, approval, and implementation of a SWPPP, and/or ESCP, as appropriate. The SWPPP, SWMP, and ESCP are required to be designed to minimize erosion and sedimentation during construction and to be implemented for the duration of the grading period and until re-graded areas have been stabilized by structures, long-term erosion control measures or permanent landscaping. Additionally, MM WAT-3c, <i>Erosion and Sediment Control Revegetation</i>, requires that the applicant re-vegetate graded areas within 30 days of completion of grading with deep rooted, native, drought-tolerant species to minimize slope failure and erosion potential. All grading plans would be subject to approval by Building and Safety, and grading inspectors and permit compliance personnel would ensure compliance in the field with approved grading plans as well as with conditions designed to minimize the potential for soil erosion or slope hazards. Conceptual landscape plans were reviewed by the South Board of Architectural Review and would receive preliminary and final approval prior to issuance of the follow-on Zoning Clearances for construction. Implementation of these measures would ensure consistency with these policies.</p>
Historic Resources	
<p>Coastal Act Policy 30244: Refer to description in the <i>Cultural Resources</i> section above.</p> <p>CLUP Policy 10-1: Refer to description in the <i>Cultural Resources</i> section above.</p>	<p>Consistent: Refer to discussion in the <i>Cultural Resource</i> section above.</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p>CLUP Policy 10-2: Refer to description in the <i>Cultural Resources</i> section above.</p> <p>CLUP Policy 10-3: Refer to description in the <i>Cultural Resources</i> section above.</p>	
Land Use	
<p>CLUP Policy 3-13: Refer to description in the <i>Geologic Processes</i> section above.</p> <p>CLUP Policy 3-14: Refer to description in the <i>Geologic Processes</i> section above.</p>	<p>Consistent: Refer to discussion in the <i>Geologic Processes</i> section above.</p>
<p>CLUP Policy 8-2: Refer to description in the <i>Agricultural Resources</i> section above.</p>	<p>Consistent: Refer to discussion in the <i>Agricultural Resources</i> section above.</p>
Public Facilities	
<p>CLUP Policy 2-6: Refer to description in the <i>Fire Protection</i> section above.</p>	<p>Consistent: Refer to discussion in the <i>Fire Protection</i> section above.</p>
Transportation/Circulation	
<p>Comprehensive Plan Circulation Element Policy A: <i>The roadway classifications, intersection levels of service, and capacity levels adopted in this Element shall apply to all roadways and intersections within the unincorporated area of the County, with the exception of those roadways and intersections located within an area included in an adopted community area plan. Roadway classifications, intersection levels of service, and capacity levels adopted as part of any community or area plan subsequent to the adoption of this Element shall supersede any standards included as part of this Element.</i></p> <p>Circulation Element Roadway and Intersection Standards: <i>Roadway Standards: The policy capacities provided in this Element shall be used as guidelines for evaluating consistency with this section of this Element. A project's consistency with this section shall be determined as follows:</i></p> <ol style="list-style-type: none"> a. <i>A project that would contribute ADTs to a roadway where the Estimated Future Volume does not exceed the policy capacity would be considered consistent with this section of this Element.</i> b. <i>For roadways where the Estimated Future Volume exceeds the policy capacity but does not exceed the Acceptable Capacity, a project would be considered consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway was less than or equal</i> 	<p>Consistent: <i>Roadways:</i> Based on traffic studies conducted for the Project (Associated Transportation Engineers (ATE) 2014a, 2014b, 2015), existing ADT counts on roadways in the vicinity of the Project site indicate that all of the roadways are currently operating well below their capacity, and the 112 Average Daily Trips (ADTs), 17 new A.M. Peak Hour Trips (PHT) and 12 new P.M. PHTs that the Project would add to these roadways would not cause them to exceed their design capacities, or result in significant new traffic movement in relation to existing traffic load and capacity of the street system. The roadways would continue to operate within acceptable levels of service and below the policy capacities assigned to those segments. The contribution of ADTs from the proposed Project to these roadways would not result in the Estimated Future Volumes for any of these segments exceeding their policy capacities. As such, the proposed Project, as conditioned, would be consistent with this policy with respect to roadways.</p> <p><i>Intersections:</i> The ATE reports conducted for the Project and discussed in Section 4.12 indicate that the Casitas Pass Road / U.S. Highway 101 northbound off-ramp currently operates at LOS C and the Casitas Pass Road / U.S. Highway 101 southbound intersection operates at LOS D. The reports conclude that the traffic that would be added to these intersections as a result of the Project (up to nine P.M. PHTs or 13 A.M. PHTs) would not cause the intersections to exceed the significance thresholds (a change of V/C ratio greater</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p><i>to 2 percent of the remaining capacity of that roadway or 40 ADT, whichever is greater.</i></p> <p>c. <i>For roadways where the Estimated Future Volume exceeds the acceptable capacity but does not exceed Design Capacity, a project would be considered consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway does not exceed 25 ADT.</i></p> <p>d. <i>For roadways where the Estimated Future Volume exceeds the design capacity, a project would be consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway does not exceed 10 ADT.</i></p> <p>Intersection Standards:</p> <p>a. <i>Projects contributing PHTs (peak hour trips) to intersections that operate at an Estimated Future Level of Service that is better than LOS C shall be found consistent with this section of this Element unless the project results in a change in V/C (volume/capacity) ratio greater than 0.20 for an intersection operating at LOS A or 0.15 for an intersection operating at LOS B.</i></p> <p>b. <i>For intersections operating at an Estimated Future Level of Service that is less than or equal to LOS "C", a project must meet the following criteria in order to be found consistent with this section of this Element.</i></p> <ol style="list-style-type: none"> 1) <i>For intersections operating at an Estimated Future Level of Service C, no project must result in a change of V/C ratio greater than 0.10.</i> 2) <i>For intersections operating at an estimated future Level of Service D, no project shall contribute 15 or more Peak Hour Trips.</i> 3) <i>For intersections operating at an Estimated Future level of Service E, no project shall contribute 10 or more Peak Hour Trips.</i> 4) <i>For intersections operating at an Estimated Future Level of Service F, no project shall contribute 5 or more Peak Hour Trips.</i> <p>c. <i>Where a project's traffic contribution does not result in a measurable change in the V/C ratio at an intersection but does result in a finding of inconsistency with Intersection Standard 2 above, intersection improvements that are acceptable to the Public Works Department shall be required in order to make a finding of consistency with these intersection standards. A measurable change in</i></p>	<p>than 0.10 for roads operating at LOS C, and 15 or more PHT for intersections operating at an estimated future Level of Service D).</p> <p>The remainder of the intersections surrounding the Project currently operate acceptably in the LOS A-B range. The ATE analysis indicates that the traffic generated by the Project at these intersections (up to 17 A.M. PHTs and 12 A.M. PHTs) would not result in a change in V/C ratio greater than 0.20 for affected intersections operating at LOS A or 0.15 for affected intersections operating at LOS B.</p> <p>As such, the Project would be consistent with this policy for area intersections.</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p><i>V/C ratio shall be defined as a change greater than or equal to 0.01.</i></p> <p>d. <i>Where a project's traffic contribution does result in a measurable change in V/C ratio and also results in a finding of inconsistency with Intersection Standards 1 or 2, above, intersection improvements that are sufficient to fully offset the change in V/C ratio associated with the project shall be required in order to make a finding of consistency with these intersection standards.</i></p> <p><i>The above intersection standards shall also apply to all projects which generate Peak Hour Trips to intersections within incorporated cities that are operating at levels of service worse than those permitted by the city's Circulation Element.</i></p>	
Water Resources/Flooding	
<p>CLUP Policy 3-11, Land Use Element Flood Hazard Area Policy 1: <i>All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with HUD regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finish floor elevations are above the projected 100-year flood elevation, as specified in the Flood Plain Management ordinance.</i></p> <p>CLUP Policy 3-12, Land Use Element Flood Hazard Area Policy 2: <i>Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control work, i.e., dams, stream channelizations, etc.</i></p>	<p>Consistent: No development is proposed within the floodway or floodway fringe. The Project would include installation of a series of new drainage systems to serve the new development. These systems would be required to comply with Flood Control Division's design standards in terms of ensuring that peak flows associated with the Project do not exceed pre-Project levels, and would be required to receive Flood Control's approval prior to issuance of the first Zoning Clearance.</p> <p>The southern system would convey water through a closed pipe to above-ground storage tanks approximately 300 feet from Gobernador Creek. Those tanks would be located outside of any flood hazard zone. The western system would convey runoff through a closed pipe to an above ground detention basin and above- and below-ground storage tanks located on an agricultural parcel west of Lillingston Canyon Road, adjacent to Carpinteria Creek. A portion of the western detention system would be located within a flood hazard overlay area. As discussed in Section 4.13, MMWAT-1, <i>Storm Water Control Plan Approval</i>, requires additional review of this system by the Flood Control Division to ensure that the above-ground elements of the drainage system located within the flood hazard zone would not cause or contribute to flood hazards within or downstream of the Project site. Therefore, the Project would be consistent with these policies.</p>

Table 5-1. Policy Consistency Analysis (Continued)

POLICY REQUIREMENT	DISCUSSION
<p>CLUP Policy 3-14: Refer to description in the <i>Geologic Processes</i> section above.</p> <p>CLUP Policy 3-18: <i>Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.</i></p> <p>CLUP Policy 3-19: <i>Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.</i></p> <p>CLUP Policy 3-15: Refer to description in the <i>Geologic Processes</i> section above.</p> <p>CLUP Policy 3-16: Refer to description in the <i>Geologic Processes</i> section above.</p>	<p>Consistent: Refer to discussion in the <i>Geologic Processes</i> section above.</p>