

**Corrections and Clarifications for the Proposed Final EIR,
Santa Barbara Ranch Project, June 30, 2008**

Page Number	Correction or Clarification
ii-xvi	Some corrections in page number listings in the Table of Contents have been made. The revised Table of Contents has been supplied to the County web site for reader reference.
ES-5	The struck-out text of Section ES3.3 was inadvertently omitted from the FEIR. This text can be found in the RDEIR, however the current and correct text is provided in the FEIR.
ES-6	The first paragraph (iii), should read, "...and Project Development Process framework for design and review <u>and construction</u> of Highway 101 / Dos Pueblos Canyon Road interchange improvements.
2-20	<p>2.9.1.1 Proposed Legislative Changes [first bullet should read]</p> <ul style="list-style-type: none"> The creation of a new NPD land use designation category under the County Amendments to the Coastal Land Use Plan (CLUP) and the Comprehensive Plan to create the Naples Planned Development (NPD) land use designation for coastal lots within the SBR property
2-21	The third non-struck bullet on the page should read, "Removal of the Special Problems Area designator over the project <u>those portions of the property with the new NPD designation</u> "
2-22	<p>2.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [first major bullet should read]</p> <ul style="list-style-type: none"> Development Plan (DP) for the entire project <u>(one for coastal areas and one for inland areas)</u>
2-22	<p>2.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [fourth major bullet should read]</p> <ul style="list-style-type: none"> Lot mergers <u>(a ministerial action)</u> or extinction of development rights on portions of the SBR property to reconfigure the existing lots to accommodate the development design
2-23	<p>2.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [eighth major bullet should read]</p> <ul style="list-style-type: none"> Major Conditional Use Permit (CUP) for an extension of the De Anza Trail network within the coastal zone boundary (Sec. 35-69.4.2) <u>equestrian center and agricultural support facility on Lot 97</u>

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2-23	<p>2.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [add 13th major bullet as follows]</p> <ul style="list-style-type: none">• <u>Minor CUPs for utilities, roads and infrastructure (separating inland from coastal portions of the project)</u>
3.14-18	<p>Closing paragraph for Impact AQ-3 should read as follows: 3.14.2.2.1 Consistency with the 2007/2004 Clean Air Plan (CAP). The APCD (2007:Table 6-3)2004 CAP provides a detailed estimate of long-range emissions for the region consistent with regional growth and development plans. The project site is within the jurisdiction of the County. Because the project is <u>a residential development</u> compliant with growth <u>increment</u> projections <u>prepared by the Santa Barbara County Association of Governments and used within the CAP (APCD 2007:Tables 5-1 and 5-9)</u>and other plan elements within the established County Comprehensive Plan and Coastal Land Use Plan, the project is considered to be consistent with the APCD 2007/2004 CAP (APCD, <u>July 2006:10</u>2004).</p>
7-25	<p>[Correct Reference to read as follows] Santa Barbara County Air Pollution Control District (SBCAPCD). <u>August 2007. 2007 Clean Air Plan. Prepared by the SBAPCD and Santa Barbara County Association of Governments, Santa Barbara, CA. Obtained from: http://www.sbcapcd.org/cap/07execsumm.htm</u>2001. 2001 Clean Air Plan, Chapter 6. http://www.sbcapcd.org/sbc/2001cap.htm.</p>
8-29	<p>8.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [first major bullet should read]</p> <ul style="list-style-type: none">• Development Plan (DP) for the <u>entire portions of the project in the NPD designation and zone district (one for coastal areas and one for inland areas)</u>
8-29	<p>8.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [fourth major bullet should read]</p> <ul style="list-style-type: none">• Lot mergers <u>(a ministerial action)</u> or extinction of development rights on portions of the SBR property to reconfigure the existing lots to accommodate the development design

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8-31	<p>8.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [first bullet at top of page should read]</p> <ul style="list-style-type: none"> • Minor CUP for each of the individual septic disposal systems for development in the DPR lots south of Highway 101 <u>and on DPR Lot 11 north of the freeway</u>
8-31	<p>8.9.1.2 Quasi-Adjudicative Approvals and Ministerial Permits [add third and fourth bullets at top of page]</p> <ul style="list-style-type: none"> • <u>Minor CUPs for utilities, roads and infrastructure (separating inland from coastal portions of the project)</u> • <u>Major Conditional Use Permit (CUP) for equestrian center and agricultural support facility on Lot 97</u>
9.4-60	<p>The last sentence of the first paragraph should read as follows: The project’s effects on native grassland (Impact Bio-7) are addressed separately, and its potential effects on sensitive grassland habitat plant species are further reduced by the incorporation of measures within the proposed Open Space and Habitat Management Plan (OSHMP) <u>required by operation of the Naples Planned Development (NPD) land use regulations</u> to preserve and enhance native grassland areas.</p>
9.4-79	<p>The last bulleted item is not part of the bulleted list and should instead be a regular paragraph.</p>
11-1	<p>In the first paragraph, the phrase “...this Revised Draft [RDEIR])” should read, “...this <u>Final EIR</u>).</p>
12-3	<p>Citation at end of first paragraph should be 14 CCR 15088.5.</p>
13-20	<p>[Section 13.4.1, first paragraph, fifth sentence should read:] The Naples Water Company is also a member agency of the Central Coast Water Agency (CCWA) and has contracted to receive up to 200 afy from that agency. <u>An additional 10 percent drought buffer is available from the CCWA, which can provide up to 20 afy depending on usage.</u></p>

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13-26	<p>[Section 13.4.6, insert the following paragraph between the fifth bullet and the summary paragraph in the section.]</p> <p><u>No water is proposed to be diverted from Dos Pueblos Creek for any new residential development under either the MOU Project or Alternative 1. The RDEIR and the Project Applicants' Water Supply Analysis include information regarding the existing withdrawals of water from Dos Pueblos Creek for ongoing agricultural operations that will continue to occur on the land adjacent to and in the vicinity of the proposed new residential development. Because these agricultural operations have been occurring on land adjacent to and in the vicinity of the proposed new development on the MOU Project and Alternative 1, data regarding water diversions from Dos Pueblos Creek were included in the RDEIR as part of a discussion of baseline water usage. More information on this issue is provided in responses to comments G-2-212 and G-2-213, based on information from the applicant's Water Supply Analysis.</u></p>
13-28	<p>[Section 13.4.7, revise the second paragraph as follows]</p> <p>An updated Draft Reliability Report has been published by the SWP (dated December 2007, and finalized in February 2008). Essentially, the updated reliability report slightly decreases estimates of the frequency with which specific delivery levels can be achieved, and includes greater variability in the distribution of delivery probabilities. From a practical viewpoint, the updated report implies that for 80 percent of the time, instead of being able to deliver 80 percent of its commitments (the so-called Table A values), the SWP will now only be able to deliver approximately 40 percent of its commitments. This decrease in reliability cannot be translated literally into an immediate effect on the project, however. This is because the CCWA, as well as the SWP, continues to develop alternate supply options, including the use of the "turnback pool" of unused SWP allotments, a "turnback pool" of unused CCWA allotments, purchases of unused agricultural allotments, and other planning methods to improve the reliability of deliveries within the CCWA area. <u>Based on the Water Supply Analysis, the CCWA is currently able to deliver essentially 100 percent of the NWC allocation because the current CCWA member demand is well below their total entitlement of 39,078 afy from the SWP. Over the long-term, the CCWA has the ability to provide 70 percent of the NWC allocation, or a yearly average of 139 acre feet.</u></p>

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13-33	<p>[Section 13.5.3, second paragraph, insert after the second sentence as shown]</p> <p>The general approach of the analysis in the RDEIR was to address potential impacts and mitigation to identified vegetation communities, habitats, and sensitive species, and to address other biological issues as identified during the EIR scoping process. This is the appropriate approach. <u>First, the only ESH explicitly designated by the CLUP that is located within with the MOU Project or Alternative 1 sites is the wetland ESH along Dos Pueblos Creek (CLUP at p.135).</u> <u>Second, only certain areas of the MOU Project or of Alternative 1 lie within the Coastal Zone. Therefore, there are many vegetation communities, habitats, and sensitive species identified in the RDEIR that lie outside the Coastal Zone and are not subject to CLUP.</u> There is, however, an overlap in the County process involving...</p>
13-37	<p>[Section 13.5.3.2.3, revise discussion as shown.]</p> <p>13.5.3.2.3 Native Grasslands. This ESHA occurs on the MOU Project and Alternative 1, in association with the coastal terraces and minor streams on the Santa Barbara Ranch property. The areas are mapped (see Figures 3.4-2 and 9.4-2), and the project design avoids any direct development in these areas. <u>The RDEIR identifies a potential impact to 0.22 acre of native grassland in the Coastal Zone lots, due to mowing for fire protection, drainage line installation, and trail construction. The MOU Project and Alternative 1 designs have since been revised to remove the potential impact associated with fire protection, by minor shifts to development envelopes of Lots 93, 91, 66, 63, and 39. Earlier design changes, as noted in the RDEIR, involved moving the agricultural support facility from Lot 57 which will avoid direct impacts to 2.9 acres of native grassland there.</u> The only disruption of native grassland areas would be associated with the temporary trenching to install drainage pipes, which would serve to control runoff and minimize erosive damage to these areas <u>(consistent with CLUP Policy 9-18)</u>, and possible minor disruption from the construction of the coastal access trail within the project. <u>Once completed, the area of disturbance will be re-seeded with native grasses and then protected to keep invasive non-native grasses from encroaching and to ensure the successful growth of the native grasses. The revegetation plans will be subject to success criteria, which have been specified in Mitigation Measure Bio-1a.</u></p> <p>The degree of disruption from the trail would be less than estimated for the RDEIR, since much of the trail would be centered on existing ranch roads or trails in the area. In any event, the degree of disruption would be minor, and the educational and interpretive value of the access trail is dependent on its location</p>

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	<p>to the coastal terrace and beach access area, therefore it would be consistent with Coastal Act Section 30240(a) noted above.</p> <p>The total anticipated effect to native grassland from all possible sources (temporary construction of drainage facilities, trail construction, and possible clearing for fire protection purposes) is under the County's threshold of 0.25 acre. Thus, under the County's CEQA thresholds, the project implementation would not have a significant disruption to this habitat area. Mitigation Measure Bio-1a includes a native grassland revegetation requirement at a ratio of 3:1. Development under the MOU Project and Alternative 1 will proceed in a manner consistent with CLUP policy 9-18 [CZO Section 35-97.10 (2)] by ensuring that all native grassland areas are protected.</p>
13-38	<p>Section 13.5.3.2.7, discussion should be revised as follows:]</p> <p>“Although the CLUP policy addresses this habitat only on More Mesa, it has been contended in certain comments that it is reasonable to extend the policies to the proposed project since white-tailed kite have been reported to have been observed on the property and the non-native grasslands there do provide foraging habitat. Currently there is no ESHA established for either white-tailed kite on the project site or non-native grasslands that could potentially support white-tailed kite.The CLUP...”</p>
13-39	<p>[Add after the first sentence at top of page, and revise subsequent discussion.]</p> <p>The RDEIR discloses that there are non-native grasslands on Coastal Zone lots that are used for foraging by a variety of raptors, including White-tailed kites. However, applying the elements of the definition of ESHs to the White-tailed Kite foraging areas on the Coastal Zone lots indicates that these areas do not qualify for designation as ESHA under the CLUP and the Coastal Act because they are not easily disturbed or degraded by human activities and developments. As the CLUP states, ESH Habitat “exhibits extreme vulnerability to disturbance or destruction from human activities.” The White-tailed kite foraging areas of concern here have been subject to decades of intensive livestock grazing and agricultural production which has converted those areas from native perennial grassland to an area dominated by non-native annual grasses and forbs. The non-native grasslands on the Coastal Zone areas of the project site exist as a result of human disturbance that has been on-going since the 1800s. Cattle and horse grazing has occurred on the site for well over 100 years and disturbs and degrades the site by annually removing all growth over the course of each grazing season. As a result, the foraging habitat is already disturbed and degraded</p>

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by human activities and developments and does not exhibit an extreme vulnerability to disturbance from human activities. The dominance of non-native vegetation on the Coastal Zone lots is indicative of a history of repeated disturbance. Accordingly, the White-tailed Kite foraging areas located on the Coastal Zone areas of the project site are not eligible for designation as ESH under the CLUP.

The issue of case-by-case establishment of white-tailed kite ESHA in the Gaviota Coast was addressed by Coastal Commission staff in its reports regarding applications to construct a golf course on the Makar property, an area adjacent to Santa Barbara Ranch (California Coastal Commission Staff Report, Item W-22, 1-22-02). Commission staff determined that where only feeding habitat existed for white-tailed kite, there was previously no requirement to establish ESHA (see pages 8-9 of Staff Report, Item W-21, 1-22-01), whereas subsequent confirmed reports of nesting did meet the Staff's criteria to establish an ESHA. While Santa Barbara County ~~contends that it is the County~~, not the Coastal Commission, ~~that~~ is authorized by the Coastal Act and the CLUP with establishing ESHAs, Coastal Commission staff's interpretation can provide some certainty that non-native grass feeding areas, where there is no nesting of white-tailed kite, do not constitute grounds for establishing an ESHA.

Having concluded that the Coastal Zone lots do not constitute ESHA does not mean that the County should not consider protecting the site's existing habitat value. An ESHA designation determines whether certain types of policies apply to an area. A determination that a site does not qualify for the application of those policies does not end the inquiry.

While there is no ESHA or requirement to establish an ESHA for this habitat the RDEIR addresses this issue in Impact Bio-11, Grassland Foraging Habitat. That discussion also describes several modifications that were made in the project design to minimize effects to this habitat type. These include retention of Lot 57 in its existing condition, consolidation of access roads and driveways and avoidance of standard curbs and gutters to provide more contiguous areas of non-native grassland, and prohibition against intensive cultivation and retention of current grazing patterns south of Highway 101. Additional mitigation measures include Bio-1a, 2a, and 3 (restoration of native vegetation and control of non-native weeds), and Bio-9 (control of wildlife mortality). These design and mitigation measures, applicable to both the MOU Project and Alternative 1, minimize the effects of the project on raptor foraging habitat.

In that regard, the RDEIR appropriately identified a potential Class II Impact

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(Bio-11) relating to White-tailed Kite foraging areas. The County concluded that “the MOU Project would eliminate foraging habitat for these species [including White-tailed Kite] within the building envelopes and access roads in the project area.” (RDEIR p. 3.4-63, 9.4-67 – 9.4-68.) The RDEIR also notes that the introduction of human development into foraging areas could cause impacts through light pollution, construction of roads, and introduction of non-native grasses. The RDEIR concludes that, given the features in the MOU Project and Alternative 1 that are designed to minimize these potential effects, coupled with the implementation of Mitigation Measures Bio 1(a), Bio-2a, Bio-3 and Bio-9, any adverse effects of the project on grassland foraging by raptors such as White-tailed Kites are mitigated to a less than significant level.

These measures are consistent with CLUP policy 9-29 [CZO Section 35-97.14 (4)] which requires that the maximum feasible area shall be retained in grassland to provide feeding area for the kites. Policy 9-29 does not preclude development in White-tailed kite foraging areas determined to be ESH. Instead it requires only that the maximum feasible area shall be retained in grassland to provide feeding areas. Under the MOU Project, approximately 197 acres of non-native grasslands within the Coastal Zone will remain and be within private agricultural easements or protected open space. Under Alternative 1, 570 acres of non-native grasslands within the Coastal Zone will remain and be within private agricultural easements or protected open space.

As stated above, the CLUP identifies four development standards applicable to white-tailed kite habitat in More Mesa. The first three of these (9-26, -27, and -28) deal with avoiding development or activity around white-tailed kite nesting and roosting areas. The species preferred nesting habitat includes trees along riparian corridors. The project does not include any new development within at least 100 feet of such corridors. The fourth policy (9-29) states: “...the maximum feasible area shall be retained in grassland to provide feeding area for the kites.” As described in the preceding paragraph, the project design and mitigation measures implement this policy.

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13-41	<p>[Section 13.5.3.2.12, revise paragraph at top of page 13-41 as follows.]</p> <p>The project as designed would not remove any oak trees, and would not remove native vegetation within the Coastal Zone, and would minimize development in native vegetation areas <u>outside of the Coastal Zone</u>. Tables 3.4-1 and 9.4-1 compile and list the areas of all native vegetation occurring within the MOU Project and Alternative 1 areas, respectively, and identify the total areas of native vegetation affected. These tables illustrate that the development designs are specifically oriented towards disturbed areas in order to maximize the retention of native vegetation in the project area.</p>
13-41	<p>Delete the summary paragraph, after the sentence dealing with Policy 9-43, <u>and replace with the following discussion.</u></p> <p><u>13.5.3.2.14 Limitations on Designation of ESHA.</u> <u>Comments received on the RDEIR contend that the non-native grasslands on the Coastal Zone lots should be designated as ESHA independent of its support of species such as White-tailed kites. However, as discussed above, the County’s certified CLUP does not recognize non-native grasslands as a distinct category of ESHA. The CLUP recognizes 13 specific categories of ESH, including habitats such as Dunes, Wetlands, Native Grasslands, and Vernal Pools. (CLUP at pp. 119-120.) Non-native grasslands are not listed an ESHA habitat category in the CLUP, nor are they reflected in the Coastal Zone ordinances governing development on or adjacent to ESH. While the CLUP allows the County to designate additional areas as ESHA, such designations are subject only to the policies that apply to the 13 categories of ESHA enumerated in the CLUP. The CLUP does not contain provisions that allow the County to designate additional categories of ESHA or to apply resource policies that differ from the policies contained in the CLUP for the specific categories of ESHA recognized in the CLUP. Accordingly, non-native grassland in and of itself cannot be considered as potential ESH under the County’s CLUP.</u></p> <p><u>As discussed in the RDEIR, and as discussed above with regard to the White-tailed Kite foraging areas, the non-native grassland areas of the Coastal Zone portions of the project site also cannot be considered ESHA because they are not an area that is easily disturbed or degraded by human activities and developments. The existing non-native grassland in the Santa Barbara Ranch project area is disturbed habitat that is subject to ongoing removal through grazing. The existing non-native grassland ecosystem on the Coastal Zone lots is already disturbed and degraded by human activity and, therefore, does not meet an essential element of the ESH definition.</u></p>

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14-307	The first comment on this page should be number G-2-523.
14-558	The first comment on this page is number G-8-285 (new comment, not continued).
14-635	The title block for this letter should be "Individual: I-6."
14-648	The asterisked note at lower left of page should be removed.
14-681	This letter (I-19, from Joe Talaugon, Elders Committee Chairman of the Santa Ynez Band of Chumash Indians) was not written during Public Review, and does not deal with the content of the RDEIR. It was correspondence to the Planning Commission related to the SB 18 consultation process, and was inadvertently included with RDEIR comment letters. Section 15 does not contain a response to this letter.
15-1	The paragraph preceding Table 15-1 incorrectly refers to Table 5-1. As the table was updated, this correction has also been made and will be included in any future electronic files.
15-1	In Table 15-1, page numbers for response locations were not inserted. The updated table will be included in any future electronic files.
15-11	Response to comment G-8-28 contains two paragraphs. The first paragraph should be deleted.
15-34, and others	Several specific comments deal with the issue of native grassland, which is discussed in the General Response in Section 13.5.3.2.3. Some of these responses were written prior to final design changes that eliminated the potential for effects on native grassland from fire protection clearing. For these comments, the information in the General Response supersedes the specific response. The affected responses start on this page with S-2-67, and include the following responses: S-4-3, S-6-13, S-6-14, G-2-288, G-2-345, G-3-53, G-3-54, G-3-55, and G-3-59.
15-85, 15-86	Two responses are provided to comment L-3-8. The first response states that information regarding beach hazards will be disclosed as part of the public displays in the information kiosks. The final design and content of public information programs has not been determined, so the first response may not be accurate. The second response is correct.

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15-93	Responses to Letter L-9 (second letter from the RWQCB) were inadvertently left out of the first printing and electronic files of the Final EIR. Insert sheets for pages 15-93 and 94 were distributed, along with the L-9 responses to be inserted at the end of Section 15. These replacements have also been made to the electronic files presented on the County's website.
15-96, and other pages	Several comments deal with the issue of diversion of water from Dos Pueblos Creek. The General Response in Section 13.4.6 addresses this matter, and explains that the project will not involve any increased diversion for domestic purposes. The applicant has proposed this as part of the project description, and has agreed to a monitoring requirement to demonstrate compliance. The original EIR alluded to potential increases in diversion, and several responses to specific comments were prepared before the final Water Supply Analysis was submitted. Where responses allude to the potential for increased diversion due to domestic use they are in error, and are superseded by Section 13.4.6. The first of these is response to comment G-1-8 on page 15-96, and other responses in this category include: G-2-16, G-2-150, G-2-316, G-2-735, G-2-772, G-2-785, G-10-13, G-13-18.
15-107	<p><u>[Response to comment G-1-38, second paragraph starting at top of this page, should be revised as follows.]</u></p> <p>The comment also states that the RDEIR does not include analysis of a range of impacts from climate change on the area, including a decrease in state water availability, increase in coastal erosion and bluff landslides, and general loss of coastal and marine habitats due to major changes in sea surface temperature and storm activity. The RDEIR does analyze the potential decrease in state water availability resulting from global climate change in Sections 3.15.1.1.6, 9.15.1.1.6, 3.16.1.3, and 9.16.1.3, and considers the assessment results of the Department of Water Resources (DWR) climate report, <i>Progress on Incorporating Climate Change into Management of California's Water Resources</i>. <u>As discussed in response to comment G-2-537, this information has been further updated pursuant to DWR's 2007 Draft Reliability Report. The Draft Reliability Report provides the most current information regarding DWR's estimate of how climate change may affect its ability to provide SWP water. The Draft Reliability Report provides estimates of SWP deliveries under future (2027) conditions which incorporate four modified scenarios of climate change. Under the 2007 Draft Reliability Report's findings regarding the impacts of climate change on SWP deliveries, even assuming the worst case scenario of DWR's latest estimates of the impact of climate change on SWP deliveries, SWP would be able to deliver</u></p>

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	<p><u>32 percent of its water in a two-year drought. Further, as discussed in response to comment 213, even with SWP deliveries as low as 26 percent, the demands of the MOU Project, or even the higher demands of Alternative 1, could still be met.</u></p> <p>The RDEIR addresses the effects of climate change on bluff retreat (referred to as coastal erosion and bluff landslides in The comment) in Impact Geol-1 (Sections 3.2.3.2.1 and 9.2.3.2.1) and Sections 3.16.1.2 and 9.16.1.2, with corresponding Mitigation Measure Geol-1 proposed in Sections 3.2.3.4 and 9.2.3.4. The general loss of coastal and marine habitats resulting from global climate change may be reduced to a certain extent as a result of the project's proposed mitigation measures and OSHMP; however, it is important to note that impacts to coastal and marine habitats, the proposed recreational amenities, private properties, etc., from global climate change occurs on a global scale and results from global contributions.</p>
15-151	<p>The Response to Comment G-2-178 was inadvertently omitted. The response is as follows:</p> <p>The comment states that the County's ongoing programs to modify land use policies for agricultural lands, generally allowing more uses and development, should have been identified in the EIR as part of the list of cumulative projects. The lists of projects were in Tables 8.10-1 and 8.10-2, and the comment notes that these lists only included discrete development and subdivision projects. The comment also implies that the City of Goleta General Plan amendment relates to this issue. The only specific policy initiative referenced in the comment is the County's 2007 amendments to the Uniform Rules for Agricultural Preserves. Preparation of the original DEIR and the RDEIR followed standard procedures in using the available listings of cumulative projects made available by the County. While the original DEIR for the Uniform Rules update was available in 2005, the cumulative impact analysis that incorporated the policies and programs referenced in the comment was not published until July 20, 2007, and the Final EIR was not available in September 2007. The original DEIR for the Santa Barbara Ranch project was published in 2006, and most of the composition work for the RDEIR had been completed by the late summer of 2007. For practical purposes, work on the RDEIR and work on the Uniform Rules Cumulative Impact Analysis occurred simultaneously, and neither document was available in publication for the other's benefit.</p> <p>Staff from the Planning and Development Department did consult regarding these projects, however, and realized that there was little or no overlap in</p>

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	environmental effects between the Countywide program related to the Uniform Rules update and the specific project at Santa Barbara Ranch, which includes unique circumstances and components to limit its effects to within its own boundaries. While the Santa Barbara Ranch project may contribute some increment towards the effects discussed in the Uniform Rules EIR, and does include plan amendments and ordinance adoption, it is not programmatic in the sense that it will have wide application or influence in other areas within the County. In fact, the NPD plan and ordinance components are necessary actions to accomplish this specific, discrete, development project. It is, therefore, appropriate to consider similar development projects in the affected region for the scope of a cumulative impact analysis, and it is inappropriate to compare or analyze this project in the context of Countywide programmatic actions. In a similar fashion, the General Plan update in the City of Goleta will have little or no interaction with or influence on the Santa Barbara Ranch project. Available data regarding development projects in the City of Goleta was incorporated in the lists of cumulative projects used in the RDEIR.
15-261	In response to comment G-2-605f, a typographical error existed. The phrase should read, “This statement is true, where any alternative creating a new NPD land use designation and and implementing zoning ordinance...”
15-264	Response G-2-630 is duplicated.
15-312	The Response to Comment G-2-891 was incomplete. The corrected response is as follows. G-2-891 The comment requests that Table 11.8-1 be modified to state that Alternative 2 is equal with Alternative 1 in the following issue areas: <ul style="list-style-type: none"> • MOU, see response to comment <u>G-2-885 and G-2-890. This series of comments misinterprets a project objective as simply being consistent with the MOU. In fact, the stated project objective is to resolve litigation that is temporarily postponed by the MOU. The proponents of Alternative 2 are not parties to the litigation or the MOU, do not control the property in question, and are not likely to contribute towards resolution of the current litigation. Therefore, the EIR accurately notes that Alternative 2 is not capable of meeting this objective.</u> • Open Space, <u>the objective relative to this and the next two issues is one of balance. Table 11.8-1 indicates that Alternative 2 would meet “most” of the</u>

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	<p><u>objective in this regard. In fact, Alternative 2 emphasizes open space at the expense of agriculture and residential uses. see response to comment G-2-XXX.</u></p> <ul style="list-style-type: none"> • Agriculture, see response to comment G-2-889. <u>The equivalency referenced in the RDEIR in Section 11.3.2.6 (cited in Comment G-2-889 as page 11-12, but now 11-13) involves a comparison of impacts to agricultural resources between Alternative 2 and the MOU Project, assuming the former can resolve its Williamson Act cancellation through the preservation of equivalent or better lands. That might be accomplished through an ACE, as is proposed in Alternative 1, but the Alternative 2 proposal did not address this issue. Separate for the issue of impacts, cancellation of the Williamson Act contract necessary for Alternative 2 would pose a question of feasibility, as noted at the end of Section 11.3.1.</u> • Residential uses, <u>Alternative 2 would provide some residential use. As noted above, the EIR concludes that Alternative 2 may be capable of meeting “most” of the overall objective related to balance.</u> <p><u>With respect to the objective related to balance, it must be noted that the comment leaves out the fourth component of this objective, which is recreation. Alternative 2 as proposed would provide a less convenient recreational experience than either the MOU Project or Alternative 1, with limited parking, a longer trail for beach access, and no rest rooms. On the other hand, the more rustic and isolated nature of the beach access trail may provide a recreational experience preferable to some visitors. For this reason, the EIR Section 11.3.2.9 concluded that Alternative 2 was roughly equivalent to the MOU Project with respect to the topic of recreation.</u></p> <p><u>see response to comment G-2-XXX.</u></p>
15-424	<p>[In response to comment G-8-240, references to EIR sections starting in the third sentence should be revised as follows.]</p> <p>The EIR analyzes the proposed project cumulative impact on climate change in Sections 3.16<u>14.2.5</u> (MOU Project), and 9.16<u>14.2.5</u> (Alternative 1), Residual Impacts.</p>
15-550	<p>The heading “T-N-5 and T-N-7” should read “T-N-5, <u>T-N-6</u>, and T-N-7”</p>
15-552	<p>The text (sentence fragments) immediately beneath the heading for T-P, Frank Arredondo, Coastal Band Chumash, should be deleted.</p>

**Corrections and Clarifications for the Proposed Final EIR,
Santa Barbara Ranch Project, June 30, 2008 (Continued)**

Page Number	Correction or Clarification
15-553	Response T-P-8 should read as follows: This comment references a newspaper account to the effect that the SB 18 consultation process would not affect this project. At the time of the public meeting (and the publication time of the Final EIR) both the SB 18 consultation process and the project review process are ongoing. It is, therefore, not possible to say how the former may or may not influence the latter.
15-563	The correct identifier for Ken Pallee should be "T-W."
Appendix E	Title page E.1 should read, "URBEMIS 2002-2008 MODEL AIR QUALITY EMISSIONS ESTIMATE".
Appendix E	Title page E.2 should read, "URBEMIS 2002-2008 MODEL AIR QUALITY EMISSIONS ESTIMATE".