

## ATTACHMENT 3



### COUNTY OF SANTA BARBARA PLANNING AND DEVELOPMENT

#### MEMORANDUM

TO: Santa Barbara County Board of Supervisors

FROM: Alex Tuttle, Deputy Director, Long Range Planning  
Staff Contact: Julie Harris, Senior Planner

DATE: November 26, 2024

RE: **Agricultural Enterprise Ordinance  
Revisions (RV02) to the Final Environmental Impact Report (23EIR-00003) –  
Agricultural Enterprise Ordinance:  
Planning and Development Case Numbers 23ORD-00005, 23ORD-00006,  
24RZN-00004, & 24RZN-00005**

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#### INTRODUCTION

The County of Santa Barbara prepared a Final Environmental Impact Report (Final EIR) for the Agricultural Enterprise Ordinance Project. There have been subsequent changes to the Agricultural Enterprise Ordinance Project as a result of public review, public comments, County Planning Commission recommendations, and Board of Supervisors considerations. An EIR Revision Document (01) was previously prepared to discuss the changes made by the Planning Commission in their recommendation to the Board of Supervisors at the August 28, 2024, hearing. This EIR Revision Document (02) has been prepared to evaluate those changes recommended by the Planning Commission, and additional changes the Board of Supervisors considered at the November 5, and December 10, 2024, hearings, as described in Section II of the EIR Revision document.

The California Environmental Quality Act (CEQA) Guidelines Section 15088.5 describes the circumstances under which a lead agency is required to recirculate an EIR when new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review, but before EIR certification. Significant new information that would require recirculation includes a new significant impact that would result from the project or a substantial increase in the severity of an environmental impact. According to CEQA Guidelines Section 15088.5, “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a new substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. Section 15088.5(b) states, “Recirculation is not required where the new

information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

Based on the analysis, the Final EIR (23EIR-00003), as herein amended by the attached EIR Revision Document analysis, may be used to fulfill the environmental review requirements for the Agricultural Enterprise Ordinance. None of the changes would result in any new significant, environmental effects or a substantial increase in the severity of previously identified significant effects, or deprive the public of a meaningful opportunity to comment. Hence, pursuant to CEQA Guidelines Section 15088.5(b), the proposed revisions described in this document have not been recirculated. The Final EIR for the Agricultural Enterprise Ordinance is hereby amended by this revision document, together identified as 23EIR-00003 RV02.

Enclosure: Agricultural Enterprise Ordinance Project Final EIR 23EIR-00003 Revision Document  
(RV 02)

**Agricultural Enterprise Ordinance**

**Final Environmental Impact Report**

**23EIR-00003**

**SCH #2021110353**

**Revision Document (RV 02)**

**November 2024**

***Prepared by:***

**County of Santa Barbara**

Planning and Development Department

Long Range Planning Division

123 East Anapamu Street, First Floor

Santa Barbara, CA 93101

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**REVISIONS TO THE FINAL ENVIRONMENTAL IMPACT REPORT  
(23EIR-00003, SCH #2021110353)**

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Attachment A – WSP Analysis Memorandum, dated November 21, 2024

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## **I. BACKGROUND**

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15168, a Program Environmental Impact Report (PEIR) (23EIR-00003) (SCH #2021110353) was prepared for the Agricultural Enterprise Ordinance (AEO) (Project). The Project would amend the County Land Use and Development Code (LUDC) and Article II – Coastal Zoning Ordinance (CZO) to expand the range and diversity of allowable uses on all unincorporated lands zoned Agricultural II (AG-II), allow incidental food service at winery tasting rooms zoned Agricultural I (AG-I), amend the *Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones* (Uniform Rules), and, as recommended by the Planning Commission, create a new overlay zone to limit agricultural enterprise uses in geographic areas with historic food crop production.

The Draft EIR was released for public comment on August 1, 2023. Public and agency comments were received until the end of the comment period on September 14, 2023. The County responded in writing to comments received on the Draft EIR in accordance with CEQA Guidelines Section 15088. Responses to the comments describe the disposition of significant environmental issues raised. The EIR evaluated three project alternatives in addition to the proposed project: the No Project Alternative; Alternative 1, which would reduce vehicle miles traveled (VMT) by removing farmstays and some permitting tiers for campgrounds, small-scale events, and education experiences, and limit the source of agricultural products for processing; and Alternative 2, which would reduce VMT by limiting the levels of intensity for several of the highest VMT generative uses.

The Final EIR concluded that the Project would result in significant and unavoidable impacts to air quality, greenhouse gas emissions, and transportation. The Project would also result in significant but mitigable impacts to agricultural resources, biological resources, cultural and tribal cultural resources, hazards and hazardous materials, noise, and wildfire.

The County Planning Commission considered the Project during public hearings on November 29 and December 13, 2023, and January 10, February 14, March 13, June 12, July 24 and August 28, 2024. The County Board of Supervisors considered the Project during public hearings on November 5 and December 10, 2024.

## **II. REVISIONS TO THE EIR ANALYSIS**

On August 28, 2024, the County Planning Commission recommended the Board of Supervisors adopt the Project, with modifications. The Board of Supervisors considered the recommendations of the Planning Commission, as well as other modifications to the ordinance amendment, including: modifying use intensity allowances for campgrounds, farmstays, small-scale events, and educational experiences and opportunities; modifying setback requirements for campgrounds, farmstays, small-scale events, educational experiences and opportunities, and composting; modifying the permit requirements for various agricultural enterprise uses; creating a Limited Agricultural Enterprise (LAE) Overlay Zone; and modifying the Uniform Rules to increase allowances for small-scale campgrounds on non-prime contracted land.

The LAE overlay would be applied to historic row/food crop growing areas west and east of the cities of Santa Maria and Lompoc, and would expressly limit select agricultural enterprise uses that present potential conflicts with row/food crop production.

Specifically, the County decision makers considered the following modifications:

- Modified Use Intensity Allowances:
  - Campgrounds:
    - Not allowed on premises of less than 40 acres.
    - On premises >320 acres, allow one additional campsite per each additional 200 acres above 320 acres, up to a maximum of 60 campsites.
    - Up to 80 percent of campsites may include landowner provided accommodations (e.g. trailers, yurts or tent cabins).
    - Allow low-impact camping areas with not more than nine campsites, with limited amenities.
    - Allow up to 20 campsites on premises between 100 and 200 acres, and up to 25 campsites on premises between 200 and 320 acres.
    - Allow up to two campground development areas for premises up to 320 acres, and up to four campground development areas for premises above 320 acres.
    - The combined campground development areas shall not exceed five acres of total disturbance.
    - Campground development areas are not required to be clustered.
  - Farmstays:
    - Maximum 15 guests accommodated in no more than six guest rooms with approval of a Zoning Clearance.
    - Up to nine guestrooms with approval of a Land Use Permit (LUP), Coastal Development Permit (CDP), or Minor Conditional Use Permit (CUP).
    - Up to 15 guest rooms with approval of a Minor CUP.
    - Maximum floor area for new guest cottages or park trailers for overnight farmstay accommodations shall not exceed 500 square feet.
  - Small-scale events:
    - Allow events without amplified music, with an Exemption: up to four event days per month and 12 event days per year, with:
      - 50 attendees max for a premises between 40 acres and 320 acres,



- 100 attendees max for a premises between 320 acres and 1,000 acres, and
    - 200 attendees max for a premises larger than 1,000 acres.
  - Allow events with amplified music with a Zoning Clearance: Up to four event days per month and 12 event days per year, with:
    - 50 attendees max for a premise between 40 acres and 320 acres,
    - 100 attendees max for a premise between 320 acres and 1,000 acres, and
    - 200 attendees max for a premise larger than 1,000 acres.
  - On premises larger than 5,000 acres, allow as an exempt activity small-scale special events such as non-motorized bike races, trail runs, equestrian endurance rides, and other similar activities up to 10 days per month, 10 events per year, and 25 total event days per calendar year, with up to 500 attendees.
- Setbacks:
    - Require setbacks of 100 feet from lot lines, 400 feet from an existing residence on an adjacent lot, and 200 feet from food crops, orchards, or vineyards cultivated within three of the previous 10 years, for campgrounds, educational experiences and opportunities, farmstays, and small-scale events.
    - Require setbacks of 1,000 feet from row and food crops, and 400 feet from orchards and vineyards, for composting.
    - Require a setback of 1,000 feet from lands zoned residential for small-scale events involving amplified sound.
  - Permit Requirements:
    - Require approval of a Conditional Use Permit for small-scale campgrounds located on premises zoned AG-II that are entirely surrounded by parcels zoned AG-I.
    - Require approval of a Zoning Clearance, rather than a Land Use Permit, or allow as an exempt use for certain educational experiences and opportunities, small-scale special events, incidental food service, agricultural processing, agricultural product sales and farm stands, composting facilities, fishing operations, and hunting operations.
  - Limited Agricultural Enterprise Overlay Zone:
    - Apply the Limited Agricultural Enterprise Overlay Zone (LAE Overlay) to AG-II zoned lands located east and west of the cities of Santa Maria and Lompoc.
    - Allowed uses within the LAE Overlay include:

- Aquaponics, Agricultural Processing (small-scale), Farm Stands, Horseback Riding (equestrian facility), Hunting, and Incidental Food Service at Wineries.
- Existing uses currently allowed in the AG-II zone would continue to be allowed in the LAE Overlay.
- AEO uses allowed with either a Minor Conditional Use Permit or Major Conditional Use Permit:
  - Minor CUP – Campgrounds and low-impact camping areas; educational experiences and opportunities; farmstays; composting facility (Inland Area) fishing operations; firewood processing and sales; lumber processing and milling (small scale); and, small-scale special events.
  - Major CUP – Composting (Coastal Zone).
- Uniform Rules:
  - Allow multiple campground development areas and increased acreage allowances for small-scale campgrounds on premises under non-prime contracts.

As discussed below in more detail, and in the WSP Analysis Memorandum (Attachment A), the revisions documented in this EIR Revision Document do not require recirculation of the PEIR pursuant to CEQA Guidelines Section 15088.5(b), as they do not involve new significant environmental effects or a substantial increase in the severity of previously identified effects, and do not deprive the public of a meaningful opportunity to comment.

#### **A. Analysis of Revised Intensity Levels of Campgrounds, Farmstays, and Small-Scale Events**

The revised Project includes revised allowances for campgrounds, farmstays, and small-scale events as described in Section II, Revisions to the EIR Analysis, above.

As discussed in the WSP Analysis Memorandum (Attachment A), the Project revisions are estimated to: increase the total number of campsites across all campgrounds and premises to 1,045 from the Final EIR estimate of 900; maintain the number of farmstays, but allow farmstays with up to nine bedrooms with an LUP\CDP, and up to fifteen bedrooms with the approval of a Minor Conditional Use Permit, rather than a mix of four and six bedrooms; and increase the number of maximum daily event attendees to 9,750 from the Final EIR estimate of 8,750.

The revised intensity levels for campgrounds, farmstays, and small-scale events would also result in an estimated increase in vehicle miles traveled (VMT) of 24.5 percent, or 33,004 VMT above the VMT estimate identified in the Final EIR to a total estimated 167,527 VMT resulting from the Agricultural Enterprise Ordinance. The Final EIR identified impacts associated with an increase in total VMT resulting from the Agricultural Enterprise Ordinance, Impact T-2 in Section 3.13, Transportation, of the Final EIR, as a significant and unavoidable impact. Based on the analysis provided in Attachment A, the total VMT resulting from the Agricultural Enterprise Ordinance, as revised, would continue to exceed the County's VMT threshold. Although the Project revisions would result in an increase in VMT over the amount analyzed in the Final EIR, the impact related

to transportation would remain significant and unavoidable and similar to the impacts described under Impact T-2 of the Final EIR. No new significant impacts or substantive changes in the severity of the impacts would occur as a result of the proposed revisions to the intensity of campgrounds, farmstays, and small-scale events.

Additionally, operational mobile-source air pollutant emissions and operational greenhouse gas (GHG) emissions would proportionally increase by 24.5 percent across all pollutants, including nitrogen oxides (NO<sub>x</sub>), reactive organic carbon (ROC), carbon dioxide equivalents (CO<sub>2</sub>e), among others (Attachment A). The Final EIR identified impacts associated with new mobile-source air pollutant emissions, Impact AQ-2 in Section 3.3, Air Quality, of the Final EIR, and impacts associated with new GHG emissions, Impact GHG-1 in Section 3.7, Greenhouse Gas Emissions, resulting from the Agricultural Enterprise Ordinance. Impact AQ-2 and Impact GHG-1 are both identified as significant and unavoidable in the Final EIR. In the time since the Final EIR was completed, the County adopted new thresholds of significance for GHG emissions (non-stationary source emissions). Based on the analysis in Attachment A, the total operational mobile-source air pollutant emissions and operational GHG emissions resulting from the Agricultural Enterprise Ordinance, as amended by the Project revisions, would continue to exceed the County's thresholds, including the new GHG emissions thresholds. Although the Project revisions would result in increases in operational mobile-source air pollutant emissions and operational GHG emissions over the amounts analyzed in the Final EIR, the impacts related to air quality and GHG emissions would remain significant and unavoidable and similar to the impacts described under Impact AQ-2 and Impact GHG-1, respectively.

As discussed in more detail in Attachment A, the analyses presented in the Final EIR and this revision document are highly conservative. This is particularly true with regard to the assumptions made to inform the trip generation and VMT calculations and with regard to the County's adopted VMT significance thresholds for land use projects. For instance, in calculating VMT from new farmstays, the analysis utilizes trip generation rates provided by the Institute of Transportation Engineers (ITE) for Motel land uses (ITE Code #320) which would be expected to result in a greater amount of vehicle trips than rural farmstays. Further, with regard to the County's VMT significance threshold, as presented in the Final EIR, any net increase in VMT is considered to be a significant impact. Such a threshold is considered to be highly conservative when analyzing impacts for a land use plan such as the Agricultural Enterprise Ordinance. This is because this threshold is based upon the County's VMT thresholds for land use projects, as the County's VMT threshold for land use plans focus on urban areas of the county and are not designed to address agritourism/rural recreational trip characteristics and are largely inapplicable to the proposed AEO. Therefore, no new significant impacts or substantive changes in the severity of the impacts would occur as a result of the proposed revisions to the intensity of campgrounds, farmstays, and small-scale events.

**B. Analysis of the Increased and Additional Setbacks for Educational Experiences and Opportunities, Small-Scale Events, Composting Facilities, Farmstays, and Campgrounds**

The Final EIR (Section 3.2) analyzed the effects of the Project on agricultural resources based on, among other impacts, the proximity of potential agricultural enterprise uses adjacent to

row/food crop farming operations. The Project revisions include the following setbacks for educational experiences and opportunities, small-scale events, composting facilities, farmstays, and campgrounds:

- a. A minimum 100-foot setback from the lot line of the agricultural premises on which the facilities or activities are located.
- b. All facilities and stationary activities shall be located no closer than 400 feet from a residence that is located on an adjacent property that is not a part of the agricultural enterprise premises.
- c. **Setbacks from adjacent commercial farming operations.** The following setbacks shall apply to commercial farming operations located on adjacent premises when the agricultural commodity has been in commercial cultivation (tilled for agricultural use and planted with a crop). For the purpose of this setback, an adjacent commercial farming operation may touch at a point or share a common boundary with the agricultural enterprise premises, or may be separated by an intervening road or street (excluding a four-lane highway), railroad right-of-way or other public facility.
  - (1) A minimum 200 feet from the lot line of the agricultural premises on which the facilities or activities are located when a commercial food crop, orchard, or vineyard farming operation is located on the adjacent agricultural premises. For the 200-foot setback to apply, the adjacent food crop, orchard, or vineyard farming operation must comply with all of the following:
    - (a) Be part of a commercial farming operation where the primary land use of the premises shall be the production of one or more agricultural commodities for commercial purposes.
    - (b) Have a minimum of 10 acres of food crops, orchards, or vineyards planted (with allowances for fallow periods, change of crop or production method) or a demonstrated planting history of a minimum of 10 acres of food crops, orchards, or vineyards planted within at least three of the previous 10 years. For the purpose of this setback, the previous 10 years shall be measured from the commencement of the exempt agricultural enterprise use or from application submittal for an agricultural enterprise use that requires a permit.
  - (2) **Adjustments.** As part of a permit to be reviewed and approved by the Department, the setbacks from adjacent commercial farming operations in Subsection c.(1) above may be adjusted downward in the following circumstances:
    - (a) Where intervening topography, roads, protected habitats, or other geographic features preclude cultivation of food crops, orchards, or vineyards on the adjacent agricultural premises within 200 feet of the

common lot line. The setback reduction shall be commensurate with the width of the land that cannot be cultivated.

- (b) Where the commercial cultivation on the adjacent agricultural premises does not occur in close proximity to the common lot line, the setback may be adjusted downward provided at least 200 feet is maintained between the facilities/stationary activities and the food crop, orchard, or vineyard.
- (c) Where the facilities or stationary activities are separated from an adjacent commercial farming operation by a four-lane highway, the setback from commercial farming operations shall not apply.
- (d) Where residential development (e.g. an existing residence, farm employee dwelling, accessory dwelling unit, or similarly-occupied building) or other development which is existing as of [the effective date of this ordinance] is located on the proposed agricultural enterprise use premises within 200 feet of an adjacent premises with a commercial food crop, orchard, or vineyard farming operation, the setback from the adjacent commercial farming operation may be reduced by up to 50 percent, provided the agricultural enterprise use is located no closer than the aforementioned existing development.

In determining whether the criteria for a setback adjustment has been met, the Department may consider any mutual agreement between the applicant and the adjacent premises owner regarding the need for setbacks from the adjacent commercial farming operations.

The following additional setback, based upon EIR Mitigation Measure MM NOI-1, has been incorporated into the LUDC and Article II ordinance amendments as a development standard for educational experiences and opportunities and small-scale events involving amplified sound:

- (c) Event activities shall be located no closer than 500 feet from the exterior boundary of the agricultural premises. If the premises boundary is abutting a lot zoned for residential uses, event activities shall be located no closer than 1,000 feet from the premises boundary abutting the residential zone.

These additional setbacks were recommended by the Planning Commission to address concerns raised by the public following discussions during the Commission's public hearings regarding the proposed Project. Although these setbacks were not required mitigation measures by the Final EIR, these setbacks would ensure further protections for nearby agriculture and residential development. Application of these setbacks would provide more space between these agricultural enterprise uses and active farming operations to protect from potential contamination or disturbance of the farming operations. The setbacks also require space between potential noise generating uses and adjacent residences, resulting in greater noise attenuation. Any further modifications to the proposed setbacks by the Board, even reductions in the setback distance, would be more protective than the project analyzed in the Final EIR as setbacks such as the ones included herein were not part of the original project description.

Therefore, impacts to agricultural resources would be reduced and would remain less than significant (Impact AG-1) and significant but mitigable (Impact AG-2). Impacts to noise would remain potentially significant but mitigable, as originally concluded in the Final EIR, and this change does not constitute significant new information.

### **C. Analysis of the Specification of Permit Requirements**

The Final EIR discussed the different potential permit levels for educational experiences and opportunities, small-scale special events, incidental food service, agricultural processing, agricultural product sales and farm stands, composting facilities, fishing operations, and hunting operations, but did not identify Zoning Clearance or Land Use Permit requirements for specific levels of intensity or development for these uses. The Project revision to require approval of a Conditional Use Permit for small-scale campgrounds located on premises zoned AG-II that are entirely surrounded by parcels zoned AG-I would provide greater discretion by the County to ensure that there are no impacts on smaller neighboring properties in the instance that a campground is proposed.

In the County of Santa Barbara, a Zoning Clearance is a less procedurally intensive permit process than a Land Use Permit. A Zoning Clearance does not require the surrounding property owners to be noticed and the decision to approve or deny a Zoning Clearance cannot be appealed, whereas a Land Use Permit must be noticed and can be appealed. Additionally, some uses would be exempt from the requirement to obtain a permit. The Project revisions modify the permit levels for various agricultural enterprise uses. The consolidation of permit requirements for many agricultural enterprise uses into Zoning Clearance level permitting, as well as establishment of permit exemptions for certain uses, has the potential to increase instances of these uses within the County of Santa Barbara by reducing permit application and processing costs. Agricultural Enterprise Ordinance development standards would apply to all AEO permit tiers, including AEO uses that would be exempt from zoning permits.

Potential projects allowed by the Agricultural Enterprise Ordinance are required to meet all applicable development standards of the Agricultural Enterprise Ordinance, including mitigation measures identified in the Final EIR which have been included as development standards. Therefore, regardless of the permit application type, potentially significant but mitigable uses identified in the Final EIR will continue to be mitigated to a less than significant degree.

### **D. Analysis of the Limited Agricultural Enterprise Overlay Zone**

The revised Project includes creation of the Limited Agricultural Enterprise (LAE) Overlay Zone as a tool to limit select AEO uses which have the potential to result in conflicts with historic row/food crop growing regions located east and west of the cities of Santa Maria and Lompoc. Within the LAE overlay zone, campgrounds, educational experiences and opportunities, farmstays, fishing operations, firewood processing and sales, lumber processing and milling, composting, and small-scale special events would require the approval of a Minor or Major Conditional Use Permit. Aquaponics, small-scale agricultural processing, farm stands, horseback riding, and hunting operations would be allowed consistent with the other areas of the County zoned AG-II.

In the County of Santa Barbara, projects that require the approval of Conditional Use Permits and Minor Conditional Use Permits are subject to discretionary review and require findings that the project site is adequate to accommodate the project, the project will not be detrimental to the neighborhood, that the project is compatible with the surrounding area, among other findings. The additional discretionary review and findings required by a Conditional Use Permit and Minor Conditional Use Permit would ensure that any agricultural enterprise use proposed within the Limited Agricultural Enterprise Overlay Zone does not conflict with or result in significant impacts to the surrounding row/food crop agriculture. Therefore, impacts to agricultural resources would remain potentially significant but mitigable, as originally concluded in the Final EIR, and this change does not constitute significant new information.

#### **E. Analysis of the Modifications to the County Uniform Rules**

The Final EIR (Section 3.2) analyzed the effects of the Project on agricultural resources based on, among other impacts, impacts related to compatibility with existing zoning for agricultural uses and the County Uniform Rules. The Final EIR included mitigation measure MM AG-2, which required the following additional criteria for the development of small-scale campgrounds to be found compatible on land under a Williamson Act contract:

1. Only one small-scale camping operation/facility is allowed on the premises;
2. Any development required for a small-scale campground on non-prime contracted land shall be limited to three percent of the premises or two acres, whichever is less;
3. Any development required for a small-scale campground on prime contracted land shall be limited to three percent of the premises or two acres, whichever is less, provided at least 50 percent of the premises is devoted to the principal agricultural operation; and
4. The small-scale campground facility is appropriately scaled and sited in such a manner that it will not interfere with the agricultural operation on the premises or other adjacent agricultural operations.

MM AG-2 additionally required that the criteria above be incorporated into the County Uniform Rules.

The revised Project would amend the County Uniform Rules to retain the limitation of one campground development area of a maximum two acres on prime contracted land, but to find compatibility for small-scale camping on non-prime contracted land for the following:

- On premises of 320 acres or less
  - Up to two campground development areas
  - Total disturbance of the area(s) not to exceed three acres
  - Remote campground development area(s) not to exceed one acre each
- On premises larger than 320 acres
  - Up to four campground development areas

- Total disturbance of the area(s) not to exceed five acres, not counting roads
- Remote campground development area(s) not to exceed one acre each

All potential projects allowed by the Agricultural Enterprise Ordinance, including those located on land under Williamson Act contract are required to meet all applicable development standards of the Agricultural Enterprise Ordinance. These standards would protect agricultural resources and agricultural viability within the County, and include setbacks from property lines and adjacent commercial agricultural operations, requirements for occupancy and pets, among other regulations.

Additionally, non-prime agricultural preserve contracts must consist of at least 100 acres, and are typically grazing operations conducted on much larger premises. The Uniform Rule amendments for small-scale campgrounds on non-prime contract premises provide greater flexibility to appropriately site campground development areas and would not significantly displace or impair agricultural operations on contracted premises or adjacent agricultural operations. Therefore, impacts to agricultural resources would remain potentially significant but mitigable, as originally concluded in the Final EIR, and this change does not constitute significant new information.

### **III. CONCLUSION**

The revised AEO Project includes modifications to the intensity of several AEO uses, setback requirements, permit requirements, the creation of the Limited Agricultural Enterprise Overlay Zone, and changes to the County Uniform Rules. Project revisions would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects, or deprive the public of a meaningful opportunity to comment.



**ATTACHMENT A**

**WSP Analysis Memorandum, dated November 21, 2024**

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# MEMORANDUM

**TO:** Julie Harris, Senior Planner  
David Lackie, Supervising Planner  
Santa Barbara County Planning & Development, Long Range Planning Division

**FROM:** Nick Meisinger, Program Manager  
Taylor Lane, Deputy Project Manager  
WSP USA, Inc.

**DATE:** November 21, 2024

**Re:** *Analysis of Decision Maker Recommendations the Agricultural Enterprise Ordinance Environmental Impact Report*

WSP USA, Inc. (WSP) has prepared this memorandum presenting additional analysis to support County staff in the consideration of recommendations provided by County decision-makers regarding the Agricultural Enterprise Ordinance Project and the associated Final Environmental Impact Report (EIR). The purpose of this memorandum is to provide detailed explanation and analysis of potential changes in the severity or magnitude of impacts analyzed in the Final EIR that may occur with revisions to proposed uses identified in the Agricultural Enterprise Ordinance (refer to Table 2-2 in the Final EIR).

## Executive Summary

### Summary of Proposed Revisions

Based on our conversations with County staff, we understand that County decision-makers are contemplating revisions to the proposed Agricultural Enterprise Ordinance with respect to campgrounds, farmstays, and small-scale events. Specifically, the decision-makers have considered the following changes:

- For proposed campground uses on large agricultural parcels, one additional campsite would be allowed for each 200 acres over 320 acres. This would increase the maximum number of campsites allowed on parcels 320 acres in size or larger from 30 campsites, up to a maximum to 60 campsites on sites 6,320 acres or larger.
- All farmstays up to 6 bedrooms could be permitted with a Zoning Clearance, rather than farmstays of only 4 bedrooms or less. This revision would adjust the assumptions regarding the number of new farmstays enabled under the proposed Project to a total of 60 new 6-bedroom farmstays, rather than 30 new 4-bedroom farmstays and 30 new 6-bedroom farmstays.
- Increases in the allowable maximum number of attendees per small-scale events.
- Addition of a new category of small-scale events that would allow for non-motorized bike races, trail runs, equestrian rides, and similar gatherings. While this use is listed under “Small-Scale Events,” it is a new use/concept that was not envisioned or analyzed in the Draft EIR. The use would be limited to premises greater than or equal to 5,000 acres. As such, County staff assumed only 2 new sites, similar to revised assumptions for “50 campsites” on premises greater than 4,320 acres.
- Allowance for campgrounds of up to 25 campsites in size on parcels ranging between 200 to 300 acres. County staff assumes that the number of new campgrounds on parcels ranging between

100 to 320 acres would remain at 15 total new sites, with the assumption that there would be 8 new 20-site campgrounds and 7 new 25-site campgrounds.

- Increase the size of farmstays allowed under a Land Use Permit (LUP) / Coastal Development Permit (CDP) to 9 bedrooms, and up to 15 bedrooms allowed with a minor conditional use permit (CUP). For the purposes of this quantitative analysis, County staff assumes that if increased to 9 bedrooms, the total number of new farmstays permitted under the program would be 40 new 6-bedroom farmstays, and 20 new 9-bedroom farmstays. If increased to 15 bedrooms, the total number of new farmstays permitting under the program would be 45 new 6-bedroom farmstays, and 15 new 15-bedroom farmstays. The following qualitative analysis presents this comparison as Scenario 1 and Scenario 2, respectively.

Specific assumptions for the potential buildout and the number of new uses enabled under the proposed Agricultural Enterprise Ordinance were developed for the purposes of illustrating increases in countywide vehicle miles traveled (VMT) under the proposed Project. The assumptions for the number of new uses enabled under the proposed Agricultural Enterprise Ordinance, which were utilized for analysis of impacts in the Final EIR, are presented Table 3.13-10 of Section 3.13, *Transportation*. **Table 1** below summarizes the use assumptions by activity, as well as the revisions considered by County decision-makers on March 13, 2024, June 12, 2024, July 24, 2024, August 28, 2024, November 5, 2024, and December 10, 2024. Decision-makers did not propose any revisions to the frequency or number of events allowed per year for proposed educational experiences, tours, recreational activities, and events.

**Table 1. Agricultural Enterprise Ordinance Use Assumptions and Buildout Projections**

Use	Final EIR Assumptions		Proposed Decision-Maker Revisions - Scenario 1		Proposed Decision Maker Revisions - Scenario 2	
	Size	New Sites	Size	New Sites	Size	New Sites
<b>Proposed Lodging</b>						
Campgrounds (<100 ac)	15 Campsites	10	15 Campsites	10	15 Campsites	10
Campgrounds (100-200 ac)	20 Campsites	15	20 Campsites	8	20 Campsites	8
Campgrounds (200-320 ac)	25 Campsites	--	25 Campsites	7	25 Campsites	7
Campgrounds (≥320 ac)	30 Campsites	15	30 Campsites	8	30 Campsites	8
Campgrounds (>2,320 ac)	N/A	--	40 Campsites	4	40 Campsites	4
Campgrounds (>4,320 ac)	N/A	--	50 Campsites	2	50 Campsites	2
Campgrounds (≥6,320 ac)	N/A	--	60 Campsites	1	60 Campsites	1
Farmstay	4 Bedrooms	30	4 Bedrooms	0	4 Bedrooms	0
Farmstay	6 Bedrooms	30	6 Bedrooms	40	6 Bedrooms	45
Farmstay	9 Bedrooms	--	9 Bedrooms	20	9 Bedrooms	0
Farmstay	15 Bedrooms	--	15 Bedrooms	0	15 Bedrooms	15
Use	Max Daily / Event Attendees	New Sites	Max Daily / Event Attendees	New Sites	Max Daily / Event Attendees	New Sites
<b>Proposed Educational Tours, Recreational Activities, and Events</b>						
Small Tour	15 Attendees	30	15 Attendees	30	15 Attendees	30
Other Education (≤100 ac)	80 Attendees	20	80 Attendees	20	80 Attendees	20
Other Education (100-320 ac)	120 Attendees	20	120 Attendees	20	120 Attendees	20
Other Education (≥320 ac)	150 Attendees	20	150 Attendees	20	150 Attendees	20
Fishing/Hunting	20 Participants	5	20 Participants	5	20 Participants	5
Horseback Riding	24 Participants	20	24 Participants	20	24 Participants	20
Small-Scale Events (≤100 ac)	80 Attendees	25	50 Attendees	25	50 Attendees	25
Small-Scale Events (100-320 ac)	120 Attendees	25	100 Attendees	25	100 Attendees	25
Small-Scale Events (≥320 ac)	150 Attendees	25	200 Attendees	25	200 Attendees	25
Small-Scale Events (Large Premises)	--	--	500 Attendees	2	500 Attendees	2

## Conclusions

These revisions represent minor changes to the Project Description that, while not substantive, require additional quantitative and qualitative analyses. Incorporation of the recommended changes to the proposed Agricultural Enterprise Ordinance would result in an increase in service population, vehicle trips, VMT, and mobile-source emissions. Under Scenario 1, proposed changes to the Project Description regarding allowed levels of use would result in an estimated 18.7-percent increase over the VMT and mobile-source criteria air pollutant emissions, as well as a 5.7-percent increase in per service population GHG emissions over what was presented in the Final EIR. Under Scenario 2, proposed changes to the Project Description regarding allowed levels of use would result in an estimated 24.5-percent increase over the VMT and mobile-source criteria pollutant emissions, as well as a 7.9-percent increase in per service population GHG emissions over what was presented in the Final EIR. Impacts related to increases in total county VMT, mobile-source criteria air pollutant emissions, and per capita GHG emissions would remain significant and unavoidable due largely to the rural visitor-serving nature of the proposed Project and the inability to effectively reduce or mitigate VMT.

It is important to note that the analysis presented in the Final EIR, along with the analysis presented in this memorandum, is highly conservative. This is particularly true with regard to the assumptions made to inform the trip generation and VMT calculations and with regard to the County's adopted VMT significance thresholds for land use projects.<sup>1</sup> For instance, in calculating VMT from new farmstays, the analysis utilizes trip generation rates provided by the Institute of Transportation Engineers (ITE) for Motel land uses (ITE Code #320) which would be expected to result in a much greater amount of vehicle trips than rural farmstays. Further, with regard to the County's VMT significance threshold, as presented in the Final EIR, any net increase in VMT is considered to be a significant impact. Such a threshold is considered to be highly conservative when analyzing impacts for a land use plan such as the Agricultural Enterprise Ordinance. This is because this threshold is based upon the County's VMT thresholds for land use projects, as the County's VMT threshold for land use plans focus on urban areas of the county and are not designed to address the agritourism/rural recreational trip characteristics and are largely inapplicable to the proposed Project.

Further, as discussed further in the Final EIR, there is no feasible mitigation measures that would provide a reasonable or quantitative reduction in VMT in a rural setting. Many of the transportation demand management (TDM) strategies recommended by the County for reducing VMT impacts involve increasing the diversity of land uses by including mixed uses within projects, providing pedestrian network improvements, providing traffic calming measures and low-stress bicycle network improvements, implementing car and ride-sharing programs, encouraging telecommuting, and increasing transit service frequency. Most of these strategies are tailored towards individual development projects or plans within or near urban areas with access to multi-modal transportation methods. Thus, many traditional TDM strategies are not appropriate for countywide visitor-oriented uses in rural areas.

It is also important to note that the quantitative analysis of VMT associated with the proposed Agricultural Enterprise Ordinance was intended to represent a conservative worst-case estimate of the potential increase in impacts. Due to the programmatic nature of the proposed Project, it is impossible to anticipate exactly where and how many new agricultural enterprise uses may occur throughout the county. As such, the analysis assumes that all new uses are located on separate individual premises dispersed throughout the rural and suburban agricultural regions of the county. This approach likely overstates changes in travel patterns or increases in VMT, but is used to conservatively estimate impacts and permit the County flexibility in program adoption. See also discussion under *VMT Methodology and*

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<sup>1</sup> Refer to discussion under *County Environmental Thresholds - Transportation* (pg. 3.13-21) in Section 3.13.4.1, *Thresholds of Significance* of the Final EIR for detailed discussion of which County thresholds were considered appropriate for analyzing VMT impacts of the proposed Project.

*Project Assumptions* (pg. 3.13-22) in Section 3.13.4.1, *Thresholds of Significance* of the Final EIR for additional discussion and context on methodology.

## **Analysis of Proposed Revisions**

To support County staff's consideration of the proposed revisions and their relation to the analysis of impacts presented in the Final EIR, a detailed discussion of the potential changes in the extent or severity of impacts related to Project-related VMT, mobile-source criteria air pollutants, and greenhouse gas (GHG) emissions is provided below.

County decision-maker revisions to the size and number of proposed lodging facilities and the maximum daily / event attendees for events enabled under the proposed Agricultural Enterprise Ordinance affects the assumptions utilized for the quantitative analysis of impacts in the Final EIR. Specifically, the proposed revisions would affect the calculation of Project-related operational VMT, mobile-source criteria air pollutants, and GHG emissions. As the proposed revisions would not affect the total number of assumed sites, physical impacts associated with site disturbance from construction of new uses enabled under the proposed Agricultural Enterprise Ordinance and associated impacts would remain as described in the Final EIR.

## **Project VMT Impacts**

### **Summary of Project VMT Impacts Presented in the Final EIR**

Impacts associated with Project-related increases in total VMT within the county are described in detail under Impact T-2 in Section 3.13, *Transportation* of the Final EIR. As described therein, utilizing the broad use and average daily trip (ADT) assumptions outlined in Section 3.13.3, *Environmental Impact Analysis*, the Final EIR estimated that the proposed Project could result in the generation of 134,523 new daily VMT due to the addition of new visitor-oriented uses in rural agricultural areas throughout the county, representing an increase in existing total regional VMT by approximately 1 percent (refer to Appendix F of the Final EIR). As described in Section 3.13.3.1, *Thresholds of Significance*, the appropriate County threshold for determining impacts of the proposed Project is a net zero increase in total VMT or regional VMT. Therefore, under Impact T-2, the Final EIR concluded that based on the County's established net-zero VMT threshold and the inability to effectively reduce VMT associated with the proposed Project to a net-zero level, the projected increase in VMT associated with the proposed Project would be *significant and unavoidable*.

### **Change in VMT Calculations under Proposed Revisions**

As previously described, County decision-makers have proposed revisions to the size and number of rural campgrounds, the size of farmstays permitted with a Zoning Clearance, LUP/CDP, or minor CUP, the number of attendees allowed per small-scale event, and the addition of a new category of small-scale events that would allow for non-motorized bike races, trail runs, equestrian rides, and similar gatherings. Utilizing the same assumptions for daily use, ADT rates, and trip lengths as presented in the Final EIR, the proposed revisions to the Project Description would result in an estimated 159,627 VMT with the addition of new visitor-oriented uses in rural agricultural areas throughout the county under Scenario 1. This represents an estimated increase of 25,104 VMT, or an 18.7-percent increase in total new VMT as compared to the proposed Project in the Final EIR. Under Scenario 2, proposed revisions to the Project Description would result in an estimated 167,527 VMT, representing an estimated increase of 33,004 VMT, or a 24.5-percent increase in total new VMT as compared to the proposed Project in the Final EIR. Updated calculations for the increase in VMT generated under the revised Project Description and comparison to the VMT calculations presented in the Final EIR are presented for Scenario 1 **Table 2** and for Scenario 2 in **Table 3**.

**Table 2. Project Daily Trip and VMT Estimates (Proposed Decision Maker Revisions) - Scenario 1**

<b>PROPOSED LODGING</b>																
Use	Size	New Sites <sup>1</sup>	Total Campsites/Bedrooms	Daily Use %	Daily Use	ADT Rate	ADT	Day Trip %	Day Trip Length <sup>2</sup>	Local VMT	Regional %	Regional Length <sup>3</sup>	Regional VMT	Total Roadway VMT	Final EIR Total VMT Calculation	% Change
Campgrounds (<100 ac) <sup>6</sup>	15 Campsites	10	150	85%	128	2.03	259	50%	10	1,300	50%	64	8,344	9,644	57,681	15.7
Campgrounds (100-200 ac) <sup>6</sup>	20 Campsites	8	160	85%	136	2.03	276	50%	10	1,380	50%	64	8,835	10,215		
Campgrounds (200-320 ac) <sup>6</sup>	25 Campsites	7	175	85%	149	2.03	302	50%	10	1,510	50%	64	9,663	11,173		
Campgrounds (≥320 ac) <sup>6</sup>	30 Campsites	8	240	85%	204	2.03	414	50%	10	2,071	50%	64	13,252	15,323		
Campgrounds (>2,320 ac) <sup>13</sup>	40 Campsites	4	160	85%	136	2.03	276	50%	10	1,380	50%	64	8,835	10,215		
Campgrounds (>4,320 ac) <sup>13</sup>	50 Campsites	2	100	85%	85	2.03	173	50%	10	863	50%	64	5,522	6,385		
Campgrounds (≥6,320 ac) <sup>13</sup>	60 Campsites	1	60	85%	51	2.03	104	50%	10	518	50%	64	3,313	3,831		
Farmstay <sup>7</sup>	4 Bedrooms	0	0	85%	0	3.35	0	50%	10	0	50%	64	0	0	31,715	39.5
Farmstay <sup>7</sup>	6 Bedrooms	40	240	85%	204	3.35	683	50%	10	3,417	50%	64	21,869	25,286		
Farmstay <sup>7</sup>	9 Bedroom	20	180	85%	153	3.35	513	50%	10	2,563	50%	64	16,402	18,965		
<b>Subtotal</b>		<b>100</b>	<b>1,465</b>				<b>3,000</b>			<b>15,002</b>			<b>96,011</b>	<b>111,013</b>	<b>89,396</b>	<b>24.2</b>
<b>PROPOSED EDUCATIONAL TOURS, RECREATIONAL ACTIVITIES, AND EVENTS</b>																
Use	Size	New Sites	Max per Year	Annual Total	ADT Rate	ADT	AADT	Local %	Within County Length <sup>4</sup>	Local VMT	Regional %	Out of County Length <sup>5</sup>	Regional VMT	Total VMT	Final EIR Total VMT Calculation	% Change
Small Tour <sup>8</sup>	15 Attendees	30	128	57,600	1	57,600	158	75%	26	3,122	25%	77	3,034	6,156	6,156	0.0
Other Education (≤100 ac) <sup>9</sup>	80 Attendees	20	24	38,400	1	38,400	105	75%	26	2,075	25%	77	2,016	4,091	4,091	0.0
Other Education (100-320 ac) <sup>9</sup>	120 Attendees	20	24	57,600	1	57,600	158	75%	26	3,122	25%	77	3,034	6,156	6,156	0.0
Other Education (≥320 ac) <sup>9</sup>	150 Attendees	20	24	72,000	1	72,000	197	75%	26	3,893	25%	77	3,782	7,675	7,675	0.0
Fishing/Hunting <sup>10</sup>	20 Participants	5	100	10,000	1	10,000	27	75%	26	534	25%	77	518	1,052	1,052	0.0
Horseback Riding <sup>11</sup>	24 Participants	20	100	48,000	1	48,000	132	75%	26	2,609	25%	77	2,534	5,143	5,143	0.0
Small-Scale Events <sup>12</sup>	50 Attendees	25	12	15,000	1	15,000	41	50%	26	534	50%	77	1,582	2,116	3,404	-37.8
Small-Scale Events <sup>12</sup>	100 Attendees	25	12	30,000	1	30,000	82	50%	26	1,068	50%	77	3,164	4,232	5,106	-17.1
Small-Scale Events <sup>12</sup>	200 Attendees	25	12	60,000	1	60,000	164	50%	26	2,137	50%	77	6,329	8,466	6,344	33.4
Small-Scale Events (large Premises) <sup>14</sup>	500 Attendees	2	25	25,000	1	25,000	68	50%	26	890	50%	77	10,548	14,110	0	--
<b>Subtotal</b>		<b>192</b>		<b>413,600</b>			<b>1,133</b>			<b>19,984</b>			<b>28,630</b>	<b>48,614</b>	<b>45,127</b>	<b>7.7</b>
<b>TOTALS</b>		<b>292</b>					<b>4,133</b>			<b>34,986</b>			<b>124,461</b>	<b>159,627</b>	<b>134,523</b>	<b>18.7</b>

Notes:

<sup>1</sup> The number of properties or premises that this analysis assumes would participate in the proposed agricultural enterprise program.

<sup>2</sup> Day trips assume 10 miles per trip to local area.

<sup>3</sup> Regional length assumes 75% of visitors travel from out of County at 77 miles per trip and 25% of visitors are within the County at 27 miles per trip, an average of 64 miles.

<sup>4</sup> Assumes weighted average of length per trip for visitors within the county (Appendix E).

<sup>5</sup> Assumes weighted average of length per trip for visitors from out of the county (Appendix E).

<sup>6</sup> ADT based on local studies of similar campground sites, ITE 9<sup>th</sup> Edition (2012) rate for campgrounds, and ITE rate for motel (Code #320).

<sup>7</sup> Trip Generation based on ITE Code #320 (Motel).

<sup>8</sup> Analysis assumes Average Vehicle Occupancy (AVO) of 2.0 (i.e., two people per vehicle) with tour starting and ending during AM/PM peak hours. No more than 128 small guided tours per year.

<sup>9</sup> Analysis assumes AVO of 2.0 with education starting and ending during AM/PM peak hours. No more than 24 days per year.

<sup>10</sup> Analysis assumes AVO of 2.0 with fishing starting and ending during AM/PM peak hours.

<sup>11</sup> Analysis assumes AVO of 2.0 with horseback riding starting and ending during AM/PM peak hours.

<sup>12</sup> Analysis assumes AVO of 2.5 with small-scale events starting or ending during the PM peak hour. No more than 12 days per year. Small-scale events include, but are not limited to farm-to-table dinners, cooking classes, weddings, receptions, parties, writing or yoga workshops, trail runs, bike races, equestrian endurance rides, and similar gatherings.

<sup>13</sup> One additional campsite may be allowed for each additional 200 acres over the minimum 320 acres (allowing for a maximum of 60 campsites on agricultural premises of 6,320 acres or larger).

<sup>14</sup> Allowance for non-motorized bike races, trail runs, equestrian endurance rides, and similar gatherings on premises ≥ 5,000 acres. Max days per year: 25; max event days per month: 10.

Source: ATE 2023; Final EIR Appendix E.

**Table 3. Project Daily Trip and VMT Estimates (Proposed Decision Maker Revisions) – Scenario 2**

<b>PROPOSED LODGING</b>																
Use	Size	New Sites <sup>1</sup>	Total Campsites/Bedrooms	Daily Use %	Daily Use	ADT Rate	ADT	Day Trip %	Day Trip Length <sup>2</sup>	Local VMT	Regional %	Regional Length	Regional VMT	Total Roadway VMT	Final EIR Total VMT Calculation	% Change
Campgrounds (<100 ac) <sup>6</sup>	15 Campsites	10	150	85%	128	2.03	259	50%	10	1,300	50%	64	8,344	9,644	57,681	15.7
Campgrounds (100-200 ac) <sup>6</sup>	20 Campsites	8	160	85%	136	2.03	276	50%	10	1,380	50%	64	8,835	10,215		
Campgrounds (200-320 ac) <sup>6</sup>	25 Campsites	7	175	85%	149	2.03	302	50%	10	1,510	50%	64	9,663	11,173		
Campgrounds (≥320 ac) <sup>6</sup>	30 Campsites	8	240	85%	204	2.03	414	50%	10	2,071	50%	64	13,252	15,323		
Campgrounds (>2,320 ac) <sup>13</sup>	40 Campsites	4	160	85%	136	2.03	276	50%	10	1,380	50%	64	8,835	10,215		
Campgrounds (>4,320 ac) <sup>13</sup>	50 Campsites	2	100	85%	85	2.03	173	50%	10	863	50%	64	5,522	6,385		
Campgrounds (≥6,320 ac) <sup>13</sup>	60 Campsites	1	60	85%	51	2.03	104	50%	10	518	50%	64	3,313	3,831		
Farmstay <sup>7</sup>	4 Bedrooms	0	0	85%	0	3.35	0	50%	10	0	50%	64	0	0	31,715	64.4
Farmstay <sup>7</sup>	6 Bedrooms	45	270	85%	230	3.35	769	50%	10	3,844	50%	64	24,602	28,446		
Farmstay <sup>7</sup>	15 Bedroom	15	220	85%	191	3.35	641	50%	10	3,203	50%	64	20,502	23,705		
<b>Subtotal</b>		<b>100</b>	<b>1,540</b>				<b>3,124</b>			<b>16,069</b>			<b>102,844</b>	<b>118,913</b>	<b>89,396</b>	<b>33.0</b>
<b>PROPOSED EDUCATIONAL TOURS, RECREATIONAL ACTIVITIES, AND EVENTS</b>																
Use	Size	New Sites	Max per Year	Annual Total	ADT Rate	ADT	AADT	Local %	Within County Length <sup>4</sup>	Local VMT	Regional %	Out of County Length <sup>5</sup>	Regional VMT	Total VMT	Final EIR Total VMT Calculation	% Change
Small Tour <sup>8</sup>	15 Attendees	30	128	57,600	1	57,600	158	75%	26	3,122	25%	77	3,034	6,156	6,156	0.0
Other Education (≤100 ac) <sup>9</sup>	80 Attendees	20	24	38,400	1	38,400	105	75%	26	2,075	25%	77	2,016	4,091	4,091	0.0
Other Education (100-320 ac) <sup>9</sup>	120 Attendees	20	24	57,600	1	57,600	158	75%	26	3,122	25%	77	3,034	6,156	6,156	0.0
Other Education (≥320 ac) <sup>9</sup>	150 Attendees	20	24	72,000	1	72,000	197	75%	26	3,893	25%	77	3,782	7,675	7,675	0.0
Fishing/Hunting <sup>10</sup>	20 Participants	5	100	10,000	1	10,000	27	75%	26	534	25%	77	518	1,052	1,052	0.0
Horseback Riding <sup>11</sup>	24 Participants	20	100	48,000	1	48,000	132	75%	26	2,609	25%	77	2,534	5,143	5,143	0.0
Small-Scale Events <sup>12</sup>	50 Attendees	25	12	15,000	1	15,000	41	50%	26	534	50%	77	1,582	2,116	3,404	-37.8
Small-Scale Events <sup>12</sup>	100 Attendees	25	12	30,000	1	30,000	82	50%	26	1,068	50%	77	3,164	4,232	5,106	-17.1
Small-Scale Events <sup>12</sup>	200 Attendees	25	12	60,000	1	60,000	164	50%	26	2,137	50%	77	6,329	8,466	6,344	33.4
Small-Scale Events (large Premises) <sup>14</sup>	500 Attendees	2	25	25,000	1	25,000	68	50%	26	890	50%	77	10,548	14,110	0	--
<b>Subtotal</b>		<b>192</b>		<b>413,600</b>			<b>1,133</b>			<b>19,984</b>			<b>28,630</b>	<b>48,614</b>	<b>45,127</b>	<b>7.7</b>
<b>TOTALS</b>		<b>292</b>					<b>4,347</b>			<b>36,053</b>			<b>131,474</b>	<b>167,527</b>	<b>134,523</b>	<b>24.5</b>

Notes:

<sup>1</sup> The number of properties or premises that this analysis assumes would participate in the proposed agricultural enterprise program.

<sup>2</sup> Day trips assume 10 miles per trip to local area.

<sup>3</sup> Regional length assumes 75% of visitors travel from out of County at 77 miles per trip and 25% of visitors are within the County at 27 miles per trip, an average of 64 miles.

<sup>4</sup> Assumes weighted average of length per trip for visitors within the county (Appendix E).

<sup>5</sup> Assumes weighted average of length per trip for visitors from out of the county (Appendix E).

<sup>6</sup> ADT based on local studies of similar campground sites, ITE 9<sup>th</sup> Edition (2012) rate for campgrounds, and ITE rate for motel (Code #320).

<sup>7</sup> Trip Generation based on ITE Code #320 (Motel).

<sup>8</sup> Analysis assumes Average Vehicle Occupancy (AVO) of 2.0 (i.e., two people per vehicle) with tour starting and ending during AM/PM peak hours. No more than 128 small guided tours per year.

<sup>9</sup> Analysis assumes AVO of 2.0 with education starting and ending during AM/PM peak hours. No more than 24 days per year.

<sup>10</sup> Analysis assumes AVO of 2.0 with fishing starting and ending during AM/PM peak hours.

<sup>11</sup> Analysis assumes AVO of 2.0 with horseback riding starting and ending during AM/PM peak hours.

<sup>12</sup> Analysis assumes AVO of 2.5 with small-scale events starting or ending during the PM peak hour. No more than 12 days per year. Small-scale events include, but are not limited to farm-to-table dinners, cooking classes, weddings, receptions, parties, writing or yoga workshops, trail runs, bike races, equestrian endurance rides, and similar gatherings.

<sup>13</sup> One additional campsite may be allowed for each additional 200 acres over the minimum 320 acres (allowing for a maximum of 60 campsites on agricultural premises of 6,320 acres or larger).

<sup>14</sup> Allowance for non-motorized bike races, trail runs, equestrian endurance rides, and similar gatherings on premises ≥ 5,000 acres. Max days per year: 25; max event days per month: 10.

Source: ATE 2023; Final EIR Appendix E.



Based on this analysis, the calculated total VMT resulting from the proposed Agricultural Enterprise Ordinance, as amended by County decision-maker recommendations, would continue to exceed the County's established net zero VMT threshold. Impacts associated with the proposed revisions would remain *significant and unavoidable* and similar to those impacts described under Impact T-2 of the Final EIR. No new significant impacts would occur as a result of the proposed revisions.

## Project Mobile-Source Criteria Air Pollutant Impacts

### Summary of Project Air Pollutant Impacts Presented in the Final EIR

Impacts associated with Project-related increases in new mobile-source criteria air pollutant emissions within the county are described in detail under Impact AQ-2 in Section 3.3, *Air Quality* of the Final EIR. As described therein, utilizing the broad use assumptions and VMT estimates detailed in Section 3.13, *Transportation*, the Final EIR estimated that the proposed Project has the potential to exceed the County's and Santa Barbara County Air Pollution Control District's (SBCAPCD's) vehicle source emissions threshold of 25 pounds per day (lbs/day) for nitrogen oxides (NO<sub>x</sub>) and Reactive Organic Compounds (ROC). Therefore, under Impact AQ-2, the Final EIR concluded that based on the established thresholds and the inability to effectively reduce VMT and associated mobile-source emissions associated with the proposed Project, the increase in operational mobile-source air pollutant emissions would be *significant and unavoidable*.

### Change in Air Pollutant Emissions Calculations under Proposed Revisions

Based on the above analysis of VMT impacts, implementation of the decision-makers proposed revisions would increase estimated VMT by roughly 18.7 percent from that estimated for the proposed Project in the Final EIR under Scenario 1, and 24.5 percent under Scenario 2.

Operational mobile-source air pollutant emissions would increase proportional to the increase in VMT estimated under these two scenarios. Updated calculations for the proportional increase in operational mobile-source air pollutant emissions under the revised use assumptions for Scenario 1 and Scenario 2, as well as a comparison to the emissions calculations presented in the Final EIR, are presented in **Table 4** and **Table 5**, respectively.

**Table 4. Estimated Maximum Daily Operational Emissions (Proposed Decision Maker Revisions) (lbs/day) - Scenario 1**

Category	Pollutant					
	ROC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Area</b>	0.00	0.00	0.00	0.00	0.00	0.00
<b>Energy</b>	0.00	0.00	0.00	0.00	0.00	0.00
<b>Mobile</b>	28.57	57.49	390.30	0.91	104.73	28.45
<b>Project Total</b>	<b>28.57</b>	<b>57.49</b>	<b>390.30</b>	<b>0.91</b>	<b>104.73</b>	<b>28.45</b>
<b>Project Total with 18.7% Increase</b>	<b>33.91</b>	<b>68.24</b>	<b>463.29</b>	<b>1.08</b>	<b>124.31</b>	<b>33.77</b>
<b>SBCAPCD and County Vehicle Source Emissions Threshold</b>	25	25	--	--	--	--
<b>Threshold Exceeded?</b>	Yes	Yes	--	--	--	--
<b>SBCAPCD and County Area + Vehicle Source Emissions Thresholds</b>	55	55	--	--	80	--
<b>Threshold Exceeded?</b>	No	Yes	--	--	Yes	--

**Table 5. Estimated Maximum Daily Operational Emissions (Proposed Decision Maker Revisions) (lbs/day) - Scenario 2**

Category	Pollutant					
	ROC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	28.57	57.49	390.30	0.91	104.73	28.45
<b>Project Total</b>	<b>28.57</b>	<b>57.49</b>	<b>390.30</b>	<b>0.91</b>	<b>104.73</b>	<b>28.45</b>
<b>Project Total with 24.5% Increase</b>	<b>35.57</b>	<b>71.58</b>	<b>485.92</b>	<b>1.13</b>	<b>130.39</b>	<b>35.42</b>
<b>SBCAPCD and County Vehicle Source Emissions Threshold</b>	25	25	--	--	--	--
<b>Threshold Exceeded?</b>	Yes	Yes	--	--	--	--
<b>SBCAPCD and County Area + Vehicle Source Emissions Thresholds</b>	55	55	--	--	80	--
<b>Threshold Exceeded?</b>	No	Yes	--	--	Yes	--

Based on this analysis, the calculated increase in estimated mobile-source criteria air pollutant emissions resulting from the proposed Agricultural Enterprise Ordinance, as revised, would continue to exceed the County’s and SBCAPCD’s vehicle source emissions threshold of 25 lbs/day for NO<sub>x</sub> and ROCs. Impacts associated with the proposed revisions would remain *significant and unavoidable* and similar to those impacts described under Impact AQ-2 of the Final EIR. No new significant impacts would occur as a result of the proposed revisions.

**Project Mobile-Source GHG Impacts**

**Summary of Project GHG Impacts Presented in the Final EIR**

Impacts associated with Project-related increases in GHG emissions within the county are described in detail under Impact GHG-1 in Section 3.7, *Greenhouse Gas Emissions* of the Final EIR. As described therein, utilizing the broad use assumptions and VMT estimates detailed in Section 3.13, *Transportation*, the Final EIR estimated that the proposed Project would generate an estimated 15,477 metric tons of carbon dioxide equivalent (MT CO<sub>2</sub>e) per year, with an estimated daily service population of 2,118, and resulting in approximately 7.31 MT CO<sub>2</sub>e per service population per year. These GHG emissions estimates would exceed the County’s adopted threshold of 3.8 MT CO<sub>2</sub>e per service population. Therefore, under Impact GHG-1, the Final EIR concluded that based on the established thresholds and the inability to effectively reduce VMT and associated mobile-source emissions associated with the proposed Project, the increase in GHG emissions per capita would be *significant and unavoidable*.

**Change in GHG Calculations under Proposed Revisions**

Implementation of decision-makers’ proposed revisions would increase estimated VMT by roughly 18.7 percent from that estimated for the proposed Project in the Final EIR under Scenario 1, and by 24.5 percent under Scenario 2. In addition, proposed revision would result in an increase in daily service population. The daily service population resulting from implementation of the proposed Project, as revised under Scenario 1, is presented in **Table 6**. The daily service population resulting from implementation of the proposed Project, as revised under Scenario 2, is presented in **Table 7**.

**Table 6. Project Service Population Assumptions (Proposed Decision Maker Revisions) - Scenario 1**

Use	Size	New Sites	Total	Occupancy Rate	Daily Service Population	Final EIR Daily Service Population Calculation	% Change
<b>Proposed Lodging</b>							
Campgrounds (<100 ac)	15 Campsites	10	150	85%	128	766	16.0
Campgrounds (100-200 ac)	20 Campsites	8	160		136		
Campgrounds (200-320 ac)	25 Campsites	7	175		149		
Campgrounds (>320 ac)	30 Campsites	8	240		204		
Campgrounds (>2,320 ac)	40 Campsites	4	160		136		
Campgrounds (>4,320 ac)	50 Campsites	2	100		85		

Use	Size	New Sites	Total	Occupancy Rate	Daily Service Population	Final EIR Daily Service Population Calculation	% Change
Campgrounds (≥6,320 ac)	60 Campsites	1	60		51	255	40.0
Farmstay	4 Bedrooms	0	0		0		
Farmstay	6 Bedrooms	40	240		204		
Farmstay	9 Bedrooms	20	180		153		
<b>Total</b>	--	<b>100</b>		--	<b>1,245</b>	<b>1,021</b>	<b>22.0</b>
Use	Size	New Sites	Max Per Year	Annual Attendance	Average Daily Service Population	Final EIR Calculation	% Change
<b>Proposed Educational Tours, Recreational Activities, and Events</b>							
Small Tour	15 Attendees	30	128	57,600	158	158	0.0
Other Education (≤100 ac)	80 Attendees	20	24	38,400	105	105	0.0
Other Education (100-320 ac)	120 Attendees	20	24	57,600	158	158	0.0
Other Education (≥320 ac)	150 Attendees	20	24	72,000	197	197	0.0
Fishing/Hunting	20 Participants	5	100	10,000	27	27	0.0
Horseback Riding	24 Participants	20	100	48,000	132	132	0.0
Small-Scale Events	50 Attendees	25	12	15,000	41	66	-37.9
Small-Scale Events	100 Attendees	25	12	30,000	82	99	-17.2
Small-Scale Events	200 Attendees	25	12	60,000	164	123	33.3
Small-Scale Events (Large Premises)	500 Attendees	2	25	25,000	68	0	--
<b>Total</b>	--	<b>192</b>	--	<b>413,600</b>	<b>1,133</b>	<b>1,098</b>	<b>3.2</b>
<b>Project Total Service Population</b>					<b>2,378</b>	<b>2,118</b>	<b>12.3</b>

**Table 7. Project Service Population Assumptions (Proposed Decision Maker Revisions) – Scenario 2**

Use	Size	New Sites	Total	Occupancy Rate	Daily Service Population	Final EIR Daily Service Population Calculation	% Change
<b>Proposed Lodging</b>							
Campgrounds (<100 ac)	15 Campsites	10	150	85%	128	766	16.0
Campgrounds (100-200 ac)	20 Campsites	8	160		136		
Campgrounds (200-320 ac)	25 Campsites	7	175		149		
Campgrounds (>320 ac)	30 Campsites	8	240		204		
Campgrounds (>2,320 ac)	40 Campsites	4	160		136		
Campgrounds (>4,320 ac)	50 Campsites	2	100		85		
Campgrounds (≥6,320 ac)	60 Campsites	1	60		51		
Farmstay	4 Bedrooms	0	0		0		
Farmstay	6 Bedrooms	45	270		230		
Farmstay	15 Bedrooms	15	225		191		
<b>Total</b>	--	<b>100</b>		--	<b>1,309</b>	<b>1,021</b>	<b>28.2</b>
Use	Size	New Sites	Max Per Year	Annual Attendance	Average Daily Service Population	Final EIR Calculation	% Change
<b>Proposed Educational Tours, Recreational Activities, and Events</b>							
Small Tour	15 Attendees	30	128	57,600	158	158	0.0
Other Education (≤100 ac)	80 Attendees	20	24	38,400	105	105	0.0
Other Education (100-320 ac)	120 Attendees	20	24	57,600	158	158	0.0
Other Education (≥320 ac)	150 Attendees	20	24	72,000	197	197	0.0
Fishing/Hunting	20 Participants	5	100	10,000	27	27	0.0
Horseback Riding	24 Participants	20	100	48,000	132	132	0.0
Small-Scale Events	50 Attendees	25	12	15,000	41	66	-37.9
Small-Scale Events	100 Attendees	25	12	30,000	82	99	-17.2
Small-Scale Events	200 Attendees	25	12	60,000	164	123	33.3
Small-Scale Events (Large Premises)	500 Attendees	2	25	25,000	68	0	--
<b>Total</b>	--	<b>192</b>	--	<b>413,600</b>	<b>1,133</b>	<b>1,098</b>	<b>3.2</b>
<b>Project Total Service Population</b>					<b>2,442</b>	<b>2,118</b>	<b>15.3</b>

Similar to criteria air pollutants, operational GHG emissions would increase proportional to the increase in VMT. Updated calculations for the proportional increase in operational GHG emissions, including calculation of GHG emissions per service population, under the revised use assumptions under Scenarios 1 and 2, along with a comparison to the emissions calculations presented in the Final EIR are presented in **Table 8**.

**Table 8. Estimated Operational GHG Emissions (Proposed Decision Maker Revisions)**

Category	Final EIR Calculation	Scenario 1		Scenario 2	
	MT CO <sub>2</sub> e/year	MT CO <sub>2</sub> e/year	% Change	MT CO <sub>2</sub> e/year	% Change
<b>Total Annual GHG Emissions</b>	15,477	18,371	18.7	19,269	24.5
<b>Project Service Population</b>	2,118	2,378	12.3	2,442	15.3
<b>Annual GHG Emissions/Service Population</b>	7.31	7.72	5.7	7.89	7.9
<b>Interim GHG Significance Threshold</b>	3.8	3.8	--	3.8	--
<b>Santa Barbara 2024 GHG Significance Threshold (Residential / Non-residential / Mixed-use)</b>	2.68 / 2.63 / 2.67	2.68 / 2.63 / 2.67	--	2.68 / 2.63 / 2.67	--
<b>Threshold Exceeded?</b>	Yes	Yes	--	Yes	--

Based on this analysis, the calculated increase in estimated per service population GHG emissions resulting from the proposed Agricultural Enterprise Ordinance, as revised, would continue to exceed the County’s threshold of 3.8 MT CO<sub>2</sub>e per service population per year. Impacts associated with the proposed revisions would remain *significant and unavoidable* and similar to those impacts described under Impact GHG-1 of the Final EIR. No new significant impacts would occur as a result of the proposed revisions.

**Consideration of New Santa Barbara County GHG Significance Thresholds**

As discussed in Section 3.7, *Greenhouse Gas Emissions*, after the County did not meet the 2020 GHG emission reduction goals contained within the Energy and Climate Action Plan (ECAP), the County began work updated the ECAP, GHG emissions forecasts, reduction targets, and GHG emissions reduction programs and policies as part of the SB County 2030 Climate Action Plan. At the time of preparation of the Draft and Final EIR, the County had not yet finalized the 2030 Climate Action Plan. As such, the EIR evaluated GHG impacts of the proposed Project by utilizing the County’s interim GHG significance threshold of 3.8 MT CO<sub>2</sub>e per service population, per year of GHG. However, following completion of the Final EIR, on August 28, 2024, the County staff finalized and the Board of Supervisors adopted the 2030 Climate Action Plan, along with amendments to the County’s *Environmental Thresholds and Guidelines Manual* to replace the interim GHG significance threshold with new GHG thresholds of significance that are based upon the new GHG reduction targets. The newly adopted GHG thresholds replace the interim significance threshold with three new GHG efficiency thresholds, as follows:

- Residential Projects: 2.68 MT CO<sub>2</sub>e per resident
- Non-residential Projects: 2.63 MT CO<sub>2</sub>e per employee
- Mixed-use Projects: 2.67 MT CO<sub>2</sub>e per service population

While the proposed Project involves a land use program that does not propose any new residential or employment-generating uses, the estimated per capita GHG emissions presented in **Table 8** have also been compared against each of these new GHG efficiency thresholds. As presented therein, both the proposed Project described in Final EIR and revised Project described in this memorandum would exceed these newly adopted thresholds, and impacts would remain *significant and unavoidable* and similar to those impacts described under Impact GHG-1 of the Final EIR. No new significant impacts would occur as a result of the proposed revisions or adoption of the 2030 Climate Action Plan and updated GHG significance thresholds.